



December 10, 2009

Multnomah County Board of Commissioners
501 SW Hawthorne Blvd. Suite 600
Portland, Oregon 97214-3587

Dear Chair Wheeler and Commission Members,

RE: City of Portland Position: Reserve Designations for NW Hills – Multnomah County
Powerline/Germantown Rd. – South – Map Areas 7a and 7b
East Bethany and Bonny Slope East

On behalf of the Portland City Council, my fellow MPAC colleague, Commissioner Amanda Fritz and I want to commend your Board, your planning staff and the county reserves Citizens Advisory Committee. This is ground-breaking work that will serve the region for decades to come. In particular we want to also commend Commissioner Jeff Cogen for his dedicated work as the county's representative to the region's CORE-4.

Thank you again for allowing us the opportunity to share the City of Portland's position and recommendation on urban and rural reserve designations in the unincorporated NW Hills.

The City of Portland staff in the Bureau of Planning and Sustainability (BPS) has participated in the Urban and Rural Reserves process since the legislation passed in 2007. Portland also served on the regional Reserves Steering Committee. As Mayor, I designated BPS Director Susan Anderson and Supervising Planner Bob Clay to represent Portland. My planning staff worked closely with your planning staff and your reserves Citizens Advisory Committee (CAC) to provide information on land use, transportation, and urban service suitability. At my direction and with the help of the City's Planning and Development Directors Team, city planning staff also convened the city's urban service provider bureaus to analyze the feasibility, costs, and benefits of providing urban services to several locations in the NW Hills—and to weigh these against the city's many priorities.

In part, because of this internal and external collaboration and outreach, the City of Portland is largely in agreement with the recommendations before you. There is only one area where we differ from the county staff recommendation—Map 7a and 7b. Let me highlight those reasons for you below.

The areas in question are in Suitability Area 7b, and also contain areas known as East Bethany and Bonny Slope East/East Laidlaw Road.

1. Multnomah County NW Hills, including East Bethany – Map 7a and 7b

At this time and based on city staff evaluation of the reserves suitability criteria we recommend this area be designated “rural.” We conclude that the suitability criteria support a rural designation

over “urban,” and a “no designation” is too uncertain and too ambiguous. Further, it may not meet the statutory purpose statement envisioned on SB 1011 and contained in OAR 660-027-0005 of either protecting lands—for their farm, forest, natural systems or natural landscape features value—or designating them to meet future urban land needs. We believe this means that where lands meet the rural reserve criteria, and that these outweigh the urban criteria, then there is an affirmative obligation to designate those lands as rural. Urban and rural designations were meant to work together to help ensure livable communities, including the protection of the natural landscape features that define the region for its residents. A “no designation” does not work to achieve this end. Relevant language in the purpose statement states in part,

“...Rural reserves under this division are intended to provide long-term protection for large blocks of agricultural or forest land and for natural landscape features that limit urban development or define natural boundaries of urbanization.” (Emphasis added)

The natural landscape features that extend westward from Forest Park include riparian streams, wildlife habitat, and corridors for ecological and scenic connectivity. These are significant features in themselves. When taken together with the County line, which is the same as a major power line easement, it divides the North Bethany concept plan area and the properties of the proposed East Bethany area in a way that both “limit urbanization” and “define natural boundaries of urbanization.”

During the course of the reserves process, city staff in our urban services bureaus met to evaluate the NW Hills area. The group concluded that there were insufficient reasons to designate the area “urban.” Let me summarize seven of those concerns:

a. Governance: There is a very difficult and long-standing challenge of governance in this area which remains unresolved with respect to further urbanization. Rural roads that are steep, narrow and unsafe for urban commute volumes and that lead to Portland are very problematic. This area raises all the same issues as have been found difficult to resolve in Bonny Slope West.

b. Suitability: Setting aside governance, and even if Portland or other provider(s) could serve the area cost-effectively, there is a question as to whether this is a priority location to meet long-term future housing and community development needs given the areas natural landscape features. We think given this location’s context with Forest Park and its important natural landscape features and attributes, a “rural” designation is warranted. We think that when combined with the city and region’s many other priorities, that on balance, it is not the right location at this time. We think the county line together with the power line easement location makes development west-to-east into Multnomah County impractical, and the potential development impacts to adjoining natural features of Forest Park significant. Portland is committed to build upon the legacy of Forest Park and acquiring key parcels through the Metro Greenspaces program and together with city contributions can likely do so, without relying on an unverifiable concept that nearby development will generate enough revenue to contribute to additional land purchases.

c. Unknown urban service liability and maintenance obligations: The city is also concerned about the viability of development in this location, particularly off-site transportation costs and impacts through portals into Portland. Our Portland Bureau of Transportation staff (PBOT) has expressed major reservations about future service liability costs for maintenance. City transportation staff is likewise concerned about off-site SDC contributions required for additional Washington County north-south collectors such as the extension of NW Saltzman Road. Portland has a growing backlog of infrastructure and maintenance needs—and an obligation to residents in

existing centers, corridors and employment areas. Residential development that straddles Lower Springville Road would almost certainly require major off-site road improvements. Development in this area will contribute to additional traffic on rural routes to Portland; roads that pass through environmentally sensitive areas that already have traffic congestion, safety problems, and are virtually impossible to improve in a way that would adequately handle additional volumes of urban commute traffic.

d. Impacts from traffic and development on Forest Park: Portland Parks and Recreation staff has raised concerns over environmental impacts to Forest Park. There is concern over impacts from traffic and development on nearby Forest Park, environmentally sensitive areas, stream corridors, wildlife habitat and natural landscape features. The concept of generating excess revenues from residential development to acquire off-site park and open space land near Forest Park, while interesting, met with great skepticism in light of expected on-site development costs and off-site transportation costs in particular.

e. Meeting Regional Housing Needs: Portland and Multnomah County cities have historically accommodated a large share of population growth in the region. This residential development has included some of the highest overall densities and a range of needed housing types, including some of the region's most cost-burdened households. Portland expects to continue to accommodate a large share of the region's growth in a sustainable development pattern, largely served by transit. Staff analysis finds that the city has significant zoned and planned development capacity in its many centers and corridors to accommodate growth that is accompanied by a focused investment strategy. The Portland Plan, the city's Comprehensive Plan update, will test and further refine the city's overall growth aspirations. The Portland Plan update has generally not focused on the having to meet the region's, or its own, urban land needs in any unincorporated areas of the NW Hills. Because of the extensive redevelopment in Portland over the past 30 years, and the enormous potential for additional growth and development in Portland and in other cities in Multnomah County, we believe the counties cities are doing more than their part to meet regional growth obligations over the 40-50 year planning horizon.

Washington County has proposed very large amounts of land for "urban" designation, including additional areas to the west of the North Bethany Concept Plan which we believe would, if needed, be more suitable. Given the aforementioned challenges, and unknown costs and benefits, from Portland's perspective, the properties east of North Bethany appears to offer lower urban productivity value to meet urban land needs compared to existing centers and corridors – and compared to urban designations proposed in locations adjoining North Bethany to the west.

f. Food Security: While East Bethany does not contain foundation agricultural land, urbanization could adversely affect farm operations on surrounding important and conflicted agricultural lands. Given their proximity, these lands are likely to be increasingly important to the city and region for food security.

g. Portland has committed investment priorities elsewhere: As mentioned, Portland has extensive growth aspirations and infrastructure investment needs in its centers, corridors and employment areas—where it will accommodate a large number of households and jobs, and produce more benefits to more people in the future.

Should any properties east of North Bethany area become either "urban" or undesignated, we urge you to recommend that Metro mediate a resolution to governance, preferably between cities. Such an agreement

would specify who provides municipal urban services in a way that is both cost-effective and within an existing city. A similar sub-regional agreement already exists for areas south of HWY 26 between Portland, Beaverton and Washington Counties; Metro Urban Services Boundary Ordinance #96-665C adopted March 6, 1997.

2. Bonny Slope East/East Laidlaw Road

Multnomah County retained Portland and several subcontractor consultants to prepare a Concept Plan for Bonny Slope West to fulfill a UGB expansion decision made by Metro in 2002. After a very collaborative process with your staff, Portland has concluded it is not cost-effective for the city to provide or coordinate urban services to this location, and accordingly recommends “Bonny Slope East” also known as East Laidlaw Road area be designated as “rural.”

Again, on behalf of the Portland City Council, we want to thank you for the opportunity to comment.

Best regards,



Mayor Sam Adams



Commissioner Amanda Fritz
City of Portland

Cc Susan Anderson, BPS, City of Portland
Joe Zehnder, Chief Planner, City of Portland
Portland Planning and Development Directors
Chuck Beasley, Multnomah County Senior Planner