



**Testimony by City of Wilsonville Mayor Julie Fitzgerald Opposing  
Revised LC 4320 Dated 2/20/2023:**

***Legislative Concept Appears to Indicate that Only Lands Outside UGBs  
Are Appropriate, Ignoring Potential Sites Within UGB;***

***High-Value Agricultural Lands of the French Prairie Rural Reserve Have  
Undergone Extensive Public Process for Long-Term Conservation***

For public hearing on Feb. 22, 2023,  
before the Joint Semiconductor Committee

Co-Chairs Sollman and Bynum, Vice-Chairs Knopp and Wallan, and Members of the  
Committee:

I am testifying to follow-up on prior testimony in support of 1) amending a primary  
legislative concept; and 2) opposing a section of Revised LC 4320 dated 2/20/2023.

**As one of Oregon’s fastest-growing cities for the past 20 years, where Wilsonville’s  
population doubled between 2000 and 2020, our community is well versed in  
advancing housing and industrial-job creation.**

**And as a city of 27,000 residents that hosts over 20,000 jobs—with half of those jobs  
in family-wage industrial occupations of high-tech manufacturing, software  
engineering and wholesale trade—Wilsonville’s 1,200 businesses generate over \$1.5  
Billion annually in private-sector payroll.** Our corporate citizens include Siemens,  
Teledyne FLIR, Collins Aerospace, Swire Coca-Cola USA, Columbia Distributing HQ,  
DW Fritz Automation, Sysco Food Services, OrePac Building Products and Tyco  
Electronics Medical Devices, among many others.

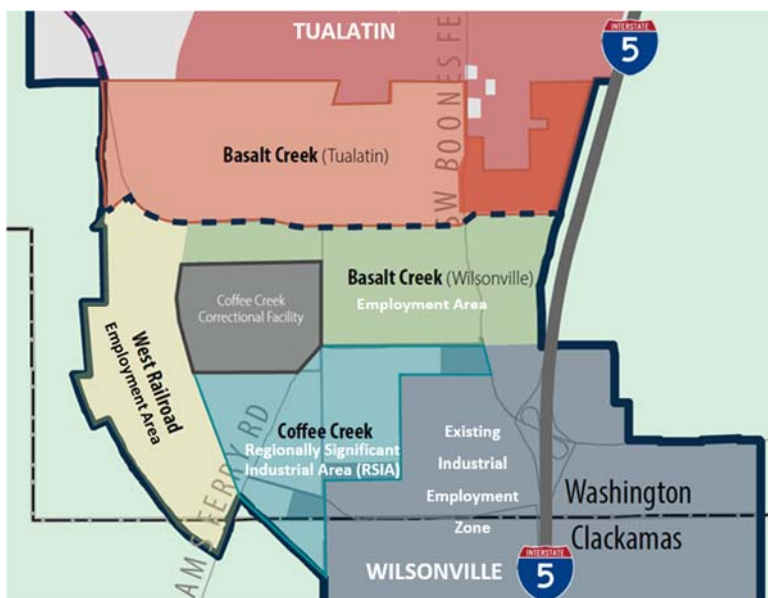
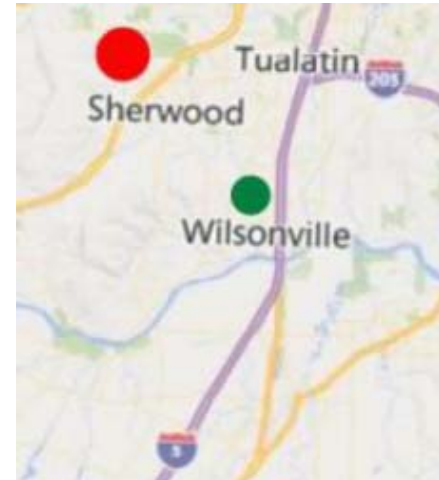
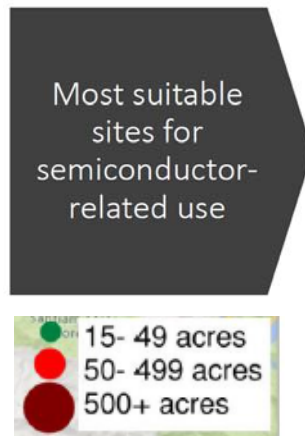
The issue of concern pertains to the “supersiting” of Section 10, which indicates that “the  
Governor may, by executive order, bring within an existing urban growth boundary  
designated lands.” **Wilsonville believes that this proposition represents a false premise  
that only lands outside the UGB can accommodate industrial siting.**

**In the greater Southwest Portland Metro Region—composed of the region located  
among the cities of Tualatin, Sherwood and Wilsonville—over 1,000 acres of  
industrial/employment lands already located in the UGB await development. *The***

*missing ingredient to advance these vacant UGB lands into productive ‘shovel-ready’ status is substantial capital to finance the needed infrastructure.*

**Just within North Wilsonville’s UGB areas, over 500 acres await development** in the Coffee Creek UGB Regionally Significant Industrial Area (RSIA) and the Basalt Creek UGB Industrial Area and West Railroad UGB Employment Area. The Coffee Creek UGB RSIA was specifically noted in the Port of Portland testimony to the committee on Jan. 20, 2023.

The Port of Portland’s Mackenzie Engineers & Architects map, “based on Industry siting criteria,” shows “Most suitable sites for semiconductor semiconductor-related use.” The map, however, undercounts the actual available acreage for the Coffee Creek UGB RSIA, which is only a portion of the North Wilsonville UGB lands that are designated by Metro and City for Industrial or Employment Uses.



**This map illustrates the 1000-acre North Wilsonville industrial zone** that borders Clackamas and Washington Counties. This area includes 500 acres of adjacent UGB lands—Coffee Creek UGB RSIA, Basalt Creek UGB Industrial Area (south portion) and West Railroad UGB Employment Area.

**The North Wilsonville area is strategically located for**

**industrial siting**, situated on the South Metro I-5 Corridor, easily accessible for freight and by Portland metro and North Willamette Valley workforce commuters, and served by top-quality SMART public-transit service that provides reliable last-mile transport from TriMet’s WES Commuter Train and direct bus connections to Salem and Canby.

**Section 10(3) specifically names Wilsonville as a potential site for designation of lands outside the UGB for development. *Wilsonville does not want and will not accept jurisdiction or governance of any land outside the UGB or Urban Reserve Areas, and therefore we request amendment of this section to remove Wilsonville.***

The City is also aware that Clackamas County has nominated controversial farm lands south of Wilsonville and I-5 Boone Bridge traffic bottleneck located in the French Prairie Rural Reserve. This high-value, traded-sector agricultural zone went through an extensive public process, including ODOT findings that over \$500 million in transportation investments would be required for urbanization, that resulted in Rural Reserves designation.

Our joint County-City constituents voiced an overwhelming negative public response when “Hundreds attend open house on county land re-designation” (see article, July 7, 2016) for the French Prairie Rural Reserve just before the 2016 4th of July holiday. **Public sentiment ran 10:1 against a Board of County Commissioners’ proposal to remove the “Rural Reserves” protection from French Prairie farmland in order to promote urban development** that the City of Wilsonville, Clackamas Soil and Water Conservation District, conservationists and area residents and farmers vehemently oppose. See also attached “Conservation district fights farmland development,” July 6, 2016; and “Cities pan county’s bid to change zoning of ag land,” July 27, 2016.

The attached *Clackamas County Rural Reserves Review 2016: Public Outreach and Comment Summary*, July 28, 2016, South of Wilsonville Review Area Comment Summary reads: **“About 92 percent of respondents strongly disagreed or somewhat disagreed that the rural reserve designation should be removed from the review area south of Wilsonville.** Less than 3 percent of respondents either somewhat agreed or strongly agreed with the proposal” to remove the French Prairie Rural Reserve designation (emphasis added).

Today in 2023, as in 2010 when originally designated as Rural Reserve, and again in 2016 when re-examined by the County, preserving the high-quality farmland and traded-sector agricultural economy of French Prairie, Oregon’s best agricultural lands, protects our economy, quality of life, and the North Willamette Valley from urban sprawl.

**Adding industrial land to the UGB is not the real issue—financing infrastructure and brownfield reclamation to support existing urban-designated lands is *the* issue.** Metro reports that the greater Portland metro region has over 5,000 acres of designated industrial and employment lands in the existing UGB just sitting idle. These un-used UGB lands include hundreds of acres in Clackamas County of abandoned brownfield mill sites that are already served with urban infrastructure. The City encourages the legislature to focus

energies on remediation and redevelopment of existing brownfield sites within the UGB so that they may again become productive lands.

**Cities are responsible for urban development, not counties nor state agencies.** Cities are mandated by state law to maintain a 20-year buildable supply of land. Cities must plan for growth—residential, commercial, and industrial. Cities master-plan for and fund the urban infrastructure necessary to provide water, sewer, storm water, transportation, and other urban facilities.

These plans may be for 10, 20, or more years out into the future and involve long-term commitments with land-owners, bond-holders and other agencies. Every city's needs, desires, and constraints are different. As indicated earlier in this testimony, Wilsonville's long-term plans focus on growing *north* of the Willamette River.

**Wilsonville knows how to do industrial development.** We have worked successfully with Counties, School District, Community College and others to underwrite the physical and human infrastructure that supports employers like Siemens, Collins Aerospace, Sysco, Coca-Cola, FLIR, DW Fritz Automation and other companies continue to grow, and attracts new businesses to set-up shop in Wilsonville. For example, new employer Twist Bioscience of San Francisco has invested \$100 million over the past year in tenant improvements and high-tech equipment to renovate a vacant industrial site as the company ramps-up employment to 400 or more new family-wage jobs in Clackamas County.

**Existing transportation infrastructure is already greatly stressed in the French Prairie region.** The daily I-5 Boone Bridge traffic-congestion bottleneck at Wilsonville, which requires over \$500 million for the new I-5 Boone Bridge and Seismic Improvement Project, would get worse with development south of the Willamette River.

**A 2010 ODOT study conducted during the Urban/Rural Reserves designation process showed that over \$600 million for new road improvements would be needed to urbanize south of the Willamette River.** Rhetorically speaking, who is going to pay for all of those improvements if French Prairie were to be urbanized?

**Clackamas County constituents strongly support the French Prairie Rural Reserve designation.** As noted previously, public sentiment opposes removing the Rural Reserves protection for French Prairie, which underwent an extensive public engagement process. Contemplating the removal of a Rural Reserve protection from French Prairie implies a controversial land-use designation change that carries far-reaching consequences.

**Protecting French Prairie Rural Reserve secures our traded-sector agricultural economy and local food production.** The “foundation farmlands” of French Prairie are

rated by the Oregon Dept. of Agriculture as the “best of the best,” growing a wide variety of crops for both domestic consumption and traded-sector exports that are key to our maintaining and enhancing the important agricultural economic sector. Companies like Campbell Soup’s Pacific Natural Foods, which employs over 600 workers in Tualatin and Wilsonville, farm thousands of acres of French Prairie lands. Agricultural operators in the French Prairie Rural Reserve are making substantial capital investments based on long-term farming of the land that is guaranteed by the Rural Reserve designation.

The City appreciates your consideration this testimony on Revised LC 4320. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie Fitzgerald".

Julie Fitzgerald, Mayor  
City of Wilsonville

Enclosures:

- Page 1 Clackamas County Public Comment Opportunity for Removing Protection of the French Prairie Rural Reserve, July 2016
- Page 3 “Hundreds attend open house on county land re-designation: Community members oppose development south of Wilsonville,” Wilsonville Spokesman, 07 July 2016
- Page 6 “Conservation district fights farmland development,” Capital Press, July 6, 2016
- Page 8 City of Wilsonville Letter to Members of the Board of County Commissioners, RE: City of Wilsonville Comments on Clackamas County Rural Reserve Review 2016, July 14, 2016
- Page 16 “The rest of the story of a county’s threat to farmland,” Capital Press, July 22, 2016
- Page 18 “Cities pan county’s bid to change zoning of ag land,” Capital Press, July 27, 2016
- Page 20 “Clackamas County hears overwhelming support for protecting farmland: A proposal to remove rural reserve designation from parts of the French Prairie was opposed by more than 90% of respondents,” Metro, August 5, 2016
- Page 23 Department of Land Conservation and Development letter to Clackamas County, RE: Clackamas County Rural Reserves Review, July 27, 2016
- Page 25 Clackamas County “Rural Reserves Review 2016: Public Outreach and Comment Summary,” July 28, 2016 - Excerpted Pages pertaining to "South of Wilsonville" French Prairie Rural Reserve



# Clackamas County Public Comment Opportunity for Removing Protection of the French Prairie Rural Reserve

City Information Page: [www.ci.wilsonville.or.us/reserves](http://www.ci.wilsonville.or.us/reserves)

➔ Online Comment until July 15: [www.clackamas.us/planning/reserves.html](http://www.clackamas.us/planning/reserves.html) ⬅

Members of the Clackamas County Board of County Commissioners (BCC) seek to remove the “RURAL RESERVE” protection of 800 acres of French Prairie “foundation farmland” immediately south of Wilsonville to facilitate damaging, inappropriate development.

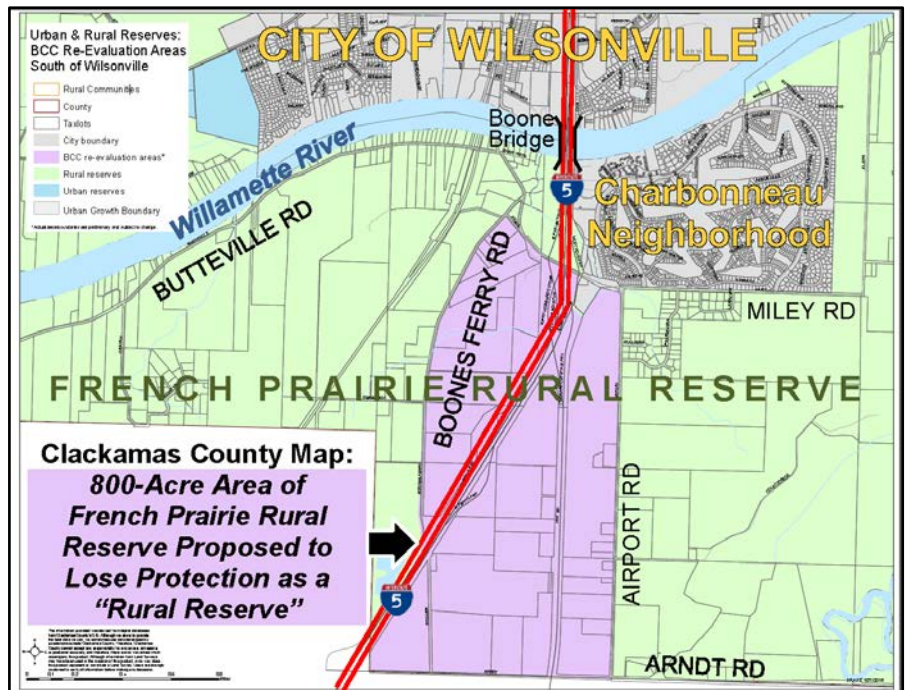
Wilsonville supports the original 2010 French Prairie “RURAL RESERVE” designation.

Wilsonville opposes efforts to overturn a thorough, two-year-long public-input process that resulted in reserves agreements with Clackamas County, Metro and the City of Wilsonville to protect the high-value farmlands of French Prairie.

## Why should we conserve the French Prairie Rural Reserve?

- Preserve the farmland and economy of French Prairie, Oregon’s best agricultural lands — Removing the “RURAL RESERVE” designation eliminates the area’s long-term protection.
- Our region has more than 8,000 acres of industrial employment lands just sitting idle – *develop what we already have; don’t add more raw land that is prime farmland.*
- Developing south of the Willamette River will cost at least \$600 million for new roads alone and make traffic on I-5/Boone Bridge area much more congested.
- Don’t reward land-speculators who want the public to underwrite their costs, so they can personally reap the profits.
- Respect the thorough, two-year-long public-process that produced both urban and rural reserves, by committing to those designations and providing certainty for investment.

Wilsonville is focused on working with Tualatin, Metro and others to develop 1,000 acres of employment lands already in the designated urban growth boundary to the north, including the Coffee Creek Industrial Area and Basalt Creek area.



**For more information on the Reserves process and the City’s position:**  
Wilsonville City Councilor Charlotte Lehan: 503-313-8040; [lehan@ci.wilsonville.or.us](mailto:lehan@ci.wilsonville.or.us)

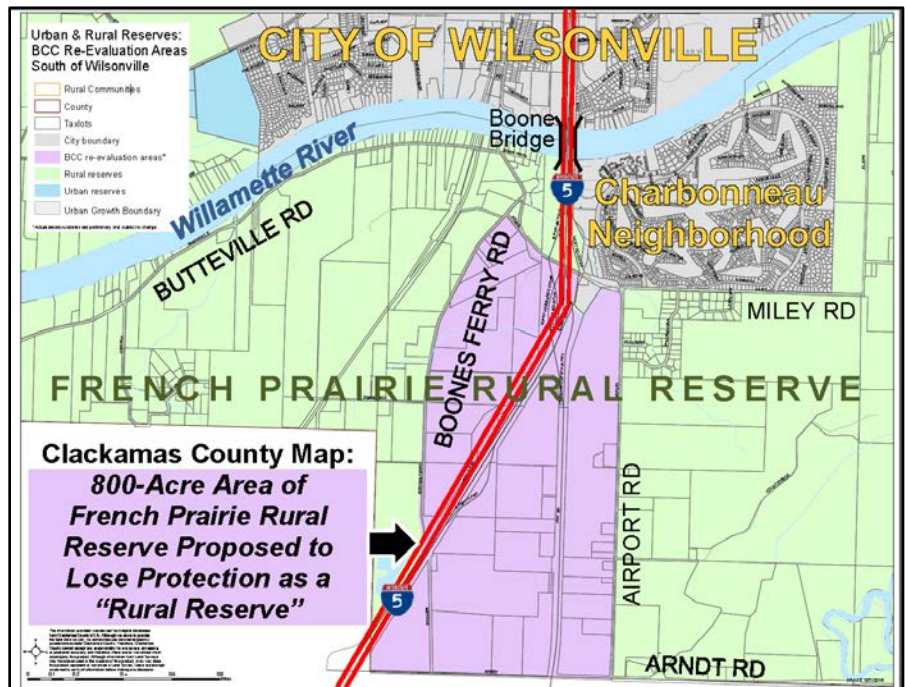
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In 2009, seven state agencies unanimously supported the protection of “lands south of the Willamette River (French Prairie) as a rural reserve.”



“The reasons for a rural reserve designation include: threat of urbanization, high suitability for agriculture, very significant transportation limitations (Boone Bridge capacity and no alternate river crossing, poor multimodal connectivity), poor suitability for urbanization (services and distance to existing population), and concerns about encouraging urban development moving south along I-5 into prime agricultural lands.”



The Oregon Dept. of Transportation (ODOT) warned that the South Metro I-5 corridor and Boone Bridge are reaching maximum traffic-handling capacity, and that the cost to increase capacity is “huge,” or “over \$500 million” for development south of the Willamette River.

While members of the Clackamas County Board of County Commissioners claim a “need” for “employment lands,” data shows that the greater three-county Metro region is awash in over 8,000 acres of vacant “greenfield” and redevelopable industrial sites that are sitting idle and awaiting capital investment. *We do not need more raw land that is high-value farmland; we need to develop the thousands of acres already designated for industrial development.* Wilsonville is focused on developing employment lands to the north, including the Coffee Creek industrial area and Basalt Creek area.

| THREE-COUNTY METRO REGION INDUSTRIAL LANDS INVENTORY ACREAGE |              |              |              |
|--|--------------|--------------|--------------|
| Jurisdiction   | Vacant       | Redev.       | TOTAL        |
| <b>Clackamas County</b>                                      |              |              |              |
| Cities (UGB)   | 571          | 595          | 1,166        |
| Unincorporated County (UGB)                                  | 95           | 142          | 237          |
| Non-UGB Cities/County *                                      | 939          |              | 939          |
| <b>TOTAL</b>   | <b>1,605</b> | <b>737</b>   | <b>2,342</b> |
| <b>Multnomah County</b>                                      |              |              |              |
| Cities   | 1,367        | 888          | 2,255        |
| Unincorporated County  | 140          | 454          | 594          |
| <b>TOTAL</b>   | <b>1,507</b> | <b>1,342</b> | <b>2,849</b> |
| <b>Washington County</b>                                     |              |              |              |
| Cities   | 1,056        | 956          | 2,012        |
| Unincorporated County  | 831          | 176          | 1,007        |
| HB 4078 (2014)   | 550          |              | 550          |
| <b>TOTAL</b>   | <b>2,437</b> | <b>1,132</b> | <b>3,569</b> |
| <b>GRAND TOTAL</b>   | <b>5,549</b> | <b>3,211</b> | <b>8,760</b> |

\*“Redev.” = Redevelopable industrial sites.  
SOURCES: Metro 2015 UGR, Appendix 3 Buildable Land Inventory; Clackamas County, Employment Land Inventory, 2010.

**For more information on the Reserves process and the City’s position:**  
Wilsonville City Councilor Charlotte Lehan: 503-313-8040; lehan@ci.wilsonville.or.us  
City Information Page: [www.ci.wilsonville.or.us/reserves](http://www.ci.wilsonville.or.us/reserves)  
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# Hundreds attend open house on county land re-designation

Wilsonville Spokesman

Thursday, 07 July 2016 02:00 | Written by [Jake Bartman](#)

<http://www.pamplinmedia.com/wsp/134-news/313836-191642-hundreds-attend-open-house-on-county-land-re-designation>

## Community members oppose development south of Wilsonville

“Disingenuous” was the word of the night at an open house convened last week to consider whether Clackamas County should remove the Rural Reserve designation from some or all of 1,600 acres of agricultural land.

More than 400 people attended the open house at Clackamas Community College’s Wilsonville campus June 28, and had pointed questions for County staff.

“It seems to me it’s a bit disingenuous, this presentation, because you haven’t mentioned that the area in Wilsonville is

foundation farmland,” said Tony Holt, president of the Charbonneau Country Club, after a presentation by County Senior Planner Martha Fritzie at the open house.

Both the 800 acres south of Wilsonville and 400 acres under consideration east of Canby are identified as Foundation Agricultural Lands. Foundation Agricultural Lands are identified by the Oregon Department of Agriculture as “agricultural lands that provide the core support to the region’s agricultural base. ... They incubate and support the larger agricultural industry and are vital to its long-term viability.”

The open house was held to solicit public input on those areas identified by county and regional governments in 2010 as land to be designated Rural Reserves. Rural Reserves lie outside the urban growth boundary, and — unlike Urban Reserves — urban development is not allowed to take place on them for 50 years following their designation.

A 2014 decision by the Oregon Court of Appeals regarding the designation of land in the Stafford area as Urban Reserve required regional government Metro and Washington, Multnomah and Clackamas counties to revisit their rural and urban reserve designations.

The Clackamas County Commission has declined to acknowledge its earlier designations, and has identified three possible areas previously marked for the Rural Reserve designation — 800



SPOKESMAN PHOTO: JAKE BARTMAN —

More than 400 people responded to announcements mailed by the City of Wilsonville and Friends of French Prairie that alerted community members to a June 28 open house soliciting feedback on whether the Rural Reserve designation should be removed from land in Clackamas County.



acres south of Wilsonville, 400 acres east of Canby and 425 acres around South Springwater Road south of the Clackamas River — as areas where land might be reclassified “undesignated,” making them candidates for development once 75 percent of Urban Reserve lands have been developed.

Fritzie said that changing conditions since 2010 have meant that the county needs more non-retail employment land.

“There’s an opportunity in light of some of the changes that have happened, including increased uncertainty about whether the County’s two largest urban reserves really can accommodate long-term developments,” Fritzie said, referring to the Stafford area and the Damascus/Boring area.

She also mentioned House Bill 4078, which passed through the Oregon Legislature in 2014 and reduced by 2,000 acres the amount of urban reserves across the region, and said that studies have found an insufficient 20-year supply of employment land in the county.

Attendees of the open house had concerns about the presentation and the issue at hand, and especially about the land south of Wilsonville.

“You’ve not mentioned the fact that there’s a lack of infrastructure down there. The City of Wilsonville has said they will not provide infrastructure in that area, and cannot,” Holt said.

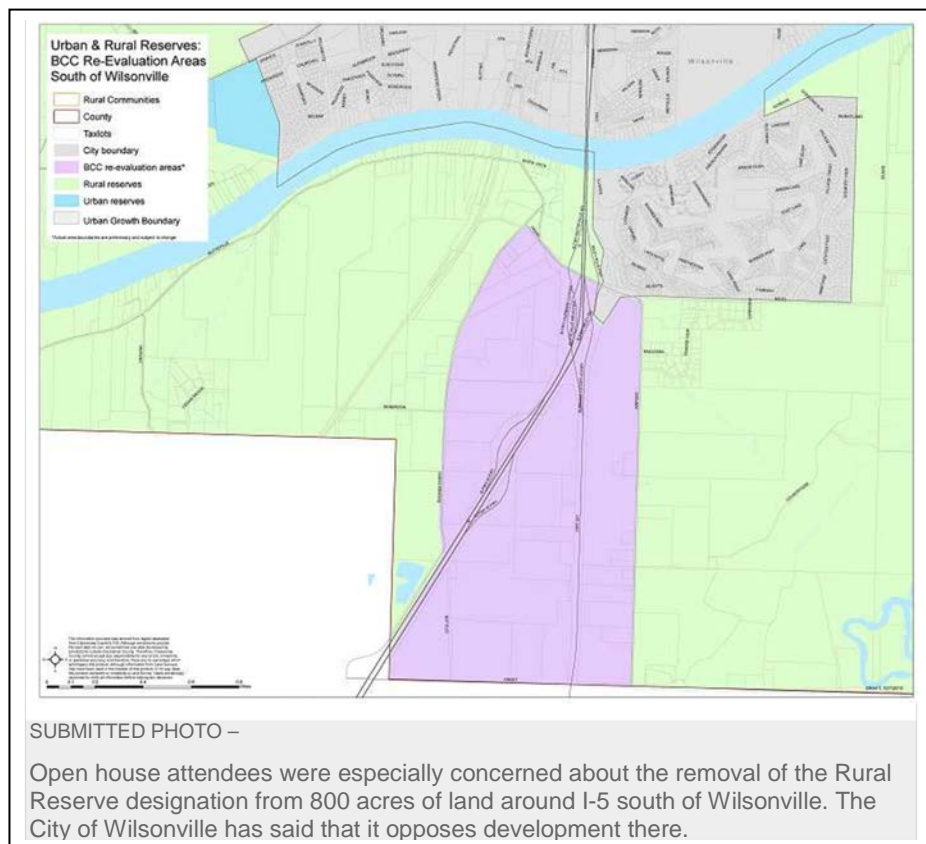
That point was reiterated at a forum in Charbonneau last month, where Wilsonville Mayor Tim Knapp expressed concern about development south of the Willamette and noted that the City would prefer to concentrate its resources on development in Frog Pond and elsewhere in Wilsonville. Two-thirds of Frog Pond — which lie outside the urban growth boundary — are designated Urban Reserve.

Holt also was concerned that most of the 800 acres south of Wilsonville are owned by members of the Maletis family.

“The Maletis brothers have contributed money to the commissioners to make sure that this happens. So this is a disingenuous presentation,” he said, to loud applause.

Chair John Ludlow, Commissioner Paul Savas, Commissioner Martha Schrader and Commissioner Tootie Smith have received campaign contributions from the Maletis family within the last five years.

Al Greenfield asked whether Marion County had given



feedback about development of the land south of Wilsonville. Fritzie said that the proposal was to have the Rural Reserve designation removed from the land, not to designate it for urban development.

“Keep in mind, this area is not being proposed for urbanization,” she said. Greenfield replied that her claim was “disingenuous.”

Some questioned whether the County was justified in revisiting the issue at all. Fritzie said that the County anticipated future legal appeals to a reaffirmation of the Stafford area as Urban Reserve, and that the County sought to review its reserves in order to resolve the Stafford conflict.

Bill Riggs, a former member of the Oregon Board of Appeals and a former member of the Oregon Supreme Court, said that a final judgment by the court of appeals had been entered some time prior.

“To blame it on the court of appeals for not getting a final judgment out is disingenuous. It is the county commissioners — I think three county commissioners — really holding the matter up. It has nothing to do with whether some parties may choose to appeal later,” Riggs said.

*Clackamas County is accepting public feedback on removing the Rural Reserve designation from several areas in the county until July 15 at [bit.ly/295yXfD](https://bit.ly/295yXfD).*

*Contact Jake Bartman at 503-636-1281 ext. 113 or [jbartman@pamplinmedia.com](mailto:jbartman@pamplinmedia.com).*

# Conservation district fights farmland development

Eric Mortenson; Capital Press

Published on July 6, 2016 10:29AM



*The issue of development pressure on Oregon farmland is on display in Clackamas County southeast of Portland. A local Soil and Water Conservation District has asked county commissioners to consider impact on farmland as they pursue additional industrial and commercial land.*

A renewed move by Oregon's Clackamas County to designate more land for future industrial and commercial development prompted an unusual response from the county's Soil and Water Conservation District.

Usually, the district's board isn't very political, General Manager Tom Salzer said. But the county's decision to review the status of 1,625 acres got the conservation district's attention. The county commissioners want to know if land in three areas south and southeast of the Portland urban center, now set aside as 50-year "rural reserves" and thus open to farming, would be more beneficial as "employment lands."

The commissioners want to review the status of 800 acres south of the city of Wilsonville; 400 acres adjacent to the urban growth boundary of the city of Canby; and 425 acres south of the Clackamas River along Springwater Road. County officials believe the land should revert to "undesignated" rather than rural reserves.

Board members of the Clackamas Soil and Water Conservation District decided they should speak up. On June 29, Salzer delivered a letter to the five-member county commission. The primary point was succinct: "The District believes the County's current initiative to create employment lands may not adequately consider the long-term value of high-value farmland. A significant amount of the land proposed for reconsideration as employment land is high-value farmland, an irreplaceable natural resource."

Salzer said the conservation district's board is concerned about the longterm future of farmland in Clackamas County, which despite being adjacent to Portland remains one of Oregon's top five agricultural counties. The county is particularly known for growing Christmas trees, nursery crops and berries.

But it's also known for political contention — some Portlanders derisively call it “Clackastan” — and for opposition to Metro, the land-use planning agency for the tri-county Portland area. The current county commission chair and vice chair, John Ludlow and Tootie Smith, are generally viewed as favoring job growth and development over land-use restrictions.

The commissioners point to an economic study by a consulting firm, Johnson Economics and Mackenzie, that said the county is short between 329 and 934 acres of industrial land and up to 246 acres of commercial land, an overall shortage of up to 1,180 acres over the next 20 years. The conservation district, however, has some concerns. The acreage south of Wilsonville involves land adjacent to the Aurora Airport and Langdon Farms golf course. It has long been proposed for development by its owners, while farm groups and land-use watchdogs oppose development spreading into prime Willamette Valley farmland.

The acreage next to the city of Canby is Class 1 agricultural soil, some of the best farmland in the valley, said Jim Johnson, the Oregon Department of Agriculture's land-use specialist.

The conservation district is alarmed at the prospect of losing more farmland, said Salzer, the general manager. “This is remarkable,” he said. “It's the first time this board has stood up as a unanimous body and said, ‘Wait a minute. Farmland is being threatened and we need to do something about it.’”

Jeff Becker, the conservation district's board chair, said the board doesn't want to antagonize the county commissioners but simply wants to promote discussion of the issue. “We don't want to fire darts,” Becker said. “We don't want to attack their policies. I know they get pressure (from all sides).”

But Becker said issues such as food supply need to be considered when development is discussed. “If you get rid of farmland, it's gone forever,” he said.

The county commissioners had questions and comments for Salzer when he delivered the conservation district's letter. Commissioner Ludlow said any development on the land in question would be years out. “We're 1,100 acres short of job-producing land,” he said. Commissioner Smith said farming requires a “whole host of behaviors” that young people don't want to engage in, and said much of the land under consideration is “fallow,” not actively farmed.

“It may be fallow at this time, but if you build on it, it's gone,” Salzer responded.

The current development proposal covers familiar ground about a lack of land for economic development. A bill introduced in the 2015 Oregon Legislature would have allowed Clackamas, Washington and Columbia counties to designate industrial reserves of up to 500 acres outside of established urban growth boundaries, but it died in committee.

This time, Clackamas County is going it alone and apparently will work through Metro.

Clackamas, Washington and Multnomah counties, which include the greater Portland area, agreed in 2010 to designate urban and rural reserves. Urban reserves will be considered first when the urban growth boundary is expanded for houses, stores and industries. More than 265,000 acres in the three counties were designated as rural reserves, meaning they would remain as farms, forests or natural areas until 2060.

“The facts on the ground have changed dramatically since the original reserves adoption,” the Clackamas commissioners said in a letter to Metro, “prompting the need for corresponding changes to reserve designations. We cannot pretend that those changes didn't happen, or allow the matter to be dismissed as simply a change in leadership.”





July 14, 2016

The Honorable John Ludlow, Chair, and  
Members of the Board of County Commissioners  
c/o Martha Fritzie, Senior Planner  
Development Services Building  
150 Beaver Creek Road  
Oregon City, OR 97045

**RE: City of Wilsonville Comments on Clackamas County Rural Reserve Review 2016**

Dear Chair Ludlow and Members of the Board of County Commissioners:

The City of Wilsonville opposes efforts to remove the “Rural Reserve” designation from the approximately 800-acre area of the French Prairie Rural Reserve now under consideration by the County. Wilsonville supports the original 2010 French Prairie “Rural Reserve” designation and opposes the County’s efforts to overturn a thorough, two-year-long public-input process that resulted in reserves agreements with Clackamas County, Metro and the City of Wilsonville to protect the high-value farmlands of French Prairie. The City’s support for the French Prairie Rural Reserve as currently designated and opposition to removing Rural Reserve designation from any portion is based on a number of public-policy positions and political realities.

**1. Metro Region Has Surplus of Buildable Industrial Lands**

The County claims a need for two thousand acres of additional employment lands, notwithstanding the fact that a review of Metro and county data shows no such need:

The greater Portland metro region has over 7,800 acres of designated, buildable industrial lands already located within the Urban Growth Boundary (“UGB”), composed of approximately 4,060 acres that are vacant and another 3,211 acres that could be redeveloped.

An extra approximate 4,793 acres of vacant or redevelopable commercial lands are already designated within the Metro UGB.

**In total, the Metro region has approximately 12,064 acres of buildable industrial and commercial lands waiting for development or redevelopment already within the UGB.**

| THREE-COUNTY METRO REGION<br>INDUSTRIAL LANDS INVENTORY ACREAGE |              |              |              |
|---|--------------|--------------|--------------|
| Jurisdiction  | Vacant       | Redev.       | TOTAL        |
| <b>Clackamas County</b>   |              |              |              |
| Cities (UGB)  | 571          | 595          | 1,166        |
| Unincorporated County (UGB)                                     | 95           | 142          | 237          |
| Non-UGB Cities/County *   | 939          |              | 939          |
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\*“Redev.” = Redevelopable industrial sites.

SOURCES: Metro 2015 UGR, Appendix 3 Buildable Land Inventory; Clackamas County, Employment Land Inventory, 2010.

Contrary to the assertions of a shortage, Clackamas County reports show an additional 939 acres of available vacant industrial land in rural areas of the County, outside the UGB, for a total of 8,760 acres in the three-county area, as illustrated on the table located on the preceding page.

## **2. County Employment Lands Study is Flawed, And Cannot Be Relied Upon to Guide Public Policy**

The City finds the County's employment lands study referenced above, the *Clackamas County Non-Retail Employment Land Analysis* of December 2014, used non-standard economic calculations and proprietary data sources that could not be independently verified. The study reaches for aspirational, unrealistic employment projections to show an alleged demand for more employment land. This is even more so when a proprietary, 'internal model' is used that assumes unrealistically "very optimistic" high rates of growth.

The report ignores the fact that Clackamas County is part of a regional economy. Many people live and work in different counties, and that reality will not be solved by adding land to the UGB. The more specific the metro region is about land needs, the more it becomes a policy statement rather than a technical conclusion. The bottom line is that the region has a surplus of industrial land as illustrated by the table on the preceding page.

## **3. County's Position on Employment Lands at Odds with Stated Needs of Clackamas County Businesses**

The *Clackamas County Economic Development Commission (EDC) Final Committee Report to Board of County Commissioners*, dated December 8, 2015, states that the "EDC, working through the outreach management of the Clackamas County Economic Development (CCED) Division, developed a program to contact 100 companies who [sic] make up the Target Business Outreach List...[which] is comprised of companies who [sic] fit within the County's [11] Key Clusters."

The report further states: "EDC and CCED staff met with 105 businesses over a 9 month period. This final report includes Key Findings and Recommendations from the EDC based on the feedback from the businesses contacted. *Key issues that rose to the top were workforce, transportation, financing.*" [emphasis added].

**Another way of stating the conclusions above is that the top priorities for businesses in Clackamas County, as identified by the businesses themselves, are: 1) Workforce Development; 2) Access to Capital; and 3) Improved Public Transit.**

***None of the 109 businesses interviewed in the EDC report identified "employment lands" or the need for new "employment lands" as a business issue of concern. The EDC report makes no mention of a business indicating a need for "employment lands," which supports a conclusion that "employment lands" are not a key issue of concern for Clackamas County businesses.***

Rather than continue to waste public resources to pursue objectives based on political considerations, the City respectfully suggests that the County focus on helping businesses with the above three issues that businesses have identified as the most critical. Doing so would have a considerably greater economic impact to the County's benefit.

#### 4. Summary of Problems with Proposals for Urbanization South of Wilsonville

In Joint State Agency Comments on the Metro Urban and Rural Reserves process, dated October 14, 2009, page 17, seven state agencies unanimously found that urbanization immediately south of the Willamette River and Wilsonville was detrimental public policy and explicitly supported a Rural Reserve designation for French Prairie:

“ODOT, ODA, DLCD, OWRD, DEQ, ODFW, and DSL support the preliminary recommendation from Clackamas County to designate lands south of the Willamette River (French Prairie) as a rural reserve. The reasons for a rural reserve designation include: threat of urbanization, high suitability for agriculture, very significant transportation limitations (Boone Bridge capacity and no alternate river crossing, poor multimodal connectivity), poor suitability for urbanization (services and distance to existing population), and concerns about encouraging urban development moving south along I-5 into prime agricultural lands.”

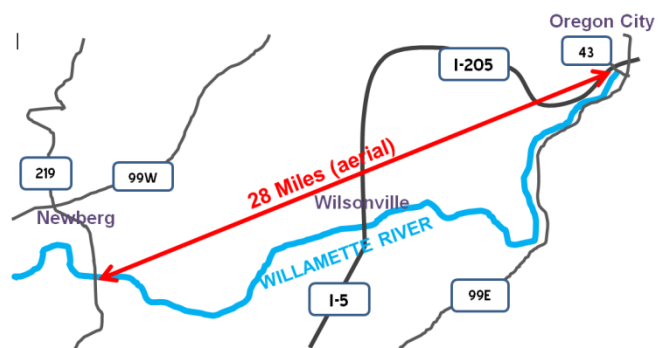
#### 5. Significant Transportation Limitations: *Detrimental Impacts to Commerce*

**“Huge” Transportation Costs:** In an April 6, 2009, joint state agencies (ODOT, ODA, DLCD, ODFW, and ODF) letter to the Metro Reserves Steering Committee, ODOT indicated that the South Metro I-5 corridor and Boone Bridge were at maximum traffic-handling capacity, and that the cost to increase capacity was “huge,” or “over \$500 million.”

ODOT states in this letter (page 3) that: “The analysis shows that the highways least suitable to accommodate additional trips and most expensive to improve, are... I-5, especially the segment from Or 217 to south of the Willamette River.”

**Commuter and Freight Traffic Overload:** The I-5 Boone Bridge reaches peak traffic-carrying capacity during normal commute times and on many other occasions; adding new traffic generators on a congested highway further harms the movement of freight and conduct of commerce in the metro region and to areas further south, including Woodburn, Salem and Albany areas.

**No Alternate River Crossing:** The I-5 Boone Bridge is the only crossing over the Willamette River for a more than a 28-mile span, as the crow flies, between Oregon City Hwy 43 and Newberg Hwy 219, resulting in a highway bottleneck without alternate routes. Placing additional traffic generators in the vicinity of the bridge increases reliance on the bridge for short, local trips, further restraining traffic flow and mobility while increasing the likelihood of freeway incidents that can result in major traffic tie-ups.



**I-5 Boone Bridge Carries More Freight than “CRC”:** The I-5 Boone Bridge carries nearly as much vehicle traffic as the I-5 “CRC” Interstate Bridge (only 4% less), but one-third (33%) more freight trucks, making this bridge a critical transportation link for commerce. Freight traffic that is split between the CRC and the Glenn Jackson Bridge, via I-205 converge at the Wilsonville I-5 Boone Bridge over the Willamette River.

**Poor Multimodal Connectivity:** The French Prairie region is composed primarily of narrow, farm-to-market county roads without shoulders or sidewalks and not designed for traffic circulation common to urban areas. The area is not served by transit services and is not bike or pedestrian friendly, lacking urban-type infrastructure for multi-modal connectivity. Again, the only Willamette River crossing is the I-5 Boone Bridge.

## **6. French Prairie Rural Reserve Area Has Poor Suitability for Urbanization: *Absence of Costly Urban Infrastructure***

**Distance from Population Centers Forces Commuting:** The French Prairie area lacks urban services and is distant from population centers and standard private commercial and public urban services. All of the foregoing makes the area a weak candidate for urbanization and attempting to make it such would result in significant additional traffic generation and unfunded public infrastructure costs.

**Lack of Available Water:** The City of Wilsonville's water capacity south of the river is fully used by Charbonneau. ODOT has prohibited any additional conveyance devices on the I-5 Boone Bridge. The City's water distribution plan calls for providing capacity to planned industrial developments in North Wilsonville, where pipes were over-sized to accommodate the Coffee Creek Correctional Institution and planned future urbanization within the City's Metro UGB areas, including Coffee Creek, Basalt Creek and Frog Pond, and Metro's Urban Reserve areas, including Advance and lands west of Wilsonville. Wilsonville has no plans or desires to provide any water to the area at issue.

Current and future water capacity is scheduled for use by Wilsonville, Sherwood, Hillsboro and other northern communities served by the Tualatin Valley Water District. Neither the Oregon Water Resources Department nor Marion County are permitting new groundwater wells that further draw-down the aquifer that is used primarily to support the region's agricultural industry. Ground water in the Northern Willamette Valley is known for high concentrations of minerals, including arsenic, that make domestic use difficult.

**Lack of Waste-Water Treatment Capacity:** The City of Wilsonville's 2009-10 \$45 million expansion in capacity for the wastewater treatment is already allocated to existing and planned new developments, including the 1,000-acre Coffee Creek and Basalt Creek industrial areas, and the 500-acre Frog Pond/Advance residential areas, and an additional 300 acres of adjacent urban reserves. Given the existing commitments, there is no surplus capacity available and Wilsonville resources will not be made available for the County's proposed industrial redevelopment.

**Expensive, Difficult Area to Provide Waste-Water Treatment Services:** A "Sewer Serviceability" study conducted by Clackamas County and Metro during the Urban and Rural Reserves process found in 2009 that the French Prairie area would be "difficult" to provide waste-water treatment services, which implies expensive infrastructure costs. In any case, taxpayer funds should not be diverted to convert prime, unserved farmland into other urban-level uses for the benefit of a select few real-estate speculators.

**No New Wastewater Outfalls:** The Oregon Dept. of Environmental Quality is not permitting any new wastewater outfalls on the Willamette River, thereby producing a major hurdle for proposing any new wastewater treatment facilities.



## **7. French Prairie Offers High Suitability for Agriculture: Oregon's Best "Foundation" Farmland**

**French Prairie soils are some of the best in Oregon and the world** and should be conserved for domestic food security and economic diversification purposes. French Prairie soils were formed over millennia by 10 major "Missoula Floods" that inundated the Willamette Valley, depositing multiple layers of organically rich silt on the lower watershed regions of the North Willamette Valley that compose the French Prairie region.

In the Oregon Dept. of Agriculture report on *Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands*, January 2007, the French Prairie subregion is described on page 34 as:

"Excellent soils, available water, well established infrastructure and large parcels that block up and dominate the land use pattern. This subregion has all the elements for maintaining and expanding viable, commercial agricultural. *This subregion, combined with the Clackamas Prairies and East Canby subregions, is one of the most significant agricultural areas in the state.*" [emphasis added]

The report on page 34 goes on to list several issues of concern that could negatively impact agricultural operations in the French Prairie area:

"The Willamette River currently provides an excellent buffer and edge between urban land uses and the intensive commercial agriculture that predominates south of the river. *A long-term potential threat to agriculture in this subregion relates to urbanization and expansion of the Metro UGB south of the river. This has been highlighted of late due to speculative discussions about development in, around and between the I-5 interchange at Charbonneau, the golf course and the airport.* Strong consideration needs to be given to providing more certainty and long-term protection to agricultural production in this area. We believe that development of a permanent or "hard" edge at the Willamette River and coordination between Metro and north valley cities on future growth and urbanization are key considerations." [emphasis added]

## **8. "Jumping" the Willamette River Is Detrimental to Top-Producing Agriculture Area: Lack of a Natural Barrier Facilitates Urban Sprawl**

As is noted above by the Oregon Department of Agriculture in the *Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands*, January 2007, "The Willamette River currently provides an excellent buffer and edge between urban land uses and the intensive commercial agriculture that predominates south of the river."

In addition to increased critical mobility congestion along I-5, urbanization of 800 to 1,200 acres of prime, foundation farmland in the greater French Prairie region of Canby and Wilsonville would result in displacing the existing agricultural operations and disrupting the larger French Prairie agriculture cluster that make significant contributions to the Oregon economy, especially to Clackamas, Marion, Yamhill and Washington counties, which are among the top agricultural producers in the State.

The Oregon Dept. of Agriculture has indicated that a majority of farm sales from Marion County, Oregon's number-one value agricultural producer, originate from the French Prairie region.

**County gross farm and ranch sales: 2014** (ODA, Oregon Agriculture: Facts & Figures, July 2014)

| <u>Rank</u> | <u>County</u> | <u>Value</u>     |                                 |
|-------------|---------------|------------------|---------------------------------|
| 1           | Marion        | \$ 639,326,000   | TOTAL OREGON AG VALUE:          |
| 5           | Clackamas     | \$ 343,514,000   | \$5,480,802,000                 |
| 7           | Washington    | \$ 292,044,000   | Percent of Clackamas, Marion,   |
| 9           | Yamhill       | \$ 269,839,000   | Yamhill and Washington counties |
|             | TOTAL         | \$ 1,544,723,000 | of Total State Value: 28%       |

**9. Negative Economic Impacts to Planned Developments:**  
***Devaluing Substantial Public and Private Investments Already Made***

**Harm to Existing and Planned Private and Public Industrial Expansion Investments:** Many local jurisdictions have been working for years with Metro, the Port and private developers to bring to market a portion of the buildable 7,800 acres of designated industrial employment lands that are vacant or slated for redevelopment. Already, both area governments and private developers have invested millions of dollars in planning and developing industrial parks in locations like Wilsonville, Tualatin, Canby, Woodburn and Salem that are recovering from the Great Recession and seeking to address high commercial/industrial vacancy rates.

Bringing online the proposed additional industrial development is inappropriate and unfairly competes with public and private investments already made and planned, harming these investments and investors. Adding more acreage diminishes the value of existing acreage and diverts private and public capital from existing and planned developments, thereby diluting the market's capacity to develop designated industrial lands for employment.

**Unfair Competition with Coffee Creek and Basalt Creek Industrial Areas:** The cities of Tualatin and Wilsonville, Washington County, Metro and ODOT have invested over \$10 million in planning and building for urbanization of the rural, unincorporated region located near Sherwood, Tualatin and Wilsonville, including making key investments in capacity improvements to existing highways and roads.

The 1,000-acre Coffee Creek and Basalt Creek Regionally Significant Industrial Areas have nearly a decade of planning, consensus-building and in-place infrastructure investments already sized and built to host planned industrial developments for over 4,000 new jobs. These areas were specifically studied, analyzed and designated through Metro and State public-approved processes as the most suitable locations to fill regional needs for industrial development. Wilsonville has no intention of providing resources in any form to compete with areas that the City has already invested in for future urban development.

**Lack of Certainty Deters Private and Public Capital Investment:** The Urban and Rural Reserves process was designed to provide certainty to many stakeholders, including both private- and public-sectors, regarding the future disposition of land-use of specific areas for a 40- to 50-year period. This level of certainty for calculating long-term investments applies to both urban development interests as well as rural agriculture enterprises. Creating uncertainty regarding future land-uses deters investments with long-term beneficial economic impacts.

Just as the Metro region seeks to affirm the planned Urban and Rural Reserves, SB 716 for example would have allowed "the counties to redesignate or undesignate land already designated as urban reserve or rural reserve." Changing reserves designations would result in scrambling a great deal of work completed and underway by both local governments and private investors.

Substantial public input and government resources over a three-year period went into designating the reserves, and this work should not be cavalierly undone.

Changing already-designated reserves creates further uncertainty and the likelihood of new appeals and lawsuits that cause additional delays for both urban interests seeking to develop land and agricultural interests seeking to invest in farming. Creating certainty for all of these stakeholders to invest was the positive goal of the reserves process.

#### **10. Designating More Farmland as Industrial Fails to Address the Real Problem: *Development Requires Substantial Private and Public Resources***

The core issue that the Metro region faces is *not* a lack of designated industrial lands; rather, it is a *lack of resources* available to address the substantial costs of bringing already properly designated industrial land into productive use. Adding acreage to the UGB as “industrial” does not create development or jobs. To the contrary, such action would dilute the available resources for development plans and projects already underway but delayed or stalled due to lack of available resources.

#### **11. Dangerous Precedent: *Special Interests Versus Public Interests***

**Poor Public-Policy Precedent:** Rewarding rural land speculators by allowing unjustified up-zoning to increase land value sends a message to the public and development community that some can achieve more favorable treatment outside existing rules and regulations that others have been required to abide by gaining political favors.

The City suggests that a more productive course of action would be to work with area cities to encourage the Oregon Legislative Assembly to actuate industrial-development programs that were created in the 2013 session but never funded. As a primary beneficiary of income tax produced by high-wage industrial jobs, the state has a direct interest in supporting local governments to bring designated but undeveloped employment lands already in the UGB to market.

**See-Saw Policy-Making Furthers Lack of Government Credibility:** When both the general public and investors observe government making a decision one day and then reversing the decision another day, especially if the reversal benefits land speculators who have made significant campaign contributions to elected officials, government suffers an enormous loss of credibility that further alienates citizens and creates a confusing, uncertain investment climate.

**Denigrating of the Public Involvement Process:** Residents of Clackamas County took a keen interest in the outcome of the two-year-long Metro process to determine the prime locations for Urban and Rural Reserves in the county. A grassroots, citizen-composed Policy Advisory Committee established by the Board of Commissioners held well-attended work sessions throughout the county. The Rural Reserve designation of the French Prairie area approved by the County at several levels, including the Planning Commission and the County Commission; subsequently the designation was unanimously approved by the ‘Core Four’ and Metro. A later challenge to this decision by the owners of the Langdon Farms Golf Course was rejected on every count by the Oregon Court of Appeals. Further, the Court confirmed that the County had used the correct process and had properly applied the ‘factors’ in arriving at that decision. Cavalierly over-riding a popular citizen-driven process and decision upheld by the courts harms the very fabric of a democracy.

More recently, residents of the greater Wilsonville area, including hundreds that would be directly impacted by the proposed change, came out in mass on June 28 at the County's Reserves "open-house event" in Wilsonville to object to the County's proposed redesignation of the French Prairie land. We hope you agree that those residents who are your constituents must be heard and cannot be ignored, who again are repeating similar sentiment as in 2009-10: Protect all of the French Prairie Rural Reserve.

Based on all of the foregoing, the City of Wilsonville respectfully urges the Board of County Commissioners to make no changes to the designated Rural Reserves and to complete timely the reserves process so that Clackamas County may have designated Urban reserves that can accommodate development in those areas that the region has agreed are appropriate for urbanization. Thank you for your time and consideration.

Sincerely,



Tim Knapp, Mayor  
Wilsonville City Council  
City of Wilsonville, Oregon

cc: City of Wilsonville City Council  
City of Wilsonville Planning Commission  
Clackamas County Economic Development Commission  
Clackamas County Planning Commission  
Clackamas County Coordinating Committee (C-4)  
Metro Council  
Area State Legislators  
Wilsonville Chamber of Commerce  
Clackamas County Business Alliance  
Westside Economic Alliance



# The rest of the story of a county's threat to farmland

**The Capital Press, July 22, 2016**  
**By Ben Williams**

As a long time subscriber, I say “Kudos to the Capital Press” for publishing Eric Mortenson’s article on farmland development in Clackamas County (*Conservation district fights farmland development*; July 8, 2016). One county within Metro Portland, OR is a small part of the Capital Press’ publishing coverage, but this a story that merits consideration. Eric captured the essence of the matter: a local Soil & Water Conservation District is asking “what is going on?” And their concern is loss of irreplaceable farmland?”

The devil is in the detail, or a Paul Harvey used to say, in “the rest of the story!” This story has four or more chapters, and the first has to do with campaign contributions – but let’s skip the gory details for now. The second has to do with the reference to “an economic study by a consulting firm, Johnson Economics and Mackenzie, that said the county is short between 329 and 934 acres of industrial land and up to 246 acres of commercial land, and overall shortage of up to 1,180 acres over the next 20 years.” Guess who hired the consulting firm and engaged them to do the study? The Clackamas County commissioners! They got the results they were looking for, and then they used the results of the study to issue a new County strategic plan in late 2014 which defined the need for employment lands and other development, but never involved any of the Cities in the County or any of the Community Planning Organizations within the County in the process or in the roll out of the new strat plan! Hire a consulting firm, get a study, issue a new strat plan. Very efficient, right?

As if that wasn’t enough, one year later, after publicly and privately playing a game of chicken with Metro (metro Portland’s tri-county planning body) by holding up the finalization of the Urban/Rural Reserves designations, they appropriated almost half a million dollars to “re-study” the Rural Reserves. This was presumably a settled matter, but their argument was that the County was short of “employment lands,” and the basis for the assertion? The study they had commissioned a year earlier.

To add insult to injury, on the Monday, Tuesday and Wednesday before the 4<sup>th</sup> of July holiday weekend they held Open Houses on the question of employment lands and re-studying the Rural Reserves to “seek public input.” The shocker was that none of the three Cities within the County in which the meetings were held (Canby, Wilsonville and Estacada) were given the courtesy of being notified of the meetings, nor was there any normal public notice: only the property owners immediately adjacent to the areas of study received a notice. The Mayor of Canby attended the Wilsonville meeting on Tuesday evening because he didn’t find out until Tuesday morning about the meeting in Canby on Monday evening! What’s the fuss? If ag land is rezoned for development and the local Cities have to provide the infrastructure like water, sewer and roads, what’s the big deal?

The fact is that Metro and others have put the “facts” on the table. There is more than enough “employment lands” within Metro and within Clackamas County to meet the development requirements of Oregon’s land use laws (a 50 year supply). The problem is that those employment lands aren’t where Chair Ludlow and Commissioner Smith want them. And, those employment lands aren’t owned by their major campaign contributors. So, this is crony capitalism at its best, compounded by a blatant attempt to avoid public involvement!

So then, the Soil and Water Conservation District’s concern is first and foremost one about what’s missing: transparency and public accountability! The consequence of that, in this case, is the loss of irreplaceable farm land. And, these kind of shenanigans probably aren’t just going on in one Metro County in Oregon!

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*Ben Williams of Aurora, Ore., is president of Friends of French Prairie, a land use advocacy group in the north Willamette Valley that works to preserve farmland and promote local farming.*

# Cities pan county's bid to change zoning of ag land

[Eric Mortenson](#)

Capital Press

Published on July 27, 2016 9:00AM

<http://www.capitalpress.com/Oregon/20160727/cities-pan-countys-bid-to-change-zoning-of-ag-land>



ERIC MORTENSON/CAPITAL PRESS

Producers south of Wilsonville, Ore., grow nursery crops, Christmas trees, berries, vegetables and grain. Clackamas County commissioners, seeking more industrial and commercial land, want to review land-use designations in the area.

WILSONVILLE, Ore. — Clackamas County's bid to review the status of three land parcels now set aside for agriculture is a concern to farm groups, and the cities that would have to service new development aren't hot for the idea either.

Charlotte Lehan, a former county commissioner, former Wilsonville mayor and now member of the city council, said it would be "very difficult and very expensive" for the city to provide water and sewer to new development south of the Willamette River.

She said development in the area Clackamas County seeks to review would increase congestion on the Boone Bridge, which carries north-south Interstate 5 traffic across the river. She said a clogged bridge would be "disastrous" for the city.

"I-5 is Wilsonville's lifeline," she said. "When the Boone Bridge isn't working, nothing works. We have to protect the functionality of Interstate 5."

The arguments back and forth are part of a long-running disconnect over Oregon's unusual statewide land-use planning system, which was designed to protect farm and forest land from urban sprawl. Under the system, cities are held in check by urban growth boundaries that can be amended in a controlled manner. But development pressure at the edges of cities remains a continuing issue all over the state.

In the Portland area, land-use planning for Clackamas, Multnomah and Washington counties is done by Metro, which has an elected board. Seeking to end ceaseless arguments, the counties and

Metro agreed to a system of urban and rural reserves that was intended to set growth patterns for 50 years.

Clackamas County's Board of Commissioners now wants to know whether three areas south and southeast of the Portland urban center, previously set aside as rural reserves and thus open to farming, would be more beneficial as "employment lands."

The county commissioners cite a study by a consulting firm, Johnson Economics and Mackenzie, that said the county is short between 329 and 934 acres of industrial land and up to 246 acres of commercial land, an overall shortage of up to 1,180 acres over the next 20 years.

A majority of the commissioners want to review the status of 800 acres south of the city of Wilsonville; 400 acres adjacent to the urban growth boundary of the city of Canby; and 425 acres south of the Clackamas River along Springwater Road, outside Estacada. County officials believe the land should revert to "undesignated" rather than rural reserves.

County officials have dismissed concerns as overwrought. They point out that any land-use change would take years to accomplish and would be subject to legal review or appeal.

Nonetheless, the proposal has reopened a can of worms. Friends of French Prairie, a farming advocacy group, maintains that allowing development to jump across the Willamette River south of Wilsonville would crack open the state's prime agricultural areas.

In a guest editorial written for the Capital Press, Friends of French Prairie President Ben Williams questioned the validity of the county's employment lands report and some of the land is owned by people who have contributed heavily to commissioners' election campaigns.

Board members of the Clackamas Soil and Water Conservation District took the unusual step of publicly warning against a land-use change. "The District believes the County's current initiative to create employment lands may not adequately consider the long-term value of high-value farmland," the district said in a letter to Clackamas commissioners. "A significant amount of the land proposed for reconsideration as employment land is high-value farmland, an irreplaceable natural resource."

Lehan, the Wilsonville council member critical of the land-use review, said her fast-growing city has planned for additional industrial growth in its Coffee Creek and Salt Creek areas, and for residential development in an area called Frog Pond. The city doesn't need more "employment land," she said.

"I know how development works and what it takes for a city to support it," Lehan said. "I'm not anti-growth by any means."

Lehan was Clackamas County board chair until defeated in 2012 by the current board chair, Commissioner John Ludlow, who is often critical of Metro and of Portland's influence on its suburban neighbors.

Canby City Administrator Rick Robinson made a point similar to Lehan's: the city has an existing industrial park that isn't full. The 400 acres Clackamas County wants to revert to undesignated status is outside the city limits and outside the city's urban growth boundary, he said. Some of it is farmed now, and much of it is Class 1 agricultural soil, he said. Robinson said the Canby City Council hasn't taken a position on the Clackamas review proposal.

The third area considered by Clackamas County is outside the city of Estacada. The mayor and city manager were unavailable to discuss the issue.

# Clackamas County hears overwhelming support for protecting farmland



Wilsonville (foreground) is inside the Portland UGB; south of the Willamette River, Interstate 5 crosses the French Prairie (background) on the way to Salem.

**By Nick Christensen**

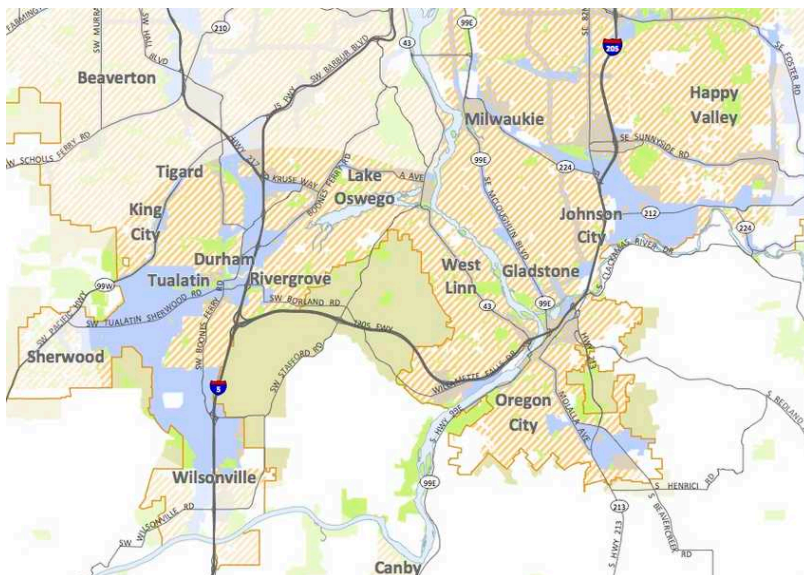
Aug. 5, 2016 10:30 a.m.

Bylined articles are written by Metro staff and do not necessarily represent the opinions of Metro or the Metro Council. [Learn more](#)

## **A proposal to remove rural reserve designation from parts of the French Prairie was opposed by more than 90% of respondents.**

Clackamas County leaders have tabled discussion of changes to the county's 50-year growth map after a public outreach campaign revealed overwhelming opposition to a key part of the proposal.

Since 2014, some county commissioners, including Chair John Ludlow, have sought to change the agreement, in an effort to allow for the possibility of development on the French Prairie between Wilsonville and Woodburn.



There are more than 1,000 acres of industrial land (light blue) in the UGB in the Interstate 205 corridor.

Opponents have said doing so would cost taxpayers hundreds of millions of dollars and open the door to endless sprawl down the Willamette Valley. Proponents say Clackamas County should focus its job-creation efforts south of the Willamette River, rather than areas like North Milwaukie or the Interstate 205 corridor that are closer to where most county residents live.

More than 400 people attended open houses on the proposed changes to the growth map. In addition to the open houses, in late June in Canby, Wilsonville, and Carver, public comments were taken online.

Clackamas County and Metro agreed to the growth plan in 2010, establishing urban reserves that would be the first priority for urban growth boundary expansions through 2060, and rural reserves where urbanization would be prohibited during that period.

A survey distributed at the open houses revealed little support for the proposal to roll back the 2010 agreement.

The survey asked people whether they agree that the area around the Langdon Farms Golf Club should be left "undesignated," meaning it could be urbanized once 75 percent of the urban reserves are used.

Of the 550 people who responded to the question, 506 said they disagreed. Only 14 said they supported the proposal. The rest said they didn't know.

Questions about proposed changes to the reserves map near Carver and Canby were similarly unpopular.

The commission's decision to postpone the discussion until further notice puts another delay into a process that has dragged on for years.

A 2014 Oregon Court of Appeals ruling put all of Clackamas County's reserves plan on hold until a minor technical fix in the plan was adopted by the Metro Council and Clackamas County Commission. The county has refused to sign off on that fix unless Metro agrees to make wholesale changes to the 2010 agreement, including changing areas south of the Willamette River to "undesignated."

Until the reserves plan is adopted, the Metro Council can't use urban reserves in Clackamas County for potential urban growth boundary expansions. Instead, it must rely primarily on soil quality to decide where growth could happen in that county – meaning that the steepest, rockiest areas are the areas least suitable for farming would be the first subject to urbanization. Adopted urban reserves in Washington County would be targeted before any land in Clackamas County.

That leaves Wilsonville, which has sought a small UGB expansion on the city's northeast side for a new residential development, out of consideration.

Wilsonville opposes Clackamas County's proposal to go south of the Willamette. They say the Boone Bridge has reached its capacity, and it would be too expensive to extend pipes across the Willamette to serve future growth, citing a 2009 estimate from ODOT and other groups that it would cost more than half a billion dollars to add capacity to the Boone Bridge.

"Adding new traffic generators on a congested highway further harms the movement of freight and conduct of commerce in the metro region and to areas further south," says a letter from Wilsonville Mayor Tim Knapp.

The sentiment was shared by others who participated in the county's survey.

"Boone Bridge 'Pinch' is already cause of miles of bumper to bumper congestion – and no solution in sight?" wrote one anonymous respondent. "Why make it worse?"



Another commenter said they want to see farm land protected.

"There is plenty of land available in other parts of Clackamas County, closer to commercial areas," they said. "There is no reason to destroy prime agricultural land which already employs people."

*This article has been updated to clarify that the Clackamas County Commission did not set a specific date to reconsider rural reserves and to reflect that the county did not conduct a scientific survey to obtain public comments.*



# Oregon

Kate Brown, Governor

Department of Land Conservation and Development

Community Services Division

Portland Metro Regional Solutions Center

1600 SW Fourth Ave., Suite 109

Portland, Oregon 97201

503.725..2183

[www.oregon.gov/LCD](http://www.oregon.gov/LCD)

27 July 2016

Martha Fritzie, Senior Planner  
Clackamas County  
150 Beaver Creek Road  
Oregon City, OR 97045



sent via email

RE: Clackamas County Rural Reserves Review

Dear Ms. Fritzie,

I attended two of the three Rural Reserves Review open houses Clackamas County hosted in late June. It is my understanding that the Board of County Commissioners will hold a work session on August 3<sup>rd</sup> to decide, based on feedback that was received at these open houses, whether or not to proceed with amending the designations of three properties identified by the County from rural reserve to undesignated. The department has a few comments regarding the County's rural reserves review process and encourages the county to maintain the rural designations of the three study areas and focus on completing the reserves process.

The presentation at the meetings implied that the reserves – both urban and rural – were open for a new look. While the local governments have the option of re-opening the analysis and decision making, it is not required by the Land Conservation and Development Commission's remand order. Rather, the order was constructed to allow Metro, Multnomah County, and Clackamas County to address very narrow and specific findings. For Clackamas County that is the Stafford Triangle area, there is not a question or concern about the rural reserves.

The overall purpose of looking at these specific properties is to ensure that there will be enough long term supply of employment land – land that would be available 20-30 years from now in Clackamas County. The identified need for long-term industrial/employment land for the county is an issue that can be resolved outside of the reserves process. The study that was done for the County included the entire county, not just the Metro UGB. The need could be absorbed both within the Metro UGB (e.g., unincorporated Damascus, Milwaukie, Wilsonville and Oregon City), as well as, outside the Metro UGB (e.g., Canby, Estacada, Sandy and Molalla). Now that Damascus is unincorporated there is potential to provide more employment lands than was originally assumed by the former city.

DLCD encourages the County to complete their findings on the specific task of the remand for Urban Reserves so that the region can move past reserves and on to focusing on development, employment land and how to fund and serve areas within the UGB.

Please let me know if you have any questions.

Regards,



Jennifer Donnelly  
Regional Representative

cc: Jim Rue, Director  
Carrie MacLaren, Deputy Director  
Dan Eisenbeis, Policy Analyst  
Steve Shipsey, DOJ  
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Mike McCallister, Clackamas County Planning Director  
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Andrew Plambeck, ODOT  
Ami Keiffer, Business Oregon  
Carolyn Meece, Business Oregon  
Cheryl Grabham, DEQ  
Lori-Warner Dickason, DSL  
Gary Roth, Dept of Agriculture  
Roger Kainu, Dept of Energy  
Jeff Boechler, Dept of Fish and Wildlife  
Mike McCord, Water Resources Dept  
Chad Davis, Dept of Forestry



# **Rural Reserves Review 2016**

## **Public Outreach and Comment Summary**

**July 28, 2016**

Excerpted Pages pertaining  
to "South of Wilsonville"  
French Prairie Rural Reserve

**Prepared for Clackamas County**  
**by EnviroIssues**



## **INTRODUCTION**

This document summarizes outreach activities conducted by Clackamas County and characterizes public comments collected on a proposal to remove the rural reserve designation from all or part of three areas outside of the Portland Metropolitan urban growth boundary (UGB). The purpose of this summary is to inform deliberations by the Board of County Commissioners on whether to move forward with additional analysis and public input.

## **PROJECT OVERVIEW**

Under Oregon law, lands outside of urban growth boundaries (UGBs) can be reserved for urban development (urban reserves), for rural/agricultural uses (rural reserves) or left undesignated. Also, lands outside the Portland Metropolitan UGB that are not in urban or rural reserves cannot be considered for development until 75 percent of existing urban reserves have been used.

Clackamas County is reviewing the land use designation of three areas classified as rural reserves due to changing economic conditions, legal challenges and uncertainty about the ability of the county's two largest urban reserve areas (Damascus/Boring and Stafford) to accommodate future, long-term development. All or part of the three areas are being considered to be removed from the rural reserves to provide the county with additional flexibility to meet future development land needs in the next 40-50 years. The county is reviewing the following areas:

- Approximately 800 acres south of Wilsonville
- Approximately 400 acres east of Canby
- Approximately 425 acres south of the Clackamas River along Springwater Road

## **DECISION SCOPE**

The County's Comprehensive Plan map is being considered for amendment. A recommendation to alter the reserves lands on the map must be based on procedures, analysis and factors identified in state law and consistent with recent Court of Appeals decisions. Three areas of rural reserves are being evaluated to provide greater land use flexibility for the County in the future. The County Commission will make the final decision after a public engagement process.

## **OUTREACH ACTIVITIES**

Clackamas County conducted the following outreach activities in summer 2016 to notify the public, other jurisdictions and potentially interested parties about the process and invite feedback. Comments were collected between June 27 and July 15, 2016. Clackamas County planning staff will continue to collect and consider comments and answer questions through the life of the project.

*Project Web Page:* The project web page hosted on Clackamas County's website was updated in May and June 2016 with information about the Rural Reserves Review proposal and open

house materials. An online survey was posted to the web page on June 27 to collect public input on the proposal. Project web page: <http://www.clackamas.us/planning/reserves.html>

*Postcard:* A postcard was mailed the week of June 13 to invite landowners and interested parties to learn about the project and come to public open houses. The distribution list included:

- Approximately 1,500 addresses for people who own land inside the review areas and within a half-mile of the review area boundaries
- Community Planning Organizations and Hamlets within or near the review areas
- Staff in the planning offices of the cities of Wilsonville, Oregon City, Happy Valley and Canby
- Other interested parties including but not limited to watershed councils, chambers of commerce, friends groups and state transportation offices

*Print Media:*

- News releases with public open house dates were sent the week of June 13 to all regional media, including local newspapers such as Canby Herald, Wilsonville Spokesman and Estacada News.
- A display advertisement inviting people to submit comments on the proposal was published the week of July 4 in the Wilsonville Spokesman, Canby Herald, Clackamas Review and Estacada News.
- The Wilsonville Spokesman posted a news article on July 7 covering the recent open houses and information about the public comment period.

*Email:* Notice for the public open houses was distributed via GovDelivery on June 22. A follow-up email was sent on July 8 to people who provided email addresses at an open house to thank them for their attendance and remind them to submit comments.

*Social Media:* Information about the proposal and open house dates was posted to Clackamas County's Facebook account on June 25 and posted 10 times to the County's Twitter account from June 22-26. Information about the proposal was shared by local officials, residents, media and stakeholder groups between June 22 and July 7.

*Public Open Houses:* Three open houses took place on June 27, June 28 and June 29. These dates were chosen based on the need for time to prepare information for the open houses, provide advance notice to the public, avoid the July 4 holiday weekend and allow time to compile the input for the Board of County Commissioners policy session originally scheduled for August 3. Open house attendees were asked to sign in and provide their contact details to remain informed about the project.



Table 1 – Public Open House Attendance

| Location                                 | Date          | Attendance* |
|--|---------------|-------------|
| Canby: Canby Adult Center                | June 27, 2016 | 51          |
| Wilsonville: Clackamas Community College | June 28, 2016 | 302         |
| Springwater Road: Harding Grange         | June 29, 2016 | 54          |

\*Number of people who formally signed in at the open house. Actual attendance is estimated to be higher.

Each open house included an array of display boards and handouts with information about the review areas and process. Project staff provided a presentation and hosted a question and answer session. Open house attendees were also able to speak with project staff individually outside of the presentation. Comment forms were available and attendees were encouraged to submit their comments at the open house, mail them to the County office or submit them online.

Staff from the City of Wilsonville provided their own informational materials regarding the need for the project at a booth outside the open house room at the June 28 open house.

## PUBLIC COMMENTS AND SURVEY FINDINGS

Clackamas County collected comments to be included in this summary between June 27 and July 15, 2016. Comments were collected in hardcopy at public open houses and mailed to the Clackamas County Planning and Zoning Division. Comments were also collected through an online survey. The comment form included a quantitative survey component that asked respondents to select their level of agreement with the proposal. Copies of the comment forms are in *Appendix A*.

While the quantitative data collected was not statistically representative of Clackamas County's population as a whole, engagement levels were high. In total, Clackamas County received 736 responses within the comment period, including 244 in hardcopy and 492 responses to the online survey. Respondents were not required to answer all questions.

The comment form and online survey asked the following questions for each of the three review areas.

- Given the changes that have occurred in Clackamas County and the region, it is appropriate to remove the rural reserve designation from this area:  

|                |                |                   |                   |              |
|----------------|----------------|-------------------|-------------------|--------------|
| Strongly agree | Somewhat agree | Somewhat disagree | Strongly disagree | I don't know |
|----------------|----------------|-------------------|-------------------|--------------|
- Please provide your reasons for your answer.
- What additional information would you like to have about the decision-making process as these rural reserve area designations are reviewed?

A large majority of respondents indicated they strongly disagreed with the proposal for the three review areas. A small minority indicated they somewhat agreed or strongly agreed with the proposal.

Figure 1 - Springwater Road Review Area: Level of Agreement

| Value             | Percent | Count |
|-------------------|---------|-------|
| Strongly agree    | 1.9%    | 10    |
| Somewhat agree    | 1.5%    | 8     |
| Somewhat disagree | 4.7%    | 25    |
| Strongly disagree | 76.6%   | 407   |
| I don't know      | 15.3%   | 81    |
| Total             |         | 531   |

Figure 2 - East of Canby Review Area: Level of Agreement

| Value             | Percent | Count |
|-------------------|---------|-------|
| Strongly agree    | 2.1%    | 11    |
| Somewhat agree    | 4.0%    | 21    |
| Somewhat disagree | 7.8%    | 41    |
| Strongly disagree | 74.1%   | 392   |
| I don't know      | 12.1%   | 64    |
| Total             |         | 529   |

Figure 3 - South of Wilsonville Review Area: Level of Agreement

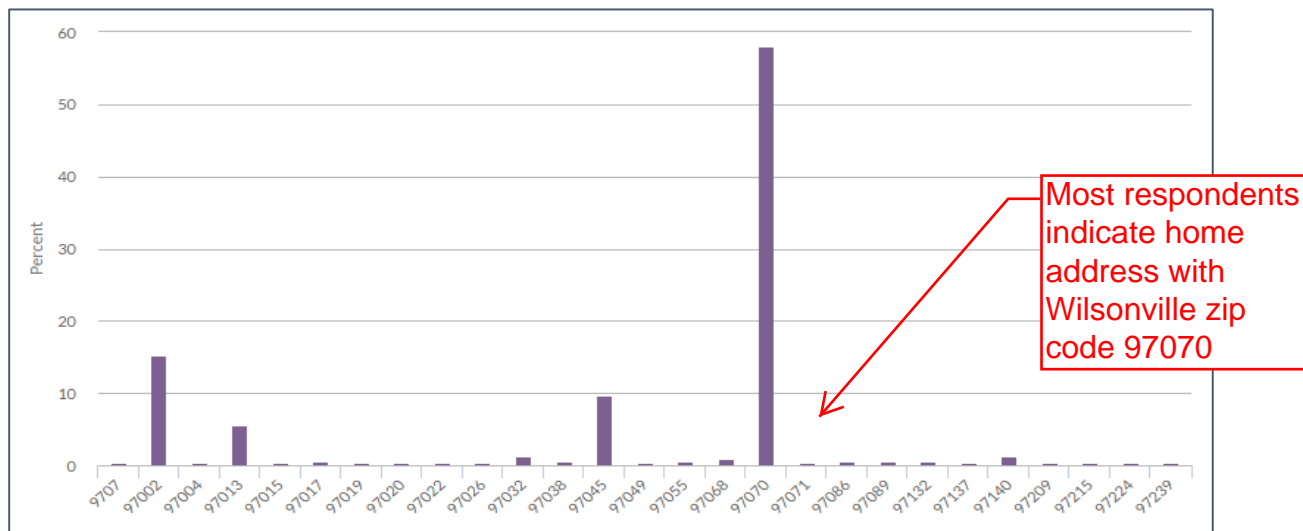
| Value             | Percent | Count |
|-------------------|---------|-------|
| Strongly agree    | 2.0%    | 11    |
| Somewhat agree    | 0.5%    | 3     |
| Somewhat disagree | 1.6%    | 9     |
| Strongly disagree | 90.5%   | 498   |
| I don't know      | 5.3%    | 29    |
| Total             |         | 550   |

Almost 500 respondents provided written comments with their survey responses. A summary of written comments begins on page 8. All written comments are in *Appendix B*.

## RESPONDENT ZIP CODE

At the end of the online survey, respondents were asked to enter the ZIP code of their home address. Of the 322 ZIP codes provided, 58 percent were from Wilsonville (97070), 15 percent were from Aurora (97002), 10 percent were from Oregon City (97045\*) and 6 percent were from Canby (97013). Twenty-two other ZIP codes made up the remaining 11 percent.

Figure 4 - ZIP Codes of Respondent Home Address



\*97045 ZIP code includes the Springwater Road review area.

## RESPONDENT DEMOGRAPHICS

The online survey asked respondents to provide demographic information. The respondents who provided this information tended to be older and less diverse than Clackamas County as a whole. More than 40 percent of respondents said they were over the age of 60, while the median age in the county is 40.6 years according to 2010 U.S. Census data. More than 90 percent of respondents said they were white or Caucasian compared to Census data showing the population to be about 83 percent white. About half of respondents were female, which is similar to Clackamas County as a whole.

Table 2 Survey Respondent Demographics

|                  |                                 |        |
|------------------|---------------------------------|--------|
| <b>Age</b>       | Under 18                        | 0.30%  |
|                  | 18-29                           | 5.90%  |
|                  | 30-44                           | 21.60% |
|                  | 45-59                           | 24.40% |
|                  | Over 60                         | 40.10% |
|                  | Prefer not to answer            | 7.70%  |
| <b>Gender</b>    | Female                          | 49.40% |
|                  | Male                            | 38.20% |
|                  | Transgender                     | 0.30%  |
|                  | Non-binary                      | 0.30%  |
|                  | Prefer not to answer            | 11.80% |
| <b>Ethnicity</b> | African America/Black           | 1.60%  |
|                  | American Indian                 | 1.30%  |
|                  | Asian-American/Pacific Islander | 2.20%  |
|                  | Latino(a)                       | 0.60%  |
|                  | White/Caucasian                 | 91.10% |
|                  | Other                           | 7.30%  |

## SUMMARY OF COMMENTS OBSERVED ACROSS ALL REVIEW AREAS

The following comments were found to be common across all review areas. Verbatim comments are available in *Appendix B*.

### *Comments about Designation Suitability*

- The review areas have rural characteristics that should be protected by a rural reserve designation.
- Protect the rural quality of life enjoyed by local residents.
- Non-rural development would reduce property values for area land-owners.
- Clackamas County's rural areas distinguish it from other counties in the Portland metropolitan region.
- There should be rural "buffers" between urban areas.
- Need more clarity on the definitions and criteria of rural reserves, urban reserves and undesignated areas.
- Need more information on the changes expected if the review areas become undesignated.

### *Comments about Project Need*

- There's enough developable land within the Metro UGB and urban reserves to serve the region's long-term need for employment lands; focus development in these areas before changing the designation of rural reserves.
- Clackamas County "wastes" land that could be put to better use.
- Other local governments don't agree with the County's assessment of long term employment land needs.
- Clackamas County has a significant supply of vacant industrial land that should be used before other areas are considered.
- It would be more efficient to develop areas currently zoned for industrial use and have better access to public services and infrastructure.
- Request to see studies or documentation that support the need for the Rural Reserves Review and identify the review areas.
- Request to see an inventory of developable land and when it is projected to be used.
- Need to understand why the Rural Reserves Review is happening now.

### *Comments about Decision Process*

- The Board should consider how the proposal would negatively affect the quality of life of residents near the review areas, and value the desires of residents over potential economic benefits.

- The review should not take place until there is more certainty about how quickly urban reserves will be exhausted.
- There is a small group of large land-owners in the review areas who would directly benefit financially from the proposal, and they are getting special treatment from the County.
- Don't trust the Board of Commissioners and other local governments to act on public input or make a decision in the best interest of residents.

#### *Comments about Timeframe*

- The timeframe of possible development needs to be clearly defined.
- Clarify how soon development could be expected if the rural reserve designation is removed.
- Removing the rural reserve designation is the first step to development, even if it doesn't occur immediately.
- It doesn't make sense to remove the designation now if development is not needed in the short term.
- Land-owners will find a way to develop their land in the short-term if rural reserve designation is removed.

#### *Comments about Previous Process*

- The outcome of the previous process should be honored because it took a significant amount of time, resources and public involvement; there was agreement that the review areas should have a rural reserve designation and the process doesn't need to be repeated.
- Conditions in Clackamas County have not changed enough to warrant another review.

#### *Comments about Public Involvement*

- Not enough people were aware of the review process.
- Do not trust consultants supporting public outreach activities.
- Do not trust there will be additional opportunities for public input on the proposal.
- The information provided in outreach materials was misleading and a waste of public money.
- Commissioners should have been available for questions at the public open houses.
- Interest to attend future public meetings and receiving notification about public comment periods and decision points.
- The public survey was biased and should have provided more information about the opportunities and challenges of the proposal.

### *Comments about Agriculture*

- The review areas have prime agricultural land with valuable soils that make farming the best use of the land.
- High quality farm land is irreplaceable once it is developed; good farm land should not be lost for employment lands or economic growth reasons.
- Urban growth and climate change is causing farm land to become scarcer worldwide, especially near metropolitan regions.
- It's important for a region to be able to grow its own food now and for future generations.
- Any development would have negative effects on neighboring agricultural practices.

### *Comments about Economics*

- Agricultural lands employ many people and agriculture is a significant sector of Oregon's economy.
- Development may provide many short term construction jobs, but we don't know the number of long term jobs development would produce.

### *Comments about Taxes*

- How will the proposal affect local tax rates and revenues?
- Local tax rates are already high and the required investment in public services and infrastructure would increase tax rates.

### *Comments about Natural Resources*

- Natural areas need to be protected.
- Removing rural reserve designation could negatively affect the area's ecology and natural beauty.

### *Comments about Public Services and Infrastructure*

- The review areas don't have adequate public services or infrastructure to support development or industrial activities.
- Infrastructure is already under strain and any more development would aggravate the situation.
- More information is needed on the cost of required infrastructure improvements.

### *Comments about Transportation*

- The review areas have traffic congestion issues and any development would make traffic worse.
- The review areas are not located near population centers and would require commuting by automobile.
- The amount of investment required to improve transportation infrastructure to accommodate development would be excessive.
- Need more information on long-term transportation plans for the areas.



#### *Comments about Agriculture*

- Increases in traffic congestion make transporting farm equipment on public roads unsafe.

#### *Comments about Natural Resources*

- Removing the rural reserve designation could negatively affect the area's greenspace and wildlife habitat.
- There are seasonal wetlands near Dietz Airpark that serve as habitat for migratory birds.

#### *Comments about Public Services and Infrastructure*

- Does the City of Canby plan to extend infrastructure into the review area?

#### *Comments about Transportation*

- There are significant congestion issues on roads that enter and exit Canby.
- Highway 99E cannot absorb more traffic from the area.
- There needs to be more analysis of how development could affect airfield activities at Dietz Airpark.
- The area has good access points that connect to Highway 99E and could absorb traffic increases better than the other review areas.

### **SOUTH OF WILSONVILLE REVIEW AREA: COMMENT SUMMARY**

About 92 percent of respondents strongly disagreed or somewhat disagreed that the rural reserve designation should be removed from the review area south of Wilsonville. Less than 3 percent of respondents either somewhat agreed or strongly agreed with the proposal.

The reasons respondents provided for these opinions specific to the review area south of Wilsonville are reflected below. Verbatim comments are in *Appendix B*.

#### ***Comments about Designation Suitability***

- The area has rural characteristics including high quality soils suitable for farming, natural scenic areas and a quiet, rural lifestyle.
- Small amounts of limited development could lead to more development in the future.
- Development should not be allowed south of the Boone Bridge; developing the review area could lead to further development into the Willamette Valley toward Marion County and Salem.
- Too much development has occurred in the area already.
- The Villebois area should be developed before the rural designation is removed.

- The review area is a logical place for future development because it has already been disturbed and has good access to transportation facilities like I-5, the Aurora Airport and railroads.

#### ***Comments about Project Need***

- There are 8,000 acres of developable land available.
- Clackamas County needs to reach a resolution with local governments on how the Stafford area may be used before changing the designation south of Wilsonville.
- Current expansion into the Coffee Creek, Frog Pond and Basalt Creek areas should satisfy long term needs for employment lands.
- There is a higher need for development on the east side of Clackamas County.

#### ***Comments about Decision Process***

- Changing the designation would set a precedent that designations can be easily changed in the future.
- The review process is biased because some Clackamas County Commissioners have accepted campaign contributions from land-owners in the review area.
- The review process should not move forward because the City of Wilsonville and Metro do not agree with it.
- The review process is long, complicated, costly and should be simplified.
- A development plan should be proposed for review before deciding whether to remove the rural reserve designation.

#### ***Comments about Cultural Resources***

- Historical resources should be protected in the area; a century farm was replaced with a golf course.
- French Prairie could be an historic tourism area.

#### ***Comments about Economics***

- Wilsonville is generating a significant number of jobs; employment lands are needed more on the east side of Clackamas County.
- Developing the review area is more likely to employ residents of Marion County than Clackamas County.

#### ***Comments about Natural Resources***

- Removing the rural reserve designation would have a negative ecological effect, increasing air pollution, water pollution and loss of wildlife habitat.
- Development would have a negative effect on children's health.
- The area has a high water table and is prone to flooding.

#### *Comments about Recreation*

- Development would negatively affect golf courses.

#### *Comments about Public Services and Infrastructure*

- Public services and infrastructure in the area is inadequate to support development or industrial activities, including the need for public schools, emergency services and access to water and sewer services.
- Wilsonville and Aurora would be strained to provide services to the area; the Boone Bridge cannot carry additional service lines.
- Developers should pay for any infrastructure improvements required.

#### *Comments about Transportation*

- There is significant congestion along I-5 through Wilsonville and south of the Boone Bridge; I-5 congestion affects traffic in town as cars wait to enter the freeway.
- Boone Bridge is a major congestion point that needs improvements now and would need to be further improved if any additional development occurred.
- Transportation investments would be needed on Ehlen Road, Donald Road, Miley Road and Arndt Road to accommodate increased traffic.
- Increases in large trucks would worsen traffic on I-5, Highway 551 and other access roads in the area.
- Transit options should be extended into the area if it is developed.
- Development would prompt expansion of the Aurora Airport, which some residents do not support.