

Written Objections to the Staff Report Re: Area 9B

Without any equivocation a substantial portion of Area 9B should have been given an “urban reserve” designation. This area meets all of the “urban reserve” designation factors and is “conflicted” farmland. The staff report concludes that Multnomah County could designate the area “rural” using the factors for significant landscape features. To some degree this argument is true...there is a significant portion of 9B that in fact does meet the landscape factors and justifies “rural” designation. The issue is the staff’s resistance to examine the area in any amount of detail. Throughout this process the area commonly referred to as the “L” has received special attention and deserves to be considered separately from the remainder of 9B.

Perhaps the most revealing method of determining whether the factors, either the rural or the urban, were correctly applied is to simply view the either region’s reserves map. Please notice the unusual “funnel” shaped indentation in the boundary in the vicinity of the Tualatin Hills that precisely follows the City of Portland’s boundary on the east and the Multnomah/Washington County boundary on the west. Please also notice that urbanization currently exists along most of the Multnomah/Washington County boundary. None of the factors refers to existing political boundaries for delineation of urban or rural areas. Is it possible that in the process of applying the planning factors that the result would be a line precisely in alignment with these two jurisdictional boundaries? This quick examination clearly demonstrates that a decision reflecting the political sentiments of the City of Portland and Multnomah County became the driving force for designation not the factors in the law.

Area 9B contains about 500 acres of land that could easily be served with urban services coming from Washington County yet in the record none of this service information was provided until the very end of the process. The City of Portland was the only jurisdiction that weighed in on the service provision issue and determined the area hard to serve because it drained west into Washington County. The City has service agreements with Washington County to serve large urban areas inside the City on the west slopes of the Tualatin Hills. None of these current service agreements were provide as an example of the most logical method of providing urban services to the “L”. This endeavor is about a very long term boundary. The City of Portland has annexed and developed urban places on the west slopes of the west hills in recent years. Future administrations might find it fruitful in the future to do more of the same. This process needs to reflect the long term sensibility of good regional planning.

All of Area 9B is designated as “conflicted” by the Oregon Department of Agriculture. Not all of Area 9B is suitable for urbanization and does meet the landscape features making it suitable for a “rural” designation. The “L” portion of Area 9B is distinctly different from the remainder of 9B and meets all of the “urban” factors and few of the landscape feature factors. The “L” is nearly in the center of a thriving urban area near the Bethany Town Center, the PCC Rock Creek Campus, and the growing employment centers in Washington County. The fact that it borders the 2002 North Bethany UGB

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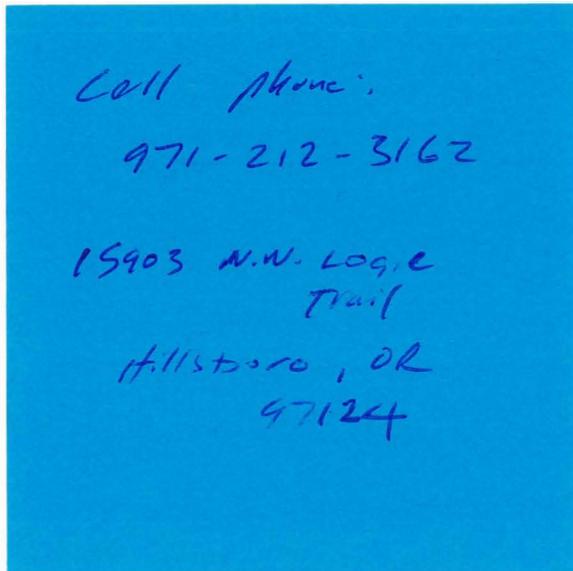
addition, which has an Adopted Concept Plan approved by Washington County, was omitted from the record during the process.

In summation, the "L" portion of Area 9B is significant in size and has strong potential for addition to the "urban" reserves and was incorrectly designated "rural". The adopted lines in the area clearly represent a "political" choice rather than a professional application of the factors used for delineation contained in the law. I respectfully request the LCDC remand the Area 9B back to the region for further consideration.

Sincerely,
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