

7/10/10

DEPT OF

JUL 12 2010

TO: Department of Land Conservation and Development
CC: Metro, Clackamas Cty, Multnomah Cty, Washington Cty
FROM: Susan McKenna, 22800 S. Ferguson Rd, Beavercreek, OR 970

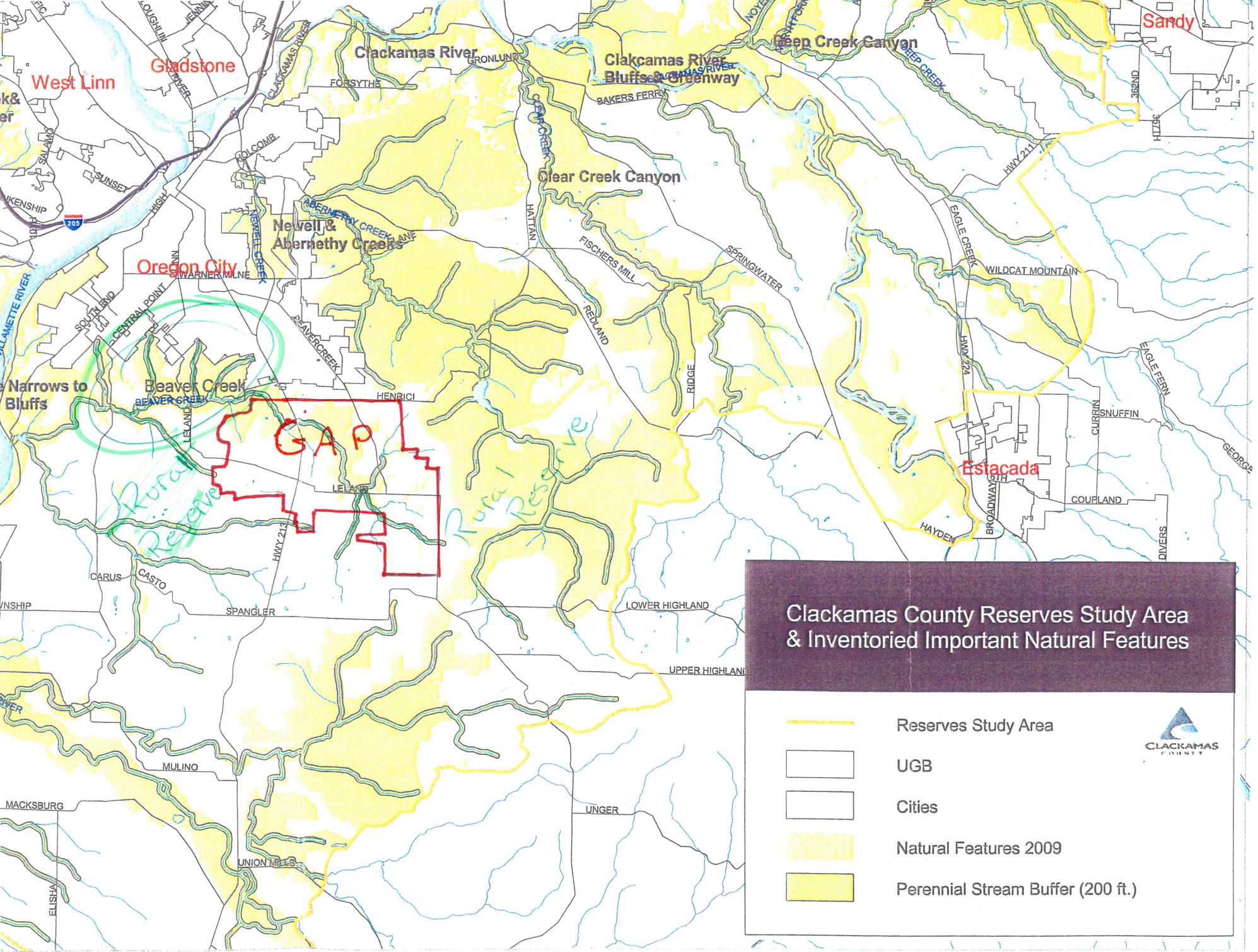
RE: Notice of Adoption of Urban and Rural Reserves

Between 6/23/09 and 7/21/10, I testified before the Policy Advisory Committee, the Planning Commission, and the Board of County Commissioners of Clackamas County in regard to designation of rural reserves in the county.

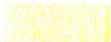
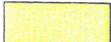
The problem, as I see it, with the final designation of rural reserves in Clackamas County is what one County Commissioner dubbed, "the Beavercreek Gap." This "Gap" consists of a large area of undesignated land south of Oregon City which separates two large bands of land designated as rural reserves. The attached map is roughly to scale. Further, Beaver Creek, an "Inventoried Important Natural Feature" is split by the final rural reserves designation so that portions at each end of Beaver Creek lie in land designated as rural reserves, while a large portion lies in the undesignated Gap. Certainly rule, law, and common sense make that unwise for resource management. In short, the Gap violates the letter and the intent of OAR 660-027-060-0040, "Factors for Designation of Lands as Rural Reserves, section 3. Details regarding the compelling reasons under OAR 660-027-060-0040 for the Gap to be designated rural reserve are attached.

The solution is simple: Close the Gap: designate it as rural reserve.

Respectfully and Sincerely,
Susan McKenna



Clackamas County Reserves Study Area & Inventoried Important Natural Features

-  Reserves Study Area
-  UGB
-  Cities
-  Natural Features 2009
-  Perennial Stream Buffer (200 ft.)



September 8, 2009

TO: Clackamas County Board of County Commissioners

FROM: Susan Mckenna, Member of the Reserves Committee of the Hamlet of Beaver Creek

RE: Application of Factors for Designation of Rural Reserves Under OAR 660-027-060-0040 in Area F

There are compelling reasons under the law to include Area F as designated Rural Reserves. Under the law, in section 3 of "Factors for Designation of Lands as Rural Reserves, the area of Beaver Creek in question meets the criteria as detailed on the following page.

(3) Area F includes Beaver Creek and a portion of Abernethy Creek, both of which are identified in Metro's 2008 "Natural Landscape Features Inventory," a document which certainly constitutes "other pertinent information" which, under the law, ". . . a county must consider. . .," "for designation, ". . . as rural reserves to protect important natural landscape features. . ."

a) Area F is unquestionably, ". . . otherwise potentially subject to urbanization. . .," lying within 3 miles of the current urban growth boundary, and having been considered for inclusion in Metro's Urban Growth Boundary in both 1996 and 2002, as well as having, this year, been opened to consideration for urban reserves.

b) Metro's "Draft Urban Study Area Analysis—Map B" (also attached) shows the extent to which the drainage of Beaver Creek causes land within the area to be "constrained" rather than "buildable." The Commissioners will no doubt remember the extensive repairs required on a section of Henrici Road within the area in question following the December 2008 flooding of Abernethy Creek

c) The Oregon Department of Fish and Wildlife has identified Beaver Creek to be important habitat.

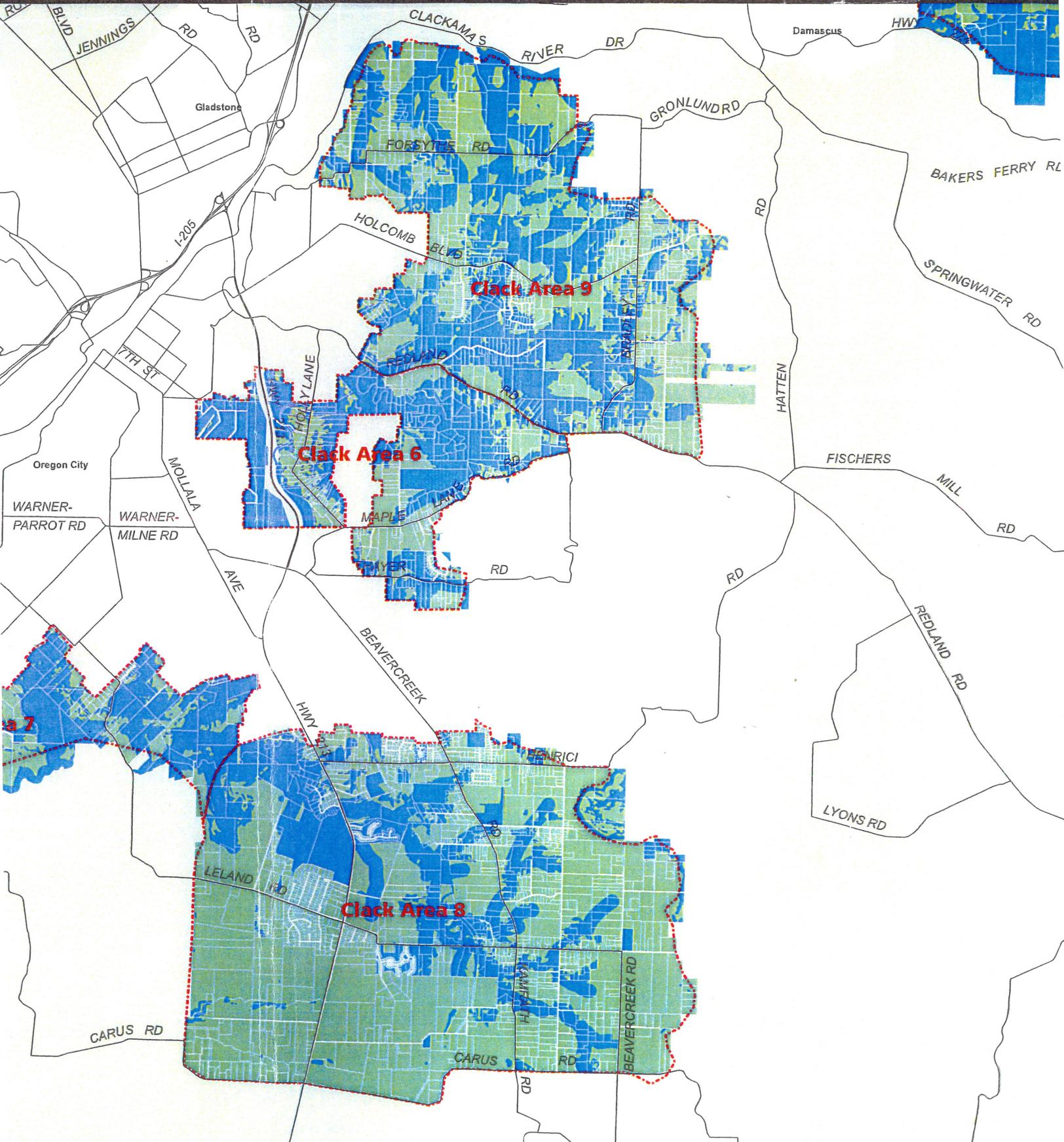
d) Protecting the entire Beaver Creek drainage and adjacent land as rural reserves will certainly serve, ". . . to protect water quality (and) quantity. . ." in the area under consideration.

e) Beaver Creek has obviously provided a sense of place for the region under question, having given its name to the Rural Center in the area as well as to the Hamlet of Beaver Creek.

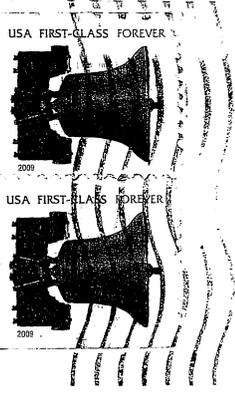
f) In its analysis of this area under the designation of U8, Clackamas County staff noted, "Area flows directly into adjacent agricultural and forestry areas without natural buffers to prevent encroachments." Stabilization of zoning in this area under rural reserve designation would prevent encroachments (sprawl) that would threaten the important farmland and forestry uses immediately south of this area. As a rural reserve, this area, "Can serve as a boundary or buffer . . . to reduce conflicts between urban and rural uses, (and) between urban and natural resources uses." OAR 660-027-0440 specifies this buffering function as a reason for designation of rural reserves.

Urban and Rural Reserves

DRAFT Urban Study Area Analysis - Map B



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