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July 6, 2020

Jon Blaser, Director
Metro Parks and Nature
600 NE Grand Avenue
Portland, OR 97232

Jon,

I was contacted by a Washington County concerned citizen, Shelia Christensen, about a proposed water pipe crossing through Hillsboro's Orenco Woods Nature Park which was acquired with Metro parks and nature funding. She is correctly concerned about impacts to fish and wildlife habitat in the park and with policies that affect decisions regarding the alignment. My understanding is that when Metro entered into an agreement with Hillsboro during planning for the park that conditional to development the water facility was part of the agreement. I also understand that this is a significant departure from Metro's official policy that requires rigorous alternatives analysis predicated on the presumption that other alternatives exist, without cost considerations. This is a critical policy given the proclivity of public works projects routinely seeking publicly owned land through which to construct their projects. We have observed this approach to reduce the cost of projects by choosing alternative that inappropriately utilize public lands. We strongly support Metro's policy that addresses this long standing problem. We hope Metro's alternative analysis policy will continue to drive alternative analyses for any properties owned by Metro or jointly owned and operated with a local park provider.

All of that said, it would appear that this specific case is an "outlier" from Metro's established policy and that the best course of action at this juncture is for Metro to hold the line with regard to requiring compensatory mitigation for impacts. As always, our preference is on-site, in-kind mitigation and the ratio should reflect the significance of the resources impacted by the construction. We feel strongly that a greater than 1:1 mitigation is warranted in this case. There may be other forms of mitigation outside habitat impacts regarding public access as well that should be considered as part of the final mitigation package.

Respectfully,

Mike Houck,
The Urban Naturalist

cc Juan Carlos Gonzalez, Metro Council
Dan Moeller, Jonathan Soll, Parks and Nature
Bob Sallinger, Micah Meskel, Audubon Society of Portland
Ted Labbe, Executive Director, UGI