



April 26, 2023

King City Planning Commission
City of King City
15300 SW 116th Ave
King City, OR 97224

CC: Mike Weston
King City Manager
City of King City
15300 SW 116th Ave
King City, OR 97224

Submitted via email

Re: King City Planning Commission Public Comment on Kingston Terrace Transportation System Plan and Master Plan

Tualatin Riverkeepers (TRK)¹ is a community-based organization that protects and restores the Tualatin River watershed. We build watershed stewardship through engagement, advocacy, restoration, access, and education. 1000 Friends of Oregon² is a non-profit organization that works with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural areas. Friends of the Tualatin River National Wildlife Refuge³ promotes the conservation and welfare of the Tualatin River National Wildlife Refuge Complex and advocates for the Refuge at local, state, and national levels.

¹ <http://www.tualatinriverkeepers.org>

² <https://friends.org>

³ <https://www.friendsoftualatinrefuge.org>

We comment to summarize our concerns with the proposed road alternative (i.e., Fischer Road extension) stated within King City's Transportation System Plan (TSP) and Master Plan:

- The Fischer Road extension would bisect a conservation easement located on the Bankston Property. When Metro approved expansion of King City, they included a condition that the City shall work with Columbia Land Trust to protect the conservation easement "to the maximum extent possible."⁴ The proposed collector corridor goes directly against this condition.
- There are five severely-degraded streams in the area. Their continuous erosion is a result of unmitigated stormwater runoff from poorly-planned development in the surrounding area. While King City is working in partnership with Clean Water Services on addressing the regional stormwater issue, this approval process comes before adoption of the Regional Stormwater Strategy. Addressing the existing stormwater issue should come before finalizing major development decisions that could exacerbate an already serious problem.
- The proposed collector road would cross several of these streams in their most vulnerable locations, thereby creating a road crossing where the land would be carving away beneath it. This poses not only a serious safety concern, but also harms downstream habitat and aquatic life within the Tualatin River. Furthermore, there is additional scrutiny for permit applications that impact an "impaired" waterbody. The Tualatin River suffers from low Dissolved Oxygen (DO) levels and high water temperatures. Increased sedimentation and erosion negatively impact DO and water temperature.
- The City should start consultation with the U.S. Army Corps of Engineers and Department of State Lands in preparation for their required dredge and fill permit. In reviewing the permit application, the U.S. Army Corps of Engineers will conduct a full evaluation of impacts, including cumulative impacts, to determine whether the project is within the public interest.⁵ If the agencies find that the project does not meet their standards and requirements, the City may have to readjust its proposed road alternative outside of what is stated within the TSP. If so, the City will need to start the amendment process all over again, putting the City even further behind schedule.
- The proposed Fischer Road extension fragments wildlife corridors and habitat in the area. Wildlife naturally follows streams and undisturbed habitat. There are several natural and conservation areas on either side of the Tualatin River and within the project area, including the Tualatin River National Wildlife Refuge, Metro's Beef Bend Natural Area, Metro's Heritage Pine Natural Area, and the Bankston conservation easement.

In conclusion, the City has proposed other collector road alternatives that would meet the needs of the growing city and help mitigate the several concerns we have raised above. We encourage

⁴ Metro Ordinance 18-1427.

⁵ 33 C.F.R. § 320.4(a)(1).

the City to further consider these alternatives that are supported by technical advisory committee members, stakeholder advisory committee members, and community members. Together, we can build resilient communities that coexist with the natural resources that surround them. Thank you for your time and consideration. Please feel free to contact us if you have any questions regarding these comments.

Sincerely,

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