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Submitted via email

Re: Public Comments on Kingston Terrace Transportation Plan and Master Plan

Tualatin Riverkeepers (TRK) is a community-based organization that protects and restores the Tualatin River watershed. We build watershed stewardship through engagement, advocacy, restoration, access, and education. We have lingering concerns about the City’s proposed Transportation System Plan, specifically how their preferred alternative will contribute to an already serious erosion problem in the area.

I. There are lingering questions regarding the King City’s evaluation.

The incorporation of a northern and southern Alternative 3 route is not clear as to whether they are to function as a singular or separate alternatives. Both routes received their own evaluation, but may need a single evaluation that culminates the assessment done for each branch. This would provide a single evaluation should King City decide to adopt both routes as a single alternative. This issue was raised in the technical advisory committee meeting, to which the City acknowledged that Alternative 3 could be limited to either the northern or southern route.¹

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However, this option is not clearly articulated in the Circulation Study. This is an important distinction because each branch of Alternative 3 has different impacts to natural resources in the area. Furthermore, the northern route of Alternative 3 would not cross the Bankston easement, whereas the southern route would.²

As part of the Master Plan, the City wants to incorporate an interconnected system of trails and parks that provide access to the Tualatin River. While TRK is in full support of river access, the City states that certain road alternatives are more appropriate for river access and park connectivity than others.³ We disagree. The City could move forward with park and trail access without the addition of a paved east-west connection. TRK does not want the City to close the door on additional trails and parks in the event their preferred alternative is not selected for incorporation into the TSP. King City Community Park could provide ample parking and boat access, and the City now has the capacity to do so with the funding for the Westside Trail.⁴ Any additional parks King City wished to develop could be connected through a series of trails and other public access points through existing roadways.⁵ In summary, TRK does not want trail and park access to be a contributing factor in the alternative selection when these needs can be met without the addition of an east-west connector.

II. The preferred Alternative 2 has detrimental impacts to an already serious stormwater issue.

There are significant erosion sites scattered throughout King City, particularly within the streams that feed into the Tualatin River. Development uphill has further exacerbated the issue, causing these sites to grow exponentially over a short period of time (Examples of these sites are provided in Figures 1 and 2). As King City grows and develops, the issue will only worsen. Stream crossings should be avoided at all costs. Not only do they threaten aquatic and wildlife habitat, but it would cost the City a lot of money to maintain these crossings as the stream banks cut away beneath them. Furthermore, addressing these legacy sites prior to any development would alleviate costs to the City in the long term. This should be a priority that is incorporated into the Master Plan. TRK conducted a field visit for the City and Council at the beginning stages of the Master Plan and would be happy to coordinate another one for anyone who has yet to see these legacy sites in person and would wish to do so.

² For more information as to how the southern branch of Alternative 3 would impact the Bankston easement, see [Columbia Land Trust's second letter](#).

³ DRAFT: East-West Circulation Alternatives Analysis, at 45.

⁴ [Metro's Westside Trail Grant](#).

⁵ For example, should King City choose to develop another park on the western most part of the Kingston Terrace area, both SW Elsner and SW Roy Rogers could connect to the park.



Figure 1: Otto Creek has increased in length, depth, and width over the span of a decade due to uncontrolled stormwater runoff.



Figure 2: Erosion between King City Community Park and the Tualatin River resulted in vertical banks between a wetland in the park and the Tualatin River. The headcutting to the north is threatening to drain the wetland complex.

Additionally, the City notes that Alternative 2 could be adjusted to account for environmental impacts, but does not elaborate as to what these adjustments would include.⁶ While TRK understands that these adjustments will not be known until on-the-ground work is conducted, this emphasizes the need to begin collaborating with the relevant federal and state agencies now. U.S. Army Corps of Engineers CWA 404 and Department of State Lands dredge and fill permit would be required prior to any road construction. Any anticipated permitting hurdles should be considered throughout this process.⁷ These permits play a vital role in determining what King City can accomplish within Kingston Terrace.

Lastly, the Circulation Study eludes that “[s]tormwater retention could be a future requirement depending on the outcome of CWS’ pending MS4 Stormwater permit.”⁸ It would be in the City’s best interest to just assume stormwater retention would be required due to the erosion problem already mentioned. King City is looking to avoid the costs of pump stations, which would be required by the No Direct Connection Alternative and Alternative 4.⁹ However, pump stations may be a requirement due to the significant runoff from northern development. Gravity-fed sewers could be overrun from runoff and require maintenance that would be even more costly than originally planned. King City should avoid leaning towards the more southern alternatives due to stormwater costs as the assumption that it would cost more is not necessarily true and has yet to be determined by Clean Water Services.

III. Conclusion

In summary, TRK’s original concerns have not been properly addressed through this process. TRK understands that King City has not made a final decision, but we ask that the City keep these issues in mind as they move forward with the decision process. We appreciate all of the work the City has put into this study, but we ask that the health and resiliency of the Tualatin River and its tributaries take the forefront in the Master Plan. Therefore, TRK asks the City to consider alternatives that avoid stream crossings and bisecting natural habitat.

Sincerely,

⁶ This was mentioned at the community engagement meeting that took place October 11, 2022 at Deer Creek Elementary School, and should be included in the community engagement summary when posted on the King City Master Plan website.

⁷ TRK has discussed this specific issue in a [previous comment letter](#).

⁸ DRAFT: East-West Circulation Alternatives Analysis, at 45.

⁹ *Id.* at 47.

A handwritten signature in black ink, appearing to read "Victoria Frankeny". The signature is fluid and cursive, with the first name "Victoria" written in a larger, more prominent script than the last name "Frankeny".

Victoria Frankeny [she/her]
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