

February 7, 2023

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Submitted via email

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

The Friends of the Tualatin River National Wildlife Refuge Complex (Friends of the Refuge) promotes conservation and welfare of the refuge for all dependent species. We are a community-based organization committed to protecting and restoring the Tualatin River watershed, including maintaining the water quality of the Tualatin River. Having attended two years of meetings representing Friends of the Refuge as part of the Kingston Terrace Master Plans Strategic Advisory Committee, it is clear that the use of Alternative 2, the current preferred alternative, would directly affect the refuge by exacerbating an already serious erosion problem. It is our recommendation that the City only consider the Northern Routes.

The use of Alternative 2 is ill conceived based on input you have already received from Columbia Land Trust, The Tualatin Riverkeepers and others. They all note, and I concur with the following:

“There are significant erosion sites scattered throughout King City, particularly within the five major stream drainages that feed into the Tualatin River. Previous development uphill has further exacerbated the issue, causing these sites to grow exponentially over a short period of time. If King City grows without consideration of environmental impact, the issue will only worsen.”

We concur with other commenters that the five stream crossings should be avoided at all costs to

avoid degrading aquatic and wildlife habitat. It should be noted that the river is home to numerous aquatic species including mussels, lamprey, and salmonids. Maintaining these crossings would be prohibitively expensive as the stream banks cut away beneath them, and environmental fines would follow. The City needs to devote as much consideration to environmental planning as it does to utilities and developer interests.

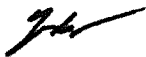
Any anticipated permitting hurdles should be considered. These permits play a vital role in determining what King City can accomplish within Kingston Terrace. I am astounded that you have adopted a preferred alternative without consulting and collaborating with the relevant Federal and State agencies. A 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.

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 Friends of the Refuge are in full support of river access, the City states that certain road alternatives are more appropriate for river access and park connectivity than others. We do not believe this is true. The City could easily move forward with park and trail access without the addition of a paved east-west connection. 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. Any additional parks King City wishes to develop could be connected through a series of trails and other public access points through existing roadways. We do 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.

The more northerly routes will provide better protection for the abundant wildlife that inhabits your side of the river and crosses to the refuge. Choose one of them unless the goal, as mentioned in the last Strategic Advisory Committee meeting, is to develop all five east-west routes, an eventuality that would be destined to result in environmental catastrophe.

In summary, it seems that many concerns have not been properly addressed through the current process. We ask that the health and resiliency of the Tualatin River and its tributaries take the forefront in the Master Plan. Therefore, Friends of the Refuge asks the City to consider alternatives that avoid stream crossings and bisecting natural habitat.

Sincerely,



Thomas Stibolt
Board Member
Friends of the Tualatin River National Wildlife Refuge Complex