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November 21, 2010

Memo to: Chair Lynn Peterson, Commissioner Bob Austin, Commissioner Jim Bernard,
Commissioner Charlotte Lehan and Commissioner Ann Lininger

From: North Clackamas Urban Watersheds Council (NCUWC)

Re: Sunnybrook Boulevard West 15% Design Update

NCUWC members recognize that considerable efforts have been directed toward reducing the footprint of the proposed Sunnybrook Extension. Nevertheless, destruction of 86 trees, including 20 Oregon White Oaks and 22 Western Red Cedars, represents significant loss of tree canopy in the Kellogg-Mt. Scott Creeks Watershed. NCUWC continues to support the no build option for the following reasons:

First, according to the watershed action plan for the Kellogg-Mt. Scott Creeks Watershed prepared by Clackamas County Water Environment Services, loss of upland tree canopy (24% to 13% remaining) and increasing amounts of impervious surfaces (approximately 46%) are two of five key stresses on watershed health specific to this area. Please note the 46 ft. paved width shown in your proposal. It doesn't include the sidewalk. Most sidewalks are paved. The paved sidewalk alone would generate approximately 300,000 gallons of runoff per year. All that runoff ends up in Mt. Scott Creek. A two-lane 'round about' has a larger impervious footprint than a one-lane 'round about'.

NCUWC requests a detailed explanation of how removing 86 trees (loss of canopy) for the Sunnybrook Extension and increasing the impervious surfaces (loss of ground water recharge) supports the county Watershed Action Plan for the Kellogg-Mt. Scott Creeks Basin and relieves these two key stresses on watershed health.

Second, the Oregon Watershed Enhancement Board lists Oak Woodland as a priority ecological system, White-breasted Nuthatch as a priority species, and oak/snowberry/fern as rare or at-risk plant communities. The Sunnybrook Extension degrades and further reduces all three.

The Clackamas County Sustainability Action Plan is based on Natural Step principles, one of which is to avoid environmental degradation. The Sustainability Action Plan, particularly Goal 4: Identify, protect, and restore lands, water and air in Clackamas, Action 4.1, Assess and prioritize protection, restoration and stewardship of public and private lands, including surface and groundwater, and Action 4.2, Restore, preserve and enhance riparian areas and other sensitive habitat areas, are relevant here, and represent what the Board has already agreed to do.

NCUWC requests a clearer explanation of how environmental degradation for the purpose of extending Sunnybrook is congruent with the county's Sustainability Action Plan.

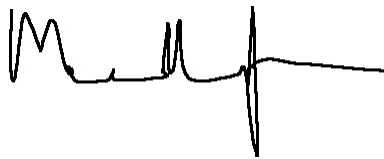
Third, reasons for extending the road through high value habitat remain unclear and continue to change. Descriptions to date include 1) East/West connector, 2) North/South connector, 3) driveway access to the Harmony Campus, 4) quiet country road, and 5) relief of intersections on 82nd avenue. Shifting reasons lack clarity of purpose and appear to be disconnected from the county's own Watershed and Sustainability Action Plans.

NCUWC requests that Clackamas County more clearly articulate the necessity for the Sunnybrook Extension and confirm that designs and design alternatives are congruent with the county's own Watershed and Sustainability Action Plans.

Respectfully,



Eric Shawn
Co-Chair



Marshall Johnson
Co-Chair