

December 17, 2009

Clackamas County Commission 2051 Kaen Road Oregon City, OR 97045 bcc@co.clackamas.or.us

Re: Protection and Enhancement of the Three Creeks Natural Area

Dear Clackamas County Commissioners,

Oregon Wild submits these comments on the proposed Harmony Community Campus Plan and the proposed extension of Sunnybrook Boulevard. Oregon Wild is a non-profit conservation organization dedicated to protecting and restoring Oregon's wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded.

It is our understanding that Clackamas County is considering a proposal to extend Sunnybrook Boulevard through and adjacent to the oak woodlands of the Three Creeks Natural Area. The road extension would be between the Natural Area and the Clackamas Community College Harmony Campus. It is also our understanding that the Sunnybrook extension is on the Regional Transportation Plan project list that is currently under review.

Oregon Wild is opposed to the Sunnybrook extension because it would cause adverse impacts to the oak woodland ecosystem in the Three Creeks Natural Area. Oregon white oak ecosystems are exceedingly rare, less than 3% of this habitat remains in the Willamette Valley. Only portions of this remaining habitat are in public ownership where long term protection can be assured. The rarity and ecological importance of oak ecosystems underscores the need for public agencies to extend the strongest level of protection to oak ecosystems within their jurisdiction.

Adverse impacts to the oak woodlands at Three Creeks are highly likely if Sunnybrook Boulevard is extended. It is our understanding that over two thousand individual trees and shrubs would be removed to accommodate a new road. The age of individual trees is largely irrelevant to the role each tree plays in the oak ecosystem. Thus, even if the largest trees would be avoided and other impacts would be minimized, an arterial road adjacent to the oak woodland would still

degrade the function of the oak ecosystem. Simply put, extending Sunnybrook Boulevard is incompatible with protecting and enhancing the oak ecosystem at Three Creeks.

Protecting and enhancing the Three Creeks Natural Area would provide the additional benefit of providing an urban community access to a remnant of our natural heritage. Constructing a road between the Harmony Community Campus and the Three Creeks Natural Area would impede access and reduce the educational, recreational, and historic value of the resource to the local community.

The 2004—2007 Statewide Comprehensive Outdoor Recreation Plan (SCORP) concluded that nature/wildlife viewing is the fasted growing outdoor recreational use. The region including Clackamas County saw a 380% increase in nature/wildlife viewing. The SCORP also concluded that residents are searching for outdoor recreation opportunities closer to home. The Three Creeks Natural Area provides outstanding nature/wildlife viewing opportunities close to dense residential communities. Thus, based on the SCORP the Three Creeks Natural Area satisfies the fastest growing demands of a rapidly growing population. The construction of any extension of Sunnybrook Boulevard would degrade this recreational opportunity for local citizens.

For these reasons, Oregon Wild opposes any proposals to construct the Sunnybrook extension. Clackamas County should remove the Sunnybrook extension from the Harmony Community Campus Plan and the Regional Transportation Plan project list. Clackamas County should instead initiate a process for designating the Three Creeks Natural Area for the highest level of protection.

Thanks for your consideration,

## Wendell Wood

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