

I am commenting primarily on the recreation section (3.9) of the DEIS.

In section 3.9.2 the narrative uses the term 'informally established trails' to define what I would call 'high value wildland trails'. The section notes that 'No Trespassing' signs are in place at several of the trail entrances to the site. It is commonly known that these wildland trails have been widely used by pedestrians, horseback riders, and mountain bike riders for decades. Nowhere in section 3.9 is the potential prescriptive right of the public to continue to use these trails mentioned.

Figure 3-34 maps trails on the site and leaves out at least a mile of existing trails. Further, it classifies the trails on site as 'minor trails' and reclassifies them as 'secondary trails' (a higher classification) as soon as they cross the line onto public property. To be fair, other sections of 3.9 clearly describe the value placed on these trails by users, but I found this general type of inconsistency throughout the DEIS - that is, contradictory descriptions and conclusions pertaining to the same areas of study. I am confused, because I supposed the DEIS to be a objective and science based document.

Section 3.9.2.3 Existing Level of Service Section mentions in one sentence that users appreciate the site as it exists but nowhere in 3.9 or elsewhere in the DEIS is the actual recreational use by any of the human user groups quantified in any way. No pedestrian trail user counts. No survey of equestrians. No documentation of the existence of an extensive mountain bike skills park. This is a major gap in the data base that cannot be fairly be surveyed in the Winter months between now and March when the EIS is supposed to be finalized.

This same section describes the required LOS's for acreage by the PRO Plan in relation to the population of South Neighborhood. My calculations yield a result of 71 acres of parks and open space that will have to be provided for a built out project. If we assume that South neighborhood will eventually accommodate an equivalent population to a built out Fairhaven Highlands, albeit in more appropriate locations, it seems absurd to eliminate 88 acres of existing open space that is already widely used by people from many neighborhoods in the city.

Section 3.9.2.2 lists goals of the 1995 Open Space, Parks and Recreation Plan and the South Neighborhood Plan. They include (to paraphrase) insuring an open space system which insures quality of life for residents that is visually attractive, environmentally sound and provides an interconnected system of trails, parks, scenic views....and that this should be done "wherever practical and environmentally desirable". None of the development alternatives proposed can accommodate these goals. The South Plan calls for the "marsh areas along the interurban trail right-of-way to be retained in its natural condition. Development Alternatives 1-C and 3-D violate the south Plan by calling for a 24<sup>th</sup> Street connector road that will encroach on the marshes.

Section 3.9.5, the concluding section of the recreation portion of the DEIS, begins with this sentence: "No significant unavoidable adverse impacts on recreation resources are expected result from any of the proposed alternatives. The next 6 sentences go on to describe very significant recreational impacts. This description of adverse impacts is

followed by this final sentence: “The significance of that impact must also be weighed in light of comprehensive planning that has long anticipated development of this property and that is itself aimed at preserving rural open space and resource lands by encouraging growth to occur within the urban growth area.” Setting aside the fact that the opinions in that statement are highly debatable, why must the supposed objective and science based impacts described be weighed against this opinion and assertion? I would note that this opinion which asserts that if Fairhaven Highlands is not developed, other forest and agricultural lands will be lost, is repeated many times in the DEIS document as well as in the public statements of the various interest groups who are proponents of the project. This, for me, greatly detracts from the credibility of the entire document.