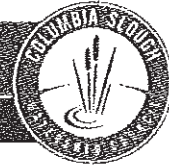


## COLUMBIA SLOUGH WATERSHED COUNCIL

7040 NE 47TH AVE, PORTLAND OR 97218

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WWW.COLUMBIASLOUGH.ORG



27<sup>th</sup> of October, 2015

City of Portland  
Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Dear Members:

Thank you for the opportunity to comment on the Employment Zoning Project, an "early action" implementation of Portland's Comprehensive Plan. The Columbia Slough Watershed Council is a group of diverse stakeholders whose mission is to foster action to protect, enhance, restore, and revitalize the Slough and its watershed. As part of our mission, each year we provide hands-on science education to over 6,000 students, host over 2,300 citizens at cycling, paddling and outdoor festivals, and coordinate almost 200 restoration volunteers. The Columbia Corridor, currently the largest industrial area in Oregon and the economic lifeblood of our community, lies within the northern part of this watershed, in north and northeast Portland.

The City's Employment Zoning Project proposes a new prime industrial overlay on industrial lands in the Columbia Corridor. While we understand and support the need to sustain the use of industrial lands, we also support the need to protect the Slough's water quality and habitat. Both of these uses depend strongly on their locations. The industrial uses depend on the freight and transportation facilities in the Corridor. The natural area uses are also location-specific, such as the water itself, the banks and buffers, and the connected forests and wetlands.

### UPDATE E-ZONES IN THE COLUMBIA CORRIDOR

In this area of the city, environmental zoning first applied in the late 1980's needs updating. While Natural Resource Inventories (NRI) have been completed throughout most of the Corridor, the process to update environmental overlays has been repeatedly delayed.

1) The Airport Futures process completed an NRI and ESEE analysis for the Middle Slough, but the environmental overlay zones were not updated on the industrial zoned land outside of Port of Portland ownership. We recommend updating the environmental overlay zones in the remaining properties within the Airport Plan District consistent with the ESEE.

2) We urge you to start the environmental update process in the remaining western portion of the Columbia Corridor immediately.

Until the environmental overlays are updated, we recommend waiving the prime industrial overlay's prohibitions on natural areas on properties with NRI-ranked resources.

### ALLOW ALL ASPECTS OF LEVEE ACCREDITATION

FOSTERING ACTION TO PROTECT, ENHANCE, RESTORE AND REVITALIZE THE SLOUGH AND ITS WATERSHED

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The Council is participating with many stakeholders in the Oregon Solutions Levee Ready Columbia process to maintain accreditation for the levees in the Columbia Corridor. These levees are critical infrastructure for the region. There are many unknowns in this process, particularly around potential federal mitigation that may be required. It is important that the prime industrial overlay, which is meant to protect industrial lands, should not hinder the accreditation process. The proposed code language prohibition on certain types of mitigation could be a hindrance. Actions that allow accreditation of the levees should be exempt from the industrial overlay conditions.

### PRESERVE ALLOWED USE OF TRAILHEADS AND BOAT LAUNCHES

We are pleased that trails and boat launches are allowed in the prime industrial overlay. The Columbia Slough itself offers significant land and water trails for residents of all ages. It is important to note that the Columbia Slough is designated as a water trail in City Code. The Council supports that there is no acreage limit for trail and boat launches. Since trails are a linear feature, it is possible that their footprint might be larger than two acres on large lots, so it is important to retain flexibility for trails and boat launches.

### DO NOT PROHIBIT NATURAL AREAS IN THE PRIME INDUSTRIAL OVERLAY

We are also pleased that stormwater facilities are exempted from the overlay. Similar to freeways and railroads, a waterway like the slough connects natural areas of high value along its length. While simple in concept, the importance of the connectivity cannot be overstated. This connectivity drives many of the principal restoration activities in the watershed. Additionally, there are instances where land designated for industrial has little value for economic development but great value for natural uses. If natural areas are prohibited, then a permit cannot be obtained for restoration if there is not also an industrial use on that site. For these reasons the Watershed Council requests that natural areas intended for conservation, habitat protection and restoration, and stormwater management be allowed uses in the industrial overlay. In its letter dated 9/4/15, Metro clarified their rules saying that the prohibition of parks in Regionally Significant Industrial Areas does not apply to natural areas that are intended for conservation, habitat protection or stormwater functions.

In closing, the Watershed Council firmly believes that the Columbia Corridor can accommodate vibrant industrial activity while preserving and restoring the important natural resources of the Columbia Slough watershed.

Thank you for the opportunity to comment. We look forward to your consideration.

Sincerely,

  
Jane A. Van Dyke, Executive Director