

To: Members of the Planning and Sustainability Commission

From: Alice Blatt, 15231 NE Holladay, Portland, OR, 97230

Re: Employment Zoning Project

Brief summary of Columbia South Shore history: The Columbia River floodplain, before construction of the Marine Drive dike, has functioned for many thousands of years as a broadly-connected wildlife corridor from the Gorge to the Willamette confluence, an invaluable natural resource. In the 1970's/80's, establishment of the Industrial Sanctuary between NE 82<sup>nd</sup> and 185<sup>th</sup>, in response to the need for more industrial land, necessitated balancing environmental with industrial needs (the Natural Resources Management Plan. In 1990-91 several East Portland communities with other interested organizations, recognizing the inadequacy of the Ec slough and wetland protection, successfully appealed the NRMP to LUBA (up to the Oregon Supreme Court), achieving 1 ½ years of city organized stakeholder (industrial, residential, and environmental participants) meetings. These interchanges of ideas resulted in the Columbia Slough Plan District in 1993 (at least 50 ft. of Ep zones on both sides of the Slough and associated wetlands – a major environmental compromise from the 300 ft. of connected breadth recommended by the EPA, US and Oregon Fish and Wildlife, Audubon, etc.. Our objective, in accepting this balanced agreement, was to enhance (vegetate) and restore optimal environmental function in this relatively narrow corridor. The absolutely most important word in this whole process, from the standpoint of wildlife habitat, human environmental contact and recreation, water quality, etc., is connectivity.

As mentioned in my second, very brief, submission, we appreciated the improvements entered into the second draft.

Several serious concerns remain:

- 1) A Question of Mapping: The Prime Industrial Overlay on the Preliminary Employment Zoning Map shows no recognition of the 50 ft. Ep zones along the slough as open space, the absolutely crucial connecting link between the various recognized open space zones, some others of which have also not been included. In 1996-7, an overlooked mapping error at the Inverness Jail (114<sup>th</sup> and the Slough) forced us into an extended, costly appeal to a hearings officer to avoid creation of a bottleneck in our wildlife/human recreation trail corridor. At that time mapping errors took precedence over conflicting text (see Portland City Council minutes February 12, 1997, Item 201 and June 25, 1997, Item 997). We don't know whether this problem with the zoning code has been corrected.

Total connectivity, without any disconnection, is crucial to all environmental corridor function. The Overlay Zone must clearly indicate this.

- 2) Prohibition of Natural Areas: The prime industrial overlay is laid down indiscriminately over land, water, wetlands, and other natural resources, yet natural areas are prohibited. What

if a developer wanted to restore a parcel of land for natural area, because it was just too wet to develop?

Because the prime industrial overlay is applied without regard to natural resources, and because it prohibits natural area restoration, it is acting against what we have been achieving in the Slough - active development for jobs AND restoration of watershed health.

Although it is important to protect the industrial use from conversion to commercial or residential use, it is also important to restore the remaining natural resources along the Slough. We need a vibrant economy and a vibrant environment.

Do not prohibit natural areas in the prime industrial overlay.

- 3) Columbia Corridor Review: Delay the Employment Zoning Project until a comprehensive review of the whole Columbia Corridor has been completed.