



August 9, 2016

Kathryn Schultz
Chair
City of Portland
Planning & Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

RE: Central City 2035 Proposed Draft

Dear Chair Schultz:

On behalf of the membership of the Pacific Northwest Waterways Association (PNWA), thank you for the opportunity to comment on the Central City 2035 Proposed Draft plan. PNWA is a non-profit trade association based in Portland that advocates for federal policies and funding in support of regional economic development. We represent over 135 public and private sector member organizations in Oregon, Washington, and Idaho. Members include public ports, navigation, transportation, trade, tourism, agriculture, forest products, energy and local government interests. A full list of our membership is attached to this letter.

PNWA has specific concerns about the Central City 2035 Proposed Draft Plan base zone designation for the Willamette River as Open Space (OS). The Willamette River includes a federally authorized navigation channel which is maintained by the U.S. Army Corps of Engineers and protected by the U.S. Coast Guard. It is a critical transportation gateway for many industries located on Portland's working waterfront. The base zone overlay, in addition to the River General and River Environmental overlay zones placed on the river, has the potential to impact critical navigation related activities like dredging and the installation of passive in-water structures like pile dikes.

Several industrial facilities on the Willamette River depend on the federal navigation channel and the ability to add/remove pile dikes near associated berths. The *Standards for Pile Replacement* in code section 33.475.440.D puts unnecessary restrictions on the process for modifying the number of pilings and/or dolphins located near a facility. The regulations in the proposed draft will add time and cost for these businesses and add an unnecessary layer of complexity to this routine infrastructure maintenance.

Additionally, we are concerned about the adjustments to the dredging activities outlined in code section 33.475.040.E. We do appreciate that exemptions remain in place for dredging in the federal navigation channel and existing berths. That said, the proposed expansion of the zoning code to regulate dredging outside of the federal channel in water between 20 and 35 feet would add another layer of complexity to managing the river and is outside of the city's stated interest in regulating shallow water habitat up to -20'. PNWA supports the alternative suggestions laid out in the Port of Portland's comments which have been submitted on this matter. These include modifying the code to identify areas where additional uses are allowed in the OS Zone and selecting a more flexible base zone.

Thank you again for the opportunity to comment. Please do not hesitate to contact my office if we can provide further information or answer questions on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Kristin Meira". The signature is written in a cursive, flowing style.

Kristin Meira
Executive Director
Pacific Northwest Waterways Association

PNWA MEMBERSHIP ROSTER



Advanced American Construction
Almota Elevator Company
American Waterways Operators
Apollo Mechanical Contractors
Barney & Worth
Bell Buoy Crab Co.
Bellingham Cold Storage
BergerABAM Engineers, Inc.
Bergerson Construction, Inc.
BNSF Railway Company
BST Associates
Business Oregon Infrastructure
Finance Authority
Central Oregon Basalt Products
Central Washington Grain Growers
Clark Public Utilities
Clearwater Paper Corporation
Collins Engineers Inc.
Columbia Basin Development League
Columbia Grain
Columbia River Bar Pilots
Columbia River Crab Fisherman's
Association
Columbia River Pilots
Columbia River Port Engineers
Columbia River Steamship Operators
Association
Columbia River Towboat Association
Cooperative Agricultural Producers
Dawson & Associates
David Evans and Associates
Dunlap Towing
East Columbia Basin Irrigation District
Ecological Land Services
EGT, LLC
Foss Maritime Company
Foster Pepper
Franklin PUD
Gibbs & Olson, Inc.
Global Partners LP
Gordon Thomas Honeywell
Great Lakes Dredge & Dock
Hart Crowser, Inc.
Idaho Wheat Commission
ILWU Oregon Area District Council
ILWU Puget Sound District Council
Jessie's Ilwaco Fish Co.
J-U-B Engineers, Inc.
Kalama Export Company
Kiewit Infrastructure West Co.

KPFF Consulting Engineers
Lampson International, LLC
Landau Associates
Lewis-Clark Terminal Association
Louis Dreyfus Commodities
Marine Industrial Construction
McGregor Company
Millennium Bulk Terminals
Moffatt & Nichol
Morrow County Grain Growers
Morrow Pacific Project
Normandeau Associates, Inc.
Northwest Grain Growers, Inc.
Northwest Public Power Assoc.
OBEC Consulting Engineers
OR Public Ports Association
OR Wheat Growers League
Pacific Northwest Farmers Co-op
Pacific Northwest International
Trade Association
Parsons Brinckerhoff
PBS Engineering & Environmental
Plas Newydd
PND Engineers, Inc.
PNGC Power
Pomeroy Grain Growers
Port of Anacortes
Port of Astoria
Port of Bandon
Port of Bellingham
Port of Benton
Port of Camas-Washougal
Port of Cascade Locks
Port of Chelan County
Port of Chinook
Port of Clarkston
Port of Columbia County
Port of Coos Bay
Port of Everett
Port of Garibaldi
Port of Gold Beach
Port of Grays Harbor
Port of Hood River
Port of Ilwaco
Port of Kalama
Port of Klickitat
Port of Lewiston
Port of Longview
Port of Morrow

Port of Newport
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Port of Port Angeles
Port of Portland
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Port of Tacoma
Port of Toledo
Port of Umatilla
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Port of Vancouver
Port of Walla Walla
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PROCESS, Inc.
Puget Sound Pilots
RSEC Environmental & Engineering
Consulting, Inc.
Schwabe, Williamson & Wyatt
Scoular Company
SDS Tug & Barge
Shaver Transportation Company
Stoel Rives LLP
Summit Strategies
Teevin Bros.
TEMCO
Tidewater
United Grain Corporation
USA Dry Pea & Lentil Council, Inc.
Vancouver Energy
Van Ness Feldman
WA Association of Wheat Growers
WA Council on International Trade
WA Grain Commission
WA Public Ports Association
WA State Potato Commission
Westwood Shipping Lines
Whole Brain Creative
Willamette Falls Locks Working Group