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#331610 | April 9, 2022

Testimony to **Portland City Council** on the **Environmental Overlay Zone Map Correction Project, Recommended Draft**

Dear Mayor Wheeler and Commissioners, I am writing to alert you to serious mapping errors in the E-zone Map Correction Project relating to newly proposed wetland designations. The proposed maps indicated wetlands on three of my parcels and on the parcels immediately west and south of me. We requested wetlands delineations that have shown four of the five parcels in question are FREE from wetlands, and the the proposed wetland on the fifth parcel has been significantly reduced. This is a ONE HUNDRED PERCENT ERROR RATE in the maps that affected us that would have become law if we had not challenged them. In light of this, I asked city staff for specific numbers to be reviewed prior to the City Council vote on this project. Specifically, I asked how many properties are affected by these new wetland designations? Of those affected properties, how many have requested a wetland delineation? Of those delineations, how many have resulted in a modification of the the proposed wetland boundary? And finally, how many adjacent properties are affected because of their proximity to a wetland “designation”. Staff did not provide me with the requested numbers. Staff must be in possession of this information, but declined to provide it when I asked for it. Instead, they offered vague conclusory statements such as: “Often, the area that was covered by the wetland changed as a result of the wetland determination; either the total area increased or decreased, or there was a shift in the mapping of the wetland.” That is not what I asked for. I asked for specific numbers to help determine the accuracy of these proposed maps. It is easy to calculate an error rate using the numbers I have requested. Staff resists providing those numbers because it would undermine their assertion that the maps are correct. Staff did say that 2,411 properties received wetland notifications, out of which only 268 wetland delineations were performed. I ask you, the members of the City Council, to require staff provide the exact number of properties on which the proposed wetlands designation was either eliminated or reduced as the result of a field visit and wetland delineation. That will give you a good idea of the accuracy — or inaccuracy — of these maps. Keep in mind that even a low 10% error rate will saddle over 200 properties with devastating restrictions that will be nearly impossible to reverse. At this point, property owners can only rely on the City Council to represent them in this critical decision. Please apply this crucial due diligence to your deliberations. If you are unable to complete this analysis before the scheduled City Council meeting, then I urge you to reject the Ezone Map Correction proposal until proper due diligence can be performed and corrections can be made.

Testimony is presented without formatting.