

Dear PSC Members:

This letter is to register deep concern about **Proposed Change #297 to rezone the Broadmoor Golf Course**. This proposed rezoning would convert a section of the Golf Course from Open Space to General Industrial 2.

This zone change would pave the way to construction of new industrial facilities directly on and adjacent to two areas (the Buffalo Slough and the Broadmoor Golf Course) that the city has designated as Special Habitat Areas^[1].

In support, I reference the City's 2010 Draft Report on Inventory CS1: Buffalo Slough/ Peninsula Canal found here: <https://www.portlandoregon.gov/bps/article/248890> **This report states that the Buffalo Slough garners a CS14.A and B —Special Habitat Area designation** for two reasons: it provides a wildlife connectivity corridor (C) and unique habitat function . . . because it is an active groundwater upwelling area (U).

Similarly, the Broadmoor Golf Course received a CS28—Special Habitat Area designation—because it provides unique migratory stopover habitat (M) and is an area of vital habitat to at-risk bat species (S);

This area is rich in wildlife species, both migratory and resident. From the Port of Portland's Fish & Wildlife Species Observations of the Buffalo Slough 2001-2008:

- 82% or 727 acres of this area ranked HIGH for providing riparian and wildlife habitats.
- 76 resident bird species were observed.
- A wide range of animals make their home there, including river otters and rabbits, painted turtles, tree frogs, coyotes, deer and beaver.

I live on the Buffalo Slough and can report that this area is a recovering treasure within the City. I have watched river otters teach their pups to crack mussels at the water's edge. I've seen cormorants dive repeatedly for fish and bald eagles swoop in to snag ducklings. I have documented dozens of species of migratory and native birds in this area that are unseen in the rest of Portland.

I also know that the City understands this is a special area, because you've directed many resources toward helping the Middle Slough to recover from its 50 year history of industrial dumping, groundwater contamination and other polluting practices. You have extensively studied the Slough, you've produced lengthy reports on the critical importance of its wetland habitats, and you've invested hundreds of thousands of taxpayer dollars to re-vegetate and improve water quality on the Slough.

Given these investments, I'm utterly flummoxed by this proposed zoning change. I understand the need to maintain good neighbor policies toward existing industrial sites on the Slough, but I simply cannot fathom why the City would encourage new industrial development on these two designated special habitat areas.

The City's report states that the primary source of water flow in Buffalo Slough is groundwater from the south. There are no tributaries to the Buffalo Slough and it is an active groundwater upwelling area. The report states that: "More current contamination of the Buffalo Slough is the result of used motor oil spills, abandoned drums and other industrial uses. Types of pollutants found in the site included ethylbenzene, toluene, TPH, xylenes, metals, and cyanide sludge."

^[1] From: <https://www.portlandoregon.gov/bps/article/248890>. Special Habitat Areas (SHA) descriptions. SHAs contain unique features and provide critical wildlife habitat as describe in the Natural Resources Description section above. SHAs receive a high relative rank for wildlife habitat. The SHA ranking supersedes lower rankings generated by the GIS Model. Therefore, all Special Habitat Areas within the site rank high for wildlife habitat (CS1Map5).

Further, the report suggests that chemicals could have been washed into the Buffalo Slough years ago or may have been recently introduced into sediments from “legacy sources.” Legacy sources include upland sources that may become disturbed during construction activities.
So what do these dots connect?

Buffalo Slough is a Special Habitat Area. It is fed by groundwater upwelling and its primary sources of groundwater are directly upland from the south. Proposed Change #297 would encourage new industrial development on a steep slope directly south of and upland from the Buffalo Slough, an area that moreover features active groundwater upwelling

I do not believe the City has the resources to ensure that new industrial development on this site will not re-pollute this fragile and recovering body of water. Impervious surfaces and new construction are documented sources of upland water contamination.

On a personal level, this area abuts my home and my neighbors’ homes. We are a low density community. We are not a wealthy community. But we care about the quality of all life (including wildlife) in our neighborhood.

I would suggest that you, as individual members of this commission, conduct more due diligence before you make a final recommendation regarding Proposed Change #297. First, if you are not sufficiently informed about the Columbia Slough’s history and its current ecological status, please read about it. You need to thoroughly understand this complex ecosystem. Second, come out and visit this neighborhood for yourself. Drop by at your convenience; let me and my family show you around. Over the past six years, my husband and I have planted dozens of trees and native plants that sequester toxins on both sides of the Buffalo Slough. We are intimately familiar with its cycles, its wildlife, and its struggles to recover within an urban landscape.

Buffalo Slough is a rich and vital wildlife habitat. If the city needs to build anything on the Buffalo Slough, you should build trails and create more open spaces there. But please, do not open the door to more industry. This is a raw deal.

If you need further proof, just study the sediments, where you can find written plainly the history of industry’s effects on the Columbia Slough.

With hope and urgency,

Nancy Henry
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