

COLUMBIA CORRIDOR  
A S S O C I A T I O N

28 April 2005

Metro Council  
600 NE Grand Avenue  
Portland, OR 97232-2736

re: Nature in Neighborhoods

Dear President Bragdon and Metro Councilors:

The Columbia Corridor Association (CCA) would like to applaud Metro's Nature in Neighborhoods effort. We thank you for the good work, encourage the emphasis on voluntary compliance, and raise a few concerns.

The Columbia Corridor is the largest planned industrial area in the state of Oregon, covering 28 square miles. It also includes 14 square miles of managed floodplain. CCA has been and continues to be particularly interested in the Metro Goal 5 process because the Columbia Corridor contains a high concentration of both the region's industrial lands and lands identified for habitat protection.

Metro's emphasis on voluntary efforts is greatly welcome. However, volunteerism works best with adequate **incentives**. Nature in Neighborhoods does not yet offer good incentives for commercial and industrial properties. CCA encourages Metro to devote the coming months to creating an exemplary incentives program. Furthermore, we suggest preparation for two scenarios: one based on a successful 2006 parks measure, the other without a parks measure. CCA commits to working with Metro to create an incentives plan.

Metro has superb **mapping** capabilities which have led to a heavily map-reliant component to Nature in Neighborhoods. Unfortunately, the map correction process is unclear and daunting. While it is easy to verify the maps, it is not easy to correct them. In addition, the correction responsibilities will often fall to the cities without adequate guidelines or a process to accomplish that in a regionally collaborative way. Map adjustments and interpretations will be an ongoing challenge given their fundamental role in the program. Metro should remain engaged with the cities to guide resolution of the likely problems that will arise as the program moves forward. There is significant risk of additional cost to all if this process is not effectively managed.

A large part of the Columbia Corridor is home to the four Drainage Districts. CCA supports the language that makes as an "allowed use" the activities of the Drainage Districts to meet their state and federal mandates. Their ability to cost-effectively maintain the managed floodplain is critical. In recent years, the Districts have been given the coveted "excellent rating" during the Corps of Engineers annual inspection. Having the ability to maintain this level of achievement keeps flood insurance

premiums low for businesses located in the Drainage Districts, and provides reassurance to businesses seeking to locate there.

CCA also supports the streamlined mitigation requirement contained in the Metro COO recommendation to address wildlife hazards on Port property within 10,000 feet of an airport operating area. This would allow the Port to address a critical safety issue without a time consuming review process. At the same time, this is not an exemption. Any impact to a resource must be mitigated.

Group Mackenzie recently offered a critique of the effects of Nature in Neighborhoods on industry. We found their critique well-reasoned and hope Metro adopts their recommendations. More time is needed to evaluate the impacts on Corridor properties, particularly the Disturbance Area Limitations. CCA understands we will have an opportunity to work with Metro staff to improve the proposal after our evaluation. Please let us know if this is not the case.

Much good work has been done. However, it behooves us to continue the hard work in order to fill in the few gaps that could grow into significant problems. CCA looks forward to working with Metro to improve our economy and community.

Respectfully submitted,



Corky Collier  
Executive Director