

March 7, 2006

Mayor Potter and Members of the Portland City Council
1221 SW Fourth Avenue, Suite 340
Portland, OR 97204

RE: Actions For Watershed Health, 2005 Portland Watershed Management Plan

Dear Mayor Potter and Portland City Council;

The Columbia Corridor Association (CCA) represents the needs and interests of businesses within the Columbia Corridor, a designated Regionally Significant Industrial Area (RSIA). The Corridor is home to 2000 businesses employing 55,000 people and is the largest economic development corridor in Oregon. CCA applauds the City's effort to coordinate the approach to watershed management. For more than two years CCA has participated in the Watershed Science Advisory Group developing the 2005 Portland Watershed Management Plan (Plan). Additionally, our representative on the Stormwater Advisory Committee has fully reviewed the plan as part of the work done by that committee.

The Plan is a good starting point to coordinate and simplify City Bureau actions and activities with regards to the management of its urban watersheds. We encourage all efforts to coordinate the myriad layers of federal, state and local regulations that apply to the City and businesses in the Columbia Corridor.

As a policy document, the 2005 Portland Watershed Management Plan sets forth the City intent with respect to watershed health. While we applaud the purpose and intent behind this effort, we have concerns about implementation and coordination with City Bureaus.

"Restore Model" Maps:

There is concern that the maps included in this document for illustrative purposes will be used to apply further city requirements to site specific properties. While the current intent is to use the maps to illustrate watershed enhancement options, others may see them as watershed enhancement requirements. This would be inappropriate as the maps developed for this effort are based on an Oregon State University "Restore Model." The maps are slices in a continuum of options the model can illustrate as the "dials" on the model are adjusted for various outcomes or objectives. These maps are mere examples of options, based on values and objectives selected by the modelers. Therefore, they should not be used for regulatory site specific purposes and should remain general and illustrative only, as originally intended.

When lands are mapped with certain values or with certain opportunity designations, the temptation is to transform these maps into regulatory requirements. The maps are not site specific nor are they “right or wrong.” They reflect options on a broad scale. For example, the “Watershed Improvement Strategies Map” has “strategy categories” for “revegetation” and “protect sites with high watershed value”. If implemented, would protections and restoration requirements be added to properties with this mapping designation? If so, such regulations could have broad socio-economic and specific impacts on individual properties, which have yet to be understood or evaluated.

We suggest the lines on the maps be blurred or the maps be watermarked with “not for regulatory use.”

Socio-Economic Objectives:

Management plans that protect or enhance restoration of watersheds and natural resources, while laudable, likely come with costs and impacts which should be weighed to enlighten your policy making choices. The costs to the City and to the community in terms of land, jobs and housing have not yet been factored in to watershed improvement efforts.

We suggest the City determine all costs to the city including any incentives to be offered, costs to private landowners and costs in developable land.

Single Watershed Approach:

Not all watersheds are the same and yet they have all been lumped together here at the policy level for simplicity sake. Through implementation it will be important to differentiate the varying characteristics, functions and values of the varying watersheds and portions thereof. For instance, portions of the Columbia Slough watershed are artificially managed under federal mandate by the Multnomah County Drainage District.

Before the Plan is implemented, specific strategies need to be matched to appropriate watersheds.

Coordination Challenge:

CCA understands the challenge facing the City in addressing multiple regulatory demands from various regulatory drivers such as Portland Harbor, the Clean Water Act and the Endangered Species Act. We applaud the City’s attempt to integrate these mandates. We ask that the City stay focused on streamlining watershed management and resist the temptation to impose additional regulations. Moving the goal posts and increasing regulatory uncertainty could have negative impacts.

Annual Reporting:

CCA feels an essential component embedded in the Plan is the annual report. We strongly urge the City Council to continue public involvement through the Watershed Science Advisory Group (WASAG), to review performance measures and effectiveness of the Plan. Allowing the WASAG to develop performance measures that can accurately

evaluate the effectiveness of a given approach is essential to the overall success and acceptance of the Plan.

The technologies and solutions for responsible watershed management and restoration are evolving. We urge you to use the Stormwater Management Manual update model, with the public involvement component. What has worked for the City in the one arena should be emulated here.

Plan Implementation:

Impacts of the Plan on private property are not clearly defined. Implementation of new City strategies often result in additional regulations and financial burdens. Seldom are incentives offered adequate to achieve public objectives. For this reason, CCA would like to remain involved as the Plan is implemented.

Defining a timeline, process and steps for implementation of the strategies and actions outlined in the Portland Watershed Management Plan will be essential. A great degree of flexibility should be built into the implementation program. The Columbia Corridor Association looks forward to continued participation with implementation process to ensure that flexibility and certainty is achieved.

Summary:

The CCA appreciates the opportunity to continue our involvement with the Watershed Science Advisory Group (WASAG) and the Stormwater Advisory Committee (SAC).

The summary of our concerns is:

- How the Restore Model maps will be used;
- Incorporating socio-economic components into the Plan;
- Ensuring characteristics unique to a single watershed are not overlooked;
- Creating certainty for business as potential new requirements are imposed;
- Developing accurate performance measures; and
- Developing a clear but flexible implementation strategy to achieve the strategies and actions described in the Plan.

The Columbia Corridor Association appreciates the opportunity to submit these comments to City Council regarding the Watershed Management Plan. Our participation with the WASAG and the SAC underscores our continued desire to work cooperatively and openly with the City to achieve our mutual goals and objectives.

Sincerely,

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

Corky Collier
Executive Director