

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

9 February 2011

Portland City Council
1221 SW Fourth Ave., Room 140
Portland, OR 97204

Dear Portland City Council:

The Columbia Corridor is home to 2,000 businesses employing 60,000 individuals. This industrial sanctuary is also home to the Columbia Slough and a long list of valuable natural spaces. We have a keen interest in enhancing natural space with minimal negative impact on our economy and the jobs located near our city's core.

The Columbia Corridor Association (CCA) appreciates the hard work staff has done to consolidate, rationalize and simplify the provisions in the Portland City Code that address trees. Staff has listened carefully to comments from members of the Tree Stakeholder Committee and has made many improvements to the earliest drafts in response to the comments. We support the proposed customer service improvements, including the Community Tree Manual.

We understand that in response to *Gunderson v. City of Portland*, (LUBA No. 2010-039, January 21, 2011)), which addresses impacts to the city's industrial lands inventory, the city has decided, pending further study, to exempt industrial land from the landscaping requirements stated in the proposed code amendments. CCA shares the concerns of other groups representing industrial land owners that tree-related requirements may have the unintended effect of making industrially zoned land unavailable for industrial use. We will continue to follow with interest the city's follow-up work on this issue.

We also suggest linkage between Title 11 and the new Comprehensive Natural Resource Plan (CNRP) chapter adopted as part of the North Reach River Plan. The CNRP will cover future development, mitigation, and resource enhancement activities, supporting site planning and management. It has been uncontroversial and is critical for the Multnomah County Drainage District to in its management of the Columbia Slough.

CCA recommends approval of the new tree code ordinance, with the understanding that it will include exemption of industrial properties. The new code is welcome in many respects, not the least of which is the acknowledgement of the value of trees in the city.

Respectfully submitted,



Corky Collier
Executive Director