COLUMBIA SLOUGH WATERSHED COUNCIL
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CCIL Ezone Project
Comments submitted by the Columbia Slough Watershed Council

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Numerous studies demonstrate the vital contributions of urban wetlands to the health of cities. Wetlands account for 5–8 percent of the world's land but contribute 20–30 percent of the world's carbon pool. In addition to being important carbon sinks, healthy wetlands provide reductive impacts to urban heat islands, promote biodiversity, and offer live-giving cultural and recreational opportunities to local residents. Despite these well-documented benefits, half the world's wetlands have been lost to urban growth and other human activity. Prioritizing the steady march of industrial expansion will come at the expense of public health, our local economy, and the extraordinary ecosystem we call the Columbia Slough.

As such, the Columbia Slough Watershed Council (CSWC) submits the following comments concerning the Columbia Corridor and Industrial Lands Environmental Overlay Zone Project:

The CSWC **strongly advocates for the Maximum Resource Protection, or "High" Scenario**. We noted areas along Wilkes Creek where C-zoning under the medium scenario converts to P-zoning under the high scenario (R265672, R318547, R265681), as well as where no protection at all converts to C-zone coverage (R519137). These important habitats should be immune to environmental review variances.

We unequivocally **deem the Minimum Compliance, or "Low" Scenario, to be unacceptable**. Incredible work and large sums of public and private money have been invested into rehabilitating the Slough. The Slough is an ecological jewel, unique among urban areas in the United States, and the City must prioritize its protection and restoration to the highest degree.

The CSWC asks the City to recognize that the Goal 9 **twenty-year industrial land supply criteria is no longer achievable** in Portland and should be amended. Further, we urge that **brownfields be included in the industrial land supply matrix** regardless of condition and expense to repurpose. Open space cannot continue to be given over to industrial development, even more so when brownfields stand empty.

The CSWC asks concerning the rezoning of the Columbia South Shore Environmental Code (33.515.274), to be replaced by the less restrictive Ezone Code (33.430), that **none of the protections to natural resources be diminished** in this code change.

Finally, the CSWC would like to ask for **clarification on the anticipated impacts to residents**. This project has been characterized as primarily impacting industrial areas, but the Columbia Slough Watershed is home to some of Portland's most diverse and vulnerable populations. How have these neighbors been accounted for and engaged with during the rezoning project?

The CSWC does want to commend the City for **updating its lighting standards** to reduce negative impacts of exterior lighting (33.475.230). This is an important improvement to the code.

In summation, the CSWC advocates for:

- the Maximum Resource Protection, or "High" Scenario;

- including brownfields in the City's calculations for industrial land supply and amending the Goal 9 twenty-year industrial land supply criteria to acknowledge its limitations;
- and maintaining all prior protections under the new Ezone code.

Thank you for carefully considering our comments, questions, and concerns.



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