

August 1, 2012

Subject: LU Case # 11-15-153362 LDS ENM
HO Case # 4120015

To: Hearings Officer, City of Portland
FAX: 503-823-4347

From: Marianne Colgrove, Friends of Tideman Johnson Co-Founder
3707 SE Berkeley Way

As a co-founder of the Friends of Tideman Johnson, and a resident near the proposed subdivision, I am concerned that the planting plan does not adequately mitigate the significant environmental impacts of the proposed development. The mitigation plan does not demonstrate that all significant detrimental impacts on resources and functional values will be compensated for, as required by 33.430.250.A.

The development site is located within a sensitive and high-quality natural area, adjacent to numerous valuable environmental resources, including Tideman Johnson Natural Area, the Springwater Corridor Trail, public lands managed by the Bureau of Environment Services, and the Johnson Creek watershed. This area has been undergoing intensive and sustained habitat restoration through the combined efforts of Portland Parks & Recreation, Environmental Services, the Johnson Creek Watershed Council, and the Friends of Tideman Johnson. Furthermore, the site is subject to numerous heightened environmental regulations, including:

- City of Portland environmental overlay;
- Johnson Creek Basin Plan;
- Springwater Corridor Standards.

The proposed development will have significant detrimental impact on the natural environment. As detailed in the BDS Staff Report environmental impacts include loss of 35 trees (17 natives), loss of other native vegetation, disturbance of topsoil, and increased impervious surface areas, which have “the potential to affect storm drainage, groundwater recharge and discharge, pollution and nutrient retention/removal, and sediment trapping and erosion control due to the paving.” (BDS July 20, p. 7).

Additionally, the site is prominent in its visibility from the Springwater Corridor and the Johnson Creek canyon. The view shed is an important natural resource that should be protected in accordance with the Springwater Corridor Standards. These Standards also require a 20 foot landscape buffer along lot lines that abut the Springwater Corridor, and it doesn't appear that this requirement is met. Unfortunately, the BDS staff report does not address these requirements that result from proximity to the Springwater Corridor.

The applicant's mitigation plan doesn't adequately compensate for the severity of these impacts in such a valuable environmental area. A meaningful mitigation plan should include both a high density and diversity of native plants, consistent with nearby restoration efforts. Mart

Hughes, the Portland Parks & Recreation Ecologist recommend plantings that include an array of species consistent with a documented native plant community, such as an Oregon ash riparian woodland. The proposed species do not offer the desired diversity nor do they conform to an appropriate plant community for this habitat. Based on conversations with Darian Santner, the BES Watershed Revegetation Project Manager for this area, some of the proposed species (especially flowering dogwood and salal) are inappropriate and unlikely to thrive in this location, completely eliminating their mitigation value and buffering function. A failed mitigation is no mitigation at all.

As a condition for approval, I recommend that the mitigation plan be reviewed by the Portland Parks & Recreation Ecologist and BES Watershed Revegetation Project Manager for consistency with nearby restoration efforts. This will help ensure that the mitigation truly compensates for the significant detrimental impacts.

Cc: Darian Santner, BES Watershed Revegetation Project Manager
Mart Hughes, Portland Parks & Recreation Ecologist
Lisa Gunion-Rinker, Ardenwald-Johnson Creek Land Use Chair
Rod Merrick, Eastmoreland Land Use Chair
Terry Griffiths, Woodstock Land Use Chair
Bob Kellett, Southeast Uplift Land Use Program Manager