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7/29/05

GROUP MACKENZIE

July 29, 2005

Metro
Nature in Neighborhoods
Attention: Paul Ketchum
600 NE Grand Avenue
Portland, OR 97232-2736

Re: **Crawford Street Map Correction**
Project Number 2030197.02

Dear Paul:

On behalf of the Crawford Street Corporation (CSC), we are forwarding a Request for Map Correction to the Regional Fish and Wildlife Habitat Protection, Habitat Inventory and Regulatory Program Options Maps, for property located in North Portland. Group Mackenzie has worked closely with CSC and evaluated information from Metro's interactive maps and Ordinance 05-1077A. We determined that map errors exist and need to be corrected. The information below provides site details and a narrative regarding the proposed map correction and attached are maps and photos that provide additional information.

SITE DETAILS

Location: N. Bradford Street at N. Burlington Avenue
Owner: Crawford Street Corporation
Tax Lots: 1N1W 12 CA tl 200 and 300
Site Size: 10.5 acres

SITE DESCRIPTION

The site is located on the Willamette River, upstream of the St. Johns Bridge and Cathedral Park. Until recently, the site housed the Lampros Steel warehouse and distribution facility. Zoned for General Employment, the site is within the St. Johns Town Center Planning Area and is considered central to the public objective of linking the upland town center commercial core to mixed-uses at the riverfront.

MAPPING ERROR

Metro's inventory mapping designates portions of this site as Class 1 Riparian and Class 2 Riparian, with High and Low HCA designations respectively. A portion of the HCA mapped area includes an existing impervious developed area. It is this area that is the subject of this request.

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Land Use Planning

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Locations:
Portland, Oregon
Seattle, Washington
Vancouver, Washington

USEPA SF
1303408

Based on Metro's interactive maps and report, it appears this area is identified as a resource area due to its location within the 100-year floodplain. Per the Title 13 Model Ordinance, developed floodplain is defined as "any man-made change to improved or unimproved lands within a FEMA defined floodplain, including but not limited to buildings or other structures, dredging, filling, grading, paving, excavation, or storage of equipment and materials." As shown in the attached site photos and aerial photo, this area is paved with asphalt, does not contain vegetation, and until recently, was utilized for outdoor storage of equipment and materials. As such, it meets the definition of developed floodplain and provides no buffer value currently, or with future development. In addition, all potential storm water, turbidity, etc. impacts associated with redevelopment will be addressed through the required jurisdictional site development standards.

Within the Model Ordinance, Table 1: Method for Locating Boundaries of Class I and II Riparian Areas, flood areas that are "developed areas not providing vegetative cover," are not classified as riparian areas. In addition, Table 7: Ecological Functional Value of Riparian Corridors states, "developed floodplains are not included as a regionally significant resource since they do not receive a primary ecological function score." This information indicates that the subject area, as developed floodplain, was not intended to be designated as a Habitat Conservation Area.

MAP CORRECTION

Based on the above information, the paved area mapped as a result of the 100-year floodplain should not be designated as Habitat Conservation Area. The attached map highlights in red the area proposed for removal.

SUMMARY

The subject site plays an important role in the future development of the St. Johns Town Center. The mapped resources on the site are erroneous and if not corrected, could undermine the ability for this site to be economically viable.

It is our understanding, that if approved, Metro will issue a letter indicating that the Habitat Conservation Area in the subject area is not applicable. However, the HCA map, per your voicemail, will not be altered at this time. Exhibit C of Ordinance No. 05-1077A indicates the Habitat Conservation Areas Map will be updated and available for public review prior to final consideration of the Ordinance, now scheduled for September 22, 2005. Given this, we respectfully request that the HCA mapping for this site be corrected as proposed as part of this update.

Attached are aerial photos highlighting the site and the existing HCA's and the area proposed for removal. In addition, we have included three pages of site photos (July 2005) that show the existing paved area, the existing vegetation, and where the two intersect. If needed, we can

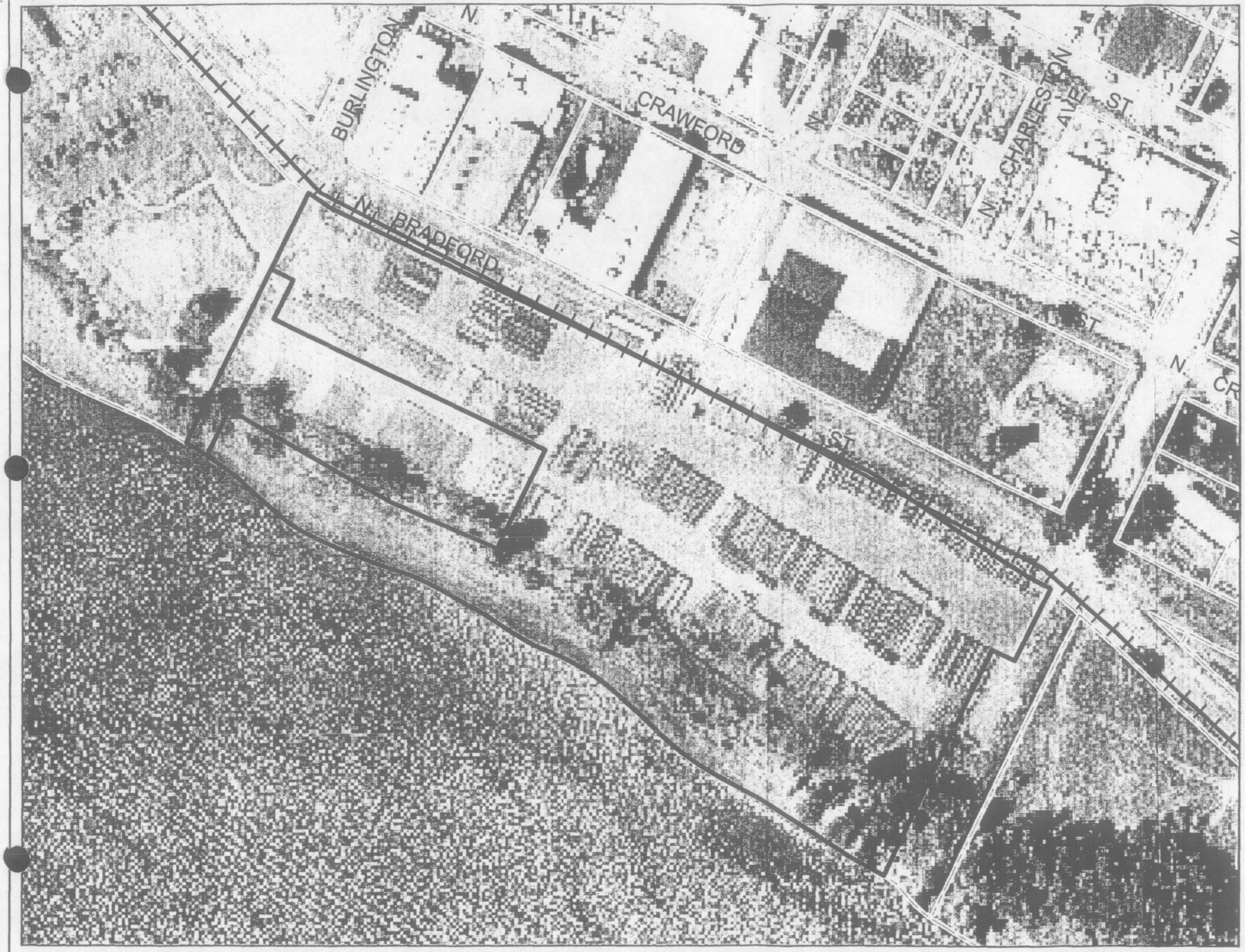
provide more information, including a digital shapefile. If you have any question, or need addition information, please call me at 503-224-9560.

Sincerely,

Geraldene Moyle, AICP
Senior Planner / Project Manager

Enclosures: Attachment A – Site Aerial Photo
Attachment B – Site Aerial Photo with HCA's and Area Proposed for Removal
Attachment C – Three Pages of Site Photos

cc: Ann Gardner – Schnitzer Investment Corp
Mathew Cusma – Crawford Street Corporation
Steve Pfeiffer – Perkins Coie
Tom Wright – Group Mackenzie



Crawford St Site

Metro Goal 5 / Title 13
Nature in the Neighborhoods
Habitat Conservation Area
Designations Map Revision

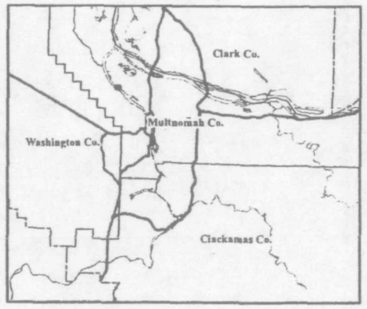
Attachment A

0 50 100 Feet

Source Data
Base Data, Metro RLIS Lite, February 2005

Geographic Projection Information
NAD 83 HARN, Oregon North
Lambert Conformal Conic

Location Map



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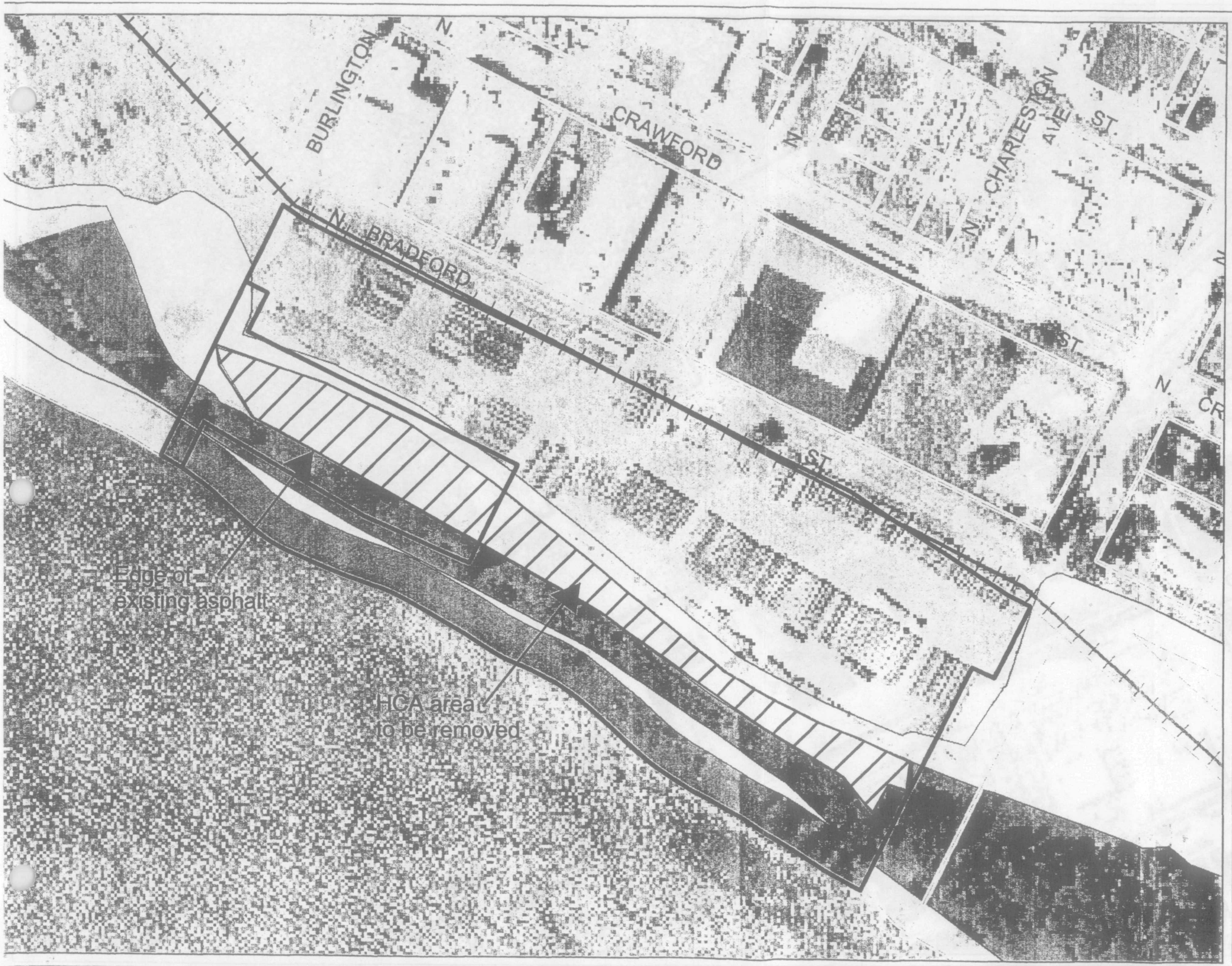
Date: 06/03/05
File: crawford aerial.mxd

Map Created by: GEM
Project No: 2030197.02



Crawford St Site

Metro Goal 5 / Title 13
Nature in the Neighborhoods
Habitat Conservation Area
Designations Map Revision

Attachment B

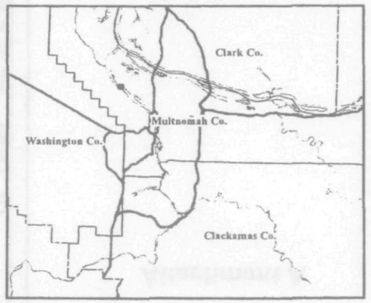
Habitat Conservation Area Designations
- HIGH
- MODERATE
- LOW
- ALLOW

0 50 100 Feet

Source Data
Base Data, Metro RLIS Lite, February 2005

Geographic Projection Information
NAD 83 HARN, Oregon North
Lambert Conformal Conic

Location Map



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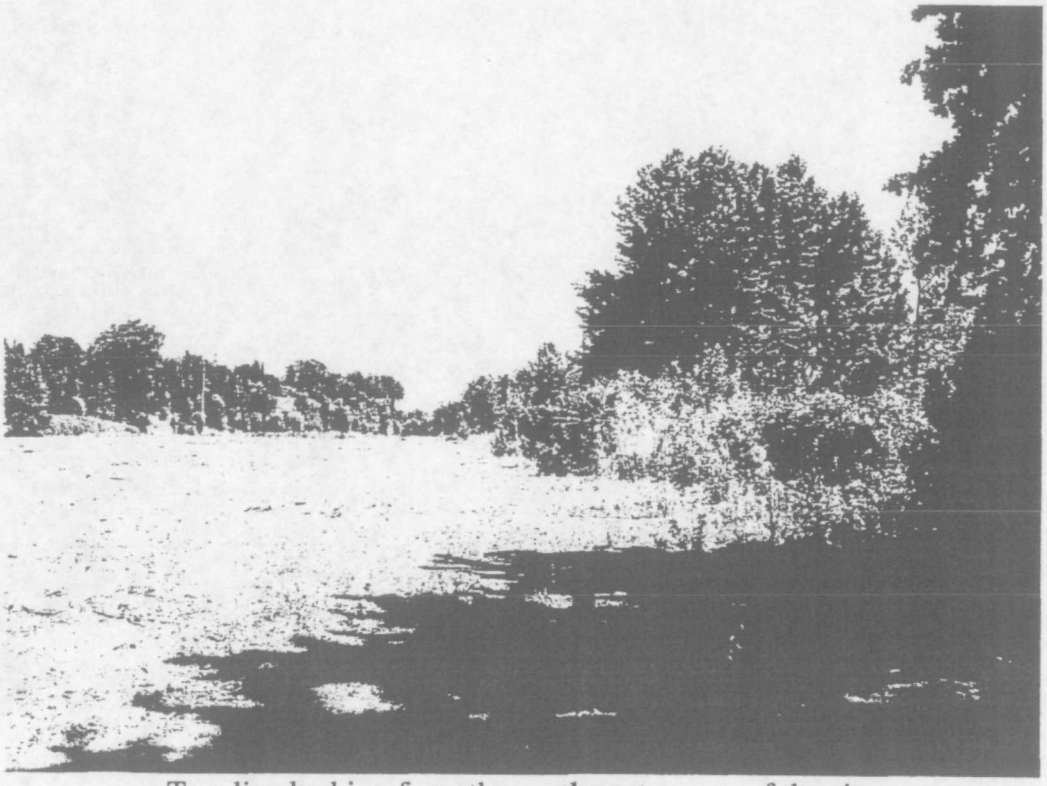
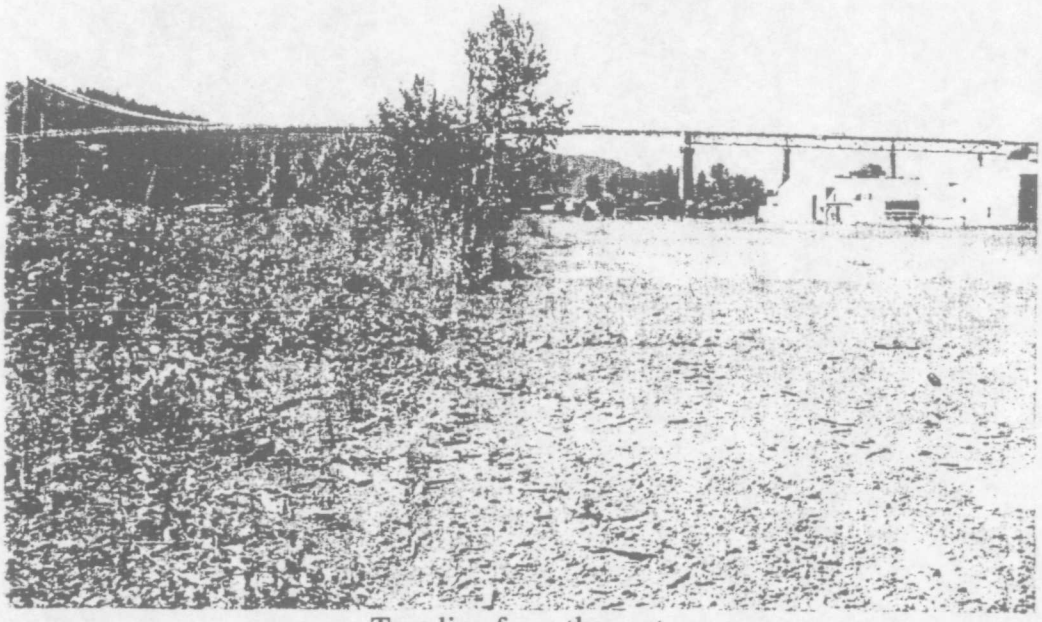
Date: 08/03/05
File: crawford.mxd
Map Created by: GEM
Project No: 2030197.02

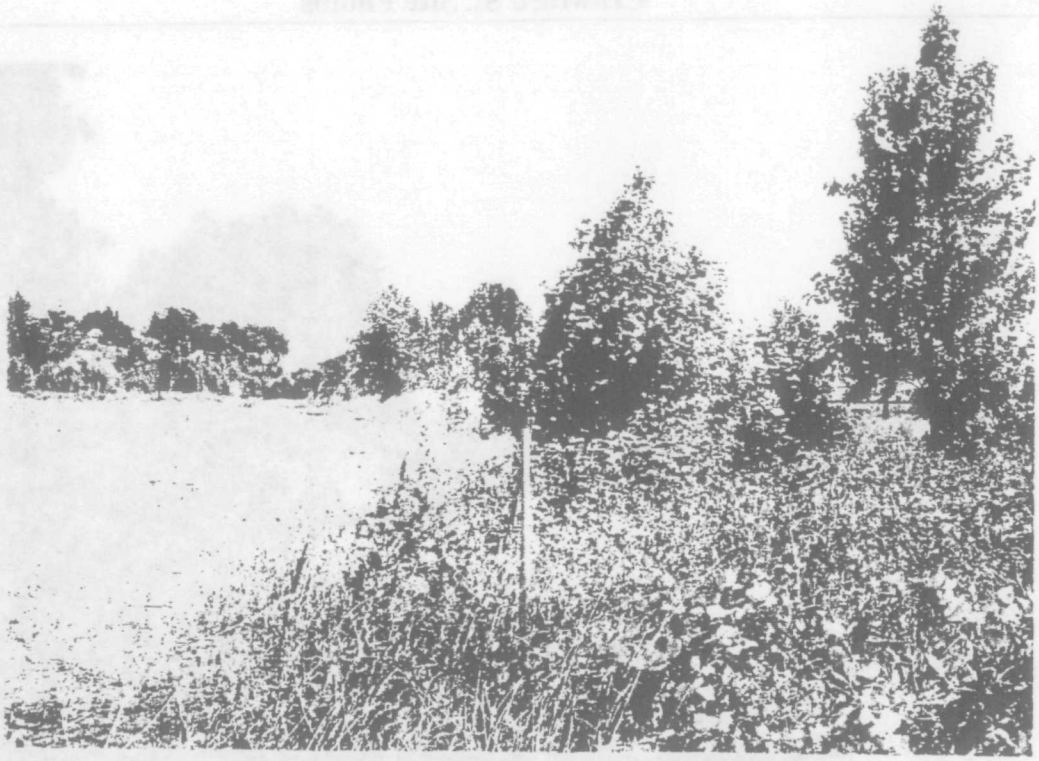
Crawford St. Site Photos



Tree line looking from the southwest corner of the site

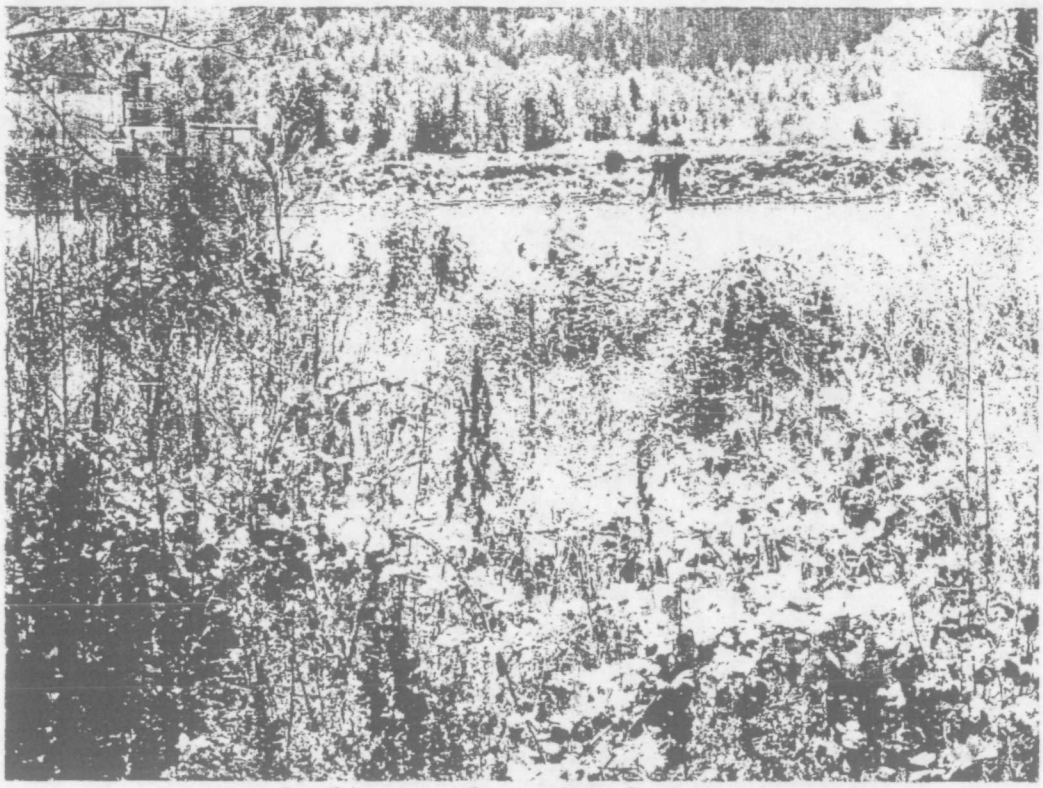


Tree line from the east

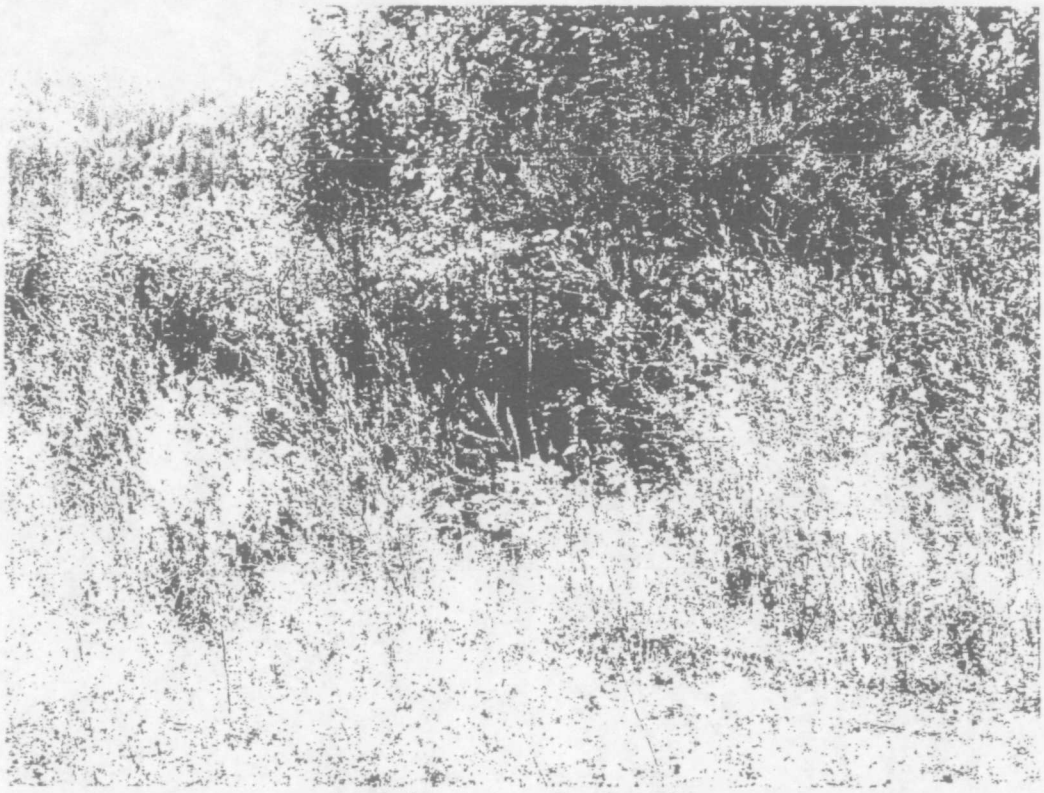


Tree line with fence location

Asphalt – vegetation interface looking south



Looking west from edge of pavement



Asphalt - vegetation interface