
coordinated by:

**Smith & Bybee Lakes Natural Area
Management Committee**
Nancy Hendrickson, Chair

Metro
600 NE Grand Ave.
Portland, OR 97232
(503) 797-1870

Smith & Bybee Lakes Management Committee Meeting

Note change in day and time!! 5:00 p.m. - 7:00 p.m., Wednesday, December 8, 1999

Note change of room number!! Metro Regional Center, Room 370 A&B

600 N E Grand Ave.
Portland, Oregon 97232

AGENDA

<i>Call meeting to order; Introductions</i>	5:00 - 5:15 pm
<i>Review and approval of October meeting notes</i>	
<i>Updates (Please try to keep these short)</i>	5:15 - 5:30 pm
Wildlife Area Manager Position	
Others	
<i>Presentation – Model Airplaners</i>	5:30 -6:15 pm
- Dennis Meyer	
<i>Presentation – Multnomah County Jail Buffer Design</i>	6:15 -7:00 pm
- Bryan Cole, Walker Macy	
<i>Adjournment</i>	7:00 pm

Enclosures:

October 26, 1999 Meeting Notes

11/17/99 letter from Charles Ciecko, Metro, to Div of State Lands

11/8/99 letter from Frank Opila, Friends of S&B, to Port of Portland Commissioners

11/16/99 letter from Dennis O'Neil, REM, to Nancy Hendrickson, BES

11/24/99 memo from Emily Roth to S & B Management Committee

Smith & Bybee Lakes Management Committee Summary Meeting Notes

Metro Regional Center
Room 370 A & B
December 8, 1999
5:00 PM

In Attendance:

Frank Opila *	Friends of Smith & Bybee Lakes
Brian Cole	Walker & Macy
Emily Roth	Metro – S & B Wildlife Area Manager
Troy Clark *	Portland Audubon Society
Jim Morgan *	Representing Metro Executive Officer
Pat Sullivan	Metro Regional Parks & Greenspaces
Bill Bach	Port of Portland
Bobbi Luna	Multnomah County Sheriff's Office
Holly Michael *	Oregon Dept. of Fish & Wildlife
Bob Nilsen	Multnomah County Facilities & Properties
Gerry Meyer *	Port of Portland
Leaf Keaton	Native American Association of Forests
Dan Kromer	Metro Regional Parks & Greenspaces
Dave Miner	Multnomah County Sheriff's Office
Frank Wildensee	Portland Bureau of Environmental Services
Tim Dabareiner	Barney & Worth, Inc
Wallace Leake	Adolfson Associates

* - voting member

Introductions

During Introductions Emily announced this would be her last meeting as Smith & Bybee Lakes Wildlife Area Manager as she has accepted a position with the Oregon DEQ heading up the Portland harbor cleanup. Patricia Sullivan expressed appreciation for Emily's diligence and commitment and that it had been a pleasure to work with her during the last 3-1/2 years, comments which were echoed by many others present, including her Division Manager, Dan Kromer.

It was announced the Model Airplaners would not be present tonight but would call at a later date when they wished to be added to the agenda.

October Meeting Notes

The October 26, 1999 meeting notes were approved as submitted.

Updates

A letter to the Oregon Division of State Lands from Charles Ciecko, Metro Parks Director, concerning the Columbia Steel Casting Co. fill permit application was discussed. Letters from others of like concerns, such as the Friends of S & B Lakes and the Columbia Slough Watershed Council were also submitted, it was learned.

Emily Roth learned today that a land use permit for the North Marine Drive Project was submitted to the City of Portland. She expressed disappointment that none of the committee members had been notified

in advance. This Committee, the Friends group and Metro had all been assured by the City Council that they would have the opportunity to appear before that Council at the point of 50% design completion. Apparently that is not going to happen now as the final design is slated to be completed by March of 2000. Emily advised the committee to be alert for the land use permit that the City will be required to issue, if there are final comments on the design yet to be made.

Bill Bach asserted that all design decisions will be made publicly and that CH2M Hill will want to go forward with all design components requested dependent upon cost. If cost exceeds budget, decisions will have to be made as to deletions. Also planned is an open house(s) at the 100% design stage and an appearance before the Port Board.

The Port announced that George Donnerberg of Real Property Consultants has been hired to do the appraisal for the "triangle piece", which is the final piece of the Facility Plan.

According to Emily, comments are due to the Corps of Engineers by December 17th regarding the application for the perimeter bank stabilization at St. Johns Landfill (for the south side of the North Slough). The Committee had previously decided not to submit any comments. Agreement had been reached that the landfill perimeter needed to be shored up, but no consensus was reached on design. Comments can also still be submitted to the City of Portland.

Also in relation to the landfill, Troy Clark reported that he is still waiting for the City of Portland Parks to determine where the 40-Mile Loop Trail will be located in that area. Jim Morgan will draft a letter to Portland Parks from the Committee urging movement on the recreational trails plans around the Smith & Bybee Lakes area.

Frank Opila reported that the Friends of Smith & Bybee will be holding its Winter Solstice canoe trip on December 19th beginning at 11:00 a.m. to be led by Troy.

Presentation – Multnomah County Jail Buffer Design – Brian Cole, the landscape architect for this project developed the proposal out of input from the citizens working group. A buffer will be created which will both support habitat and screen the facility as seen from the lake over a period of time. Walker Macy, as a separate part of their contract with the County, will also be developing a Maintenance and Monitoring Plan. Major points of Cole's presentation included: existing conditions, soils and hydrology, site grading, plant materials, required plant survival rate, a planting plan and maintenance and monitoring. Following the presentation, Troy made the suggestion that the general contractor for the project attend a future Management Committee meeting.

Setting of January Agenda

Radio Tower site
Turtle Monitoring Report
Stabilization of North Bank of Landfill
Surface water/ground water report

Friends of Smith & Bybee Lakes
P.O. Box 83862
Portland, OR 97283-0862



Port of Portland Commissioners
P.O. Box 3529
Portland, OR 97208

NOV 11 1999

EXECUTIVE OFFICER

November 8, 1999

Dear Commissioners,

The Friends of Smith & Bybee Lakes appreciated the opportunity to participate in the advisory committees and design workshops for the North Marine Drive Project. Generally, we are pleased with the "Road over Rail" alternative. This alternative provides significantly more protection for the Smith and Bybee Lakes Wildlife Area than the original proposal. We greatly appreciate the Port's willingness to work with the public on the environmental and community issues related to this project.

At the last design workshop meeting held on September 29, 1999, we were told that, given the costs at 50% design, there was a shortfall in funding this project. Ideas were presented about "sequencing" some aspects of this project. Even with the proposed "sequencing" there was still a shortfall of approximately \$1 million. Back in July 1998, the Friends of Smith & Bybee Lakes received separate letters regarding this project from Mike Thorne, Executive Director, and Charlie Hales, City of Portland Commissioner. In both of these, there were assurances that all issues, except the bridge over the rail line, but including our environmental and community concerns, would be addressed in Phase 1 of this project.

Therefore, the Friends of Smith & Bybee Lakes request that the Port of Portland fund all environmental and community aspects in Phase 1 as previously agreed. In particular we request that the 40-mile loop trail be retained in this project west of the railroad. Additionally, we suggest native vegetation be planted on the south side of N. Marine Dr. This would require petitioning the Urban Forestry Commission for an exception, but could potentially reduce costs. We also urge the Port to develop project synergies by coordinating the N. Marine Dr. project with Metro's relocation of the parking lot for Smith and Bybee Lakes.

Thanks for your consideration.

Sincerely,

Frank Opila
Board Director, Friends of Smith & Bybee Lakes

*copy to
Elected
Parks
11/99*

- c: Mike Thorne, Executive Director, Port of Portland
Mike Burton, Executive Director, Metro
Charlie Hales, Commissioner, City of Portland
Stacy Bluhm, Project Manager, Portland Office of Transportation
Smith and Bybee Lakes Management Committee



METRO

November 16, 1999

Ms. Nancy Hendrickson
Bureau of Environmental Services
City of Portland
1120 SW Fifth Ave.
Portland, OR. 97204

Re: Perimeter Bank Stabilization at St. Johns Landfill (LUR 99-00579 EN)

Dear Ms. Hendrickson:

Thank you for taking time to discuss with me the concerns of the Bureau of Environmental Services (BES) regarding Metro's planned project at the St. Johns Landfill. This letter serves as a follow-up to our telephone conversation yesterday afternoon.

We discussed the concern, implicit in your previous written comments, that Metro's proposed bank stabilization design would be the only one used, not only now to repair damage to the bank in three critical areas, but also to repair other areas in the future. This would tend to happen because no alternate would be given the opportunity to demonstrate long term stability under the hydrologic conditions specific to St. Johns Landfill.

This concern may very well be valid. However, the experimental bio-benches, installed two years ago, have not been in place long enough to demonstrate their ability to protect, in the long term, the toe of the bank from the undercutting process or to protect, in the long term, the bank above from erosion during high water events.

George Kral, in his capacity as Forester for BES, has suggested that the slope above one or more of these benches be intensively planted by BES to test whether long-term stability can be achieved by the combination of bench and intensive planting. If demonstrated to confer long-term stability, this combination might be a future alternative to Metro's proposed rock filter for some sections of perimeter bank.

To meet this concern I am prepared to propose that Metro and BES determine whether a bio-bench alone, or intensive planting on the bank alone, or a combination of the two would confer long-term stability on the landfill perimeter bank. Metro would contribute up to \$25,000 of the costs to BES for intensive planting of the bank above at least one bio-bench, and for comparison purposes, similar planting not above a bio-bench. The bank above one bio-bench would not be further planted beyond what BES has already accomplished.

You also expressed concerns about the three layer red rock filter at the toe of the slope that supports the mechanically stabilized earth layers above. You suggested that we consider concrete structures, called "a-jacks" rather than rock as a support layer.

After carefully examining the material that you sent, our engineering consultant has recommended that Metro adhere to our proposed rock filter design for the three critical areas. This design is intended to ensure that we can, in the long term, (1) prevent future scour by surface water; and (2) prevent silt erosion and bank collapse caused by internal water pressure after rapid lowering of the adjacent surface water. A-jacks or similar concrete structures may be useable in the future on other sections of the perimeter bank where shallow erosion is occurring and where it is not critical to reduce the risk to health, safety, and the environment from damage to the high-pressure natural gas pipeline and from buried solid waste falling into the slough.

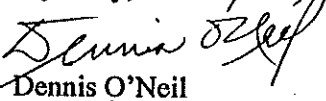
However, to meet this second concern of the Bureau, I propose that Metro experimentally apply sand to the surface of about 400 lineal feet of the rock filter after it is constructed order to fill the chinks between the large surface rocks. (I do not propose silt because the Oregon Department of Environmental Quality directives that require that turbidity be minimized. I do not propose compost because I am sensitive to your concern about adding BOD producing material to the riparian area.)

We invite the BES to attempt to establish vegetation in this material after submitting to us a planting and maintenance plan and cost estimate. After plant establishment is successfully demonstrated, Metro would similarly treat the remaining lineal feet of rock filter.

You have expressed concerns that the mechanically stabilized earth layers are not able to support trees and shrubs if only clean sand is used. In response to your concern our engineering consultant has determined that local clayey silts can be used with a thin crushed rock layer placed at the rear edge of the mechanically stabilized earth to channel internal soil water downward into the rock filter below. I propose adopting this design refinement to alleviate your concern.

I believe that these proposals will allow Metro to address risks in these three critical areas in a timely manner and give BES, the Planning Bureau, Metro, and other interested parties information useful in considering future bank stabilization projects along the landfill and along the lower Columbia Slough. If BES will not object to approval of our project by the Planning Bureau and other regulatory agencies, I propose that Metro would accept the above proposals as conditions for approval of our project by the Planning Bureau. If I do not receive a written objection to these proposals from BES within one week of the date of this letter, I will assume that BES accepts these proposals. I will then ask the Planning Bureau to issue a decision on Metro's application, including these conditions.

Sincerely,



Dennis O'Neil
Program Supervisor

DO:gbc

cc: Jim Watkins, Metro
Maurice Neyman, Metro
Jessica Wilcox, City of Portland Bureau of Planning
G. Scott Bryan, City of Portland Bureau of Environmental Services
George Kral, City of Portland Bureau of Environmental Services



November 17, 1999

METRO

Lori Warner
Oregon Division of State Lands
775 Summer St.
Salem, OR 97301-1279

RE: Columbia Steel Casting Company Fill Permit, State Project No. FP18787

Dear Ms. Warner:

Metro Regional Parks and Greenspaces manages 2,000 acre Smith and Bybee Lakes Wildlife Area (SBLWA), located in the Columbia Slough watershed and adjacent to the Columbia Steele Castings (CSC) facility. Smith and Bybee Lakes Wildlife Area is managed for protection and enhancement of wetland and wildlife resources. The area is surrounded by industrial development, with only remnants of the original sloughs and wetland complex that Lewis and Clark explored at the confluence of the Columbia and Willamette rivers. The remaining habitat is extremely valuable for a range of wetland functions and conditions. Because of the speculative nature of the fill, questions about the information provided in the Adolfson report and the lack of a comprehensive mitigation plan, Metro strongly recommends that the permit be denied or the application be considered incomplete and withdrawn from public comment.

The CSC proposed permit would adversely impact wildlife and wetlands adjacent to the wildlife area and consequently the natural resource values Metro seeks to protect and enhance. The Adolfson Associates, Inc. 1999 report describes the fill area as isolated and moderate to low value. In fact, the area is an integral part of an area often referred to as "Wapato Wetlands", used extensively by wildlife and numerous native plants that grow in the wetland. It is an emergent wetland that provides a secluded resting and feeding area for a variety of wildlife and waterfowl. In the past, CSC have illegally placed fill in the area and as you are aware, are presently under a restoration order from the U.S. Corps of Engineers that requires 3-years of monitoring.

The CSC property has a Metro Title 3 overlay for water quality and flood management (enclosed map). The fill site is identified as a wetland (primary protected feature), and is included in the 100-year FEMA floodplain. Although the City of Portland has not adopted Title 3 ordinances, they are required to do so in the future. The permit does not address Title 3 regulations.

The permit application is for a 20-year implementation of a Capital Improvement Plan (CIP) envisioned by CSC. It does not give a schedule for implementation of the plan or a budget. The permit application seems premature, as nowhere is there a detailed description of the project or proposed wetland mitigation. CSC needs to show both that funding is available and the design and engineering documents for the project are completed before a permit is issued for implementation.

Attached are Metro Parks and Greenspaces' detailed questions and comments on the permit application, and the Adolfson Associates, Inc 1999 report. Thank you for your consideration of our concerns and comments. If you have any questions please contact me at 797-1843.

Sincerely,



Charles Ciecko, Director
Regional Parks and Greenspaces

Enclosures

C: Amy Chemowitz, BES – City of Portland
Jay Mower, Columbia Slough Watershed Council
Troy Clark, Friends of Smith and Bybee Lakes
Judy Linton, U.S. Army Corps of Engineers

Joint Permit Application Form

1. Estimated Completion Date: 2020. According to OAR 141-085-0032, Multi-Year Permits, permits may be issued with a duration of up to five years. Section (5) (b) only allows a 5-Year permit if "the project purpose, location or methods of construction or operation described in the application are not expected to change during the course of the project."

The Application is requesting a 20-year permit, which is not allowed. Also, the application does not detail the methods of construction or operation. With changes in technology, both could significantly change in the next 20-years that would allow the applicant to avoid filling wetlands.

2. Proposed project purpose & description.

The applicant does not detail a time schedule for implementing the CIP plan. No design engineering documents are included. The applicant is speculating that they will need to fill sometime in the future.

3. Project impacts and alternatives.

The need to fill 5 acres is not justified, nor does it represent the minimal fill needed for the site. There are opportunities to replace some of the administrative and engineering buildings with a 2 story structure, remove stockpiling of used casting sands from the site and other alternatives that were dismissed in Alternative C.

4. Site conditions of Impact area.

Seasonally Isolated Channel – the proposed fill site is not isolated as described in the permit application and the report. It is an integral part of a backwater slough connected to the Columbia Slough. The N. Oregonian outfall pipe (there is no earthen berm) is a barrier, but does not isolate the area from the slough system. The ODSL does not define "seasonally isolated channel" in the statute or administrative rules for removal-fill permits or wetlands. The Oregon Department of Environmental Quality defines isolated as being at least ¼ mile from the nearest body of water. The proposed fill area is adjacent and connected to the backwater known as "Wapato Wetlands" and connected to the main channel of the Columbia Slough.

5. Resource Replacement Mitigation

The permit does not detail the location or design of the proposed mitigation. It is very conceptual. Without definite mitigation, the permit requirements are not met. If and when a detailed mitigation plan is developed, Metro requests that a public notice is sent to all interested parties for review.

Columbia Steel Casting Co, Inc Report by Adolfson Associates, Inc. 1999

- 1.1 Need for Expansion – the applications describes the CIP plan. It does not detail the design engineering on the proposed construction. Again, no schedule is given nor any indications that the company has committed funds for the implementation of the plan.

The only time the reports states the site was contaminated was during the 1996 flood. During that time all low-lying areas along the Lower Columbia Slough were flooded and contaminated. On normal rain years, the site does not flood and the CSOs from the North Oregonian outfall do not back-up on the property. The COP North Bloss Avenue Stormwater Outfall does not contain CSOs (enclosed email from the City of Portland).

1.2 Columbia Steel Process – is it practical to store finished products at the shipping location, eliminating the need to store them on-site?

2.2 Wetland Mitigation Area – CSC recently replanted the wetland mitigation area. With the recent completion of the restoration, how can the consultant anticipate DSL and USACE will determine "that the wetland mitigation restoration was successful"? CSC has a poor record of stewardship and reporting to the regulating agencies. The restoration order requires three years of monitoring before the agencies can determine if it is a success or whether CSC will be required to do additional work. In a letter dated February 11, 1998 from Judy Linton, Corps of Engineers, to Guy Marshall, CSC, she states that three years of monitoring will be required to determine whether restoration efforts have been successful. Part of the restoration area is where the applicant wants to place fill. This would not be consistent with the restoration order.

Besides the removal-fill violations stated in the report, CSC illegally placed used casting materials on the Union Pacific Railroad property. Has this violation been resolved?

2.4 Columbia Slough – the lower section is tidally influenced, not controlled by the drainage district as implied in this section.

2.8 Isolated area – this area has a direct connection to the Columbia Slough. It is not "isolated" from "Wapato Wetlands" as stated in the report. For 3-4 months per year the area has a direct hydrologic connection to the slough. In drier months, there are possible groundwater connections. The COP North Oregonian stormwater pipe is a barrier, but does not isolate the site. Also, there is no earthen berm over the pipe. The site is both connected to the slough and adjacent to Smith and Bybee Lakes Wildlife Area. The area does dry out during the summer, a characteristic of seasonal wetlands.

3.1 Hydrology

This main hydrologic influence at this site is water from the Columbia Slough and precipitation. The stormwater outfall and CSO discharges have minimal influence on the hydrology. The lower slough is tidally influenced, upstream irrigation and drainage management practices do not directly affect this area. The Drainage District does not control flows in the lower slough. Three to four months per year, the area is tidally influenced, flushing the area. This is also the time of year when there are CSOs discharged into the slough and regular stormwater discharge events.

As previously stated, the N. Bloss outfall does not discharge untreated sewage into the slough. Under the revised DEQ Industrial Stormwater Discharge Permit, CSC will be required to treat all stormwater before it can be discharged into the slough. Has CSC performed any sediment testing to verify if there is an accumulation of contaminants at the site as stated in the last paragraph?

3.4 Wildlife Resources

The importance of the proposed fill area for wildlife is enhanced by the fact that it is adjacent to Smith and Bybee Lakes Wildlife Area, not diminished as stated in the report. This area is secluded, providing a habitat type different than that found in the wildlife area. Deer, beaver, otter, Great Blue Heron, a variety of waterfowl and numerous songbirds have been seen in the slough. An Osprey nest is nearby. With so little secluded wetland habitat left in this area, the proposed 5-acre wetland site is very valuable to wildlife.

4.2 North Bloss Stormwater Outfall Extension, and

4.3 Protection from Combined Sewer Overflow Discharge

See comments in the second paragraph on hydrology (3.1).

4.4 Flood Protection

1996 is not a good example to use for flood events. It was an exceptional year, where all properties in the lower Willamette and Columbia Slough system flooded. How many times has the site flooded and contamination been a problem during other years? What has been the extent of the damage and contamination?

4.6.2 City Ordinances

The site is located on Metro's Title 3 Map for Water Quality and Flood Management protection for Statewide Planning Goals 6 and 7. At this time the City of Portland is writing ordinances to implement Title 3 within its jurisdiction. OAR 141-085-0035 allows the Director of ODSL to consider "use subject to future Goal consideration" in permit decisions. Metro's Title 3 was not considered in this section.

5.0 Expansion Alternatives

Again, the permit application for fill activity is based on CSC's CIP plan. There is only an estimated cost of \$5 million (probably low for all the planned construction) for implementation. There is no schedule for construction or phasing, and no information showing CSC has the funds to implement the CIP plan.

5.3 Alternative C – Increased Land Use Efficiency within Existing Footprint

With 40-acres of paved, flat surface there are options not explored by CSC that could better utilize the property without filling wetlands. Did they examine the possibility of constructing a 2-story building for administrative and engineering offices? Much of the property is used for storage of used casting materials. Can it be stored elsewhere, hauled off site, recycled more efficiently so that there is less that needs to be stored on site? This alternative does not discuss any of these possibilities.

5.5 Alternate E – Limited On-Site Expansion

This preferred alternative implies that since the amount of wetland fill has been reduced to 5 acres from 15 acres that this is minimal impact to the wetland site. Under this alternative, they are still proposing to fill 1/3 of the wetlands in the area. In an earlier sited USCOE letter to Guy Marshall, 3) Future Expansion, it indicates that CSC would like to fill 4 acres. The letter goes on to state that they need "to explore further alternatives that completely avoid or minimize wetland fills." The letter further states, "The report describes a development option that would limit the extent of expansion to include the Center Pond but not the side channel area. If wetlands can not be avoided, this alternative should be given further consideration." What happened to this option? It is not in the Adolfson report.

5.6 Description of Preferred Alternative (E), Expansion of Storage Areas, #6 on pages 21-22

The report does not show the comparison of transporting the sand off site versus recycling and reusing the sand on-site. How much does each cost and does keeping it on site justify filling in 5-acres of wetland? Right now, there are 20-25-foot tall piles of sand stored on site. The material is uncovered and until CSC was reported for filling in wetlands, machine operators pushed the material into the slough. Finally, if CSC does dispose the material off-site, it would need to be disposed of in a landfill. It could not be placed in wetlands, as stated on page 21, last paragraph, unless they had a permit.

6.0 Impacts of Alternative E on Natural Resources

6.2 Wildlife

The implementation of Alternative E would adversely impact wildlife. The current quality of the habitat is moderate to high, and would be better if CSC had not pushed casting sands into the

slough and buried the riparian vegetation at the eastern edge of the site. The filling of 5-acres would eliminate a seasonal wetland that contains many native plants, including Wapato, provides a wildlife connection to Smith and Bybee Lakes Wildlife Area, and is used by numerous mammals, waterfowl and songbirds. Waterfowl use the area because of the seed production and seclusion.

Table 5: What methodology was used to make this assessment? What area does the "Channel" refer to, it is not used elsewhere in the report? If the consultant is using best professional judgement, than 2 limited observations in April and July are not sufficient to make this judgement.

7.0 WOUS/WOS Mitigation Strategy

This section is incomplete. They do not give nor detail a mitigation strategy for the proposed fill.

7.2 Off-Site Mitigation Opportunities

The report states that the cost of undeveloped land in the slough is high and that current land-owners are "unwilling to sell their sites for less than the average cost for developable industrial lands." This has made sites not available for mitigation. CSC needs to acknowledge that the cost of land for mitigation is part of doing business, just as any other development costs they will incur for implementation of their proposed CIP plan. If they are unwilling or unable to pay these costs, than they need to avoid impacting wetlands.

I and other Metro employees have contacted many people at Metro and MERC to try to identify who is currently negotiating for the possible purchase of the North Edge of Penn 1. At this time we cannot locate anyone in our organization trying to purchase the property.

A contribution of \$18,000 to \$20,000 per acre for restoration or enhancement credit is well below the current cost of mitigation. Per acre costs run between \$50-75,000 if there is inexpensive land available. If the developer must purchase land, costs are often much higher. The consultant has greatly underestimated the cost of off-site mitigation.

Title 3 (Adopted by Metro Council on 6/18/98) (Section 1n1e06)

Water Quality and Flood Management Area Map



This map is intended to be used as a guide for delineating protected areas, in conjunction with the Title 3 Ordinance Language, adopted by the Metro Council.

Part of the Urban Growth Management Functional Plan, Title 3 requires that cities and counties comply with the Performance Standards set forth in the title.








Implementation of this title through local zoning codes and comprehensive plans is to take place at the local jurisdiction level.

The deadline for demonstration of compliance with Title 3 is 18 months after the date of adoption, or December 18, 1999.

Flood Management Area:

-  FEMA 100-Year Floodplain
-  Feb. 1996 Flood Inundation

Water Quality Resource Areas (Vegetated Corridor):

-  Riparian Areas
-  Wetland Areas
-  Primary Protected Water Features
-  Secondary Protected Water Features
-  Unprotected Water Features
-  Tax Lot Lines
-  Metro Boundary

SOURCES:

RIVERS & STREAMS:

County water maps, 1994. Data collection scale: 1:200' - 1:400'.

US Geological Survey Digital Elevation Model (DEM), received in 1995.

Data collection scale: 1:25,000.

Description: A DEM was used to calculate stream drainage areas of 50 & 100 acres. This information was used to enhance existing data.

Local jurisdictional updates (1997-1998)

FLOOD MANAGEMENT AREAS

Army Corps of Engineers, FEMA maps, 1992.

(See Federal Insurance Rate Maps (FIRM) for actual flood along local

Feb. 1996 Flood inundation data (from aerial photos taken 2/9 - 2/11).

(See 1996 Flood inundation source data for actual flood inundation)

WETLANDS

U.S. Department of Fish and Wildlife, 1983-1990.

Local jurisdictional updates and local wetland inventories.

BOUNDS:

TAX LOT MAP

City of Portland, Oregon City and Tigard.

Source: City, 1994. Map agency: aerial point positional accuracy

is plus or minus five feet or better. Data collection scale: 1" = 200'

Multnomah County East of Clatsop.

Source: Multnomah County Assessor, 1996. Map agency: based on

existing cadastral data. Line work entered using coordinate geometry.

BOUNDARY OF REGION

Source: Portland General Electric and Metro, 1994. Map agency:

aerial point positional accuracy is plus or minus ten feet.

Data collection scale: 1" = 200', 1" = 200' or 1" = 200'

NOTE: Due to positional error inherent in

mapped data, a field survey is required to

determine the precise location of natural

boundaries (i.e., wetlands) in relation to

tax lot boundaries.



Scale: 1" = 800'

0 250 500



From: "Barthel, Susan" <SUSANB@BES.CI.PORTLAND.OR.US>
To: "rothe@metro.dst.or.us" <rothe@metro.dst.or.us>
Date: Wed, Oct 13, 1999 11:16 AM
Subject: FW: Columbia Steel Castings project

fyi-----

> -----Original Message-----

> From: Walker, Cathy
> Sent: Wednesday, October 13, 1999 10:36 AM
> To: 'arhea@adolphson.com'
> Cc: Choy, Chee; Barthel, Susan; Houle, John; Stauning, Lloyd
> Subject: Columbia Steel Castings project
>

> Alison: I received a copy of your transmittal containing the executive
> summary of the permit application for the CSC site expansion because I am
> the project manager for a BES pre-design project that will investigate the
> source of pollutants in the Bloss Avenue storm drain and water quality
> treatments for the basin. In your report you state that "(t)he North
> Bloss Outfall is typically contaminated with untreated CSO discharge".
> That is not true. The North Bloss Outfall is not a CSO and there are no
> connections to sanitary sewer lines.
>

> The only CSO contamination that occurred on the CSC property was caused by
> the 1996 storms and originated from the Oregonian combined sewer system.
> The 1996 storms were extreme events and atypical of the area's normal
> storm events. BES is completing phase 2 of construction of the Oregonian
> separation project. Phase 3 (the final phase), which involves upsizing
> approximately 90 lf of pipe and rebuilding a diversion structure, is
> scheduled for completion next summer. When the project is complete,
> overflows will rarely occur, and when they do, they will outfall to the
> Columbia Slough. Lloyd Stauning is the project manager for the separation
> project. His number is 823-7633.
>

> If you have any questions about these projects, feel free to call either
> Lloyd or me.

**METRO**

November 24, 1999

Dear,
Troy Clark
Frank Opila
Holly Michael
Nancy Hendrickson
Gerry Wright
Lance Bailey

Kevin O'Sullivan
Pam Arden
Jim Sjulín
Jim Morgan
Gerry Meyer

I know that many of you have heard the news by now, but for those of you that haven't, I have made a decision to leave Metro and the manager position of Smith and Bybee Lakes Wildlife Area. This has been a very difficult decision for me. I feel very fortunate to have had the opportunity to work with everyone on the management committee for the protection and enhancement of the wildlife area, to learn about the ecology of a very special "wilderness" in our community and to have spent many wonderful hours paddling. I have learned about western painted turtles, been frustrated by beaver, logged hundreds of hours of conversation with Troy on weekly bird walks and even managed to learn the Bewick's Wren's song.

December 8th will be my last day at Metro. My position is currently being advertised and will be open until December 17. If you know anyone who would be interested in the position, a job description and applications are available at the Human Resources Department at Metro. It a plum position so I expected Metro will get many qualified applicant. In the interim, Dan Kromer – Parks and Greenspaces, Operations and Maintenance Manager, and Jim Morgan will look after the lakes until a new manager is hired.

So, why am I leaving? I don't have a definite answer to that question. An opportunity came up for me at the Oregon Department of Environmental Quality (DEQ) to manage the planning and policy portion of the Portland Harbor clean up. After much discussion and agonizing, I decided to take the job. I am excited, and a little nervous, about being part of the DEQ team working to restore and enhance the Willamette so it will be cleaner for all users – humans and wildlife.

Again, thanks for all the hard work and energy you have brought to the protection and enhancement of the wildlife area throughout my tenure as manager. I am confident that your good work will continue through this transitions time and when a new manager is hired.

Sincerely,

A handwritten signature in cursive script, appearing to read "Emily".

Emily Roth
Wildlife Area Manager
Smith and Bybee Lakes
(at least for a few more days)