



City of Portland
Bureau of Development Services
Land Use Services Division

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Date: August 22, 2008
To: Interested Person
From: Kim Freeman, Land Use Services
503-823-5663 / kim.freeman@ci.portland.or.us

NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The reasons for the decision are included in this notice. If you disagree with the decision, you can appeal it and request a public hearing. Information on how to appeal this decision is listed at the end of this notice.

CASE FILE NUMBER: LU 08-142131 GW

GENERAL INFORMATION

Applicant: Emily Roth
Portland Parks & Recreation
1120 SW 5th Avenue, Suite 1302
Portland, OR 97204

Site Address: Ross Island
Legal Description: TL 100 UPLAND 116.83 ACRES SUBMERGED 197.04 ACRES,
SECTION 15 1S 1E
Tax Account No.: R991150370 **State ID No.:** 1S1E 00100
Quarter Section: 3631

Neighborhood: Brooklyn Action Corps, contact Lance Lindahl at 503-963-8113 and South Portland Neighborhood Association, contact Jim Davis at 503-248-9820.

Other Designations: 100 year Flood Plain
Zoning: Osnq – Open Space (OS), River Natural (n), River Water Quality (q)

Case Type: GW - Greenway Review
Procedure: Type II, an administrative decision with appeal to the Hearings Officer.

Proposal:

The Portland Parks and Recreation (PP&R) is proposing resource enhancement on the City owned 44.8 acre portion of Ross Island within Willamette River. The enhancement project includes removal of invasive species (Himalayan blackberry, English ivy, and Clematis) and nuisance tree and shrub species (European hawthorn, English holly and Black locust) using manual, mechanical and herbicide applications. Revegetation of the 44.8 acres will include planting native species to increase structural diversity and ongoing maintenance of invasive species. Monitoring and maintenance is proposed for the next ten years.

Herbicide use application is proposed to be in conformance with the Portland Parks and recreation Integrated Pest Management Plan (IMP) Policy 19 (Exhibit C.2). Site preparation and ongoing vegetative maintenance is proposed to be in conformance with the IMP as well.

Greenway review is required per section 33.440.310.B for this project since application of herbicides for invasive plant removal is proposed within the greenway River Natural and Water quality overlay zones.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33. The relevant criteria are found in section 33.440.350 Greenway Overlay Zone.

ANALYSIS

Site and Vicinity: The project site includes the city owned property, 44.8 acres, on Ross Island located in the Willamette River. The main river channel runs to the west of the island, Holgate channel borders the island to the east and provides access to the Ross Island lagoon. The site is managed by the City of Portland Bureau of Parks and Recreation.

Ross Island Sand and Gravel operates within the lagoon and on the uplands to the south and east of the lagoon. Hardtack Island to the south is used for sand and gravel processing. Ross Island and Hardtack Island are connected with a constructed berm.

The project site is dominated by a tree canopy of Oregon ash, big leaf maple, and black cottonwood with invasive trees including black locust and sweet pie cherry. The understory consists of a mix of invasive species including blackberry, clematis, English ivy, Scots broom and English Hawthorne. There are few native shrubs.

The riverbanks of the island are steep within the lagoon, with some sandy beach areas along the Holgate channel portions of the project site. The western riverbank is steep and eroding due to wave action.

Greenway Resources: The Ross Island site is within Site 22A (Rank I), as noted in the *Lower Willamette River Wildlife Habitat Inventory*. This area is noted for being natural in character, with natural beaches, low gradual banks around the perimeter and steeper banks in the lagoon. There is heavy vegetative cover on the uplands, primarily black cottonwood with some Oregon white ash. Areas are covered with Himalayan blackberry and other invasive species. The most significant feature from a wildlife perspective is the Great Blue Heron rookery, with approximately 40 nests.

Bald eagles have nested on the island since 1996. The eagle pair has raised many fledglings through 2005. The island is designated as an Important Bird Area by the Audubon Society of Portland for eagle nest, heron rookery and use by migratory songbirds.

Zoning: There are multiple zoning designations on the site, including Open Space (OS) and Greenway River Water Quality (q) and River Natural (n) overlay zones.

*The **Open Space (OS)** zone is intended to preserve and enhance public and private open, natural, and improved park and recreational areas identified in the Comprehensive Plan. These areas serve many functions including:*

- *Providing opportunities for outdoor recreation;*
- *Providing contrasts to the built environment;*
- *Preserving scenic qualities;*
- *Protecting sensitive or fragile environmental areas;*
- *Preserving the capacity and water quality of the stormwater drainage system; and*
- *Providing pedestrian and bicycle transportation connections.*

The site has two **Greenway** Overlay Zones

- *The **River Natural (n)** zone protects, conserves, and enhances land of scenic quality or of significant importance as wildlife habitat.*

- The **River Water Quality (q)** zone is designed to protect the functional values of water quality resources by limiting or mitigating the impact of development in the setback.

In the River Water Quality zone, primary uses that are river-dependent or river-related are allowed. The River Natural zone does not have specific use provisions. Resource enhancement projects are considered river-related.

Land Use History: City records indicate there are no prior land use reviews for this site.

Agency Review: Several Bureaus and agencies have responded to this proposal. Please see Exhibits E.1-.7 for details. The comments are addressed under the appropriate criteria for review of the proposal.

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on July 16, 2008. One written response has been received from either the Neighborhood Association or notified property owners in response to the proposal.

The R. B. Pamplin Corporation wrote to express concern about potential erosion and turbidity in the lagoon, and the potential for herbicide to contaminate fill in the Ross Island lagoon. The PP&R propose to follow the Integrated Pest Management Plan (IMP) Policy 19 for herbicide use near waterways. Herbicide application will be done by hand, will not occur on windy days and will only be applied by licensed applicators. There are no proposed activities that will cause erosion. Please see Exhibit A.1 for a more detailed explanation of the herbicide application methods.

ZONING CODE APPROVAL CRITERIA

33.440.350 Greenway Review Approval Criteria

A greenway review application will be approved if the review body finds that the applicant has shown that all of the approval criteria are met.

- A. For all greenway reviews.** The Willamette Greenway design guidelines must be met for all greenway reviews.

Findings: The Willamette Greenway Design Guidelines address the quality of the environment along the river and require public and private developments to complement and enhance the riverbank area. The Design Guidelines are grouped in a series of eight Issues:

- Issue A. Relationship of Structures to the Greenway Setback Area
- Issue B. Public Access
- Issue C. Natural Riverbank and Riparian Habitat
- Issue D. Riverbank Stabilization Treatments
- Issue E. Landscape Treatments
- Issue F. Alignment of Greenway Trail
- Issue G. Viewpoints
- Issue H. View Corridors

(A complete description of the Design Guidelines and their applicability is provided in pages 45-81 in the *Willamette Greenway Plan*.)

Issue A. Relationship of Structures to the Greenway Setback Area: This issue “applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway Trail is shown on the property in the *Willamette Greenway Plan*.” These guidelines call for complementary design and orientation of structures so that the greenway setback area is enhanced:

Findings: This project does not include the construction of any buildings or structures; therefore, this Issue does not apply.

Issue B. Public Access: This issue “applies to all but river-dependent and river-related industrial use applications for Greenway Approval, when the Greenway Trail is shown on the property in the *Willamette Greenway Plan*.” These guidelines call for integration of the Greenway Trail into new development, as well as the provision of features such as view points, plazas, or view corridors:

Findings: There is no Greenway Trail designation on the island, therefore this issue does not apply.

Issue C. Natural Riverbank and Riparian Habitat: This issue “applies to situations where the river bank is in a natural state, or has significant wildlife habitat, as determined by the wildlife habitat inventory.” These guidelines call for the preservation and enhancement of natural banks and areas with riparian habitat:

Findings: The project area is located on the City owned portion of Ross Island. As noted in the site description above, the Ross Island site is riparian forest habitat with significant invasive plant species. In order to avoid and minimize impacts to the site resources during the restoration activities, the applicant has outlined a number of measures that will be implemented to achieve the project goals, and protect and enhance the habitat values of the property (Exhibit A.1). An overview of these measures, and the potential impacts and benefits of the project is provided below:

Site access: The applicant proposes to use a pontoon type boat to access the island from the Holgate Channel beach area. The applicant will coordinate with Ross Island Sand and Gravel for this access. There is no grading, structures or permanent impacts proposed as part of this method of access. All materials, tools and equipment will be hand carried on and off the island with no storage of materials on the island.

Herbicides: The use of herbicides is proposed to ensure the success of the restoration plantings proposed for the site. The applicant proposes herbicide use in conformance with the Portland Parks and Recreation Integrated Pest Management Plan (IMP) Policy 19. The Policy has been reviewed by the National Marine Fisheries Service and received an Endangered Species Act 4(d) exemption in 1999 to allow herbicide use in proximity to waterways with salmonids. This policy limits type of herbicide, application method, application and type of herbicide within proximity to water bodies, time of year for application, and limits application if winds exceed 5mph. These measures are designed to prevent spills, ensure safe application of herbicides for people, fish and native plants, and prevent overuse of herbicide. In combination to the herbicide use, invasive vegetation will also be removed by hand, mowing and pruning. The applicant proposes to target invasive species known to be ecosystem disrupters with herbicide application. These targeted species are clematis (*Clematis vitalba*), English ivy (*Hedera helix*), and Himalayan blackberry (*Rubus armeniacus*). These species require a combination of manual removal and herbicide application to effectively disrupt the below ground reproductive structures.

Because there is no proposed modification of the riverbank, and the proposed herbicide use to assist in removal of invasive species and revegetation program will enhance riparian habitat on the site, the Riparian Habitat guideline will be met, and this Issue is met.

Issue D. Riverbank Stabilization Treatments: This Issue “applies to all applications for Greenway Approval.” This guideline promotes bank treatments for upland developments that enhance the appearance of the riverbank, promote public access to the river, and incorporate the use of vegetation where possible:

Findings: As indicated above in response to Issue C, the applicant does not propose riverbank stabilization; rather the applicant intends to remove invasive plant species and restore the site by planting native species. The application of herbicides to prevent regrowth of non-native species will allow the newly planted native plants to survive until

they can out-compete non-native species. Public access to the island is not identified as a goal in the current Willamette Greenway Plan. Because the project will enhance the appearance and habitat function of the site through invasive species removal, does not propose to alter the river bank, and will not preclude future access or use of the island; this Issue is met.

Issue E. Landscape Treatments: This Issue “applies to all applications for Greenway Approval which are subject to the landscape requirements of the Greenway chapter of Title 33 Planning and Zoning of the Portland Municipal Code.” This Issue calls for landscaping treatments that create a balance between the needs of both human and wildlife populations in the Greenway Setback area or riverward of the Greenway Setback.

Findings: Since the PP&R proposes to use herbicides to remove and control regrowth of invasive and non-native species, a Greenway Review for the use of herbicides is required. The use of herbicides will initially help to kill targeted invasive vegetation and to control the regrowth of unwanted non-native invasive species on the site, while providing time for native vegetation to become established. The long-term effect will contribute to an enhanced environment that provides wildlife habitat and is aesthetically pleasing to humans. Therefore, this Issue is met.

Issue F. Alignment of Greenway Trail: This issue “applies to all applications for Greenway Approval with the Greenway Trail shown on the property in the Willamette Greenway Plan.” These guidelines provide direction for the proper alignment of the greenway trail, including special consideration for existing habitat protection and physical features in the area of the proposed alignment.

Findings: This site does not have a Greenway Trails designation in the *Willamette Greenway Plan*. Therefore, this criterion is not applicable.

Issue G. Viewpoints: This issue “applies to all applications for Greenway Approval with a public viewpoint shown on the property in the *Willamette Greenway Plan* and for all applications proposing to locate a viewpoint on the property. These guidelines provide direction about the features and design of viewpoints, as required at specific locations.

Findings: The *Willamette Greenway Plan* does not include any designated viewpoints on Ross Island, so this Issue does not apply.

Issue H. View Corridors: This issue “applies to all applications for Greenway Approval with a view corridor shown on the property in the *Willamette Greenway Plan*”. These guidelines provide guidance in protecting view corridors to the river and adjacent neighborhoods.

Findings: There are no view corridor designations on this site in the *Willamette Greenway Plan*, so this issue is not applicable.

Summary of Issue Findings: The design guidelines in Issues A, B, F, G and H are not applicable and those in Issues C, D, and E are met. Therefore, this criterion is met.

B. River frontage lots in the River Industrial zone.

Findings: The site does not have a River Industrial designation, so this criterion does not apply.

C. Development within the River Natural zone. The applicant must show that the proposed development, excavation, or fill within the River Natural zone will not have significant detrimental environmental impacts on the wildlife, wildlife habitat, and scenic qualities of the lands zoned River Natural. The criteria apply to the construction and long-range impacts of the proposal and to any proposed mitigation measures. Excavations and fills are prohibited except in conjunction with approved development or for the purpose of

wildlife habitat enhancement, riverbank enhancement, or mitigating significant riverbank erosion.

- D. Development on land within 50 feet of the River Natural zone.** The applicant must show that the proposed development or fill on land within 50 feet of the River Natural zone will not have a significant detrimental environmental impact on the land in the River Natural zone.

Findings: The western bank and eastern bank area along the Holgate channel are located within the River Natural zone, however there is no proposed development or fill within the River Natural zone. Therefore, these criterion do not apply.

- E. Development within the greenway setback.** The applicant must show that the proposed development or fill within the greenway setback will not have a significant detrimental environmental impact on Rank I and II wildlife habitat areas on the riverbank. Habitat rankings are found in the *Lower Willamette River Wildlife Habitat Inventory*.

Findings: As discussed on Page 2 of this report, Ross Island is a Rank I resource in the *Lower Willamette River Wildlife Habitat Inventory*. The applicant is not proposing any development or fill within the greenway setback, therefore, this criterion does not apply.

- F. Development riverward of the greenway setback.** The applicant must show that the proposed development or fill riverward of the greenway setback will comply with all of the following criteria:
1. The proposal will not result in the significant loss of biological productivity in the river;
 2. The riverbank will be protected from wave and wake damage;
 3. The proposal will not:
 - a. Restrict boat access to adjacent properties;
 - b. Interfere with the commercial navigational use of the river, including transiting, turning, passing, and berthing movements;
 - c. Interfere with fishing use of the river;
 - d. Significantly add to recreational boating congestion; and
 4. The request will not significantly interfere with beaches that are open to the public.

Findings: There is no proposed development within or riverward of the greenway setback. Therefore this criterion does not apply.

- G. Development within the River Water Quality overlay zone setback.** If the proposal includes development, exterior alterations, excavations, or fills in the River Water Quality overlay zone setback the following approval criteria must be met:

3. Resource enhancement projects. In the River Water Quality overlay zone setback, resource enhancement projects will be approved if the applicant's impact evaluation demonstrates that all of the following are met:
 - a. There will be no significant detrimental impact on functional values;
 - b. There will be a significant improvement of at least one functional value; and
 - c. The project is generally consistent with the recommendations of any applicable City-adopted watershed restoration plans.

Findings: The proposed use of herbicide in the River Water Quality overlay does not include development, exterior alteration, excavation or fill activities, therefore, this criterion does not apply.

- H. Mitigation or remediation plans.** Where a mitigation or remediation plan is required by the approval criteria of this chapter, the applicant's mitigation or remediation plan must demonstrate that the mitigation will occur on-site or as close to it as possible; that the applicant owns the mitigation site; and that the mitigation plan contains a construction timetable as well as monitoring and maintenance plans

Findings: Because there is no development, exterior alteration, excavation, or fills within the River Water Quality overlay proposed, a mitigation plan is not required by this review. Therefore this criterion does not apply.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all development standards of Title 33 can be met, or have received an Adjustment or Modification via a land use review prior to the approval of a building or zoning permit.

CONCLUSIONS

The applicant requests approval of a Greenway review for use of herbicides to remove and control regrowth of non-native invasive and other weed species as part of a PP&R proposal to clear such species from the site and revegetate with native trees and plants.

The applicant has demonstrated compliance with the Issues and Guidelines of the *Willamette Greenway Plan* as well as meeting the relevant approval criteria for the Greenway review.

ADMINISTRATIVE DECISION

Approval of Herbicide Use in accordance with the Portland Parks and Recreation Integrated Pest Management Plan for the project area shown on approved Exhibit C-1, signed and dated August 20, 2008.

Decision rendered by: Michael Nayak **on August 20, 2008.**
By authority of the Director of the Bureau of Development Services

Decision mailed: August 22, 2008

Staff Planner: Kim Freeman

About this Decision. This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on July 1, 2008, and was determined to be complete on July 14, 2008.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on July 1, 2008.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant did not waive or extend the 120-day review period.

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information

satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term “applicant” includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

Appealing this decision. This decision may be appealed to the Hearings Officer, which will hold a public hearing. Appeals must be filed **by 4:30 PM on September 5, 2008** at 1900 SW Fourth Ave. Appeals can be filed on the first floor in the Development Services Center until 3 p.m. After 3 p.m., appeals must be submitted to the receptionist at the front desk on the fifth floor. **An appeal fee of \$250 will be charged.** The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized organizations appealing a land use decision for property within the organization’s boundaries. The vote to appeal must be in accordance with the organization’s bylaws. Low-income individuals appealing a decision for their personal residence that they own in whole or in part may qualify for an appeal fee waiver. In addition, an appeal fee may be waived for a low income individual if the individual resides within the required notification area for the review, and the individual has resided at that address for at least 60 days. Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Fee waivers for low-income individuals must be approved prior to filing the appeal; please allow 3 working days for fee waiver approval. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please contact the receptionist at 503-823-7967 to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at www.portlandonline.com.

Attending the hearing. If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Hearings Officer is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 550 Capitol St. NE, Suite 235, Salem, Oregon 97301, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Hearings Officer an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

If this Land Use Review is approved the final decision must be recorded with the Multnomah County Recorder. A few days prior to the last day to appeal, the City will mail instructions to the applicant for recording the documents associated with their final land use decision.

- *Unless appealed,* The final decision may be recorded on or after **September 8, 2008 – (the day following the last day to appeal).**
- A building or zoning permit will be issued only after the final decision is recorded.

The applicant, builder, or a representative may record the final decision as follows:

- **By Mail:** Send the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to: Multnomah County Recorder, P.O. Box 5007, Portland OR 97208. The recording fee is identified on the recording sheet. Please include a self-addressed, stamped envelope.
- **In Person:** Bring the two recording sheets (sent in separate mailing) and the final Land Use Review decision with a check made payable to the Multnomah County Recorder to the County Recorder's office located at 501 SE Hawthorne Boulevard, #158, Portland OR 97214. The recording fee is identified on the recording sheet.

For further information on recording, please call the County Recorder at 503-988-3034
For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

Expiration of this approval. An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Zone Change and Comprehensive Plan Map Amendment approvals do not expire.

Applying for your permits. A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

EXHIBITS

NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
- B. Zoning Map (attached)
- C. Plans/Drawings:
 1. Site Plan (attached)
 2. Portland Parks and Recreation Integrated Pest Management Plan (IMP) Policy 19
- D. Notification information:
 1. Mailing list
 2. Mailed notice
- E. Agency Responses:
 1. Bureau of Environmental Services
 2. Bureau of Transportation Engineering and Development Review
 3. Water Bureau
 4. Fire Bureau
 5. Site Development Review Section of BDS
 6. Bureau of Parks, Forestry Division

7. Life Safety Review Section of BDS

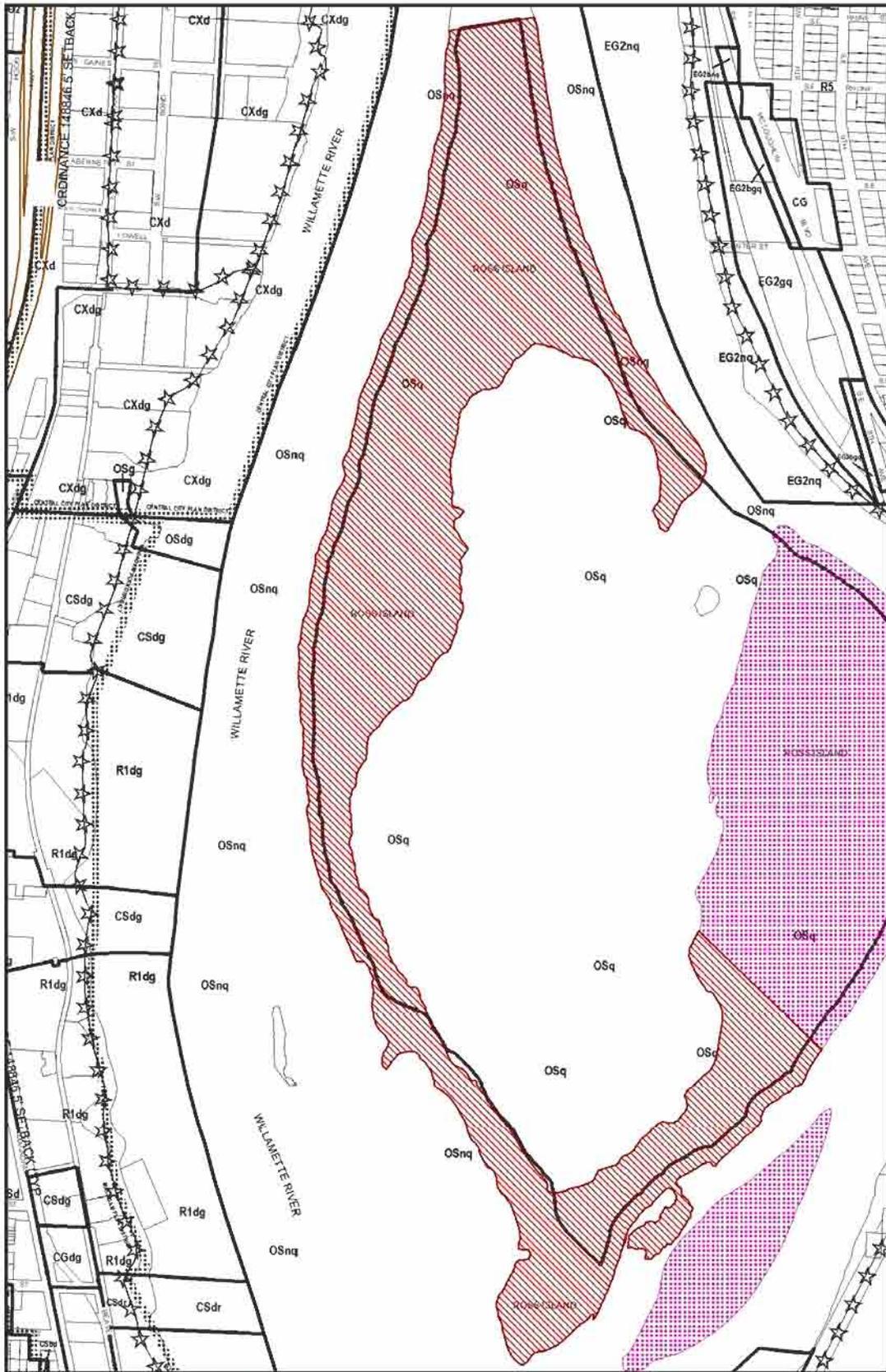
F. Correspondence:

1. Marilyn Stewart R.B. Pamplin Corporation, July 24, 2008, Concerns about potential erosion and herbicide contaminates affecting their reclamation project.

G. Other:

1. Original LU Application
2. Site History Research

The Bureau of Development Services is committed to providing equal access to information and hearings. If you need special accommodations, please call 503-823-0625 (TTY 503-823-6868).



ZONING

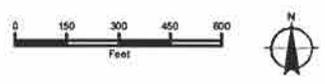
- Site
- Also Owned
- Historic Landmark



File No. LU 08-142131 GW
 1/4 Section 3430,3431,3530,3531,3630,3631
 Scale 1 inch = 600 feet
 State Id 1S1E 100
 Exhibit B (Jul 07 2008)

Ross Island Natural Area
Existing Conditions Site Plan
Fig. 1

- Key**
-  Project Area
 -  Portland 100yr Floodplain



June 11, 2008

Project extends
4300 feet along
shoreline

Shrubs and Groundcover
Rubus ursinus
Rubus discolor
Symphoricarpos albus
Hedera helix

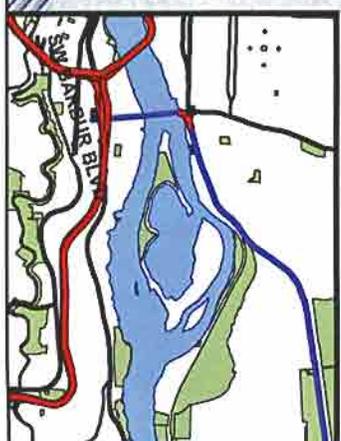
Trees:
Salix lucida ssp. *lasianдра* 0-5 in. dbh
Quercus garryana, 0-5 in. dbh
Robinia pseudo-acacia 0-5 in. dbh
Acer macrophyllum 10-20 in. dbh
Acer saccharinum 5-10 in. dbh
Prunus avium 5-10 in. dbh
Alnus rubra 10-20 in. dbh
Fraxinus latifolia 10-20 in. dbh
Crataegus douglasii 0-5 in. dbh
Crataegus monogyna 0-5 in. dbh
Populus balsamifera ssp. *trichocarpa* 20-30 in. dbh

ordinary high water
line

Ross Island Lagoon

Willamette River

Holgate Channel



Approved
 City of Portland
 Bureau of Development Services
 Permit # 08-1421316W
 Planner K. Freeman
 Date 8/20/08
 * Approval for Environmental Review only.
 Not a building permit.
 Additional zoning requirements may apply.

CASE NO 08-1421316W
 EXHIBIT C
 LV 08-1421316W