



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Michael Jordan, Director

May 12, 2021

Representative Jeff Golden, Chair  
Senate Natural Resources and Wildfire Recovery Committee  
900 Court St. NE, HR D  
Salem, OR 97301

Dear Chair Golden and Members of the Committee,

The City of Portland supports and urges you to vote yes on HB 3185-A which would limit the types of wetlands where fill could be placed during maintenance of agricultural channels. The City of Portland Bureau of Environmental Services (BES) manages Portland's wastewater and stormwater infrastructure to protect public health and the environment, leading the City in preserving and restoring the health of Portland's watersheds. BES works to protect the quantity and quality of surface water and groundwater within the City and to conduct activities that plan and promote healthy ecosystems in our watersheds.

Wetlands may be protected under treaty rights between the federal government and sovereign Tribal Nations, therefore said tribes should be consulted during the development of, and changes to, any wetland regulation. The City of Portland urges you to consult with the appropriate Tribes prior to making any change to the enforcement of wetlands regulations.

Many of our state's wetlands are of importance to Native people in the region and are culturally significant in many ways, such as holding first food plants such as wapato, camas, tule, and wokus. Wetlands provide natural water filtration, protecting groundwater and water draining to nearby streams and rivers from a variety of pollutants. Wetlands serve as critical habitat for sensitive species that are part of our region's larger food webs and serve as natural stormwater infrastructure by attenuating peak stormwater flows and reducing flood risks to surrounding homes, businesses, and roads. Wetlands and associated vegetation help cool surrounding areas and capture carbon. These functions are valuable in urban, rural and wilderness settings. The importance of protecting wetlands is even more critical as climate change impacts precipitation patterns, temperature, and biological communities. There are a number of agricultural operations in the city and in unincorporated areas of the surrounding counties that drain to and impact watersheds in Portland, that are affected by HB 3185-A.

HB 3185-A would prohibit the spreading of materials from agricultural channels on "undisturbed" wetlands. While we believe the science is clear that even previously impacted wetlands provide some of the essential functions discussed above, protecting undisturbed wetlands from such activities is an important step in maintaining the important benefits provided by wetlands for Oregonians. Because we do not have records of the number and acreage of wetlands pre-urbanization in Oregon, we cannot accurately estimate loss to date. However, scientists have estimated that 53% of historic wetlands were lost in the 48 contiguous states before 1980, with

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losses continuing since that time. HB 3185-A would protect an important subset of those remaining wetlands from degradation and help preserve the important water quality, flood control, habitat, temperature regulation, and cultural functions they provide for our communities.

We urge your support for HB 3185-A. If you have any questions regarding these comments, please contact Eric Noll at [eric.noll@portlandoregon.gov](mailto:eric.noll@portlandoregon.gov) or at 503-823-6726.

Sincerely,

Michael Jordan  
Director