



# Portland Pedestrian Advisory Committee

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Portland OR 97204

183518

## Members

January 26, 2010

David Aulwes

Mayor Sam Adams

Karen Berkowitz

1221 SW Fourth Avenue, Room 220

Carolyn Briggs

Portland, OR 97204

Ali Corbin

City Council

Kim Cottrell

1221 SW Fourth Avenue

Portland, OR 97204

Elaine Friesen-Strang

## Re: South Waterfront Code & Design Guideline Project and Greenway Paths

Erin Kelley

To Mayor Sam Adams and Members of City Council,

Doug Klotz

Jess Laventall

The Portland Pedestrian Advisory Committee wishes to convey to City Council the importance of the South Waterfront Greenway trail **dual path bike-ped system**, as well as the whole Greenway Trail system, to the pedestrian environment. Providing access to and along the river's edge is a critical design element of the adopted Greenway Development Plan and South Waterfront Plan. The dual pathway system helps achieve this access for everyone and ensures their safety and enjoyment.

Sumi Malik

Rod Merrick

Elizabeth Mros-O'Hara

Marian Rhys

In the big picture, the Greenway Trail system is integral to achieving Oregon's Statewide Planning Goals and Guidelines, specifically Willamette River Greenway Goal 15 as follows:

Alison Wildman

Rod Yoder

**To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette Greenway.**

Among other important elements, the Oregon Statewide Planning Goals and Guidelines require that plans and implementation measures shall provide for **recreation, adequate public access, fish and wildlife habitat and scenic qualities and views**.

The South Waterfront Greenway trail dual pathway system represents world-class thinking and design for pedestrian and bicycle facilities. Portland should be proud to have this system along the Willamette River.

A dual pathway trail system within the Willamette River Greenway enables people who are moving slowly and stopping along the river to be separated and shielded from those who are primarily intent on moving quickly along the path such as joggers, cyclists, and roller bladers. As the number of people in both categories has increased, so have the conflicts - conflicts that degrade the pedestrian and bicycling environment. These conflicts are already evident along the existing Greenway Trails on the east and west banks of the river. While usage is steadily increasing as intended by policy, these existing trails generally lack the needed separation, are frequently too narrow for current usage, and will be inadequate for anticipated growth.

The dual pathway system helps to avoid such conflicts and maintains access to and along the river for all trail users. It is particularly important in the South Waterfront, where greater density is planned. The dual pathway system is necessary to accommodate future growth within the district, as well as travel through the district on the Greenway Trail.

The South Waterfront Plan and Greenway Development Plan represent a delicate balance of many public and private values and interests - the result of years of work and negotiation among the many stakeholders representing a variety of interests to reach agreement on closely linked plan elements.

Compromising this delicate balance now to respond to single issue pressures would require reopening the process of negotiation among the many inter-dependent interests.

The location, width and design of the South Waterfront Greenway trail dual pathways is one of these elements in the delicate balance. We advise against changes to the Greenway Development Plan or South Waterfront Code and Design Guidelines that would impact it.

Please help Portland realize the South Waterfront Greenway trail dual pathways as reflected in current plans, so that everyone will be able to walk, ride and roll on it, and appreciate the value it will bring to our City. People need to be able to view the river, experience it, and convene on its banks, if they are to know and care for it.

We appreciate your time and consideration of this matter and the opportunity to advise on it.

Thank you,



David Aulwes

Chair, Portland Pedestrian Advisory Committee

cc: Paul Smith, Portland Bureau of Transportation  
cc: Art Pearce, Portland Bureau of Transportation  
cc: Troy Doss, Portland Bureau of Planning and Sustainability  
cc: Brett Horner, Portland Bureau of Parks

**SOUTH WATERFRONT CODE & DESIGN GUIDELINE UPDATE**IF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME, ADDRESS, AND EMAIL.

NAME (print)	ADDRESS AND ZIP CODE	Email
MIKE HOUCIK	PO Box 6903 97228	mikehoucik@urban greenspaces.org
Andrew Jansky	4217 SW ALTAGENA, PORTLAND 97239	Andrew@ Flowing Solutions.com



December 2, 2009

Portland City Council  
City Hall  
1221 S.W. 4th Avenue  
Portland, Oregon 97204

Dear Mayor Adams and Commissioners,

We are writing on behalf of our respective organizations to express our concerns regarding the proposed South Waterfront Design Guidelines. Our staffs have participated in the South Waterfront Greenway development process dating back to the mid 1990's. During the past decade we have served on a succession of committees including the Greenway Design Task Force, the Greenway Partnership Group and most recently the 2008 Greenway Public Advisory Committee. We have also been actively engaged in efforts involving permit negotiations with NOAA Fisheries.

We regret bringing concerns to you late in the process. However despite our longstanding involvement in South Waterfront related issues, we were caught by surprise by the new Design Guidelines. Apparently stakeholders were notified via mail about this process. Given our long term and ongoing involvement in South Waterfront efforts, we must admit some frustration that more direct outreach was not undertaken to solicit our perspective and input into this phase of the process. We recognize that there are many stakeholders involved in South Waterfront; However Audubon and UGI have diligently represented the environmental perspective since this projects conception and we would have expected to have been directly involved in the development of design guidelines given their clear and direct implications for the ecology of the South Waterfront Greenway.

Our comments are offered with the hope that they can be integrated into the Design Guidelines before adoption and to flag issues that we believe need to be closely tracked going forward. Attached is a detailed, page by page outline of our specific concerns with the guidelines. The following are three generalized areas of concern that are covered in more detail in the appended comments:

1. In general the Design Guidelines appear to deemphasize habitat restoration as a priority on the greenway. Sections on habitat restoration are relegated to the back of the Design Guideline document after several sections on development. Pictures throughout the document feature river scenes with hardened, developed banks and minimal vegetative cover. Finally the scope and intensity of greenway development described throughout the document, while difficult to quantify, would appear to be inconsistent with the restoration objectives that have been repeatedly reaffirmed over the past decade. This document reflects an ongoing shift in both the narrative and pictorial content of South Waterfront related documents that have been developed in recent years away from restoration objectives and toward a much more intensely developed greenway. We are particularly interested in working with staff prior to adoption to: a) incorporate images that more accurately reflect the restoration objectives of the greenway and b) modify the narrative on the North Greenway Reach to reflect restoration objectives.

From the outset of planning for the Greenway the North Reach was to be the most habitat intensive portion of the greenway. The Greenway Vision anticipated more active use to be concentrated in the Central and South Reaches and denser habitat restoration in the North Reach in order to take best accommodate of both human population concentrations and the natural hydrology of the river. However the Design Guidelines call for open lawns, small play area, "large" activity area, community garden, plaza, river overlook, dock, restroom, and a vender kiosk in the North Reach. Given all of these uses it is difficult to understand how the restoration goals can be met in the North Reach.

2. The Design Guidelines do not reflect lessons learned during the federal permitting process that has occurred over the past three years. Various elements of the proposed Central District Greenway failed to meet NOAA Fisheries standards for compliance with the Endangered Species Act. Those deficiencies are currently being remedied. However those remedies have not been incorporated into the design guidelines. For example NOAA Fisheries has indicated that it wants pilings removed from shallow water areas because of the impacts on listed fish species. The Design Guidelines, however, suggest utilizing existing pilings as architectural features and the companion code amendments include exemptions that would allow property owners to add additional pilings. We would encourage the City to capture these types of permit conditions in the Design Guidelines to ensure a more efficient permitting process in the future.
3. One of our greatest concerns is coordination. We firmly believe there should be one coordinating entity within the city taking the lead on this

issue. We spent several hours preparing for this hearing, including going to the website of Parks, PDC and Planning and Sustainability. It is noteworthy that there is no one place stakeholders or the general public can go for a unified, coherent easily tracked version of the South Waterfront concept and guidelines. While we are not necessarily recommending which bureau takes the lead, we are under the impression that the newly established Office of Healthy Working Rivers was created for just such a coordinating role. From our perspective it appears that inter-bureau communication continues to be a challenge on the South Waterfront Greenway Process. We understand, for example, that many of our comments were also made by the Bureau of Environmental Services. When we discussed our concerns and referenced BES's comments yet some in the city seemed unaware that our concerns mirrored those of BES. We believe that on a project of this complexity and longevity, it is critical that a single entity retain ongoing responsibility for better overall project coordination.

We appreciate the work that has gone into developing the Design Guidelines and hope our comments will be useful in designing a more efficient and effective process going forward. Most importantly we are hopeful our recommendations will help ensure that the ecological objectives that we believe have long been an integral element of the Greenway concept but seem to have decreased through the many iterations of the process will actually be realized.

Mike Houck



Executive Director  
Urban Greenspaces Institute

Bob Sallinger



Conservation Director  
Audubon Society of Portland

Specific South Waterfront Design Guideline Comments :

In general the Design Guidelines appear to deemphasize habitat restoration. Sections on habitat restoration are relegated to the back of the guideline document after several sections on development. Pictures throughout the document feature river scenes with hardened, developed banks and minimal vegetative cover. Lessons learned during the federal permitting process over the past three years have not been incorporated into the document and in fact the document in several places directly contradicts the requirements that have been established by NMFS. Finally the degree of greenway development described throughout the document while difficult to quantify would appear to be incongruous with the type of restoration objectives that have been repeatedly reaffirmed over the past decade.

Our understanding throughout this process is that more active uses would be focused on interior parks while a heavier focus on restoration, engagement with nature and more contemplative activities would be accommodated on the Greenway. We are not suggesting by any means that people should be excluded or discounted in the Greenway. However we are surprised by intensity and scope of the descriptions of multiple plazas, play areas, community gardens, spillage of commercial activity onto the greenway, kiosks, restrooms, rental facilities, manicured lawns, art installations, overlooks, etc. From our perspective the descriptions leave little or no room for nature, a perception that is compounded by the use of pictures throughout the document which portray landscapes with fully developed and hardened banks and little or no vegetative cover rather than naturalistic settings.

Our specific comments are as follows:

1. Pictures throughout the document are inconsistent with habitat objectives especially along rivers edge. They portray hardened banks, landscapes with little or no vegetation, and development outcomes that directly contradict federal permitting requirements that are currently under negotiation. While we understand that some of these pictures are meant to show features other than the nature resource restoration outcomes, the overwhelming number of pictures that deviate from the natural resource objectives at South Waterfront send a very odd and we believe, confusing message that will ultimately undermine on the ground restoration efforts. The following is a list of pictures that we believe send an inaccurate message about the South Waterfront Greenway:
  - a. Page 16: The cement ramp down to the gravel beach--almost certainly would not get through permitting.
  - b. Page 17: Hardened surfaces at rivers edge
  - c. Page 18: Upper left hand picture shows sea wall with no vegetation
  - d. Page 18: Lower left hand picture shows riprap shorelines with no vegetation in background, overlooks with no vegetation in foreground set on in water pilings and extensive docks

- e. Page 31: Sea wall with hardened unvegetated surface area.
  - f. Page 34: Sea wall with Hardened surface area and extensive boat docks in background
  - g. Page 37: Left picture shows sea wall with hardened surface area
  - h. Page 46: Left hand picture shows sea wall with hardened surface and pilings in background
  - i. Page 50: Both left hand pictures show sea walls with hardened surfaces
  - j. Page 51 left hand picture shows riprap bank with minimal vegetation
  - k. Page 51 right hand picture shows seawall with hardened surface
  - l. Page 58: Right hand picture shows hardened surfaces and no vegetation on banks
  - m. Page 64: Right hand picture shows hardened walkway next to river with no vegetation.
  - n. Page 81: Three of the four pictures show the river with hardened edges and no tree plantings in either the riparian areas or uplands.
2. Page 15: The objective that restaurants and shops should "spill out onto greenway" needs to be better defined. We question whether this is the best use of very limited open space. We are concerned that the Design Commission and the Zoning Code Amendments seem to anticipate far more commercial activity spilling into the Greenway that was previously anticipated.
  3. Page 27: Example A-1 (both pictures) of pilings as examples of recycling elements of South Waterfront's past are inappropriate. NMFS has indicated that they want pilings removed where possible to reduce salmonid predation. Pilings should not be featured as desirable future elements of the Greenway.
  4. Page 43: Text describes trails curing toward top of bank. NMFS has indicated that it wants the trails pulled back from the top of bank. More detail should be provided about trail placement to eliminate conflicts with restoration activities.
  5. Page 57: Diverse set of gathering places: It was anticipated that the other parks at South Waterfront would serve as more active sites while the greenway would be more focused on habitat restoration, enjoyment of nature and more contemplative activities. The heavy emphasis (intensity and scope) on a variety of plazas, play areas, overlooks and docks seems inconsistent with the restoration objectives. While these types of areas were always included in the greenway plan, the design guidelines appear to place far more emphasis on these types of areas. The greenway seems to have transitioned from a naturalistic landscape interspersed with more active areas interspersed to a very active area with limited islands of natural resource restoration.
  6. Page 68: The plan guidelines focus on benefits at the "water's edge" but the Greenway Plan called for both upland and riparian habitat restoration.

Uplands are treated as an afterthought (see page 71) in this section. The guidelines should provide more detail on upland opportunities.

7. Page 74: North Greenway Reach: This section of the Greenway was supposed to be where habitat restoration was prioritized including much more dense plantings of trees in both the riparian areas and uplands. The idea was to compensate for more active areas in the central and south reaches by emphasizing habitat restoration in the North Reach. The pictures on page 74 (right hand side), 76 and 77 and the text convey a much more manicured, open and active than anticipated. We were particularly surprised by the text which describes: open lawn, small play area, "large" activity area, community garden, vendor kiosk, public restrooms, small docks, plaza and river overlook. It is hard to imagine that there will be any room left for habitat...
8. Page 78: The text suggests that there may be "small watercraft links" to Ross Island. This reference is inappropriate. There is currently no access allowed on Ross Island and promoting public access in advance of a management strategy unnecessarily sets the stage for unintended impacts. This issue was raised repeatedly during the Partners Committee Process.
9. Pages 78-80 Central Reach: The description of the Central Reach is inconsistent with federal regulatory requirements. NMFS has already indicated that it will require the trails be pulled back from the river, increased plantings in both riparian and upland areas and elimination of docks, some overlooks and the "urban beach" concept. The picture on page 79 shows minimal riparian restoration and virtually no upland habitat. The picture on page 80 shows virtually no trees and trails directly abutting the top of bank throughout the reach.
10. Page
11. No Reference is made in the document to the specific spatial distribution of upland habitat areas that has been described in previously distributed documents and maps.
12. Some of the previously distributed cross sections of bank design and vegetative plantings should be included in the document to give a more accurate picture of the type and scale of restoration that is anticipated.

#### Additional Comments on Zoning Code Amendments:

1. Page 13: We are concerned about amendments that promote more commercial activity adjacent to the greenway. We question whether this is consistent with the more naturalistic and contemplative aspects of the greenway.
2. Page 27: The exemption of four single piles or two multiple piles of dolphins is inconsistent with restoration objectives. NMFS has indicated that it would prefer that these types of structures be removed.
3. Page 33: The requirement that no vegetation taller than 3 feet be allowed in view corridors seems excessive. Trees are part of the view and other structures will surely exceed three feet.



# City of Portland

## Design Commission

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December 2, 2009

Mayor Sam Adams  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Randy Leonard  
Commissioner Dan Saltzman  
City of Portland  
1221 SW 4<sup>th</sup> Avenue  
Portland, OR 97204

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CITY OF PORTLAND, OR.  
BY \_\_\_\_\_

### **RE: South Waterfront Active Uses and Greenway Design Guidelines**

To the members of Portland City Council:

The Portland Design Commission appreciates this opportunity to clarify our rationale for requesting "active retail uses" at very limited locations along South Waterfront's Greenway.

Our push for some modest adjustments to Greenway zoning code grew from incidences wherein city employees and others who, while leading tours on public property along the river's edge, were confronted by South Waterfront residents who believed that the Greenway was their private property. As more proposals for new South Waterfront projects along the river's edge came before our commission, it became clear that the Greenway was shaping up into an amenity that mostly feels like "private" space to those that live next to it and potentially to the general public.

The Design Commission is particularly concerned about this unintended consequence of the current broad zoning language because the public has and will make significant investments in the river's restoration and South Waterfront's development in general. Today there are few places for Portlanders to connect with the Willamette River. Therefore, we believe the public should be drawn to the South Waterfront Greenway to see and enjoy our river.

Through requiring "active retail uses" at just two nodes along the central portion of South Waterfront's greenway, we hope developers will create a few special areas where the public could feel comfortable to stop, rest, and enjoy the river. It should be noted that south of River Place and all the way around the waterfront pathway loop south of OMSI, there are very few opportunities to stop, rest, or get a bite to eat while enjoying a visual connection to the river. Should the zoning code status quo be maintained, the South Waterfront's greenway risks becoming much like the rest of the southern reach of the Willamette Greenway loop - a "just passing through" trail rather than a trail that encourages the broader public to contemplate the

beauty of the river.

It should be noted that these uses are already allowed on the existing Greenway by right. The difference is that "active use" has been interpreted to date as front yards for private townhomes. It is the Design Commission's belief that these proposed limited nodes of active retail will better serve trail users, signal that the thoroughfare is a public amenity, and potentially create a much better, safer, higher functioning facility for all users.

The photos included in the document in question are not meant to be prescriptive. The Design Commission believes that Bureau of Planning and Sustainability staff has a particular challenge in providing visual examples of how this sort of riverfront activation might be met. We believe that it is quite likely that the perfect combination of a restored natural environment and a beloved, highly visited public amenity may not yet exist. But the Design Commission believes that it could exist. Indeed, Portland may be the first city to broker a successful balance between comfortable habitat for ALL of the city's inhabitants.

The design teams who have worked on the properties lining the Greenway and on the Greenway itself have all met the challenge of designing a built environment in an environmental zone. It is our belief that design teams will continue to successfully develop the river's edge. It is our hope that they do so in a way that encourages the public to enjoy the river running through our great city.

Thank you for your consideration today.

Sincerely,



Jeff Stuhr, Portland Design Commission Chair

Cc: Tim Heron, BDS Staff



City of Portland  
Bureau of  
**Planning and  
Sustainability**

Sam Adams, Mayor  
Susan Anderson, Director

183518

November 12, 2009

**Portland Planning  
Commission**

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Mayor Sam Adams and Members of Portland City Council  
Portland City Hall  
1221 SW Fourth Avenue  
Portland, OR 97204

**Re: South Waterfront Code and Design Guidelines Update Project**

Dear Mayor Adams and City Commissioners:

On September 22, 2009, the Portland Planning Commission held a hearing on the South Waterfront Code and Design Guidelines Update Project. The Commission heard testimony and received letters from residents of South Waterfront towers who represented other residents of the Meriwether and Atwater buildings. At the time, planners presented a proposal from the Design Commission that would require retail in the ground floors of buildings at the Northeast and Southeast corners of Curry and Gaines. A majority of commissioners found residents' testimony compelling that a mandatory requirement for retail use could leave spaces empty too long, when there are better places to locate retail in the subdistrict. One member of the Commission supported the proposal for mandatory retail at specific sites. *Commissioners voted 4-1 to approve the project with the exclusion of mandatory retail at the corners of Curry and Gaines.*

Since the Planning Commissioner's meeting on September 22, planners, neighbors and the Design Commission have agreed upon a proposal acceptable to all: *to require retail and other active ground floor uses to be sited at key locations throughout the district, including sites located adjacent to the greenway, Gibbs Street, and the South Waterfront Neighbor Park.* The Planning Commission supports this revised proposal and recommends adoption of the updates to previous planning efforts that will vitalize the South Waterfront neighborhood as the economy improves.

Sincerely,

Don Hanson, President  
Portland Planning Commission

c. Portland Planning Commission