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Sent: Tuesday, March 26, 2019 4:54 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Cc: Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>; BELLEQUE Janine * OSMB <Janine.BELLEQUE@oregon.gov>

Subject: Willamette River Greenway Inventory

Planning and Sustainability Commission

Attn: Willamette River Greenway Inventory

Thank you for the opportunity to participate in the public event - open house on March 6th and for taking the time to discuss with us, as well as keeping us informed throughout the planning process for the City of Portland update to the Willamette Greenway Inventory.

The Oregon State Marine Board is an advocate for recreational boating safety, navigation and access pursuant to Oregon Revised Statutes chapter 830 and Oregon Administrative Rules chapter 250. The Boating Facilities Program provides engineering services, technical assistance and grant funding for public recreational boating access facilities. The Marine Board has previously provided boating facility grant funding to City of Portland for recreational boating facilities at Sellwood Park, Willamette Park, Duckworth Memorial Dock, Swan Island Boat Ramp and Cathedral Park. In addition, the city receives grant funding annually as part of the Maintenance Assistance Program for maintaining the boating facilities on the Willamette River.

The Marine Board comments are made in part based on a comprehensive review of the boating activities, waterway rules, conflict and congestion on the Willamette River in Portland. Our comments will focus on recreational boating facilities and recreational boating use of the river. According to the 2017 Triennial Survey of Boaters; the Willamette River in Portland, from the confluence with the Columbia River to the Willamette Falls, received 250,776 use days, making it the largest waterbody section per use day in the State of Oregon. Boating activities on the Willamette River in Portland include angling, cruising, paddling, and watersports such as waterskiing, tubing, wake boarding and wake surfing. The peak boating season is April-June with approximately 40% of all boating activity occurring. January-March is also a popular shoulder season with 32% of all boating activities.

The Marine Board has been in discussions with NOAA Fisheries (NMFS), Army Corps of Engineers, Oregon Department of State Lands, and Oregon Department of Fish and Wildlife in regards to floating structure placement and design. NMFS is requiring floating structures to be located in a minimum of 15 feet of water at ordinary low water. While we understand the need to protect habitat, extending a floating structure out into the river to meet NMFS or further out to meet the Greenway Plan guideline of 20 feet, can have serious unintended consequences to recreational boating safety and navigation. Extending floating structures further into the river constricts the boatable water compressing recreational boaters into a smaller area which increases the likelihood of on-water conflict and congestion. Additionally, extending floating structures further into the river exposes the floating structure to higher river flows, wave, wake and debris. It may require additional structures to abate natural and human caused environmental loading. It is extremely important that floating structures are designed for these loading criteria so they perform the way the structure owners anticipate.

The greenway overlay zones identified in the Willamette River Greenway Inventory purpose is to implement the land use patterns, water quality requirements and regulate development. The Marine Board is concerned that zoning changes may impact the ability to make future repairs, renovations, replacement or improvements at existing sites and request that a 25-50 foot setback be created around existing public boating facilities so that overlay zones do not impact site modification necessary for safety and function of the public recreational boating facilities.

The Marine Board would like to request changes be made to Map 8: Recreation within the Willamette River Greenway Inventory. We recommend removing the “motorized” launch ramp category and that sites be identified as “motorized & non-motorized” or “non-motorized”. Unless the non-motorized access is signed or clearly designate at Willamette Park we recommend removing the icon because it is similar to launching on the beach/shore at Cathedral Park and Swan Island which do not have non-motorized icons.

Because of these concerns about the Willamette Greenway Inventory as related to recreational boating safety, navigation and access; the Marine Board would like to be made aware of any planning activities that allow for private docks and floating structures to be permitted and constructed on the Willamette River, as we may have serious safety concerns as structures can become obstructions and create navigation hazards for recreational boaters. We will be looking for opportunities to discuss alternative solutions or concepts and for future partnering opportunities. Thank you for this opportunity to comment.

Thank you,

Joe Severson, GISP
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