

July 7, 2021

Subject: South Park Blocks Master Plan, July 15, 2021 City Council Hearing

Mayor Ted Wheeler MayorWheeler@portlandoregon.gov
C. testimony@portlandoregon.gov

Dear Mayor Wheeler,

The Portland Coalition for Historic Resources (PCHR) is writing to highlight objections and recommend rejection of the Draft South Park Blocks Master Plan (SPBMP), dated May 2021 prepared by Portland Parks & Recreation Bureau (PP&R). PCHR includes representatives from Portland's historic districts, historic preservation groups, neighborhood organizations, and other persons concerned with Portland's development and livability. While we support the expressed aspirations of the Master Plan to serve the larger community and improve the park's resiliency to impacts of climate change and population growth in the city's heart, we share the widely felt concerns about the priorities and direction of this proposal. The "green loop" is a worthy goal but the SPBs are already green. The insertion of a wide cycle path in the mix will not make it greener, nor "enliven" the park. And a redesign of the blocks including destruction of mature trees to achieve this is unjustifiable.

This historic public park survives as one of Portland's defining gems whose iconic features are its pedestrian scale, axial symmetry, and unique and majestic deciduous tree canopy that define the north-south axis of downtown. The SPBMP disrupts the historic form, essential to the pedestrian-oriented nature of these blocks, and destroys portions of the existing healthy, mature tree canopy. The Recommended Draft Plan, which alludes to a Tree Succession Plan, seems to imply that the canopy will be maintained in some form and that only dead and dying trees, or trees damaged during construction, will be removed. An analysis by a group of concerned citizens (including an experienced architect and former Parks Board member) revealed that the claim is in fact misleading. The "before" and "after" two-dimensional presentation images are not, in fact, the same trees – but overwhelmingly replacements.

The Executive Summary claims that many trees are reaching the end of their "designed" lifespan; however, this is not the same as their actual lifespan (if properly maintained with proper stewardship, their usual lifespan is up to 300 years). City consulting arborist, Morgan Holen & Associates, in their May 2019 report on the health of the trees in the park commissioned by PP&R, *concluded that 97% of the trees were healthy but needed proper maintenance to ensure longevity*. It is important to note that the SPB is now entirely free of Dutch elm disease (DED), as a result of the cost-effective inoculation program that had kept them in good health. (Should that inoculation plan be suspended, as it has been in the recent past, then the future health of the trees could be endangered, since DED is highly destructive and can spread through the interconnected root systems on through the remainder of the trees in the grove.)

Another potential threat to the trees (as well as diminishing the park's overall perceived width and character) is the construction of the bicycle track, which removes the existing sidewalk along SW 9th Avenue and regrades the area along the western perimeter for conversion to a redundant, inappropriate, and unnecessary multi-modal bike/pedestrian pathway and removes parking that serves our cultural institutions. That proposed construction is in conflict with Title 11 and will clearly harm the root structure of this western row of trees, many of which actually abut the sidewalk. (Portland's Title 11 Tree Code prohibits construction activities in the protected root zone, an area that extends one foot in radius for each inch of diameter of the tree's girth.) Proposed barrier plantings shown within the western 10 feet of the park could result in further compaction to the root structure. *The SPBMP is not a tree preservation or protection plan and contradicts the city's own tree code.*

PP&R's draft plan makes the assertion that it is taking a "rehabilitation" approach to guide its design, referencing the U.S. Secretary of the Interior's Standards for Rehabilitation, but appears to ignore most of them. For example, the Green Loop will alter the spatial relationships by impinging on the park's width and apparently threatening loss/damage to the western row of trees. In Blocks 7-12, the two parallel, central north-south pathways are collapsed into a single, wider central promenade. This implies removal of the central row of trees that form the double allée to create a single allée.

Lastly, the Master Plan seems to ignore equity. Who will benefit? In terms of transportation, there are safer and faster parallel bikeways without unsignaled conflicts at every intersection. The existing street easily accommodates both vehicles and cycling. Except along this axis, there is little evidence of the proposed central city "green loop." The projected cost for this developer-driven project (see Final Findings and Decisions by the Design Commission rendered on April 21, 2016) is estimated at \$53 million. Can the City justify such spending priorities when there are much greater needs elsewhere, especially on the East side or needed repairs to O'Bryant Park and Ankeny Square?

PCHR strongly urges City Council to vote "no" on the draft Master Plan, which would result in drastic and wasteful changes to one of the city's most beloved parks. Further, the Tree Succession Plan and Green Loop should be separated from the SPBMP. Both are too important to be buried in the SPBMP. The Green Loop merits its own process and public discussion. The Tree Succession Plan should include a comprehensive maintenance/protection plan to sustain the future health of the trees.

Thanks for your consideration,

John Liu, PCHR Co-chair

Rod Mertick, PCHR Co-chair