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TO: Portland Planning and Sustainability Commission

FROM: Susan Anderson

SUBJECT: Response to Questions on the Natural Resource Inventory

At the November 23rd Planning and Sustainability Commission (PSC) meeting, some members questioned about adopting the Natural Resource Inventory (NRI) as part of the Portland Plan Factual Basis. One individual also raised concerns about the NRI in his testimony to the Commission. Below is a more detailed response to points raised, which will hopefully some additional clarification. If you have additional questions, please contact Roberta Jortner at Roberta.Jortner@portlandoregon.gov or 503.823.7855.

Commissioners Rudd and Sherman noted that members of the public had raised concerns about the NRI during recent River Plan/North Reach and Airport Futures hearings, and asked:

- 1) Were the concerns related to specific sites or more general in nature?**
- 2) Were these concerns addressed and incorporated into the citywide NRI that is currently before the PSC?**

Response: Most of the NRI-related concerns raised during the River Plan and Airport Futures hearings pertained to mapped natural resources and existing or proposed environmental zoning specific sites. Staff spoke with numerous property owners and explained the rationale behind both the NRI and the zoning proposals. Staff also conducted a number of site visits to check the natural resource maps for individual properties and modified the maps if needed to more accurately depict the type and location of the resource features.

These types of map refinements are to be expected. The NRI maps are based on citywide data which, while increasingly accurate, still contains some level of error. The City has conducted targeted field work for the NRI but it is infeasible to ground-truth the entire city. So, City maintains a process for correcting inventory and environmental zoning maps. That said, the updated NRI is a great improvement over the 10 to 20 year old City NRI maps. The PSC (then Planning Commission) heard testimony commending the City for this work during the first round of hearings held last spring. The Commission also heard testimony about limits of the inventory and support for maintaining opportunities to refine the maps as appropriate.

Regarding questions about basing the City's NRI on Metro's inventory approach, it is important to reaffirm the quality of Metro's work. The Metro Council adopted its regional NRI along with Title 13 of the Urban Growth Management Functional Plan in 2005. This was only after a thorough multi-year process that included an extensive scientific literature review and analysis, coordination with agencies and local governments, a detailed review of the NRI methodology by independent scientists, and a regional public hearings process. The City of Portland actively participated in this process. The Oregon Department of Conservation and Development acknowledged Metro's Title 13, including the regional NRI, in 2007, deeming this work in compliance with State Land Use Planning Goals 5 Natural Resources, and Goal 6 Air, Water and Land Quality.

Although legally the City could rely fully on Metro's inventory for our planning work, we have invested additional resources to update the existing stream, wetland, and vegetation data for Portland. We have also honed the regional model criteria to reflect emerging research and local conditions in Portland. The City collaborated with Metro, other state and federal agencies, and regional experts in refining the regional inventory. We refined the NRI further during the River Plan/North Reach and Airport Futures projects, and the NRI was vetted again through a technical

review process and at public hearings for each project. While some continue to disagree with elements of Metro's and the City's NRIs, these works were thoroughly vetted and have greatly improved the natural resource information available at regional and citywide scales.

In conclusion, the decision currently before the PSC is to endorse the NRI as useful information to help inform the Buildable Lands Inventory, Portland Plan, and Comprehensive Plan update. The NRI tells us about the general types, locations, and functional values provided by natural resources throughout the city, and it will inform the evaluation of policy choices and alternative growth and urban form scenarios. It is also important to recognize that the NRI is dynamic and will continue to change over time. Any future regulatory or zoning changes would be carried out through separate legislative projects, where the NRI would again be vetted and honed for that project area.

Note: John Gibbon expressed a concern about adopting the NRI before the Citywide Tree Project goes to the City Council. It should be noted that the NRI and the new Tree code, Title 11, are independent. Therefore adopting the NRI as part of the Portland Plan factual basis will not adversely affect the Citywide Tree Project or vice versa.