

**Subject: Houck Comments on Comp Plan PART I.**

To: BPS Staff and PSC

From: Mike Houck

Re: My Comments on Comp Plan Proposed Draft, PART I

I am in the desert of S Utah with minimal Internet access. Therefore, I'm sending my comments in three installments, hoping to avoid a catastrophic loss of data as I proceed with my comments! Please bear with me. Julie Ocken, if it's feasible to cut and paste so the three installments are in one combined document for future PSC hearings that would be appreciated. If that's too much hassle then that's fine. I don't have my computer with me so I couldn't do that myself.

I-7. Good: Nature is woven into the city....I'd add FISH and Wildlife

Environmental risks are managed.....I feel strongly, assign development and environmental impacts, that environmental risks should first and foremost, be AVOIDED. This relates in particular to the issues raised in W Quad plan with regard to flooding.

Housing: I will pass along from my housing colleagues that they feel strongly that this is a critical missing piece in the Vision statement. Their suggested language: "All Portlanders have a safe home (emphasis on HOME) in which they feel safe and allows them to be financially secure and promotes a sense of well being for a healthy lifestyle, civic involvement and economic opportunities."

I-9: 6. Improve Resiliency: I'd add away from FLOODPLAINS. And I'd add something specific to Ecosystem resiliency and maintaining biodiversity. e.g. "; and provide for ecosystem resiliency and ensure maintenance of biodiversity....."

8: improve Housing Choices (housing advocate recommendation)

I-11. Why create.....? Housing advocates suggest adding Home Equity results in small business development with access to capital

I-13. Corridors. Wildlife (biodiversity?) Corridors??

I-9. Availability to capital (see earlier house equity comment)

Good to see natural and built environments

I-21. Successful carbon emissions.....expand on point 3 to read: "Use GI to reduce urban heat island effect; sequester carbon; and efficiently and effectively manage urban stormwater at its source."

I-23. Add FISH and wildlife first sentence

I-24. Add to end. "Habitat corridors must be wide enough to promote ecological function and accommodate human access"

For example, the Willamette Greenway will NEVER function ecologically AND accommodate access if it remains 25' wide!! Similarly, stream corridors have to be increased in width if we are serious about resiliency in the face of climate change and IF we were serious about protecting existing and encouraging more habitat corridors

I-25. Add FIRE at top with flooding

I-27. First para add and natural areas after open space

Same under What is infrastructure. Parks, natural areas, streets, and trails....

I-28. I realize Green Infrastructure is covered in I-31 but feel strongly that it should be, AT LEAST, mentioned in the context of this

e.g. "As Portland continues to grow....existing grey and green infrastructure becomes increasingly important."

3. Future needs: Assess which facilities need to be upgraded or replaced to avoid major problems or to meet growing demand. NEW: Assess where and how a mix of grey and green infrastructure might extend the life of existing infrastructure and either avoid or minimize cost of future infrastructure maintenance and investment."

I-31. Good on GI. I'd add green roofs to the mix. I'd also explicitly reference the fact that GI results in MULTIPLE BENEFITS for every dollar spent and avoids and minimizes costs in most cases.

I-33. Climate change presents.....

3rd para add: ...increasing incidents of flooding.....; AND DEGRADING NATURAL SYSTEMS....

Land use policies: Add:

Avoid development in sites identified as ecologically sensitive and hazard prone

Ensure ecosystem resiliency and maintenance of biodiversity

I-37. Final para: rewrite to read. Any new development along rivers and streams must integrate complex hydrology and ecological characteristics into every recreational, employment, transportation, and habitat protection and restoration scenario. New development should also be designed so as to improve ecological condition of the stream or river."

A-7. I beg to differ with the following statement...."Portlanders cleaned up the Willamette River. This is hyperbole. Should read "Portlanders have long supported efforts to clean up the Willamette River."

Last bullet add: Portland needs well-designed, flexible, NATURAL, and strong physical, social,

and economic infrastructure to adapt and thrive."

A-9. GP1-5.

Environmental Health: Good to see "intrinsic value of nature"!!

Resilience. Rewrite as follows: ".....and the natural and built environment to AVOID WHENEVER POSSIBLE and recover from natural and human-made disasters, climate change, and economic shifts,"

GP3-6

Goal 3.E Connected public realm and open spaces: delete "appropriate" and insert "natural and built green infrastructure throughout Portland."

NOTE: I think it's important to start using built and natural green infrastructure to distinguish between bioswales, green roofs, urban canopy (BUILT) and streams, wetland, riparian, upland forest (NATURAL)

GP3-15 to GP3-17. I like all of the language associated with City Greenways and Urban Habitat Corridors. This represents a significant advancement over the previous Comp Plan. It's clear that staff from BPS, BES, Parks put a lot of thought into the concepts and language.

GP3-20

Policy 3.60: .....add. "and significant habitat, fish, and wildlife, AND RESTORATION SITES.

Policy 3.62: add: provides LOCALLY and regionally significant habitat Fordham and wildlife OPPORTUNITY SITES FOR ECOLOGICAL RESTORATION.

Policy 3.66. Add: Coordinate with Department of State Lands To identify sites of ecological significance where camping and other recreational activities should be limited or curtailed to ensure the ecological integrity of the identified sites."

(This relates to Ross Island and Holgate Channel in particular)

GP3-31. West Hayden Island. The designation should be Open Space. Another, less desirable, option would be the existing Farm/Forest designation. Under no circumstances should the entire 800 acres be designated for "jobs"

Chapter 4

GP-4-1

What is this chapter about?

As elsewhere in the Plan, I'd like us to push the envelope much farther than "encouraging" the actions referenced. I would substitute Ensure for Encourage in bullets 1, 2, and 4. I would replace promote with create in bullet 4.

Last paragraph, for the same reason replace encourage with " The policies in this chapter ARE DESIGNED TO ENSURE development that respects....."

GP4-8

Policy 4.21: excellent

GP4-13

Designing With Nature

Excellent language

Policy 4.58. Replace Encourage with Require Policy 4.59. Same recommendation

GP4-14

Policies: In all cases replace Encourage with REQUIRE

Chapter 5 Housing

Housing advocates note that it's a fact that some students cannot access a school near home because they couldn't get on the list and may have to attend a distant school. Access in those cases will be extremely problematic unless they can find transit that doesn't require 2 or 3 bus transfers.

GP5-6

Need an inclusionary zoning policy!

GP5-7

Policy 5.13. Replace Encourage with Ensure and delete "to"

GP5-9

Policy 5.22. Impact of housing on schools: Open enrollment policy has implications

Policies 5.24 and 5.25. What does evaluate mean? Actions to follow?

GP5-10

Policy 5.30: how about buying the owner out and creating a Co-op, which would be state financed as an example of this policy?

Policy 5.32: replace Encourage with ,Work with employers to create.."

GP5-11

Policy 5.39: include drug and alcohol services

Chapter 6 Economic Development

Bullet 1. Add. Reduce or eliminate need for green field development, including natural resource areas

Good to see 6.1.1 on page GP6-8 refers to role of quality of life, BUT I'd really like to see it added to the bullets under What is this chapter about?

I'd add the language on 6.1.1 as last bullet

GP6-8

Policy 6.1.1. Excellent but would add earlier as well. This bears emphasis, given that the role of quality of life AND ecosystem health has for too long been ignored in the policy realm regarding its importance as part of the city's economic engine

GP6-14

Policy 6.41 West Hayden Island: I've already submitted substitute language for this as well as the map designation. My earlier comments stand.

Chapter 7 Environment and Watershed Health

GP7-1

1st bullet. Good to see reference to intrinsic value of nature as well as economic and health nexus

2nd bullet. Good to see reference to ecosystem services although that term is not used explicitly

3rd bullet. Good to see reference to biodiversity. If we manage to save habitat solely for "generalist" typically "urban" species we will not have achieved our objective of attaining resiliency in natural systems. We need to look for efforts that retain/enhance diversity of plants AND animals we share the city and region with.

4th bullet. Good to see carbon reduction and climate change referenced but I think it's important to recognize the importance of natural systems to also SEQUESTER carbon. Research at U of WA indicates considerable sequestration occurs in urban settings

6th bullet. Good to see climate ADAPTATION!

7th bullet. Good to see recognition of "incremental" degradation. All too often environmental impacts ignore cumulative impacts. I'd advocate for explicitly referencing the concept of cumulative impacts as a critical element of the city's evaluation of projects.

10th bullet. Add Climate Preparation Strategy and Parks Vision 2020 (or it's update)

GP7-8

Protecting natural resources in development situations

Policy 7.10 I strongly support Avoid, minimize, mitigate hierarchy

Policy 7.11. Replace Encourage with Require

Policy 7.13. Replace Consider with Integrate

7-11

Policy 7.26 Access to nature: I am strongly supportive of including VISUAL access. Not every site is suitable for "boots on the ground" access. A case in point is Ross Island. Too little of the island remains to make physical access ON the island feasible. It's already possible to access the island via motorized and human powered craft and there are myriad visual access points. Very few sites fall into this category but when they do it's critical not to dismiss the importance of visual access.

Policy 7.27. Carbon sequestration. Excellent

Policy 7.28. Climate adaptation and resilience. Excellent

GP7-12

Aggregate resources: This needs review and possible rewrite. I realize state land use requires addressing aggregate resources but the reality in Portland is Ross Is Sand and Gravel ceased extraction over a decade ago. This policy needs more work!

Chapter 8 Public Facilities and Services

GP8-7

Goal 8.B. Multiple Benefits. Excellent to call out this concept which should always be a major driver with regard to infrastructure investment (see Green Infrastructure comments which exemplify this valued added concept)

Goal 8.H. Parks, natural areas, and recreation: change to read "The city manages it's natural areas and urban forest to protect both Common and unique habitats and offer Portlanders OPPORTUNITIES to connect with nature WHER THEY LIVE, WORK, AND PLAY."

GP8-15 to GP8-16

Sanitary and Stormwater systems: good to see Green Infrastructure is called out as "an important part of the Stormwater system"

GP8-17

Policy 8.55. Green Infrastructure. Excellent. We need to add, most logically through the Systems Plan the need to change national accounting law to allow for capitalization of green infrastructure

Houck