



February 10, 2015

Dear Members of the Planning and Sustainability Commission,

Audubon Society of Portland would like to submit the following preliminary comments regarding the 2-10-15 Comprehensive Plan Work Session. We are still working our way through the extensive materials but wanted to flag a few issues of particular importance. We are disappointed that BPS released the materials for this work session with only one week notice----this is not adequate to allow for meaningful review and submission of written comments. The following are some of the priority issues we have identified in the materials that were released last week:

- 1) **West Hayden Island:** We are pleased to see that the City has removed West Hayden Island from the industrial lands maps and inventory. However, we are disappointed that policy 6.41 regarding future annexation and development on West Hayden Island has been retained even with the modifications provided by BES. The staff summary incorrectly focuses on the industrial map designation as the primary focus of public concern regarding West Hayden Island. In fact it was both the policy and the map designation that were repeatedly highlighted in public testimony as they are functionally flip sides of the same coin---the policy decisions ultimately drive the map designations. Leaving the policy intact but removing the map designation signals that the City's intent remains functionally the same in the long run—development on West Hayden Island. The policy was just as much of a concern as the inventory and was the focus of much of the public testimony. We believe the same logic that the city applied to removing WHI from the industrial land inventory (lack of community support, lack of community agreement regarding annexation within the current planning horizon page 15) should also be applied to the policy statement. Including this policy even after the Port rejected five years of public process to develop a West Hayden Island development proposal and mitigation package breaks faith with the community and abandons the PSC 's commitment to only move forward if development can be done in a way that adequately protects the community and the environment. We urge you to remove the policy as well as the map designations for the draft comp plan.

- 2) **Redundant Policy's Protecting Industrial Land:** We urge the City to carefully review policies 6.12, 6.15, 6.17, 6.18, 6.35, 6.36, 6.37 and 6.47. These policies are extremely redundant and individually and collectively put in requirements to perpetually identify new industrial lands and install barriers that will make it virtually impossible to put in place any environmental or community protection regulations on existing industrial lands which restrict the use of those lands. In short these policies effectively place the expansion and protection of industrial lands above all other community goals. While Audubon supports policies which restrict the upzoning of industrial lands, we strongly oppose policies which restrict the ability of the City to adequately regulate protection of the health of the community or the environment or which commit the City to prioritizing creation of new industrial lands above other community concerns and objectives. We believe that these policies need to be collectively reassessed to ensure that the City retains this ability going forward to adequately protect watershed and neighborhood health.
- 3) **Golf Course Conversion:** Audubon opposes the conversion of valuable open space at golf course to industrial uses. We believe that this proposed policy exemplifies the degree to which the City is now prioritizing protecting and expanding industrial lands over all other community values. It is worth noting that the prior Comprehensive Plan actually included a policy focuses on the importance of permanently protecting golf courses as openspace.
- 4) **Elimination of the word "Protect" in the Natural Resources Chapter:** The City appears to be actively trying to remove the word "protect" from the natural resources chapter replacing the term with much more nebulous verbiage. We are concerned that this change reflects a decrease in the city's commitment to actually protecting the environment. It is worth noting that the economic development chapter is replete with use of the words "protect" and "provide." We believe that these changes further exacerbate a fundamental disparity in strength of the language incorporated into the economic development and natural resource chapters.
- 5) **Policy 7.10 Regulatory Hierarchy: Avoid, Minimize, Mitigate:** We find this policy change confusing. It appears to obfuscate the intent of this policy which should be to ensure that where possible, natural resource impacts are avoided, and when avoidance is not possible, should be fully mitigated. This objective should be incorporated into both the development proposals and environmental plans.
- 6) **Policy 7.11: Mitigation Effectiveness:** We urge the City to retain the original priority of this policy to prioritize onsite mitigation first and then offsite within the same watershed. We are concerned that the new language will allow developers to move quickly to mitigating natural resource impacts outside the City where the costs can be much lower. It is critical, if the City is going to maintain the health of its environment, that natural resource mitigation be conducted inside the city and as close as possible to the site of impact. We believe that the amendment as written will result in a fundamental shift in city policy and priority regarding natural resources that will deemphasize protecting and mitigating natural resource impacts close to where they occur.

Thank you for your consideration of these comments. Again, we would emphasize that a week is inadequate to allow the public to review and provide written comments to the PSC on complex and voluminous materials. We will submit additional comments in the coming weeks and we hope that the

PSC will be open to continuing to revise the economic and industrial chapters of the Comprehensive Plan.

Respectfully

A handwritten signature in black ink that reads "Bob Sallinger". The signature is written in a cursive, slightly slanted style with a long, sweeping tail on the final letter.

Bob Sallinger
Conservation Director
Audubon Society of Portland