

Executive Summary				
#	Ref	Topic – Comment - Source	Proposed Amendment	Staff Response
1	i	<b>Willamette River</b> – There is no mention of environmental issues in either the Executive Summary or Goal for the SE Quadrant. Staff response was that environmental concerns appear throughout the document. While that may be true, it seems odd that environmental issues warrant no mention at all in the Executive Summary. <b>Houck</b>	The goal of the SE Quadrant Plan is to increase the number of jobs per acre and new industrial types in the Central City, while preserving traditional industrial uses, activating increasing accessibility to the waterfront, <u>improving fish and wildlife habitat</u> , providing parking solutions and managing increased activity in this emerging area of economic creativity and growth.	
Chapter 2 - Background				
#	Ref	Topic – Comment - Source	Proposed Amendment	Staff Response
2	II-1	<b>History and Timeline</b> – Given the city proclamation stating that the city will develop closer ties and working relationship with the tribes, and recent concerns expressed by the Commission and Native American community, this and other documents should start going beyond historical uses of the indigenous peoples and at least reference treaties that form the basis for more active involvement in planning processes and other city actions that impact ceded lands. <b>Houck</b>	Native Americans For thousands of years prior to the first sustained contact with Europeans and Americans in the early nineteenth century, Chinookan-speaking peoples, including the Clackamas, Cascades and Multnomah, inhabited the lower Columbia basin in the vicinity of the area now known as Portland. Chinookan villages, characterized by large, multi-household plank houses, were located on both sides of the Columbia River and on Sauvie Island near the mouth of the Willamette. Additional villages, resource areas, and trade routes were located along the lower Willamette. The rivers were important for transportation, subsistence and trade.  <u>As Europeans came to the Willamette Valley conflicts with the native people arose. Eventually, the United States government and tribal governments signed treaties that set aside land for reservations and gave ownership of the Willamette Valley to the Unites States. Tribal governments also retained rights to fish at accustomed grounds and stations, the right to erect fish-processing sheds and to hunt, gather and graze livestock on unenclosed lands.</u>  <u>Today Portland is home to the ninth largest Native American population in the United States, with residents coming from tribes across the country.</u>	
3	II-1	<b>Willamette River</b> – Reference to 25’ greenway setback. It states that the intent is to allow for both recreational and habitat protection. There should be an acknowledgement that the setback is woefully inadequate to meet those goals. <b>Houck</b>	None	Please see Comments 35 and 38. The Willamette Greenway setback is addressed in other parts of the plan with regards to its ability to help meet the purposes of the setback for recreation and habitat. This chapter just presents a history and timeline.
4	11-16	<b>Willamette River</b> – Add more information from the Natural Resources Inventory to the existing conditions section of the report. <b>Staff</b>	.... Below is a snapshot of riverfront conditions.  <u>The 2012 Natural Resources Inventory: Riparian Corridors and Wildlife Habitat (NRI) identifies significant natural resource features and functions throughout Portland. Approximately 4 miles of the Willamette River flows through the Central City and is the largest natural resources. There are 93 acres of 100-year floodplain, 21 acres of which are vegetated, surrounding the river. Approximately 50 acres of vegetation ½-acre in size or larger is located in the Central City including forest, woodland, shrubland and herbaceous patches. Additional tree canopy is found along streets and within parks and open spaces. These features provide riparian corridor functions, such as microclimate and shade, flood attenuation and nutrient and sediment filtering, and wildlife habitat functions, such as wildlife movement corridors.</u>  The Willamette River is the only route fish can take between tributary streams to the Columbia River and Pacific Ocean....	
Chapter 3 – The Plan				
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5	III-4	<b>Tree canopy and green infrastructure</b> – Enhance the Livability of the District, third bullet, “Where possible, increase amount of tree canopy and green infrastructure.....” Who determines “where possible?” <b>Houck</b>	<del>Where possible, To help alleviate the effects of heat Island and combined sewer backup risk, increase the amount of tree canopy and green infrastructure in locations and using designs that do not interfere with freight movement, to help alleviate the effects of Heat Island and combined sewer backup risk in the district (multiple actions starting on pg. V-24).</del>	The SAC voiced that tree canopy and green infrastructure must be located and designed to not interfere with freight mobility within this district.
6	III-6	<b>Climate change</b> – Reduce or mitigate. The city has an adopted Climate Preparation Strategies that focuses on measures need to “adapt” to climate change. Preparation or adaptation, which is different than reducing or mitigation for climate change. <b>Houck</b>	Develop a riverfront that <del>reduces or adapts to</del> and mitigates risks associated with climate change, and protects and enhances shallow water habitat.	
7	III-18	<b>Climate change</b> – Willamette Riverfront Strategies: The city has an adopted Climate Preparation Strategies that focuses on measures need to “adapt” to climate change. Preparation or adaptation, which is different than reducing or mitigation for climate change. <b>Houck</b>	Develop a riverfront that <del>reduces or adapts to</del> and mitigates risks associated with climate change, and protects and enhances shallow water habitat.	
8	III-25:	<b>Green Infrastructure</b> – Integrate Open Spaces and Green Systems, reads “where possible” with regard to tree canopy, stormwater infrastructure, green walls, and other green systems....” Who will determine “where possible?” This sound ambiguous and anything but aggressive regarding increasing GI in the SE Quad, which has been supported in numerous public venues. <b>Houck</b>	Tree canopy, stormwater infrastructure, green walls, and other green systems can be integrated into areas of activity, <u>taking into consideration that this is a freight district</u> , and within pedestrian-oriented open spaces throughout the district to enhance the area’s livability and mitigate the effects of heat island, air pollution, and noise <del>where possible</del> .	The SAC voiced that tree canopy and green infrastructure must be located and designed to not interfere with freight mobility within this district.

**Chapter 4 – Central City 2035 Policies and Actions**

#	Ref	Topic – Comment - Source	Proposed Amendment	Staff Response
9	IV-11	<b>Willamette River</b> – See Comment 35 (Some locations will be better suited for recreational access while others may have to be reserved solely for habitat enhancement and restoration.” This recognizes that, while there will be some instances where both access/recreation are compatible with habitat objectives, in some cases this will not be possible. <b>Houck</b> )	<u>47. Consider the interrelated nature of the city and region’s economic, natural, social and cultural systems and strive to optimize benefits from these systems across the Central Reach while recognizing that each site along the Willamette River may prioritize different uses.</u>	This is a new policy structured after the River Renaissance guiding principles. The intent is to make sure that each site may not address all the different objectives, but as a whole the Central Reach will.
10	IV-11	<b>Willamette River</b> – Riverbank Restoration and Enhancement Target: I’d like clarity on this target, both with regard to riverbank habitat and shallow water. Are both targets still planned for? <b>Houck</b>	<b>Riverbank Restoration and Enhancement Target:</b> Enhance 2.4 miles of riverbank habitat and restore at least 5 shallow water sites in the Central Reach, with at least 2 sites on each side of the Willamette River ( <u>Appendix C</u> ).	
11	IV-12 WR9 WR10 WR11	<b>Willamette River</b> – See Comment 39 (As stated earlier, I’d like clarity regarding total number of enhancement/restoration sites. In one location it’s stated there should be a minimum of 5 sites and WR10 and WR11 refer to two sites, with only one site being taken through pre-design and implementation. <b>Houck</b> )	WR9: Develop an action plan to enhance and restore fish and wildlife habitat throughout the Central Reach. <del>WR10: Seek funding to and investigate the feasibility of restoring fish and wildlife habitat in two locations in the Central Reach.</del> WR11: <del>Seek funding to and d</del> Develop a concept plan <u>and complete pre-design for a project to restore fish and wildlife habitat between the Hawthorn Bridge and Marquam Bridge for the most feasible restoration site in the Central Reach (see Action #10).</u> Then, <u>seek funding to implement take the project through pre design and implementation.</u>	These combined Central City-wide actions were adopted with the West Quadrant Plan but apply to the entire Central Reach. Since adoption, the City Council has allocated funding to start a project between the Hawthorne and Marquam bridges, including the OMSI riverbank. Therefore, the actions WR9, WR10 and WR11 need to be updated.  WR9 is still needed to develop a strategy for achieving the full enhancement and restoration target for the Central Reach. WR10 is no longer necessary because a site has been chosen – Eastbank Crescent. WR11 is updated to reflect the next step to develop a concept and complete pre-design. Additional funding will be needed to implement the project.
12	IV-13: WR13	<b>Willamette River</b> – What does long-term mean? Do we not need both short and long term strategies, particularly with regard to integrating or avoiding recreational and habitat projects? It’s also critical to “consider” these conflicts and necessary to address, not consider. <b>Houck</b>	Study the most feasible and safe locations in the Central City for formal public access and swimming in the Willamette River. Consider accessibility, hydrology, currents, underwater obstacles and conflicts with other uses such as habitat and boating. Recommend <u>a short- and long-term strategy.</u>	
13	IV-13, WR-14	<b>Willamette River</b> – “If necessary” flies in the face of the facts regarding 25’ being woefully inadequate setback. When will the Willamette Greenway be updated to address this long standing issue? <b>Houck</b>	<del>If necessary, u</del> Update the Willamette Greenway code to recognize and address development that is subject to the Maritime Transportation Security Act, <u>if necessary.</u>	Staff are reviewing the different urban zoning codes related to the MTSA to determine if any code amendments are necessary to address the MTSA in the Central Reach.

14	IV-15	<b>Public Restrooms</b> - Add public restrooms or access to social services (currently included under Equity section as well) as essential Public Services. This can also be added to Urban Design Policies under (7) Open Space? <b>Tallmadge</b>	UD8 - Pursue the development of public restrooms at locations within transit stations, and near the Willamette Greenway and public parks, plazas, and open space features.
15	IV-20: EN19	Delete Explore Strategies, and start sentence with "Reduce nighttime lighting....." <b>Houck</b>	<del>Explore</del> Develop strategies to reduce nighttime lighting and sky glare to diminish impacts of building lighting on human health, wildlife and energy consumption.

**Chapter 5 – SE Quadrant Plan Vision, Goals, Policies and Actions**

#	Ref	Topic – Comment - Source	Proposed Amendment	Staff Response
16	V-1	<b>District Vision:</b> Why state, "Where opportunities exist?" Why not simply state, "River health and habitat are improved by restoring shallow water areas and planting native vegetation on the riverbanks." I have a major concern with the use of the term "vegetation." High quality riparian habitat includes native trees, particularly Oregon white ash, willows, and black cottonwood. Trees have long been an issue on the greenway. By stating vegetation in the generic sense I am very concerned that trees will be left out of the restoration strategy. This Action should explicitly that trees and other vegetation will be planted. <b>Houck</b>	<del>Where opportunities exist,</del> River health and habitat are improved by restoring shallow water areas and planting native <u>trees and</u> vegetation on the riverbanks.	
17	V-8	<i>Amendment introduced before the hearing</i>	RC22 - Retail on Large Sites. Amend Zoning Code to allow sites within the EOS larger than 40,000 square feet to have up to 12.5 percent of the site area used for Retail Sales and service uses.	
18	V-8	<i>Amendment introduced before the hearing</i>	RC23 - FAR and Structured Parking. Study new development bonus and transfer provisions to incent development of structured parking in the Central Eastside.	
19	V-8	<i>Amendment introduced before the hearing</i>	RC24 - OMSI Station – Height and FAR. Study minimum height of 100 feet and a maximum FAR of 1:1 at the OMSI Station Area. Study ability to earn additional height to a maximum of 250 feet, and FAR of 5:1 through new Master Plan Provisions.	
20	V-8	<i>Amendment introduced before the hearing</i>	RC25 - Clinton Station – Height and FAR. Study minimum height of 75 feet and a maximum FAR of 1:1 at the Clinton Station Area. Study ability to earn additional height to a maximum of 100 feet, and FAR of 5:1 through new Master Plan Provisions	
21	V-8	<i>Amendment introduced before the hearing</i>	RC26 - Powell/Woodward – Height and FAR. Study minimum height of 65 feet and a maximum FAR of 3:1 on blocks located between SE Woodward and SE Powell. Study ability to earn additional Height (up to maximum of 100") and FAR through development bonus and/or transfer provisions.	
22	V-8	<i>Amendment introduced before the hearing</i>	RC27 - Big Box Retail. Limit the amount of retail that can be developed on a site in the EX zone at the OMSI and Clinton Station Areas to a maximum of 40,000 square feet.	
23	V-8	<i>Amendment introduced before the hearing</i>	RC28 - Business Improvement District. Study the feasibility and strategy behind creating a new business improvement district for the Central Eastside.	
24	V-10	<i>Amendment introduced before the hearing</i>	HN5 - Sustainable Source(s) of Funding. Develop a sustainable source(s) of funding to create and preserve affordable housing throughout the Central City that aligns with geographic scope and time horizon of the City's affordable housing goals.	
25	V-15	<b>Transportation</b> - In addition to complete bike lanes and sidewalks, emphasize perception of safety with additional street lighting. <b>Tallmadge</b>	T26 - As part of new Master Plan provisions for OMSI and Clinton Station areas require identification as to how lighting within public realm and ground floor programming will be designed to create a safe and attractive environment for pedestrians through the day and night with an emphasis on hours of transit service.	
26	V-15	<i>Amendment introduced before the hearing</i>	T27 - Clinton Station Pedestrian Bridge. Pursue redevelopment of the Clinton Station pedestrian overpass bridge linking the Clinton Station with the HAND Neighborhood to the northeast.	

27	V-15	<i>Amendment introduced before the hearing</i>	<u>T28 - Mt. Hood Freeway Easements. Seek vacation of ODOT easements impacting potential development sites in the OMSI Station Area established to develop the Mt. Hood Freeway.</u>	
28	V-15	<i>Amendment introduced before the hearing</i>	<u>T29 - Study Allowing G Zone Permits in areas zoned EX – No Housing. Work with PBOT and the TPAC to study potential impacts and benefits of allowing G Zone parking permits to be issued to employees located within areas zoned EX – no housing.</u>	
29	V-15	<i>Amendment introduced before the hearing</i>	<u>T30 - Study Amendments to Parking Permit Ordinance to Restrict Residential Permits in Employment Zones. Work with PBOT and the TPAC to study potential impacts and benefits of amending Title 16.20.800, Area Parking Permit Program, to allow restricting permits to residential development within areas zoned for employment uses.</u>	
30	V-15	<i>Amendment introduced before the hearing</i>	<u>T31 - North-South Bus Alignments and Station Area Connections. Work with TriMet to study the potential to better link the Clinton and OMSI Station Areas with LRT stations in the Lloyd District and Rose Quarter.</u>	
31	V-15	<i>Amendment introduced before the hearing</i>	<u>T32 - Transit on Water Avenue. Work with TriMet to study the potential bus service along SE Water Avenue.</u>	
32	V-17, 7	<b>Open Space:</b> While I strongly support as a policy to increase parks, open space, and recreational opportunities, including publicly accessible private plazas and pocket parks with new development, I believe a policy that ensures the public truly has unlimited access is critical, if these spaces are intended to supplant or, better, complement public open space. There is no way this policy will be met without expansion of the Willamette Greenway. <b>Houck</b>	<b>7. Open Space.</b> Increase <u>public</u> parks, open space, and recreation opportunities in the district and encourage the provision of publicly accessible private plazas and pocket parks with new development, redevelopment and building rehabilitation projects, especially in areas zoned for high density, mixed-use development. Broaden the number and range of available recreation experiences accessible to all district users.	
33	V-19, UD12	<b>Green Loop:</b> Delete Explore, and state “Develop a Green Loop...” We need to see an alignment for the Green Loop in the Central Eastside. <b>Houck</b>	None	The Green Loop was discussed at length by the SAC. The majority of the SAC supported the concept of the Green Loop in the Central Eastside, but felt that due to freight loading and other unique aspects of the district, more study and engineering work is necessary before an alignment can be identified. Instead, the SAC focused on establishing evaluation criteria the City should use in designing and siting the Central Eastside portion of the Green Loop to maximize its potential to support the district while avoiding negatively impacting industrial operations. For this reason, we feel that the term “explore” more accurately describes the intent of the SAC and staff are not able to propose a single alignment at this time.
34	V-21, WR 2 and WR3	<b>Willamette River:</b> These actions are clearly linked. We do not need to “evaluate” the width of the greenway. We already know it’s woefully inadequate to meet the recreational and habitat needs identified in the SE Quad Plan and Central City 2035 Plan. This should read, “Expand the width of the Willamette Greenway setback so that both recreational and riparian and in-water habitat objectives can be met.” Regarding WR3, while expanding the greenway trail to accommodate increased recreation is warranted, the trails (as with South Waterfront) should not preclude meaningful increase in riparian habitat, including a robust tree canopy. <b>Houck</b>	<u>WR3 – Within the Willamette Greenway, but outside of the Greenway setback, allow small commercial uses along or near the riverfront including food kiosks, bicycle and boat rentals and other retail that support an active riverfront in the Southeast Quadrant.</u>	Please see Comments 3 and 38. Over the next 6 months staff will work with BES, Parks, PBOT and other stakeholders to evaluate the different purposes of the Willamette Greenway and options for widening the setback. Staff will discuss the options with the public. The pros and cons of options will be presented along with a staff recommendation to the PSC. This will come forward as part of the full CC2035 package.
35	V-21, WR6 WR7	<b>Willamette River</b> – Delete “Explore” and state unequivocally, “Develop concepts and partnerships to implement an active waterfront with a mix.....while recognizing there will be some locations where recreational and river access goals are in conflict with meaningful habitat enhancement and restoration. Some locations will be better suited for recreational access while others may have to be reserved solely for habitat enhancement and restoration.” This recognizes that, while there will be some instances where both access/recreation are compatible with habitat objectives, in some cases this will not be possible. <b>Houck</b>	<u>WR6 -Partner with OMSI and Portland Parks and Recreation to design and implement a riverbank project between the Hawthorne and Marquam bridges that includes <del>Explore concepts and partnerships to implement an active waterfront with a mix of fish and wildlife habitat, boating, swimming, educational opportunities and enhanced greenway trail between the Morrison Bridge and Tilikum Crossing.</del></u>  <u>WR7 – Explore concepts and partnerships to enhance fish and wildlife habitat along Eastbank Esplanade between the Morrison Bridge and Hawthorne Bridge.</u>	WR6 needs to be split into two actions. One that is about the OMSI riverbank and directly relates to the revised Central City action WR10. The second action is about the area north of Hawthorne Bridge.  The rest of the comment is addressed in 9.

36	V-21	<i>Amendment introduced before the hearing</i>	<u>WR9 - Portland Boathouse/ODOT Easement. Work with ODOT to study the feasibility of building long-term structure for the Portland Boathouse within the ODOT easement adjacent to the Willamette River.</u>	
<b>Chapter 6 – Specific Implementation Details</b>				
#	Ref	Topic – Comment - Source	Proposed Amendment	Staff Response
37	VI-28 and VI-29	<b>Willamette River:</b> Update the Willamette Greenway Plan: 9. It is indisputable that the greenway needs to be expanded. We don't need a greenway "review", we need a process to expand the greenway significantly if the SE Quad and Central City and future South Reach Plans are to be implemented with increased access and recreational activity and habitat improvements. Reference to South Waterfront is problematic, given that habitat improvements have not lived up to the greenway plan that was developed ten years ago. <b>Houck</b>	9. <u>Work with stakeholders to evaluate the purpose and objectives of the Willamette Greenway and options for widening the Greenway setback. Staff will discuss the options with the public. The pros and cons of options will be presented along with a staff recommendation to the PSC. There is a need to review the 25' greenway setback requirement to determine if it is appropriate to increase it in the Central City such as was done in South Waterfront.</u>	Please see Comments 3 and 35
38	VI-29	<b>Willamette River:</b> We need to add a new 11 that reads along the following lines: "There are ongoing conflicts between property owners and residents along the entire Willamette River Greenway that result in cutting of trees and other vegetation that conflicts with restoration of riparian and upland habitat. Codes need to be rewritten that makes cutting of trees and vegetation easier to enforce and results in improved habitat conditions along the Greenway." <b>Houck</b>	10. <u>Apply a river environmental overlay zone to significant natural resources that are identified in the Willamette River Greenway Inventory (Oct. 22, 2014). Develop zoning code standards modelled on the existing environmental conservation overlay zones applied through the rest of Portland.</u>	The City plans to apply the river e-zone to the Willamette River and riverbanks as part of CC2035. The river e-zone is modelled after the environmental c-zone used in the rest of the city and has clearer violation language than the greenway code. Until the new river e-zone is in place, property owners are subject to the newly implemented Title 11 and any tree removal will require a permit.
39	VI-30, WR9, WR10, WR11	<b>Willamette River:</b> As stated earlier, I'd like clarity regarding total number of enhancement/restoration sites. In one location it's stated there should be a minimum of 5 sites and WR10 and WR11 refer to two sites, with only one site being taken through pre-design and implementation. <b>Houck</b>	See Comment 11. The actions will be updated to match the revised actions above.	The target for the entire Central Reach remains 2.4 miles of riverbank enhancement and at least 5 shallow water area restored by 2035. The OMSI riverbank is the first restoration site.
40	VI-35	<b>Tree Canopy:</b> This sounds too timid for increase in tree canopy needed for both habitat and amelioration of urban heat island. <b>Houck</b>	<p>Increase Tree Canopy</p> <p>The North/Northeast and West Quadrant Plans included preliminary targets for tree canopy within each district. Since development of these targets additional data and information has become available. Appendix B presents the updated methodology for setting tree canopy targets throughout the Central City and is applicable to the Central Eastside District.</p> <p><u>Staff will be using the new satellite data (anticipated to be available in early summer 2015) to update the existing tree canopy information for the Central City. Staff will also use information collected by Parks and BES to determine the available planting spaces within the rights-of-way. This data is based on existing conditions such as width of planter strips and location of utilities. Staff can then estimate what the tree canopy will likely be in 2035 based on the existing regulations and making assumptions about stocking rate.</u></p> <p><u>Next, based on the outcome of the above analysis, staff will evaluate how additional changes to regulations may impact the amount of tree canopy that is likely by 2035. This evaluation will be used to update the targets for the North/Northwest and West Quadrants and produce a target for the Southeast Quadrant.</u></p> <p><u>In support of this work, new satellite imagery data, anticipated to be available in spring 2015, will be necessary. Once this data is available, staff will update the North/Northeast and West Quadrant tree canopy targets and set the Southeast Quadrant tree canopy target.</u></p> <p>In the meantime, there is a placeholder for the Southeast Quadrant in Appendix B of 10%, which is the same target used for Lower Albina District in the North/Northeast Quadrant. Including a placeholder allows staff to produce a draft Central City-wide tree canopy target to be used as a point of discussion. All of the targets will change when the new data becomes available.</p>	<p>BPS is working closely with BES, Parks and PBOT to update the methodology for evaluating tree canopy and setting targets for the Central City. A number of new data have been developed or are almost ready for use. These new data will allow staff to better understand what is actually possible with regard to adding trees in the right-of-way. This ground-truthing is important because targets that can never be met if there just isn't enough space are not useful. Staff are striving to set targets that are reasonable but ambitious.</p> <p>Also, the tree canopy targets do not stand alone. BPS is working with BES to develop ecoroof targets for the Central City. Ecoroofs are also an important tool for reducing heat island, managing stormwater and creating habitat for birds and pollinators.</p>