



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Michael Jordan, Director

March 22, 2016

Dear Planning and Sustainability Commission:

Thank you for the opportunity to provide testimony on the Stage 2 Proposed Draft of the Transportation System Plan. Environmental Services is pleased to support this update of an essential component of the Comprehensive Plan, and we appreciate the collaborative approach taken by the Bureau of Transportation to include Environmental Services in their refinement process.

The Bureau of Transportation has done great work through Stage 1 and Stage 2 of the update in making the changes necessary to the Transportation System Plan to be consistent with the current and emerging opportunities and challenges that have been identified in the Comprehensive Plan Update.

To meet the current and future needs of the sewer and drainage system to protect public health and the environment, the latest Comprehensive Plan Update added a number of new stormwater system policies under Chapter 8: Public Facilities and Services.

- Policy 8.65 Stormwater facilities.** Provide adequate stormwater facilities for conveyance, flow control, and pollution reduction.
- Policy 8.66 Stormwater as a resource.** Manage stormwater as a resource for watershed health and public use in ways that protect and restore the natural hydrology, water quality, and habitat of Portland's watersheds.
- Policy 8.67 Natural systems.** Protect and enhance the stormwater management capacity of natural resources such as rivers, streams, creeks, drainageways, wetlands, and floodplains.
- Policy 8.68 Green infrastructure.** Promote the use of green infrastructure, such as natural areas, the urban forest, and landscaped stormwater facilities, to manage stormwater.
- Policy 8.69 Stormwater discharge.** Avoid or minimize the impact of stormwater discharges on the water and habitat quality of rivers and streams.
- Policy 8.70 On-site stormwater management.** Encourage on-site stormwater management, or management as close to the source as practical, through land use decisions and public facility investments.
- Policy 8.71 Pollution prevention.** Coordinate policies, programs, and investments with partners to prevent pollutants from entering the stormwater system

by managing point and non-point pollution sources through public and private facilities, local regulations, and education.

**Policy 8.72 Stormwater partnerships.** Provide stormwater management through coordinated public and private facilities, public-private partnerships, and community stewardship.

These new policies are all important within the context of the development of the transportation system and the right-of-way, and it does not appear that the current Proposed Draft includes new references to them. As the Stage 2 Proposed Draft is intended to make the Transportation System Plan consistent with the Comprehensive Plan Update, we believe these new references should be incorporated in an appropriate place within the document.

We look forward to the upcoming Stage 3 refinements as an excellent opportunity to update and expand the existing linkages between transportation development and stormwater management. Our two bureaus have worked closely together in recent years to better support and complement each other's work, and incorporating elements of that partnership will be valuable additions to the Transportation System Plan.

As you deliberate about the Stage 2 Proposed Draft of the Transportation System Plan, please let me know if Environmental Services staff can be of any assistance.

Sincerely,



Michael Jordan