

Moore-Love, Karla

From: Drew Bradbury <drewbradbury@gmail.com>
Sent: Tuesday, July 12, 2016 7:46 PM
To: Council Clerk – Testimony
Cc: Randi Sachs
Subject: Testimony for Agenda Item 828

To the attention of the City Council:

Good day.

My wife, Randi (copied here), and I would like to formally submit video testimony regarding the 2016 Stormwater Manual, as supporting evidence that the manual does not adequately address stormwater management in southwest Portland.

The following link is to a video which I took of SW 48th Ave. and SW Pendleton St. on December 7, 2015.

[Video of flooding on SW 48th Ave.](#)

Comments on the Video

Though this video was originally narrated to address concerns surrounding the proposed 11-home development at 5920 SW 48th Ave., it nonetheless provides evidence of flooding on SW Pendleton St. and SW 48th Ave., both of which are public right of ways.

You'll see images here of standing water halfway down SW 48th Ave. as well as of a bona fide runoff channel on the portion of SW 48th Ave. closer to Pendleton, where water from SW Pendleton carves its way in gravel towards Pendleton Creek. This runoff floods not only SW 48th Ave. but also the bottom of SW Pendleton St. The flooding causes damage to yards and, in some cases, homes.

As you can see, the video documents how the neighborhood's existing stormwater infrastructure is unable to handle current rainfall production, even with 2.3 acres of the immediate neighborhood being comprised of undeveloped land and tree cover.

The Risk is Getting Greater, and the Stakes Higher

The increased pace of development in southwest Portland only serves to highlight infrastructure gaps, as neighborhoods that once relied on land mass and flora to manage rainfall in lieu of stormwater infrastructure, now endure an even greater risk of property damage, when those natural barriers to runoff are eliminated.

As such, we ask that the City Council strongly consider including in its plan more stringent stormwater requirements for developers.

The specific development above is a prime example as to why stricter requirements are needed. In our neighborhood's case, the builder is suggesting using existing infrastructure on SW Pendleton St. and SW 48th Ave. and just that one culvert in the video (which bridges the upstream and downstream portions of Pendleton Creek) to manage all of the increased runoff from the 11 homes proposed on the parcel in question.

As you can see from the video, that infrastructure is already inadequate, and the culvert is already at capacity during just one rainfall. The area is already compromised, and this is with the 2+ acres still undeveloped. Once that permeable ground cover and tree cover are removed, homes downhill of and adjacent to the parcel will be further compromised, which also, incidentally, increases the city's exposure. (The tree plan, alone, shows 90+% of the tree cover being removed.)

Because current requirements do not protect our neighborhood, we are relegated to a David and Goliath battle wherein, if we are not victorious, the results will be very serious, knowing that the neighborhood is already compromised, as shown in the video.

In closing

To be abundantly clear, while the video and also the proposed development above underscore concerns specific to us and to our neighborhood, we offer them here only in the hopes that they can shed light on the need for a more sophisticated and deliberate stormwater plan for SW Portland.

We encourage the City Council to appreciate the severity of situations like ours, and to use our situation to craft a stormwater plan for southwest Portland can ultimately benefit its inhabitants and of which the City of Portland and the City Council can be proud.

Please let us know if you have any questions at all, and if there are other people at the city with whom you think we should share this concern, as well.

In the meantime, we offer our gratitude for your time and consideration.

Kind regards,

Drew Bradbury and Randi Sachs
5911 SW 48th Ave.

Moore-Love, Karla

From: Marianne Fitzgerald <fitzgerald.marianne@gmail.com>
Sent: Saturday, July 09, 2016 8:44 PM
To: Commissioner Fish; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; Hales, Mayor; Council Clerk – Testimony
Cc: Al Iverson; Chris Lyons; Blackwood, Jim
Subject: City Council Item 828 and previous Item 808 on July 6, 2016 agenda, Stormwater Manual

Members of the Portland City Council:

From my review of the Bureau of Environmental Service's website, it appears that the 2016 stormwater manual revisions have already been administratively adopted (see <http://www.portlandoregon.gov/bes/64040>) and the Council Item 808 (now 828) is unchanged, without any response to testimony provided by Al Iverson on July 6 regarding the need for flexibility in areas such as Southwest Portland that have impervious soils (see Mr. Iverson's testimony below).

Following our testimony last week and Commissioner Fish's comments, I expected assurances that the 2016 stormwater manual has sufficient flexibility to allow construction of high priority sidewalk/bike lane projects in SW Portland (such as SW Capitol Highway between Multnomah and Taylors Ferry Road) using alternatives to the SWMM's on-site management requirements in areas such as SW Portland that have impervious soils. In these areas, it may be more cost-effective to allow "conveyance" to manage stormwater, as Mr. Iverson noted below.

Thanks in advance for written assurances that our requested flexibility exists in the current Stormwater Management Manual to cost-effectively construct much-needed sidewalks, bike paths and stormwater systems in SW Portland. Without such assurances, I agree with Mr. Iverson that City Council should delay adoption of the draft ordinance.

Sincerely,
 Marianne Fitzgerald
 10537 SW 64th Drive, Portland 97219

----- Forwarded Message -----

Subject:Item 808 on July 6,2016 agenda, Stormwater Manual
Date:Wed, 6 Jul 2016 14:27:25 -0700
From:Alvin Iverson <alvin.iverson@gmail.com>
To:cctestimony@portlandoregon.gov
CC:Marianne Fitzgerald <fitzgerald.marianne@gmail.com>

The following is the text of the testimony I gave today requesting a delay in approving the Stormwater Manual.

My name is Al Iverson. I live on SW 36th Ave, near Gabriel Park. I am a Professional Engineer, licensed in Civil and Environmental Engineering.

I'm here to ask you to delay approval of the Stormwater Manual until it addresses stormwater management in southwest Portland better than it does now. I had submitted comments to BES before and during the comment period concerning sections 1.3.1 and 1.3.2 but I received no response addressing these concerns. These sections are about how stormwater is to be discharged.

Portland needs a different approach to stormwater management for southwest Portland. Southwest Portland is geologically different than on the other side of the Willamette River and for that reason the stormwater, now and in the past has always followed a different pathway. Portland's stormwater management approach needs to be expanded to accommodate that different pathway.

All stormwater runoff in southwest Portland eventually ends up in the Willamette River, mainly by way of Tryon Creek and Fanno Creek, not as ground water like on the other side of the Willamette.

These two creeks are fed by numerous named and unnamed creeks which in turn are fed by smaller creeks, seeps and springs. Most of this last group do not flow year around and when the area was settled, the practice was to fill them in and install field drains to keep pastures from getting soggy.

When the area became urbanized stormwater still has to find its way to the Willamette and in many cases our street system became the uppermost part of the drainage system, to the detriment of the street system.

The guiding principle stated in Section 2 of the Ordinance "controlling stormwater run-off before it runs off of individual sites" simply doesn't mimic nature in southwest Portland.

A better guiding principle would be like the one I offered in my comments to BES. It reads "The City of Portland's approach to stormwater management in southwest Portland emphasizes the use of various facilities to treat and convey stormwater through natural and constructed features, to a natural stream in a manner not detrimental to the stream or natural areas."

Please delay approval of the Stormwater Manual until it does a better job of addressing stormwater management issues in southwest Portland. Thank you.



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CITY STORMWATER MANAGEMENT MANUAL AND SOURCE CONTROL MANUAL

IF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME, ADDRESS, AND EMAIL.

NAME (print)

ADDRESS AND ZIP CODE (Optional)

Email (Optional)

not
used

MARY ENG

✓ AL IVERSON

6610 SW 36TH

alvin.iverson@gmail.com

✓ Marianne Fitzgerald

10537 SW 64 Drive 97219

fitzgerald.marianne@gmail.com

Parsons, Susan

From: Alvin Iverson <alvin.iverson@gmail.com>
Sent: Wednesday, July 06, 2016 2:27 PM
To: Council Clerk – Testimony
Cc: Fitzgerald, Marianne
Subject: Item 808 on July 6, 2016 agenda, Stormwater Manual

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