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From: william savery [mailto:william@savery.us]

Sent: Monday, August 08, 2016 12:22 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: CC2035

I am a property owner in and resident of the South Waterfront for six years. I regularly walk the trail between the new South Waterfront Greenway Park and Willamette Park along the westside of the River. My kayak is stored near Willamette Park, so I frequently launch there and paddle the stretch of the Willamette River between the Sellwood and Tilikum Crossing Bridges. Less frequently I bike the loop trails between these bridges. Thus, I have become well aware the issues of river setback and vegetation removal in the overlay zone.

The westside river trail between Tilikum Crossing and Sellwood Bridge is unique in comparison to Tom McCall Park and the Springwater on the Willamette Trail because of its low elevation river bank, views of Ross Island and residential environment. It does, however, have good accessibility, nearby small scale businesses and a central location. It is urgent to maintain its character by extending the river setback to 75 ft. without exceptions, closing the grandfather clause for historic building footprints and curtailing the tree/vegetation removal in the overlay zone. Please find Jeanne Galick's excellent written comments attached below which speak to these issues in detail.

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August 5, 2016

Central City 2035

From: Jeanne E Galick, West Quad SAC member, 7005 SW Virginia Avenue, Portland 97219

There are some wonderfully innovative concepts in this document. The Green Loop , the increased greenway setback and robust tree canopy targets are particularly noteworthy. These are ideas that will improve livability and human and environmental health. They deserve to be fully supported and funded.

However, major gaps and issues remain.

Willamette Greenway Setback 33/475.220

The increased 50 foot greenway setback is a step in the right direction but it needs to be wider still. Science indicates that at least 100 feet is necessary to provide healthy riparian functions. For a city that strives to lead on sustainability and environmental issues, the proposed increase literally falls short – settling for the absolute lowest standard to maintain some semblance of riparian health.

Recommend increasing greenway setback to at least 75 feet with 50 feet for revegetation and habitat enhancement/protection and 25 feet for the recreational trail which will measure 16 feet minimum.



Current construction and greenway with 25' setback. Note how close trail is to building.

inset shows how close the trail is to top of bank

Greenway Setback examples

A wide greenway that includes ample room for people, large trees and landscaping has huge benefits for human health, the urban economy, recreation, tourism, wildlife and the environment.



Portland at South Waterfront with 100' setback



Vancouver, BC



Vancouver, BC



Boise
river is to the far right

South Reach Greenway

Current greenway regulations are flabby, weak and outdated. The south reach still has environmentally significant resources but these will disappear if the city continues to drag its feet on updating the north and south reach greenway regulations.

A much larger setback (consistent with South Waterfront's 100-150' setback), landscaping and environmental protections are desperately needed as development is occurring at a fast pace.

Recommend the city makes a formal commitment to establish new greenway regulations in the South Reach immediately.



6-story building will loom over the trail which clings to the top of the bank. Old building footprint visible

33.475.404

33.430.080

Alterations to buildings that do not change the building footprint... aka "grandfathering."

There are few opportunities to complete the greenway— buy the land (when available) or wait for existing properties to rebuild or remodel. This exemption is a major loophole that allows a new building to build *inside* the greenway setback if using the same footprint or if a remnant of the old structure remains. The greenway will never be complete if these grandfathering exemptions remain.

Recommend removing exemption. The example below was allowed to rebuild within the setback, on a hazardous corner of the trail because a corner of the old foundation was kept.



Recent building *within* the 25-setback because it uses the same footprint

33.430.080
33.475.040
33.475.220
Tree/vegetation removal in river overlay zone

These exemptions have the unintended consequence of actually encouraging invasives. Property owners allow blackberries and other invasives to cover the bank and then annually mow them down because they present a) nuisance or b) fire hazard. It's a popular tactic for keeping views unobstructed in the South Reach. Cottonwood saplings fall into this category too. Immediate replanting requirements would end this cycle.

Remove exemptions or require immediate replanting that brings property into landscaping compliance *even when there is no change to building footprint.*



Examples of annual removal of invasives in the South Reach.



Exemptions aren't the only problem for achieving a healthy landscape along the river. There needs to be a mechanism that requires *existing* properties to come into compliance within a certain time period.

Recommend a new mechanism to require existing properties to come into compliance within 5 years, starting from 2016. This could remedy large barren sections of the greenway.

Inconsistent /negligible enforcement of greenway landscaping requirements is an on-going problem.

33.430.080
33.475.040
33.475.440J
33.475.220
Tree/vegetation removal

New policies and targets for increasing tree canopy should be wholeheartedly supported. However, even non-native trees are a welcome amenity to barren areas, supplying needed shade and habitat.

A consistent issue with property owners along the river is view obstruction by vegetation. When trees are young, they block views. An unintended consequence of allowing native trees up to 6" to be removed and replaced with whippet-thin saplings could mean constant tree removal without ever growing mature trees. Any tree removals that are exempt should be subject to Title 11 tree permit requirements.

Rethink native and non-native tree removal and replanting requirements.



6" diameter tree
(person is 5'2")

33.430.140
revegetation fee

J-#4 -Revegetation fee, paid in lieu of replanting, should be used solely for revegetating the same or nearby site -- not somewhere in the Willamette River watershed. This exemption defeats the goal of restoring or preserving a healthy riverine environment at a particular location.

Require revegetation fees be dedicated to replanting the same or nearby site where removals have occurred.

33.475.230
33.510.253
Exterior Lighting Standards

These new standards help the city to achieve a sustainability goal by improving efficiency and reducing light pollution – a health hazard for both humans and birds. It should not only be strongly supported but extended throughout the Central City.

Extend lighting standards to the rest of Central City

33.510.223
Bird-safe exterior glazing

I worked on Audubon's Bird-friendly Design Guidelines that were adopted by the City. The number of bird strikes caused by reflective glass is staggering. Following City Council's direction in Resolution 37034 (2013, **establish of the new standards calling for bird and wildlife friendly building design**). These standards are also generally consistent with the City's recently updated Green Building Policy (2015). Standards are also needed given proposed requirements to increase exterior glazing to support active ground floor uses.

Recommend a general prohibition on mirrored and highly reflective glass, not only to reduce risk of bird collisions but also to reduce glare and heat.

Waterfront Park

When does a park stop being a park and becomes a commercial opportunity? Waterfront Park was a major concern for the West Quad SAC. Consensus was for the park to be more usable throughout the year and less of a fairgrounds.

The committee was assured by staff that new commercial activity would be extremely small and limited in number (think coffee cart). It is outrageous that up to 10 permanent, 2000 square foot each, commercial buildings might be allowed within the park. It is co-opting the park.

Severely limit both number (2) and size (less than 1,00') of any commercial enterprise within the park. See current master plan with smaller, more intimate subareas for plantings, picnicking and recreation. **Rethink this! Encourage more activity on adjacent Naito (west side).**