

August 8, 2016

Subject: Central City 2035 Plan – Willamette Greenway

Planning and Sustainability Commission Chair and members:

I have over 30 years of experiences with Portland's Willamette Greenway zoning code and regulations. From 2000 through the spring of 2014 I worked for Portland Parks & Recreation (PP&R) as the Bureau's Willamette watershed ecologist and landscape designer serving as the field operations manager of all natural area parks on the River and the adjacent Willamette Greenway Trail. During my tenure I represented PP&R on many City of Portland plans and projects within the Willamette Greenway: Oaks Bottom Wildlife Refuge Fish Enhancement, South Waterfront Greenway and Trail, Willamette Park + Cathedral Park Master Plans, Stephens Creek Restoration, Springwater Corridor Trail and North Portland Greenway Plans and the Sellwood Bridge mitigation projects. Also, both before my public service and since, I have provided consulting services to many private landowners and HOA's affected by Greenway regulations.

I have reviewed the Willamette Greenway sections of the proposed Central City 2035 Plan and offer the following suggestions and comments for your review:

Applicability (33.475.040)

- Native riparian shrubs remain unprotected in the proposed zoning code. Consider adding protection requirements.
- Identify tree removals that are exempt (e.g., dead, dying, dangerous trees) are still subject to Title 11 tree permit requirements.
- Removal of CoP nuisance vegetation (e.g. Himalayan blackberry, etc.) is problematic so consider establishing standards and recommended timelines for the removal of any vegetation within the river setback. These standards should include submittal of suggested BMP's such as a riparian vegetation management plan that includes a site maintenance work schedule and weed control plan for the duration of the native plant establishment period.
- The control of nuisance species on the Willamette riverbank requires a Greenway permit for the application of approved herbicides.

River setback (33.475.210)

- A 50-foot setback is an absolute minimum and current scientific literature suggests that 100 or more feet of vegetated buffer is needed to provide ecologically sound riparian functions. Furthermore, the Willamette River Greenway in the Central City also contains the greenway trail, further reducing space for riparian vegetation. Suggest a larger setback or at least a 50-foot of vegetated setback not including the width of the trail.
- Suggest a City Council ordinance noting that a 50-foot setback in the Central City shall not create a precedent for setback widths in future south or north reach planning.
- Plant larger trees in the setback and that require a mix of tree and shrub species and sizes to be planted.

Finally, it should be noted that currently there is currently little or no enforcement of existing Greenway native vegetation protection regulations after a Greenway landscape restoration design is approved and permitted. I recommend that the CoP increase Willamette Greenway enforcement staffing.

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