




PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

Date: August 9, 2016

To: Planning & Sustainability Commission

From: Mike Abbaté, Director 

cc: Commissioner Amanda Fritz, Pooja Bhatt, Tim Crail, Brett Horner, Kia Selley

RE: Comments and Recommended Changes to the Central City Plan

Dear Planning and Sustainability Commissioners:

Portland Parks & Recreation (PP&R) appreciates the opportunity to address the Commission, express our support for this important long-term vision for the central city, as well as provide some recommended changes to the June 20, 2016 draft plan. We thank you for listening to our concerns and we also wish to thank the staff at the Bureau of Planning & Sustainability (BPS) for making significant improvements based on our input over the last two years.

We are pleased to see the extensive work done on scenic views and in particular, the addition of the downtown view from the Japanese Garden in Washington Park, the added flexibility being proposed for small retail areas in central city parks, the Green Loop vision, and the attention paid in the plan to the urban forest and its importance in addressing climate change and a more livable central city.

Our remaining concerns and recommended revisions are as follows:

Administration

1120 S.W. 5th Ave., Suite 1302
Portland, OR 97204
Tel: (503) 823-7529 Fax: (503) 823-6007

www.PortlandParks.org
Amanda Fritz, Commissioner
Mike Abbaté, Director



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| Page # | Policy # or Code Section | Issue | Suggested Changes and Rationale |
|--------------------------|--|---|--|
| 15 (Part 1) | 33.510.115.B1.a / b | Limits retail sales in Open Space (OS) zones to 1,000 sq. ft. | Revise to retain the previously proposed 2,500 sq. ft. maximum of retail space in OS zones, with options for adding more retail if desired by future park plans. Retail is an important component of activating and improving safety and oversight in parks. The trend nationally and internationally is to strategically use retail uses, particularly in the urban core, to provide additional eyes on the park, and provide needed park visitor services and support facilities. The City Council-accepted master plan for Waterfront Park envisioned three such buildings in the park to improve the visitor experience with small cafes, rental of recreation equipment, and ticket offices for potential water-dependent boat operations. Some retail spaces may be located underneath bridges to limit park space concerns. |
| 61 (Part 1) | 33.510.210.C.2.f | A static \$22.10 dollar amount is set for those wishing to obtain a bonus by contributing to the open space bonus fund. | We recommend this dollar figure adjust annually (like development processing fees) as property values and inflation rates change. Can the code refer to a fee schedule for annual amount instead? |
| 139 (Part 1) | 33.510.220.B.2 Also relates to: 33.140.230.B.1.a | This section requires ground floor windows for development along public streets. | Update 33.510.220.B.2 and Map 510-8 to include parks, open spaces, and trails so that windows are required on buildings that front parks and open spaces. PP&R can provide geographic layer. |
| 30 (Part 2) | 33.475.220 C | Where public beaches are proposed, clarify that these areas do not require landscaping | Aside from those beaches that might be proposed for human use, non-landscaped areas also provide valuable habitat as beach. It is also difficult to establish and maintain grasses and forbs, as proposed. |
| 28 (Part 2) | 33.475.220 C. Table 475-1 | Subarea planting requirements. | These areas (subarea 1) are highly disturbed and often contain fill. Planting on the slope is very difficult. The proposal is very prescriptive and most likely will not survive. We recommend allowing willow planting and other native and Northwest hardy plantings that will survive the river fluctuations and the bank armoring in these areas. |
| 40 and 42 (Part 2) | 33.475.440.E and I | The proposed 30' setback for park amenities, trails and viewing areas required | Remove the 30' setback as that is unreasonable and costly for bridging a waterway or wetland. Change setbacks for trails and park amenities to 5 feet for rivers, |

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| | | from top of bank of a stream, wetland, and drainage are too restrictive. | streams, wetlands, water bodies, etc. Allow viewing areas to extend riverward of top of bank (because the purpose of a viewing area is to get near and even over the water), if the viewing area is on public land and/or open to the public. We have many excellent examples of viewing areas and trails that are close to or that enter into wetlands, including Westmoreland Park, Oaks Bottom, East Lents Floodplain, Tideman Johnson Natural Area, and Smith and Bybee where this is acceptable. |
| 42 (Part 2) AND 91 (Part 2) | 33.475.440.E AND 33.430.190 | Proposes that a viewing area be no larger than 500 square feet (SF) and at least 30' from any waterbody. This is unacceptable. | Not all, but some viewing areas may need to be larger than 500 square feet because viewing areas may contain items such as interpretive displays, public art, seating, and even large marine historical items like masts or hulls. Revise to allow viewing areas no larger than 1800 SF and remove the 30' setback from top of bank (to allow the viewing deck to cantilever over the river, wetland, or water body bank). The 30 foot setback defeats the entire purpose of a viewing area and enjoyment of the river. |
| 91 (Part 2) | 33.430.190 A-C | Current code limits trails to no longer than 5,000 feet long. | We request that there not be an upper limit on trail length. The 5,000 feet in the current code is an arbitrary length. If all other exemption criteria are met, trail length should not matter. We realize this is a citywide code issue and one we want changed with the citywide zoning code, but the Central City plan should not perpetuate an arbitrary limit. |
| 105 (Part 2) | 33.440.240.C | Notes that trails in River Natural and River Water Quality Zones must be designed to minimize natural environment impacts. | Add "while also ensuring trails comply with State Planning Goal 15 (Greenway) and meet PP&R Trail design standards and user needs. |

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| Page # of Discussion Draft | Policy # or Code Section | Issue | Suggested Changes and Rationale |
|----------------------------|--|--|---------------------------------|
| 17 | Transportation System Plan (TSP) Major Projects list | North Portland Greenway Trail (NPGT) Segment 5 in Lower Albina does not appear to be on this list. | Add NPGT Segment 5. |

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| 38 | Central City Tree Canopy Scenarios and Targets | The methodology that is used is based on opportunity (what we can get given current conditions and estimates of the available space for trees) rather than optimum desired level of canopy to meet ecosystem and other objectives. | Suggest adding this sentence to the end of paragraph 2 on page 38: "The City should continue to explore creative ways to add canopy so that optimal canopy levels can be met, and exceed what is targeted in this plan and feasible under today's current conditions. The existing Urban Forestry Management Plan will be updated by PP&R in the next several years and will explore ways in which to achieve appropriate canopy in the central city, and citywide. It is likely that additional canopy will be needed to address pressing issues like climate change, heat island effect, and air pollution." |
| 49 | Action EN36 | This action calls for Parks to enhance planting along the Willamette on the west side between the Steel and Broadway Bridge. | Remove this action as the City and PP&R have no ownership or control of this land area. Alternatively, assign BES to lead Implementer with "Private" property owner. |
| 150 | Action EN38 | Calls for native plantings only in PP&R open spaces and parks. | Revise to "native and Northwest hardy plantings." Non-natives can contribute to the ecological health of open spaces and in some cases, can outperform natives (drought tolerant). |
| 150 | Action EN41 | Calls for PP&R to enhance the riverbank and shallow water area around RiverPlace Marina. | Move from 2-5 year timeline to 6-20 year timeline, and suggest assigning BES as Lead Implementer, with PP&R as partner. This action has not been identified as a priority for limited PP&R resources. |

Thank you for your consideration of these very important issues to Portland Parks & Recreation. Further questions can be directed to Parks & Trails Planning Manager, Brett Horner.