

July 12, 2011

Received after
record closed

Andre Baugh, Chair
Portland Planning & Sustainability Commission
c/o Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue; 7th floor
Portland, Oregon 97204

RE: Portland Plan – Watershed Health Background Report

I am a planning consultant for Gunderson, LLC.

We appreciate the opportunity to comment on this background report.

We concur with the points made by the Port of Portland in their letter of June 27, 2011.

The Natural Resource Inventory (NRI) findings remain in dispute. The City needs to be careful in using as a basis until its validity has been fully resolves.

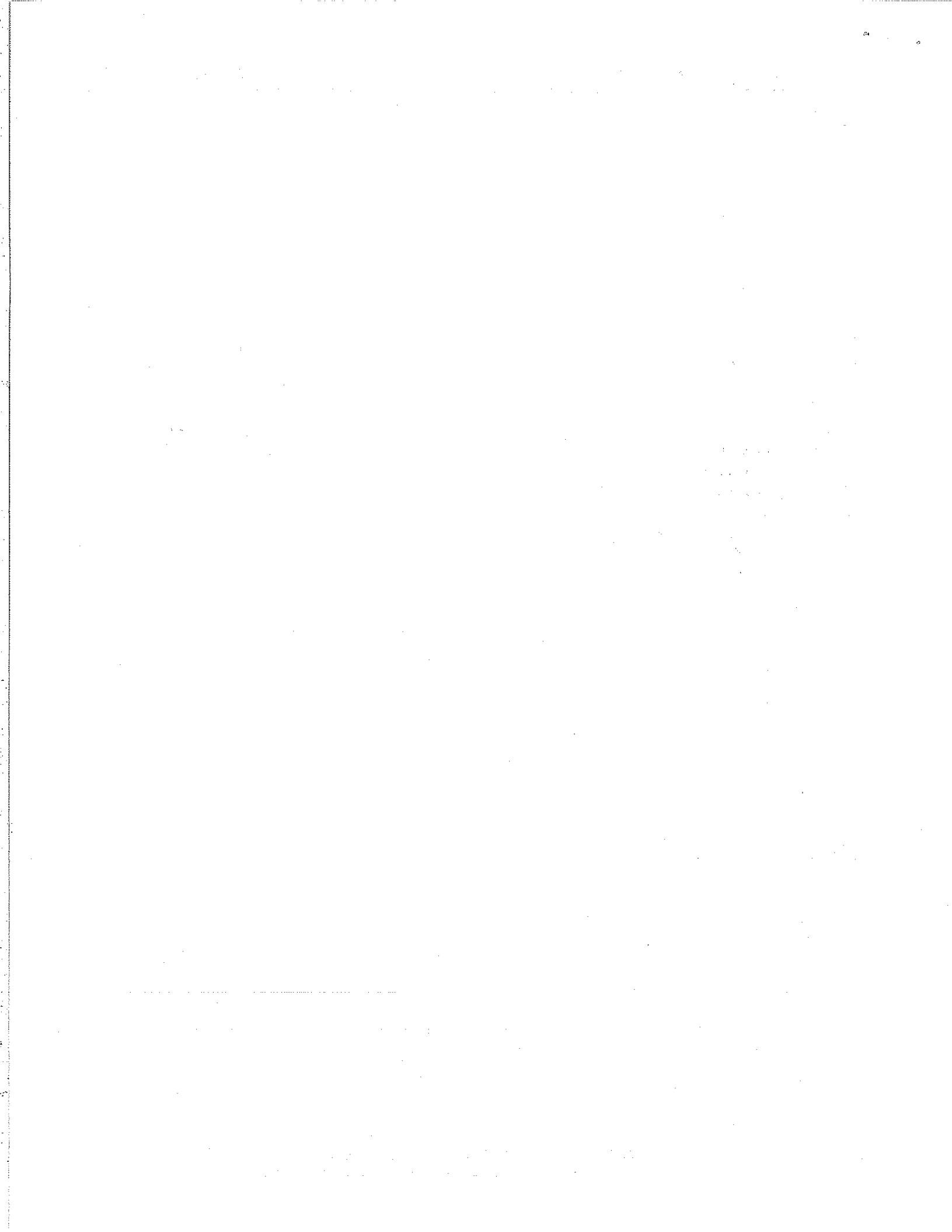
The significant improvement in water quality identified in the report is a very positive beginning. Portland's programs (which Gunderson supports including the incorporation of habitat roofs and the grey to green program) have clearly stopped further degradation.

The provision of high-quality wild life habitat is clearly important; however healthy streams are so much more. The very health of the City is reflected by the quality of its water.

The measure of tree canopy should be qualitative, not quantitative. The diversity of species, appropriate placement, and maintenance of the trees health whether it is alone or within a grove or forest should be the measurement of a healthy canopy that provides habitat and shade.

A section should be specifically devoted to the species that migrate through Portland including the flyways, fish ways, and pathways. These species and their needs should be identified to allow Portland to maximize the quality of their visit.

The discussion of waterways should include the Columbia, Sandy, Tualatin, and Clackamas rivers, as well as the significant underground streams such as Tanner and Asylum creeks. The types of soils these waters flow over and through are extremely important whether they be the Troutdale gravel formations on the eastside or the weathered basalt that forms the west hills. Specific attention should be made to identify and address the streams that run under our City in culverts.



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Andre Baugh, Chair
Portland Commission of Planning and Sustainability
Portland Plan – Watershed Background report
Peter Finley Fry AICP for Gunderson LLC

The definition of natural condition seems too simplistic. Rivers and water flows change dramatically season to season and year to year. The shoreline also fluctuates as evidenced by the shores flushed away in our recent flooding event which was powerful, but not as destructive as 1996 due to the controlled release of incredible volumes of water. Water quality and temperature also fluctuate with the season, year to year and at various reaches of the river.

These conditions give rise to habitat, including human habitat as described by human ecology. Wildlife does not survive in spite of human presence, but due to it. While it is clearly true that the confluence of the Willamette and Columbian rivers has seen different settlement patterns; humans have dominated this environment for over fifteen thousand years, and Rousseau's depiction of the "noble savage" is certainly not an accurate description of the pre Russian, Oriental and European settlement patterns.

Sincerely

A handwritten signature in black ink, appearing to read 'P. Fry', with a long horizontal line extending to the right.

Peter Finley Fry AICP

CC David Harvey, Gunderson, LLC
Steven D. Olson, Tonkin Torp, LLC

