

October 20, 2014

To: BPS staff and PSC members

From: Mike Houck

Re: My Feedback Concerning W Quadrant Work Session Materials for October 21, 2014

Dear Staff and Colleagues,

I wanted to communicate to you, in writing, my feedback regarding the PSC W Quadrant Work Session Materials for tomorrow's meeting, given I will be out of town and calling in to participate. My experience with long distance call in participation has not been uniformly positive. Hence, my written comments so you have them in advance of the meeting.

First, thanks to staff for their having clearly taken our comments to heart in the previous hearing and responding to them in a comprehensive manner.

In regard to Karl Lisle's memo of October 9 to the PSC, I have the following comments:

Pages 1-9, Proposed Revisions Master List

I appreciate the fact that staff has proposed revisions that reflect many of the concerns raised by myself, other Commission members, and city staff. I am particularly pleased that ambiguous and less active words such as "consider" and "encourage" have been replaced with more action oriented words, as requested.

I am pleased to see:

New WR6 regarding use of existing dock facilities as adding new docks to the river will be problematic from a fisheries perspective and it's important to accommodate small water craft to the maximum extent possible with existing docks and moorage.

New WR8 higher standards for new development in the floodplain

New WR Policy, Minimize risk to new and existing development.....

Adding impervious standards to EN1

Adding urban heat island effect to EN4

New EN12 Action, Work with FEMA

New EN13, Amend flood related regulations, to address flooding

New 9 to address Ross Island and address conflicts with additional boating/activities on the river (I have comments related to the appendix)

New Appendix A to explain to address existing flooding and changes in flooding due to Climate Change

**Building Heights:** I was pleased with the comprehensive nature of the information provided in response to concerns regarding building heights, including shade and wind generation, two issues of great concern from my perspective. I feel I have a better understanding of the rationales for some increase in building heights in the downtown core.

I have also had discussions with Katherine Schulz regarding wind in particular and have a better understanding of opportunities to mitigate for wind through physical changes to the building (i.e. building on podiums to interrupt air flow before it hits the street level and installation of canopies and other structures to intercept wind coursing down the face of the building). Another concern I have had is the potential for too many tall buildings, an issue I assume will be discussed at tomorrow's meeting and that was addressed in the memo (page 17).

There was much thoughtful testimony from the public regarding building heights (too many, too many in the wrong place, and impacts to the river experience at the two bridgeheads). I look forward to PSC conversation on those issues.

**Environmental & River Content:**

Proposed Revisions (pp 1-5), revisions I support:

Adding green infrastructure, flexible streets

Changing may to will with regard to Climate Preparation Strategy

Deleting "if beneficial"

Changing Encourage to Increase use of ecoroofs green walls, etc

New WR6, increase use of existing docks

New WR7, Require higher standards for new development in the floodplain

(I would had, however, that the first preference is not directing development into harms way in and near the floodplain)

Orient building towards the river **at appropriate setbacks**.... Although this begs the question regarding what's appropriate, given interest in addressing flooding

due to climate change and interest in habitat enhancement and restoration (adding habitat)

New WR Policy: Minimize risk to new and existing development and infrastructure.....**while maintaining and enhancing ecological functions associated with the river and floodplain**

Other references to addressing flooding and response to climate change on page 3

Locate all new redevelopment west of Naito Parkway to minimize and outside the floodplain (reword?)

Attachment 2:

**Appendix A: Willamette River Flooding**

EN1 and EN13, I support these actions to work with FEMA to expedite remapping of the floodplain to address potential frequency and duration of flooding due to climate change.

I also strongly support EN13 actions to “Amend the flood related and other guidelines to minimize and mitigate the risk of flood damage to new, redeveloped building..... However, my preference would be to **first avoid** then minimize and mitigate. Is there a reason the **avoid, minimize, and mitigate hierarchy** was not used in this instance?

**Attachment 3: Tree Canopy Target:**

I am pleased staff has responded to criticism regarding the methodology for establishing tree canopy targets and that there will be a process going forward with a technical team. **I would urge staff to include interested parties outside staff (Urban Forestry Commission, Audubon Society, Friends of Trees, etc) in updating CC2035 tree canopy targets.**

**Attachment 4: Riverbank Enhancement Target:**

I am pleased to see, in response to public testimony regarding lack of explicit targets for riverbank habitat improvements, that a technical team from BES, PP&R, and BPS will update the methodology for setting riverbank targets.

I am also pleased to see enhance

**Attachment 5, Ross Island and Potential Solutions:**

While I am very pleased that staff has responded to my numerous criticisms regarding lack of attention to Ross Island, Holgate Channel during W Quadrant and CC2035 planning processes, I have some serious concerns with this attachment.

**Issues:**

**Long Term Management:** First and foremost, the proposal to wait until there is a single, unified ownership before proceeding with master planning or development of a holistic management plan is unrealistic. I cannot foresee, nor can the city, when RIS&G will cease processing material on Hardtack Island and whether or not they will cede ownership to the city or other entity. We simply cannot wait until there is a unified ownership before proceeding with management plans for the Ross Island-Holgate Channel-Oaks Bottom complex.

**Enforcement:** Enforcement cannot be restricted solely to Ross, East, and Hardtack islands and the Ross Island lagoon (it's important to include all three islands and not focus exclusively on Ross Island).

I strongly support the recommendation to petition DSL to prohibit camping, but I would include the banks of the Willamette not solely Ross Island. There are illegal encampments along the banks of the Willamette, particularly the east side, from downtown to Oaks Bottom Wildlife Refuge. They are not merely unsightly but have degraded fish and wildlife habitat. The city should work in cooperation with the Port of Portland in its petition to DSL since the Port is also working on these issues at Government Island.

I strongly support updating the Willamette Greenway Plan to address these issues as well.

I strongly support identifying actions Ross Island Sand and Gravel can take, but would suggest they should be actively courted and engaged in the development of a long term management plan. There is no reason why a private entity such as RIS&G and public agencies should not develop a cooperative management plan while the islands continue to be in both public and private ownership.

**Long term management and Property Acquisition/Donation:**

I strongly support funding development of a Natural Resources Management Plan for the Oaks Bottom—Holgate Channel—Ross Island complex as recommended. I would support the multi-owner approach, given the islands will not be entirely publicly owned for some time and we cannot wait for that eventuality.

DSL did not complete a management plan. It called for the creation of a cooperative management plan by the city and RIS&G, which has yet to be undertaken, much less completed. There is no management plan to be implemented in the interim.

Background

**Environmental Conditions:** Osprey are migratory, not resident

**Recreation:** It is stated that camping is not allowed on city property without permission. A condition placed on the city by RIS&G was that there be no public access, at any time on the 45 acres donated to the city. There is access allowed for restoration activities, but only with PP&R and/or other city staff present as part of an official restoration or wildlife monitoring activity. But, the problem is not only camping on the island. Boaters are mooring for months at a time in the Holgate Channel and off Ross Island and the artificial berm connecting Ross and Hardtack Island on the river's main channel (west side) and then erecting camps and building fires while living on their boats.

There are also significant issues inside Ross Island lagoon with boats ignoring the slow/no wake zone and anchoring in small flotillas and cranking up music with loudspeakers, which they also do in the Holgate Channel. Noise is a significant issue, both aesthetically and impacts on fish and wildlife. Boats sometimes anchor directly next to the active Bald Eagle nest in the Ross Island lagoon.

In addition to actively petitioning DSL to disallow camping below Ordinary High Water throughout the Portland Harbor the city should petition the Oregon State Marine Board to extend the slow/no wake zone from the Ross Island Lagoon where it currently ends to the downstream tip of Ross Island so that the entire Holgate Channel is slow/no wake. As it stands now boats arriving at the Ross Island lagoon from the downstream end of the Holgate Channel assume there is no slow/no wake zone in the Ross Island lagoon which is a major management issue.

I hope these comments will assist the PSC in its deliberations on the West Quadrant Plan at tomorrow's work session. I will do my best to weigh in from afar as well.

Regards,

Mike Houck,  
PSC Member