To: Portland Sustainability Commission Nov 4, 2014

Subject: Portland Comprehensive Plan Comments

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**Recommendations:** 

1. Protect all of West Hayden Island. 300 acres of rust-belt development is not worth the loss! There is no guarantee that the industries will provide what they purport, but the benefit of the existing landscape is working everyday. It is a mistake to loose such a natural treasure in our midst.

2. It's time to create incentives and requirements for installation of ecoroofs on new multi-family, commercial and especially industrial development. Ecoroofs are a proven and affordable technology. Ecoroofs and solar panels are complimentary one doesn't preclude the other.

3. Determine specific goals for green infrastructure. In addition to centers and corridors we need better attention to green infrastructure associated with new development for all land use types, especially industrial lands. Special attention should be made to reduce impervious surfaces on private developments and in the public Right of way. Specify that a Portland Green Factor, such as Seattle's or Berlin's, be developed to assist in achieving these green infrastructure goals.

4. With 42 years of urban development experience I have learned that the manifestation of the built environment is a result of design practices, many of which are not compatible with new policies. This is especially true for conventional infrastructure bureaus. The Comp Plan needs to be specific and also find those areas of conflict with these existing design conventions. If you don't address it now many new policies are not likely to get through when they encounter PBOT, BES, BPS, Urban Forestry and other bureaus common and oft times inconspicuous barriers. Several years ago BES had what they called Greenscan, a process of identifying existing codes and practices that would prevent application of new green goals and policies. It was successful, but unfortunately BES discontinued this program. I strongly recommend that you incorporate attention and resources to set up such a process in the city. This could dovetail with developing a Green Factor.

5. Huddben suggestions suffert.