

November 4, 2014

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VIA E-MAIL (PDXCOMPPLAN@PORTLANDOREGON.GOV)

Portland Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: PSC Comprehensive Plan Testimony, related to 2035 Comprehensive Plan (July 2014 Draft) Goals and Policies

Dear Portland Planning and Sustainability Commission:

This office represents Schnitzer Steel Industries, Inc. (“Schnitzer”). This testimony is directed at the Goals and Policies of the July 2014 draft 2035 Comprehensive Plan (the “comp plan”), and we request that it be included in the record. Please provide us notice of the PSC’s recommendation and the City Council’s decision on the comp plan.

Schnitzer owns and operates an approximately 101 acre port and related metals recycling facility at 12005 N. Burgard Way, which is located on the north reach of the Willamette River. Schnitzer has closely followed the City of Portland’s periodic review tasks, particularly as they relate to Portland’s working harbor. Schnitzer’s comments on the comp plan are directed at ensuring that the City can comply with Goal 9 by accommodating the projected demand for developable employment lands with site characteristics and corresponding job opportunities in the working harbor, and that the working harbor remains economically viable. Given the working harbor’s importance in trade statewide, and as a source of jobs for under-represented communities and family wage jobs, we hope that the PSC and City share Schnitzer’s desire for a comp plan that will support a thriving working harbor.

A summary of Schnitzer’s concerns with the current draft of the comp plan is below. Solutions to our concerns are detailed in the attached is redline version of Chapters 6 and 7 of the comp plan. Our suggested revisions to the draft comp plan recalibrate the lack of balance in the comprehensive plan and emphasize that in order for the City to prosper, it must be economically viable to retain and grow jobs, and an adequate supply of land with appropriate site characteristics must be available.

1. Lack of Balance in the Comp Plan

When read in isolation, Chapter 6: Economic Development is supportive of prosperity, which is one of the comp plan’s four “key values” (GP1-2) and encouraging job growth, which is one of seven key directions in the comp plan (I-9). However, when the entirety of the comp plan is analyzed, there is a disproportionate emphasis on the Goals and Policies in Chapter 7:

Environment and Watershed Health, which creates an inappropriate policy conflict adverse to the continued viability of the working harbor. Stated otherwise, a comp plan with these policy conflicts will not achieve the Guiding Principle of prosperity,¹ the Goals and Policies in Chapter 6, or Goal 9's requirement that the City provide an adequate supply of sites of suitable sizes, types, locations and service levels for a variety of industrial uses, consistent with the EOA. See Goal 9 and ORS 197.712. These inconsistencies in the current draft of the comp plan also raise Goal 2 compliance issues.

A comparison of the verbs used in Chapters 6 and 7 is an example of how economic development is undermined by the comp plan. Verb choice in comp plan goals and policies is meaningful. For example, "require" means to "compel, demand something," whereas "consider" means to "think about, take into account." See Appendix A: Glossary. The policies in Chapter 7 are predominately mandatory actions ("protect") whereas Chapter 6 are largely aspirational ("encourage"). As such, the Chapter 7 policies of mandatory implementation would necessarily control.

The abundant use of "protect" in Chapter 7 is particularly troubling. The comp plan Glossary defines "protect or maintain" as "keep what you have; conserve; maintain; preserve." The Court of Appeals and LUBA have interpreted the term "protect" to mean that the only impacts to a "protected" resource that are permitted are *de minimus* or insignificant. D.C. Riverkeeper v. Clatsop County, 238 Or. App. 439 (2010). In other words, Portland's existing e-zone regulatory scheme that allows some impacts to resources if those impacts are avoided, minimized and mitigated would be inconsistent with a comp plan policy that requires "protection." The Court of Appeals also reasoned that when a comp plan policy requires protection, it cannot be "balanced" with other comp plan policies that encourage competing outcomes to allow limited impact to resources. The cited case relates to Goal interpretation and local regulations implementing Goals, and the reasoning would be applied to the comp plan's use of the verb "protect." Accordingly, as currently drafted, the comp plan would prohibit development, and jobs, on sweeping expanses of land. For example, Policy 7.1 provides "Environmental quality. Protect air, water, and soil quality and associated benefits to public and ecological health and safety." As written, Policy 7.1 applies to all air, water and soil in the City, and calls for it to be protected, which means there can be only *de minimus* impacts to air, water and soil Citywide. Even more devastating to the working harbor are Policy 7.43, which requires the preservation and enhancement of all existing river banks in the Willamette and Policy 7.46, which requires the protection and enhancement of all grasslands, beaches, floodplain, wetlands and other wildlife habitat. Neither Policy 7.43 nor Policy 7.46 consider the significance, function or value of the resource or whether it is even inventoried, and the policies do not consider the needs of water-dependent or water-related uses and opportunities for mitigation.

¹ The economic prosperity Guiding Principle provides, "encourage land use decisions that support a low-carbon economy and foster employment growth, competitiveness, and equitability-distributed household prosperity." GPI-5.

Not only does the prolific use of “protect” in the comp plan stifle job preservation and creation, it is inconsistent with Goal 5. Specifically, Chapter 7 does not always link the “protect” requirement to an identified Goal 5 resource on an adopted Natural Resources Inventory (“NRI”). Regulating resources, especially to the extent that impacts are prohibited through a “protect” designation, that are not designated as significant violates Goal 5. For example, Policy 7.1 (quoted above) indiscriminately “protects” all air, water and soil qualities, regardless of whether the resource is significant or on an adopted NRI. Policies 7.43, 7.46 and others in Chapter 7 have the same defect.

The issues in Chapter 7 can be resolved if the term “protect” is replaced with verbs that allow more discretion, such as “conserve,” “encourage,” “reduce,” “limit,” “strive” or “consider.”

2. The Working Harbor Needs Predictability, an Improved Regulatory Climate and Certainty About Superfund

Portland’s economic competitiveness, particularly in the working harbor, is negatively impacted by regulatory schemes; particularly ones that are redundant to or in contradiction of state and federal regulations. While Policy 1.5 “Consistency with state and federal regulations” and Goal 6.B “Development” are gestures toward avoiding the detrimental effects of uncoordinated regulations, other goals and policies encourage potentially duplicative regulation. For example, Policy 7.4 requires the protection of the quantity, quality and function of significant natural resources, many of which are already subject to state and federal environmental protection regulations.

The relative competitiveness of industrial sites, particularly river dependent ones, is critically important to business. However, Policy 6.16 (Regionally-competitive development sites) suggests that sites only need to be competitive in the region. River-dependent and river-related sites need to be competitive globally, not just regionally. Additionally, while incentives and other assistance are important tools for improving competitiveness, Policy 6.16 should be broadened to recognize that City-imposed regulations (particularly ones that duplicate state and federal regulations) can contribute to Portland sites not being competitive.

Avoiding duplicative regulations is particularly important in the working harbor, which is included in the Portland Harbor Superfund Site. The existing federal and state Superfund regulations create uncertainty, expense and added discretionary review processes. Industrial uses in the harbor cannot tolerate additional regulatory burdens, such as those included in the River Plan and encouraged by the comp plan. We strongly support the inclusion of a Superfund-specific policy in the comp plan, Policy 6.40 (Portland Harbor Superfund). Policy 6.40 appropriately recognizes the importance of the cleaning up the Harbor to the City’s future land supply. While Policy 6.40 is a step in the right direction, we encourage the City to include specific Superfund action items, such as expressly exempting remediation activities from City

regulation, City recognition of Superfund-related mitigation and/or remediation when land use processes require mitigation, and funding prioritization

Many of Schnitzer's concerns could be addressed by including the concept of "economic viability" in the comp plan. The term "economically viable" further refines the concept of what is "practical" for development. The term means that a redevelopment or development objectives of a specific project are achievable in the Portland market, considering factors such as cost, time and predictability. Because jobs do not survive in a climate which is not economically viable climate, we request that the City include economic viability as a concept in the comprehensive plan.

3. The Importance of Site Characteristics

For water-dependent and water-related uses, it is not just the quantity of available land that matters; the quality is critical. These qualities include site characteristics that are necessary for trade, including river and rail access, and proximity to the interstate. While Policy 6.36 (Prime industrial land retention) is an important means to preserve prime industrial land from quasi-judicial map amendments, it needs to be strengthened. Specifically, Policy 6.36(a) should be broadened prevent the conversion of prime industrial land due to legislative map or text amendments. If conversion of prime industrial land is unavoidable, then the loss of land must be fully mitigated with comparable acreage with appropriate site characteristics. Without these changes, it appears as if habitat corridors depicted on Figures 3-5 and 3-6 will be introduced into prime industrial areas, which will reduce the supply of industrial land with needed site characteristics, contrary to Goal 9. Policy 7.43's (River bank conditions) requirement to preserve existing river banks and rehabilitate developed banks, Policy 7.47's (Riparian corridors) support for increasing the width and quality of vegetative buffers along the Willamette River and Policy 7.18's (Habitat connectivity) direction to weave habitat into new development without recognition of the use's functional needs are other examples of converting industrial land.

4. There Must Be Accountability for Job-Capacity Creating Policies

We expect that the land deficit identified in the EOA will be satisfied, in part, by making existing land more productive. We are supportive of this approach, where appropriate, such as increasing employment densities in the Central Eastside. However, job densification will not address the identified need for inherently land-intensive jobs that have site specific needs, such as water-dependent and water-related uses. Policies that are the basis for an assumption of increased land supply must have a more direct connection to the assumed outcome so that accountability is ensured. For example, if we assume that by 2035, 40% of brownfield acreage will be redeveloped, then Policy 6.39 (Industrial brownfield development) should include a metric for measuring success, and remedial steps that will be taken if the assumed outcomes are not achieved. Additionally, Policy 7.29 (Brownfield remediation) appears to erode Policy 6.39 because brownfield remediation will be promoted and facilitated if it incorporates ecological site

design and resource enhancement. In other words, cleaning up the brownfield pursuant to state and federal regulations is not enough; additional ecological lift must also be provided. Such an additive requirement would increase the cost of brownfield remediation, which is an obstacle to creating job capacity on brownfield land.

Policy 6.48 (Golf course reuse and redevelopment) is another example. To the extent that golf course conversion is relied upon for land supply assumptions, the policy must ensure that there is a connection between the quantity of land that the City assumes will redevelop, and the City's actions. The golf course reuse and redevelopment policy (Policy 6.48) currently limits the City's obligation to only "facilitating" golf course redevelopment.

Finally, to the extent that the City intends on relying upon brownfield sites to accommodate needed jobs, such as the Time-Oil site, Policy 7.46 (Sensitive habitats) appears to foreclose those opportunities.

5. The Link Between the Working Harbor and Equity Issues Should be Strengthened

We welcome that Policy 6.27 (Income self-sufficiency) links the land supply with job opportunities for less-educated people. However, the policy should go farther and link these jobs to the employment geographies that provide most of these job opportunities -- the Portland Harbor and Columbia Corridor. Additionally, the equity policies should be strengthened. For example, Policy 6.27 (Income self-sufficiency) suggests that City regulatory actions could impact job opportunities for less-educated people, but only requires "evaluation" of these regulatory plans. "Evaluation" only requires an analysis of the issue. To be meaningful, the equity policies should be strengthened so that regulations with negative impacts on job opportunities for underrepresented communities are avoided.

Thank you for the opportunity to provide preliminary feedback. We look forward to an ongoing collaborative process so that the comp plan can achieve all of the City's Guiding Principles.

Very truly yours,



FOR:

Dana L. Krawczuk

DLK:dlk

Enclosures

Cc: Schnitzer Steel Industries (via email) (with encs.)

Chapter 6: Economic Development

What is this chapter about?

The goals and policies in this chapter convey the City's intent to:

- Provide land supply to support job growth, and to expand the use of tools, such as brownfield redevelopment, to increase efficient use of land.
- Expand economic opportunity and improve economic equity for Portland's growing population through sustained business growth.
- Support traded sector growth, expand exports and retain Portland's position as an innovative industrial and commercial center and a West Coast trade gateway.
- Provide land use policies to support the growth and vitality of business districts.
- Create an environment that encourages innovation and entrepreneurship, builds on local strengths for business success and growth, and offers businesses a functional and attractive place to locate.

Why is this important?

A healthy economy provides opportunities for people to achieve their full potential and it is the foundation of a livable city. A healthy economy supports the creation of living wage jobs for our growing and increasingly diverse population. It supports a growing tax base for public services. It also improves health and educational outcomes. People with stable jobs and reliable incomes have resources to meet their basic needs, which contributes to their physical and mental health, and to the educational and economic success of youth.

Portland is an innovative employment center in a region with strong economic and export growth. Economic strengths also include a successful Central City and industrial base, a primarily middle-class distribution of jobs that support a diverse community, and livability advantages that attract population growth and talent. However, these strengths mask trends toward declining prosperity for many Portlanders and highlight that economic development must be a higher priority in the coming decades than it has been.

Since 2000, job growth in the city has fallen far short of housing growth. Rising costs of living have outpaced average wages. The share of middle-wage jobs and resulting upward-mobility opportunities for low-income people has declined. Income growth has been concentrated among the top-earning 20 percent of the workforce. In addition, deep income disparities persist for under-represented and under-served populations, such as people of

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color. Research suggests that cities with more equitable economies have stronger economies.

As businesses face an increasingly competitive regional and global marketplace, new directions are needed to sustain job growth and improve economic equity. The region's primarily industrial traded sectors that drive regional prosperity will need more investment in workforce education, land supply, freight infrastructure and innovation. Improving economic equity and affordability will depend on making equity a more central part of City policy and investments.

New land development approaches are needed to improve local competitiveness in regional and global markets, including more brownfield redevelopment, regulatory certainty, low-cost office development and institutional zoning. Land use programs must address the increasingly blurred lines between commercial, industrial and create services sectors. Citywide neighborhood prosperity will depend on new approaches to concentrated commercial growth in centers, neighborhood revitalization, flexibility, affordability and small business growth. And business climate improvements are needed to keep regulatory burdens and fees competitive in the regional and global marketplace.

The world economy is a dynamic system. Portland's economy will continue to change in response to technology, social change and global trends. Zoning and land use must respond to these changes. This kind of local economic innovation will be key to Portland being a player in development of the future economy.

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Goals

Goal 6.A: Prosperity

Portland has vigorous economic growth and a healthy, diverse economy that supports prosperity and equitable access to employment opportunities for an increasingly diverse population. A strong economy that is keeping up with population growth and attracting resources and talent can:

- Create opportunity for people to achieve their full potential.
- Improve public health.
- Support a healthy environment.
- Support the fiscal well-being of the city.

Goal 6.B: Development

Portland supports an attractive environment for industrial, commercial, and institutional job growth and development by 1) maintaining an adequate land supply; 2) a local development review system that is nimble, predictable, and fair; and 3) high-quality public facilities and services.

Goal 6.C: Business district vitality

Portland implements land use policy and investments to:

- Ensure that commercial, institutional, and industrial districts support business retention and expansion.
- Encourage the growth of districts that support productive and creative synergies among local businesses.
- Provide convenient access to goods, services, and markets.
- Take advantage of our location and quality of life advantages as a gateway to Oregon and the Columbia River basin.

Policies

Diverse, expanding city economy

Diverse economic growth is central to Portland’s long-term prosperity. It provides jobs for a growing population, improved equity, fiscal stability, neighborhood prosperity, and economic resilience. Moreover, Portland is a statewide economic engine with opportunities and benefits that extend beyond city boundaries.

About 140,000 new jobs are expected in the city between 2010 and 2035, which is consistent with local and national 25-year trends. The policies below set explicit economic growth targets, highlight coordination opportunities, and specify benefits that should be sought through economic growth, and call out important local strengths that support economic growth.

- Policy 6.1** **Diverse and expanding economy.** Align plans and investments to maintain the diversity of Portland’s economy and status as Oregon’s largest job center with growth across all sectors (commercial, industrial, and institutional) and across all parts of the city.

- Policy 6.2** **Employment growth.** Strive to capture at least 25 percent of the seven-county region’s employment growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania Counties).

- Policy 6.3** **Fiscally-stable city.** Maintain a high citywide jobs-to-households ratio that supports tax revenue growth at pace with residential demand for municipal services.

- Policy 6.4** **Economic resilience.** Improve Portland’s economic resilience to impacts from climate change and natural disasters through a strong local economy and equitable opportunities for prosperity.

- Policy 6.5** **Low-carbon economy.** Align plans and investments with efforts to improve energy efficiency and reduce lifecycle carbon emissions from business operations. Promote employment opportunities associated with energy efficiency projects, waste reduction, production of more durable goods, and recycling.

- Policy 6.6** **Competitive advantages.** Maintain and strengthen the city’s comparative economic advantages including access to a high-quality workforce, business diversity, competitive business climate, and multimodal transportation infrastructure.

- Policy 6.7** **Business environment.** Use plans and investments to help create a positive business environment in the city and provide strategic assistance to retain,

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expand, and attract businesses.

- Policy 6.8** **Small business development.** Facilitate the success and growth of small businesses and coordinate plans and investments with programs that provide technical and financial assistance to promote sustainable operating practices.
- Policy 6.9** **Business innovation.** Encourage innovation, research, development, and commercialization of new technologies, products, and services through responsive regulations and public sector approaches.
- Policy 6.10** **Sharing economy.** Encourage mechanisms that enables individuals, corporations, non-profits and government to market, distribute, share and reuse excess capacity in goods and services. This includes peer to peer transactions, crowd funding platforms, and a variety of business models to facilitate borrowing and renting unused resources.
- Policy 6.11** **Economic role of livability and ecosystem services.** Conserve and enhance Portland’s cultural, historic, recreational, educational, food-related, and ecosystem assets and services for their contribution to the local economy and their importance for retention and attraction of skilled workers and businesses.

Land development

According to forecasts, Portland will continue to have **relatively** strong demand for employment land development. However, most of Portland’s land supply for employment growth is on land that has constraints or is already developed.

Statewide Planning Goal 9 – Economic Development requires Portland to provide adequate long-term and short-term land supply for economic development and job growth, consistent with an Economic Opportunities Analysis. Forecasted demand for buildable land by 2035 includes 150 acres in the Central City, 1,350 acres in industrial districts, **of which acres is river-dependent**, 690 acres in neighborhood business districts, and 370 acres for campus institutions.

New directions to support Portland’s land supply for job growth include policies for adequate long-term and short-term development capacity, a targeted increase in brownfield redevelopment, incentives to maintain competitiveness in regional **and global** markets, and guidance for streamlining the City’s regulatory climate.

- Policy 6.12** **Land supply.** Provide **adequate** supplies of employment land that are sufficient to meet the long-term and short-term employment growth forecasts, adequate in terms of amounts and types of sites **with necessary site characteristics**, **readily** available and **economically** practical for development.

- Policy 6.13 Land efficiency.** Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land.
- Policy 6.14 Brownfield redevelopment.** Cleanup and redevelop 60 percent of brownfield acreage by 2035. Additional related policies are found in the Industrial and Employment Districts section of this chapter. Require evaluation of percentage of brownfield cleanup and redevelopment every five years. If sufficient cleanup and redevelopment is not occurring, then require additional financial and regulatory incentives for cleanup and redevelopment.
- Policy 6.15 Annexation.** Facilitate a predictable, equitable process for annexation of employment lands within the urban services area as needed to meet the City’s forecasted land needs. See the West Hayden Island policy in the Industrial and Employment Districts section below.
- Policy 6.16 Regionally-competitive development sites.** Improve the regional and global competitiveness of the vacant and underutilized sites located in Portland’s employment areas through the use of incentives and regional and state assistance for needed infrastructure and site readiness improvements and avoiding City regulations that diminish these objectives.
- Policy 6.17 Regulatory climate.** Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:
- 6.17.a.** Assess and monitor cumulative regulatory costs to ensure that Portland is financially competitive with other comparable cities.
 - 6.17.b.** Promote certainty for new development through appropriate allowed uses and “clear and objective” standards to permit typical development types without a discretionary review.
 - 6.17.c.** Allow discretionary-review as a way to facilitate flexible and innovative approaches to meet requirements.
 - 6.17.d.** Design and monitor development review processes to avoid unnecessary delays.
 - 6.17.e.** Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and avoid duplicative regulations and procedures when City policies can be achieved through other means.
- Policy 6.18 Short-term land supply.** Provide for a competitive supply of development-

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ready sites, with different site sizes and types, to meet five-year demand for employment growth in the Central City, industrial areas, campus institutions, and neighborhood business districts.

Policy 6.19 Evaluate land needs. Update the Economic Opportunities Analysis and short-term land supply strategies every 5 to 7 years.

Policy 6.20 Corporate headquarters. Provide land opportunities in suitable locations for development of corporate headquarters campuses.

Traded sector competitiveness

Global trends have put increasing pressure on regions to strengthen their competitiveness for traded-sector growth, which drives regional prosperity. Traded sectors are local businesses of all sizes that export goods and services and compete in markets outside of the region, bringing income and jobs into the region. These sectors have become more vulnerable and dynamic in the shifting global marketplace, as they reinvent their supply and distribution lines and concentrate activity in lower cost or higher productivity locations.

The following policies call for focusing limited resources on strategic traded sector specializations with growth prospects. This region's growing export activity is concentrated in high tech and advanced manufacturing, where job growth has been modest but output growth continues to outpace the service sectors. Other growing export specializations include software, apparel, clean-tech, freight-hub distribution, and creative services. While these growing specializations are expected to shift over time with market changes, connecting existing and emerging local business with global markets helps bring new resources into the region.

Policy 6.21 Traded sector competitiveness. Align plans and investments with efforts to improve the city and regional business environment for traded sector and export growth. Participate in regional and statewide initiatives.

Policy 6.22 Clusters. Align plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters.

Policy 6.23 Trade and freight hub. Encourage investment in transportation systems and services that will retain and expand Portland's competitive position as a West Coast trade gateway and freight distribution hub.

Policy 6.24 Import substitution. Encourage local goods production and service delivery that substitute for imports and help keep the money Portlanders earn in the local economy.

Policy 6.25 Business opportunities in urban innovation. Strive to have Portland's built environment, businesses, and infrastructure systems showcase examples of

best practices of innovation and sustainability, provided that the sustainability measures are competitive and economically viable.

Policy 6.26 **Traded sector diversity.** Encourage partnerships to foster the growth, small business vitality, and diversity of traded sectors.

Equitable household prosperity

National and local trends reveal growing inequities in economic opportunity. Income growth has been concentrated among the top-earning 20 percent of the workforce as disproportionate barriers to upward mobility persist for people of color and people with disabilities. Since 2000, slower job growth and the decline of middle-wage jobs have further widened economic insecurity, increased unemployment, and reduced upward-mobility opportunities for the working poor. Rising inequality threatens the long-term stability of our economy.

In response, the Portland Plan set a high bar for improving economic equity, targeting increased levels of income self-sufficiency from 77 percent of county households to 90 percent by 2035. The new policy directions below support expanded employment, and housing opportunities to increase middle-class prosperity, improve job growth in East Portland, and coordinate efforts to overcome poverty and disparities.

Policy 6.27 **Income self-sufficiency.** The Portland Harbor and Columbia Corridor have historically provided self-sufficient wage level jobs for underrepresented communities. Improve access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities, particularly in the Portland Harbor and Columbia Corridor, to support and expand opportunities in Portland for middle and high wage jobs that do not require a 4-year college degree. ~~Evaluate~~ Require that plans and investments ~~for their~~ have a positive impact on middle and high wage job creation and retention.

Policy 6.28 **East Portland job growth.** Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.

Policy 6.29 **Poverty reduction.** Encourage investment in and alignment of poverty-reduction efforts that address economic development, land use, transportation, housing, social services, public health, community development, and workforce development.

Policy 6.30 **Disparity reduction.** Encourage investment in and alignment of public efforts to reduce racial, ethnic, and disability-related disparities in income and employment opportunity, including by ensuring that new regulations maintain and enhance employment opportunities for these underrepresented communities.

Policy 6.31 **Minority-owned, woman-owned and emerging small business (MWESB) assistance.** Ensure that plans and investments improve access to contracting opportunities for minority-owned, woman-owned, and emerging small businesses.

Transportation, public facilities, and economic development

Transportation and other public facilities and services play critical roles in ensuring an adequate land supply for job growth, strengthening competitive location advantages, and providing better access to employment opportunities. See the Public Facilities and Transportation chapters for related policies on prosperity objectives, leveraging private investment, and freight mobility.

Central City

Central City is the region's and the state's high density employment center. While it is primarily an office district for professional and business services, finance, information, and government, it's also a key location for the entertainment, tourism, small industry, and education sectors. See the Central City 2035 plan for the land use and development policies for this part of the city's economy. The following policies provide overall direction for the Central City's continued employment growth, competitive roles in the region, and land use in the Central City industrial districts.

Policy 6.32 Central City. Maintain the Central City's regional share of employment and continue its growth as the unique center of both the city and the region for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

Policy 6.33 Central City industrial districts. Protect and facilitate the long-term success of Central City industrial districts, while supporting their evolution into places with a broad mix of businesses with high employment densities.

Industrial and Employment Districts

Portland is the core of the region's-state's distribution and diverse manufacturing economy, including the state's (and the Columbia River Basin's) largest seaport, rail hub, and airport. Established "industrial sanctuaries" meet the needs of manufacturing and distribution firms for medium to large sites, and are buffered from housing. Other types of employment areas include flex space developments, incubator districts for emerging local businesses, industrial headquarters offices, and dispersed neighborhood employment areas. The businesses in these districts are a primary source of Portland's middle-wage jobs, upward mobility opportunities, and traded sector activity (See Figure 6-1).

Looking forward to 2035, new strategies are needed to expand capacity for employment growth while also meeting environmental and other objectives. The policies below call for new tools to maintain economic viability, accelerate brownfield redevelopment, make freight investments that expand market access and industrial land intensification, more effectively protect prime industrial land, and strategically expand industrial and flexible neighborhood employment areas.

- Policy 6.34 Industrial land.** Provide industrial land that encourages industrial business retention, growth, economic viability and traded sector competitiveness as a West Coast trade and freight hub, a regional center of diverse manufacturing, and a widely accessible base of family-wage jobs, particularly for under-served and under-represented people. Avoid regulations that diminish these objectives.
- Policy 6.35 Industrial sanctuaries.** Protect industrial land as industrial sanctuaries identified on the Comprehensive Plan Map primarily for manufacturing and distribution uses and to encourage the growth of industrial activities in the city.
- Policy 6.36 Prime industrial land retention.** Protect the multimodal freight-hub industrial districts at Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1) that is prioritized for long-term retention:
- 6.36.a.** Strictly limit quasi-judicial and legislative Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.
- 6.36.b.** Strictly limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.
- 6.36.c.** Identify how regulations affect the capacity, affordability, and viability of industrial uses, and minimize those impacts.
- 6.36.d.** Prohibit the net loss of prime industrial land capacity by requiring any ~~Strive to offset the~~ reduction of development capacity and acreage to be fully mitigated as needed, with additional prime industrial capacity that includes ~~consideration of~~ comparable and appropriate site characteristics.
- Policy 6.37 Harbor access lands.** Strictly limit use of harbor access lands to river- or rail-dependent or related industrial land uses due to the unique and necessary infrastructure and site characteristics of harbor access lands for river-dependent industrial uses.
- Policy 6.38 Industrial land use intensification.** Encourage reinvestment and intensification of industrial land use, as measured by output and throughput per acre.
- Policy 6.39 Industrial brownfield redevelopment.** Provide incentives, technical assistance and direct support to overcome financial-feasibility gaps to enable

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remediation and redevelopment of brownfields for industrial growth. Given the importance of brownfield redevelopment to the City's industrial land supply and the financial burden faced in redevelopment of brownfields for industrial uses, new City regulations on brownfields shall be minimized to the maximum extent practicable.

Policy 6.40 **Portland Harbor Superfund Site.** Take a leadership role in prompt resolution and cleanup of the Portland Harbor Superfund Site and redevelopment of associated brownfields. Encourage-Strive for the most a science-based and cost-effective cleanup solution, so as to not economically burden Portland ratepayers or businesses, while still being protective of human health and the environment, and that facilitates re-use of land for river- or rail-dependent or related industrial uses. Implementation measures to facilitate efficient redevelopment in the Portland Harbor Superfund Site shall include:

- Prioritizing Superfund sites when making transportation and other capital investment decisions.
- Exempt Superfund remediation actions from City review, and instead rely exclusively upon state and federal regulations.
- Offset City environmental mitigation requirements for Superfund mitigation and/or remediation actions completed as part of Superfund cleanup, regardless of whether performed under state or federal oversight.

Policy 6.41 **West Hayden Island.** Provide for the future annexation of West Hayden Island for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or other implementation agreement that ensures mitigation of impacts and provision of public benefits. The annexation ordinance, future zoning, plan districts, and intergovernmental agreements will be used to:

- Allow no more than 300 acres for future deep water marine terminal and infrastructure development.
- Permanently protect and enhance at least 500 acres as open space, to be managed primarily for the benefit of the regional ecosystem.

Policy 6.42 **Multimodal freight corridors.** Encourage freight-oriented industrial development to locate where it can maximize the use of and support reinvestment in multimodal freight corridors.

Policy 6.43 **Dispersed employment areas.** Provide small, dispersed employment areas for a flexible and affordable mix of office, creative services, small scale manufacturing, traded sector and distribution, and other small-format light industrial and commercial uses with access to nearby freeways or truck streets.

Policy 6.44 **Impact analysis.** Evaluate and monitor the impacts on industrial land capacity that may result from land use plans, regulations, public land acquisition, public facility development, and other public actions. Should the

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impact threaten the economic viability, predictability, or operational practability of industrial uses, require regulatory amendments that minimize those negative impacts.

Policy 6.45 **Clean, safe, and green.** Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitating adoption of market feasible new technology and design.

Policy 6.46 **Industrial growth and watershed health.** Facilitate concurrent strategies to protect and improve economically viable industrial capacity and watershed health in the Portland Harbor and Columbia Corridor areas.

Policy 6.47 **District expansion.** Provide opportunities for expansion of industrial areas based on evaluation of forecasted need and the ability to meet environmental, social, economic, and other goals.

- Policy 6.48** **Golf course reuse and redevelopment.** Facilitate a mix of industrial, natural resource, and public open space uses on privately owned golf course sites in the Columbia Corridor that become available for reuse.
- Policy 6.49** **Residential and commercial reuse.** Facilitate compatible industrial or employment redevelopment on residential or commercial sites that become available for reuse if the site is in or near prime industrial areas, and near a freeway or on a freight street.
- Policy 6.50** **Public facilities and land acquisition.** Limit the use of prime industrial land for parks or other non-industrial public facilities.
- Policy 6.51** **Mitigation banks.** Facilitate industrial site development by promoting and allowing environmental mitigation banks that serve industrial land uses on prime industrial land.
- Policy 6.52** **Neighborhood buffers.** Maintain and enhance major natural areas, open spaces, and constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas, without encroaching into or negatively impacting the operations of, the Portland Harbor and Columbia Corridor industrial areas.

Campus institutions

Health care and education sectors are concentrated in large hospital, college, higher education and high school campuses (see Figure 6-2) as well as dispersed smaller facilities. Major institutions are large employers with campuses that vary from pastoral expanses to more concentrated urban grounds. Health care and education are projected to be the city's leading job growth sectors, adding more than 50,000 new jobs by 2035 at campus institutions and in other commercial areas. Rapid growth of campus institutions is a national trend, and best practices offer opportunities to plan effectively for this campus growth, and reduce neighborhood impacts. Examples of new directions in the policies below include designation of major campuses as employment land, regulatory improvements, and transportation-related improvements.

- Policy 6.53** **Campus institutions.** Provide for the stability and growth of Portland's major campus institutions (see Figure 6-2: Campus Institutions) as essential service providers, centers of innovation, workforce development resources, and major employers.
- Policy 6.54** **Campus land use.** Provide for major campus institutions as a type of employment land, allowing uses typically associated with health care and higher education institutions.
- Policy 6.55** **Development impacts.** Protect the livability of surrounding neighborhoods

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through adequate infrastructure and campus development standards that foster suitable density and attractive campus design.

Policy 6.56 Community amenities and services. Encourage campus development that provides amenities and services to surrounding neighborhoods, emphasizing the role of campuses as centers of community activity.

Policy 6.57 Campus edges. Provide for context-sensitive, transitional uses and development at the edges of campus institutions to enhance their integration into surrounding neighborhoods, including mixed-use and neighborhood-serving commercial uses where appropriate.

Policy 6.58 Satellite facilities. Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality.

Neighborhood business districts

Neighborhood business districts are mixed-use corridors and centers outside of the Central City (see Figure 6-3: Neighborhood Business Districts). Home to retail and related businesses that typically serve customers on-site, they are commonly interspersed with multi-family housing. Many of these districts are experiencing significant growth and change, providing synergistic locations for concentrated housing and commercial growth in “complete neighborhoods” with convenient access to services.

Neighborhood business districts also provide major economic benefits by keeping local dollars circulating within Portland, providing goods and services to nearby residents, defining neighborhood character, supporting small business vitality, and accounting for about one-fourth of all jobs in the city. Neighborhood business districts are especially important to Portland because we are a city mainly made up of small business.

New directions to support these multi-functional places include:

- A framework of new centers and civic corridors well served by pedestrian, bicycle, and transit systems.
- Focused public investments that attract concentrated growth and improve equity, and community-based economic development initiatives that broaden access to jobs and prosperity.
- Opportunities for affordable commercial space and affordable housing.

- Policy 6.59 Neighborhood business districts.** Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3).
- Policy 6.60 District function.** Enhance the function of neighborhood business districts as a foundation of neighborhood livability.
- Policy 6.61 Small, independent businesses.** Facilitate the retention and growth of small and locally-owned businesses.
- Policy 6.62 Home based business.** Encourage low-impact home based businesses in residential areas.
- Policy 6.63 Neighborhood-serving business.** Provide for neighborhood business districts and small commercial nodes in areas between centers to expand local access to goods and services. Allow nodes of small-scale neighborhood serving commercial uses in large planned developments and as a ground floor use in high density residential areas.
- Policy 6.64 Investment priority.** Prioritize commercial revitalization investments in neighborhoods that serve communities with limited access to goods and services.
- Policy 6.65 Involuntary commercial displacement.** Evaluate plans and investments for their impact on existing businesses.
- 6.66.a.** Limit involuntary commercial displacement in areas at risk of gentrification and incorporate tools to reduce the cost burden of rapid neighborhood change on vulnerable small business owners.
- 6.66.b.** Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.
- Policy 6.66 Temporary and informal markets and structures.** Acknowledge and support the role that temporary markets (farmers markets, craft markets, flea markets, etc.) and other temporary or mobile vending structures play in enabling startup business activity. Also acknowledge that temporary uses are assumed to be replaced ultimately by more permanent development and uses.

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Policy 6.67 **Community economic development.** Encourage collaborative approaches to align land use and neighborhood economic development for residents and business owners to better connect and compete in the regional economy.

6.68.a. Encourage broad-based community coalitions to implement land use and economic development objectives and programs.

6.68.b. Enhance opportunities for cooperation and partnerships between public and private entities that promote economic vitality in communities most disconnected from the regional economy.

6.68.c. Encourage cooperative efforts by area businesses, business associations, and neighborhood associations to work together on commercial revitalization efforts, sustainability initiatives, and transportation demand management.

Policy 6.68 **Centers.** Encourage concentrations of commercial services and employment opportunities in centers.

6.68.a. Encourage a broad range of neighborhood commercial services in centers to help residents and others in the area meet daily needs and/or serve as neighborhood gathering places.

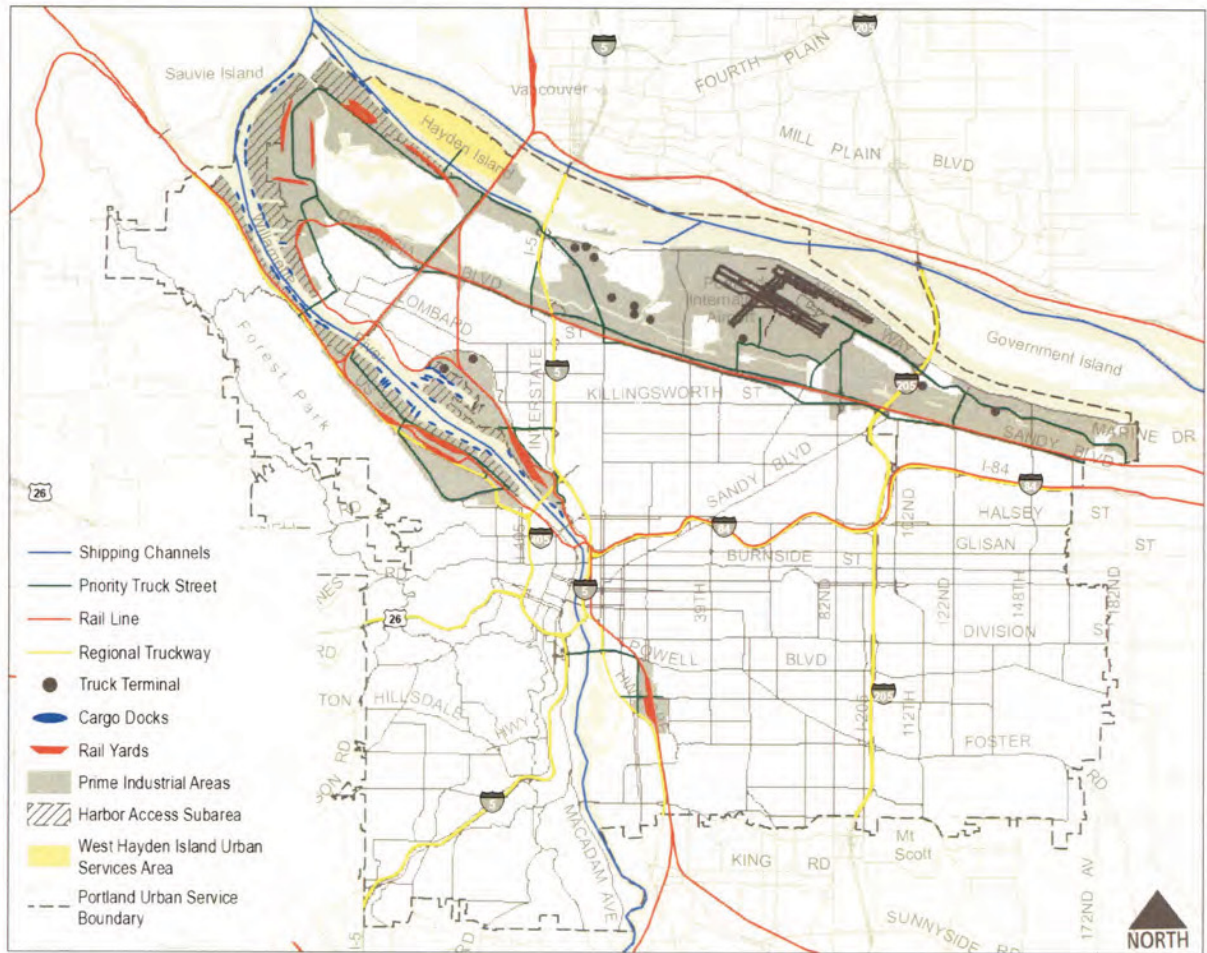
6.68.b. Encourage the development and retention of grocery stores and local markets as essential elements of centers.

6.68.c. Enhance opportunities for services and activities in centers that are responsive to the needs of the populations and cultural groups of the surrounding area.

6.68.d. Require that ground-level building spaces in core areas of centers accommodate commercial or other street-activating uses and services.

6.68.e. Encourage employment opportunities as a key function of centers, including connections between centers, institutions, and other major employers to reinforce their roles as vibrant centers of activity.

Figure 6-1. Industrial and Employment Districts



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Figure 6-2. Campus Institutions

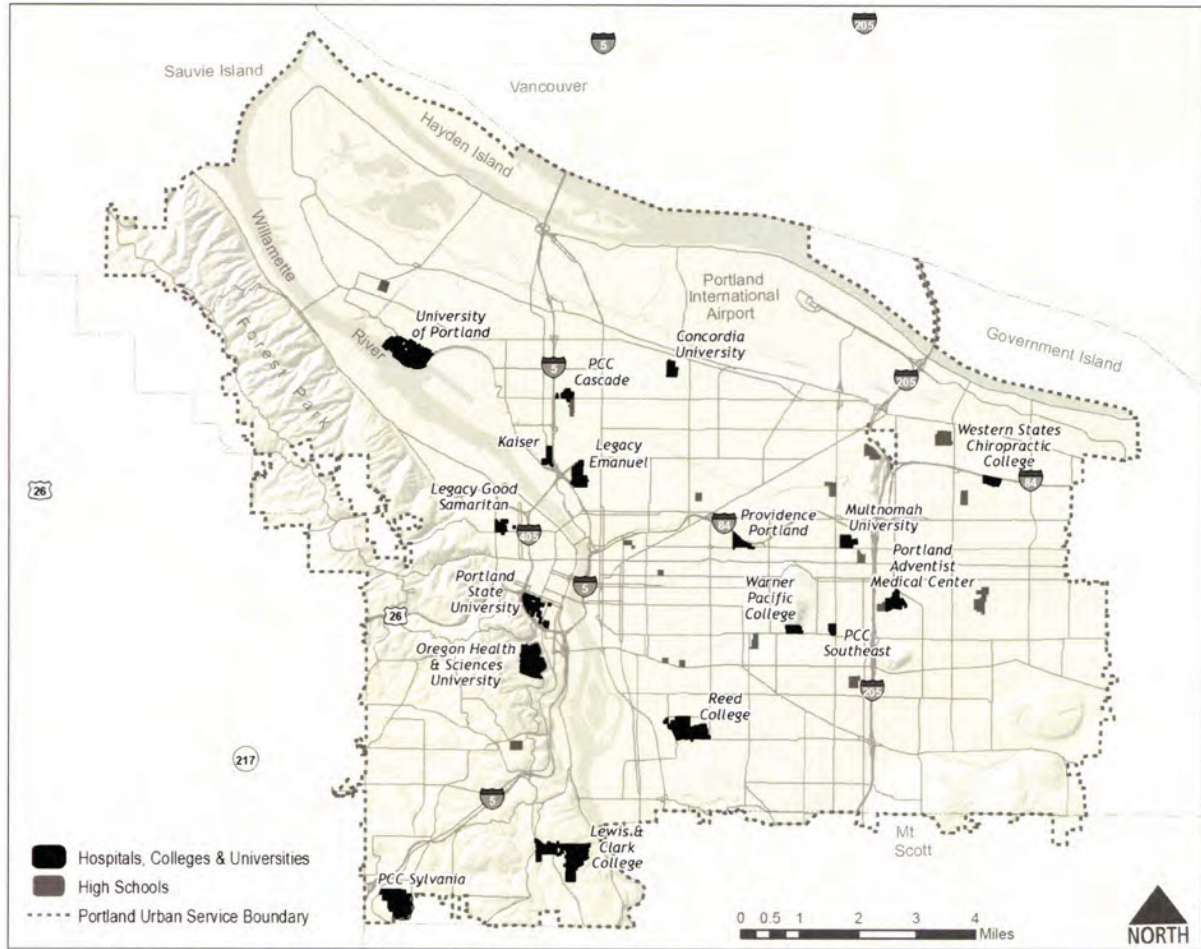
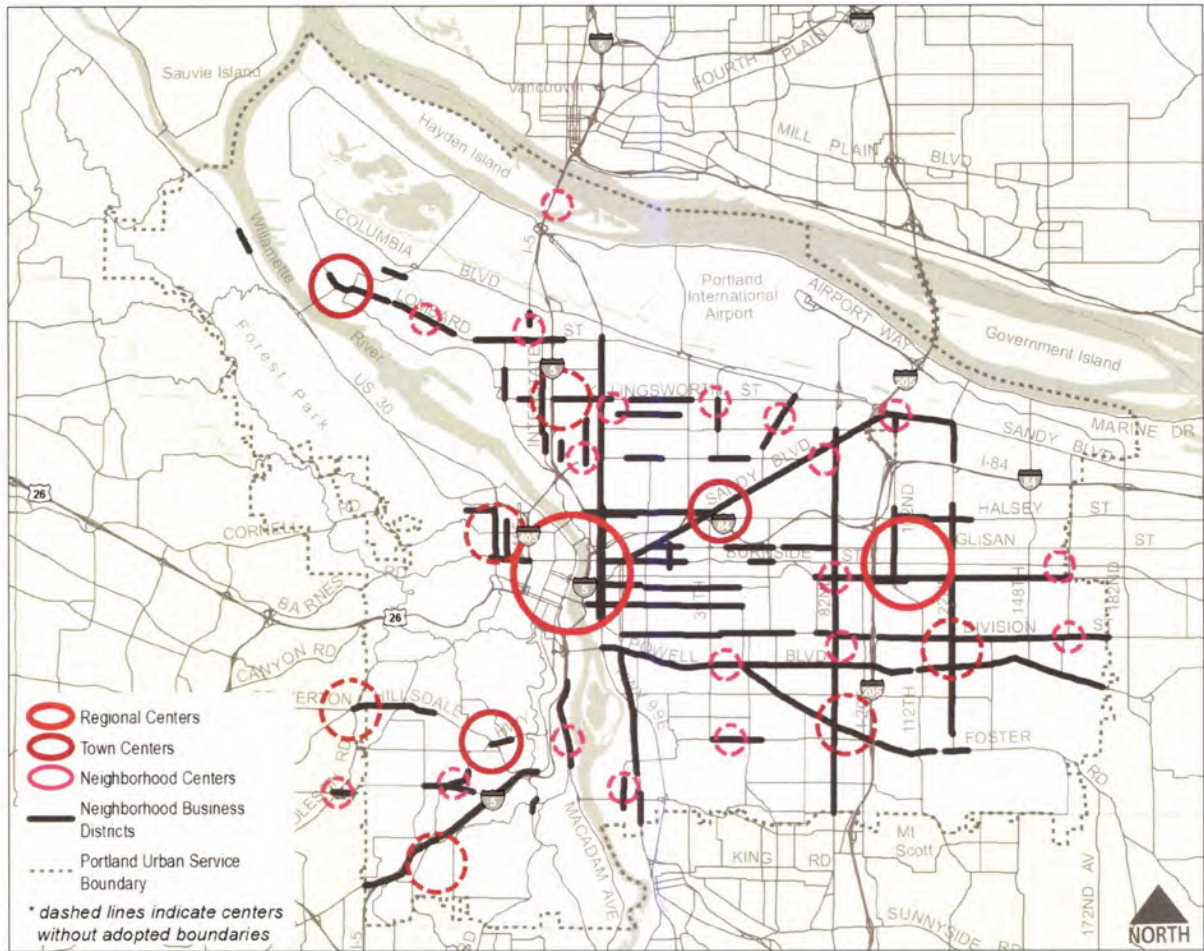


Figure 6-3. Neighborhood Business Districts



Chapter 7: Environment and Watershed Health

What is this chapter about?

The goals and policies in this chapter convey the City's intent to:

- Recognize the economic, health, and intrinsic values of nature, and the importance of community stewardship.
- ~~Preserve~~ Maintain natural resources and the beneficial functions and services ~~they~~ provided by inventoried natural resources.
- Improve air quality and watershed health, including hydrology, water quality, fish and wildlife habitat, and biodiversity.
- Recognize the city's impact on global climate change, and opportunities to reduce carbon emissions.
- Recognize the importance of a healthy urban forest and natural systems in reducing the impacts of natural hazards, such as landslides and flooding, and in adapting to climate change.
- ~~Prevent~~ Mitigate incremental environmental degradation including the spread of invasive species, loss of habitat, and adverse impacts of additional impervious surfaces.
- Ensure that environmental ~~protection plans~~ programs and regulations reflect current data, science, ~~and evaluation do not negatively of impacts to~~ under-served and under-represented communities, and avoid duplicative regulations and procedures.
- Advance good decisions and adaptive management through better data collection.
- Provide guidance that addresses the distinct ecological issues of specific watersheds.
- Ensure that plans and investments are coordinated and balanced with relevant policies from other City plans such as the Portland Watershed Management Plan, Urban Forest Management Plan, Climate Action Plan, and Natural Hazard Mitigation Plan, as well as economic development policies and plans.

Why is this important?

Located at the confluence of two major rivers, between two mountain ranges, and adjacent to some of the most fertile agricultural land in the world, Portland's wealth of natural resources provides an array of ecologically, economically and aesthetically valuable ecosystem services. Our rivers, streams and floodplains convey and store water and provide critical habitat for native fish and aquatic species. Our wetlands, trees, and vegetation clean and cool Portland's air and water, stabilize hillsides, soak up rainwater and provide habitat for an abundance of birds and other wildlife. These resources also trap carbon and reduce urban heat island effects, which are increasingly important given the potential impacts of climate change. These natural resources are key contributors to Portland's identity, reputation and sense of place.

The City has a long-standing commitment to maintaining a high-quality environment; however many of Portland's natural resources have been lost over time or are currently at risk. Urbanization has filled floodplains, contributing to seasonal flooding damage. Stormwater runoff from paved areas and rooftops has eroded our stream channels and polluted our streams, many of which are unable to support healthy fish populations. There is concern that anticipated growth and development will result in substantial tree removal, continued habitat loss, and negative impacts on at-risk plant and animal species.

The City's land use plans and investments have been, and will continue to be, instrumental in helping contribute to improvements in air and water quality over time, and in preserving maintaining natural resources. In addition, the City and community have made substantial investments of time and money to restore our watersheds. The goals and policies in this chapter protect-reflect these investments and help the City meet various regulations to protect-maintain public health and the environment. With thoughtful guidance, we can achieve and sustain healthy watersheds and a healthful environment as the city grows and economy prospers.

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Goals

Goal 7.A: Climate

Carbon emissions are reduced by 50% below 1990 levels.

Goal 7.B: Healthy watersheds and environment

Ecological and ecosystem functions are maintained and watershed conditions have improved over time, in a manner that encourages vigorous economic growth and a healthy, diverse economy.

Goal 7.C: Resilience

Portland's built and natural environments function in complementary ways and are resilient in the face of climate change, and natural hazards.

Goal 7.D: Environmental equity

All Portlanders have access to clean air and water, can experience nature in their daily lives, and benefit from development designed to lessen the impacts of natural hazards and environmental contamination.

Goal 7.E: Community stewardship

Portlanders actively participate in efforts to maintain and improve the environment, including watershed health.

Policies

Planning for natural resources protection

Portland's quality of life depends on maintaining clean air, water, soil, and a healthy environment overall. The policies in this section will preserve and maintain environmental quality by emphasizing protection/maintenance of natural resources and their functions, consistent with widely accepted ecological principles and scientific literature. These policies call for an up-to-date natural resource inventory and actions to protect/maintain air, water, soil, climate, biodiversity, and existing significant natural resource functions and values. They also call for consideration of tradeoffs in developing environmental protection programs/plans and regulations, and for balancing natural resources with economic development and prosperity.

- Policy 7.1** **Environmental quality.** Protect/Maintain air, water, and soil quality and associated benefits to public and ecological health and safety.
- Policy 7.2** **Climate action.** Update and implement the Climate Action Plan to reduce carbon emissions and resilience through policy, regulations, investment, and behavior change.
- Policy 7.3** **Biodiversity.** Maintain self-sustaining populations of native plants, native resident and migratory fish, and wildlife species, including at-risk species and beneficial insects such as pollinators.
- Policy 7.4** **Natural resources protection.** Protect/Maintain the quantity, quality, and functions and values of significant natural resources identified in the City's adopted natural resource inventory, by, depending upon the value of the inventoried resource and conclusions of a Goal 5 ESEE analysis, protecting the resource, allowing development, or limiting development so that adverse impacts to the functions and values of natural resources are avoided, minimized and mitigated. Inventoried natural resources may include:
- Rivers, streams, sloughs, and drainageways.
 - Floodplains.
 - Riparian corridors.
 - Wetlands.
 - Groundwater.
 - Native and other beneficial vegetation species and communities.
 - Aquatic and terrestrial habitats, including special habitats or habitats of concern, including large anchor habitats, habitat complexes and corridors, rare and declining habitats such as wetlands, native oak, bottomland hardwood forest, native grassland habitat, shallow water

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habitat, and habitats that support special-status or at-risk plant and wildlife species.

- Other resources identified in adopted natural resource inventories.
-

Policy 7.5 Natural resource inventory.

Maintain an up-to-date adopted inventory by identifying the location and evaluating the relative quantity, ~~and~~ quality, functions and values of natural resources.

Policy 7.6 **Environmental ~~protection programs~~ plans and regulations.** Adopt environmental ~~protection~~ plans and regulations that implement the decisions made pursuant to a Goal 5 ESEE analysis, based on the best data and science available and balancing all city policies and goals, that determine whether to allow, limit, or prohibit conflicting uses for specify the significant inventoried natural resource sites to be protected and the types of protections to be applied, based on the best data and science available, and on an evaluation of the potential consequences of allowing conflicting uses.

Policy 7.7 **Environmental ~~protection plan and regulation program~~ updates.** Improve the effectiveness of environmental ~~protection~~ conservation plans and regulations. Updates will reflect current data and science, consider avoid negative impacts on under-served and under-represented communities, avoid duplicative regulations and procedures and meet multiple-all city policies and goals.

Policy 7.8 **Land acquisition priorities and coordination.** Maintain a prioritized list of natural resource types, target areas, or properties desirable for public acquisition to support long-term maintenance of inventoried natural resource functions and values ~~protection~~, and establish a process for coordinating acquisition with other programs including strategies to maintain employment land capacity, programs to protect maintain water quality, and programs to reduce exposure to flooding hazards.

ProtectMaintaining natural resource functions and values in development situations

The following policies provide guidance for land use regulations that address significant inventoried natural resource functions and values ~~where new development is proposed and the natural resource site has been identified as being protected from development or where development should be limited. The following policies do not apply to individual applications for development.~~ They will help ensure that the potential adverse impacts of development are well understood, and avoided where practicable. These policies also call for an evaluation of design alternatives to minimize impacts, and mitigation approaches that fully mitigate unavoidable impacts.

- Policy 7.9** **Impact evaluation.** Evaluate the potential adverse impacts of proposed development on significant inventoried natural resources, their functions, and the ecosystem services they provide.

- Policy 7.10** **Regulatory hierarchy: avoid, minimize, mitigate.** Require that the potential adverse impacts of new development on significant inventoried natural resources ~~and their~~ functions first be avoided where practicable, then minimized, then lastly mitigated.

- Policy 7.11** **Mitigation effectiveness.** Encourage practicable mitigation approaches that ~~maximize enhance~~ the intended inventoried natural resource-related benefits functions and are proportional to the impact of development. ~~Require Encourage~~ on-site mitigation unless off-site mitigation within the same watershed will improve mitigation effectiveness.

- Policy 7.12** **State and federal coordination.** Coordinate implementation of these policies to ensure consistency with and avoid redundancy of state and federal permitting authorities.

- Policy 7.13** **Ecosystem services.** Consider the benefits provided by healthy ecosystems that contribute to the livability and economic health of the city.

Improving environmental quality and preventing degradation

The following policies are intended to support improving environmental quality over time as the city grows, while encouraging economic development and prosperity. They provide direction to enhance the condition, capacity, and resilience of Portland’s air and water. They support Portland’s watershed plan goals to restore hydrology, water quality, habitat and biological communities. These policies call for more effectively preventing incremental environmental degradation, including the spread of invasive species, soil loss, habitat fragmentation, and introduction of hazards to wildlife. They support a healthy urban forest and recognize that healthy natural systems reduce natural hazard risks. They also help the City mitigate and adapt to climate change.

Like preventive medicine, preventing additional environmental degradation, including through mitigation for adverse impacts, will be more successful and cost-effective than addressing problems as they increase in severity. These policies will help the City avoid exacerbating adverse and disproportionate impacts on under-served and under-represented communities. ~~While some of the impact areas listed below are regulated by other agencies, the City’s land use plans and investments can help avoid or reduce impacts, while also improving conditions over time.~~ The following policies provide guidance for plans and investments, and do not apply directly to individual applications for development.

- Policy 7.14** **Air quality.** ~~Ensure Encourage that~~ plans and investments ~~are to be~~ consistent with and advance efforts to improve air quality and reduce

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exposure to air toxics, criteria pollutants, and urban heat island effects. Consider air quality related health impacts on all Portlanders, with an emphasis on under-served and under-represented communities.

Policy 7.15 Hydrology. ~~Ensure that~~Encourage plans and investments are-to be consistent with and advance efforts to improve watershed hydrology by achieving more natural flow and enhancing conveyance and storage capacity in rivers, streams, floodplains, wetlands, and groundwater aquifers. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly infiltrating soils and limited public stormwater discharge points, and encourage restoration of degraded hydrologic functions, where practicable.

Policy 7.16 Water quality. ~~Ensure that~~Encourage plans and investments are-to be consistent with and advance efforts to improve water quality in inventoried significant rivers, streams, floodplains, groundwater, and wetlands, including reducing toxics, bacteria, temperature, metals, and sediment pollution. Consider water quality related health impacts on all Portlanders, especially under-served and under-represented communities.

Policy 7.17 **Habitat and biological communities.** ~~Ensure that~~Encourage plans and investments are to be consistent with and advance efforts to improve the diversity, ~~quantity,~~ and quality, of inventoried significant fish and wildlife habitat and habitat corridors, especially rare and declining habitat types and habitats that support at-risk plant and animal species and communities.

Policy 7.18 **Habitat connectivity.** ~~Ensure that~~Encourage plans and investments are to be consistent with and advance efforts to improve the functions and values of inventoried significant terrestrial and aquatic habitat connectivity for fish and wildlife by:

- ~~Preventing~~Avoiding, minimizing and mitigating habitat fragmentation.
- Improving habitat functions and values quality.
- Weaving habitat into sites ~~as~~ new development occurs in a manner that does not negatively impact the functionality of the development.
- Enhancing or creating habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas while not negatively impacting the functionality of adjacent uses.

Policy 7.19 **Urban forest.** ~~Ensure that~~Encourage plans and investments are to be consistent with and advance efforts to improve the quantity, quality, and equitable distribution of Portland’s urban forest:

7.19.a. ~~Require or e~~Encourage preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas as an element of discretionary land use reviews.

7.19.b. Coordinate plans and investments with efforts to improve tree species diversity and age diversity.

7.19.c. Support progress toward meeting City tree canopy targets.

7.19.d. Invest in tree planting and maintenance, especially in low canopy areas, neighborhoods with under-served or under-represented communities, and within and near urban habitat corridors, in a manner that does not negatively impact the functionality of industrial uses.

7.19.e. When development requires mitigation, encourage ~~Require~~ native trees and vegetation in significant natural resource areas.

7.19.f. Encourage planting of native trees and vegetation generally, and especially in urban habitat corridors, in a manner that does not negatively impact the functionality of industrial uses.

7.19.g. Identify priority areas for tree preservation and planting in land use plans.

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Policy 7.20 **Soils.** Coordinate plans and investments with programs that address human-induced soil loss, erosion, contamination, or other impairments to soil quality and function.

- Policy 7.21 Invasive species.** ~~Ensure that~~Encourage plans and investments ~~are to be~~ consistent with and advance efforts to prevent the spread of invasive plants, and support efforts to reduce the impacts of invasive animals and insects.
- Policy 7.22 Natural hazards.** ~~Prevent~~Avoid, minimize and mitigate development-related degradation of natural systems and associated increases in landslide, wildfire, flooding, and earthquake risks, especially as they affect under-served and under-represented communities.
- Policy 7.23 Low-impact development and best practices.** Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure, especially for City-owned, managed, or funded facilities.
- Policy 7.24 Impervious surfaces.** ~~Limit impervious surfaces to~~rReduce impacts on hydrologic function, air and water quality, habitat connectivity, and tree canopy caused by impervious surfaces.
- Policy 7.25 Hazards to wildlife.** Encourage building, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.
- Policy 7.26 Access to nature.** Promote equitable, safe, and well-designed physical and visual access to nature while also ~~protect~~maintaining the functions and values of significant inventoried natural resources, fish, and wildlife, while not negatively impacting the functionality of adjacent uses. Provide access to major natural features consistent with these objectives, including:
- Water bodies, such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.
 - Major topographic features, such as the West Hills, Mt. Tabor, and the East Buttes.
 - Natural areas, such as Forest Park and Oaks Bottom.
- Policy 7.27 Carbon sequestration.** Enhance the capacity of Portland’s urban forest, soils, and water bodies to serve as carbon reserves.
- Policy 7.28 Climate adaptation and resilience.** Enhance the ability of rivers, streams, wetlands, floodplains, urban forest, habitats, and wildlife to temper and adapt to climate-exacerbated flooding, landslides, wildfire, and urban heat island effects.
- Policy 7.29 Brownfield remediation.** Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment ~~that incorporates ecological site design and resource~~ enhancement.

Policy 7.30 Adaptive management. Evaluate trends in watershed and environmental health using current monitoring data and information to guide improvements in the effectiveness of City plans, regulations, and infrastructure investments.

Policy 7.31 Restoration partnerships. Coordinate plans and investments with other jurisdictions, air and water quality regulators, watershed councils, soil conservation organizations, and community organizations and groups to maximize the benefits and cost-effectiveness of watershed environmental efforts and investments.

Policy 7.32 Coordinated stormwater management. Coordinate transportation and stormwater system planning in areas with unimproved or substandard rights of way to improve water quality, pedestrian safety, freight mobility, and enhance neighborhood livability.

Policy 7.33 Community stewardship. Encourage voluntary cooperation between property owners, community organizations, and public agencies to restore or re-create habitat on their property, including removing invasive plants and planting native species.

Other policies in Chapters 3, ~~and 4~~ and 7 are essential counterparts to the policies in the section above, and all policies must be balanced.

Aggregate resources

Policy 7.34 Aggregate resources ~~protection~~. ~~Protect~~Conserve aggregate resource sites for current and future use, where there are no major conflicts with urban needs, or where these conflicts may be resolved.

Policy 7.35 Aggregate resource development. ~~Ensure that~~Encourage development of aggregate resources to ~~minimizes~~ adverse environmental impacts and impacts on adjacent land uses.

Policy 7.36 Mining site reclamation. ~~Ensure~~Encourage that reclamation of mining sites that protect~~maintain~~ public health and safety, restore the site to adequate watershed conditions and functions, and is compatible with the surrounding land uses and conditions of nearby land.

Watershed specific policies

The policies above guide planning, actions, and investments citywide. The following policies are intended to augment the citywide Watershed Health and Environment policies, by providing additional guidance relating and responding to the characteristics within each of Portland's distinctive watersheds. They address watershed-specific habitat types, hydrology, water quality issues, and stormwater management challenges. Together, the citywide and watershed-specific policies support the close coordination of watershed health and land use programs, guiding land use planning-related activities and future infrastructure investments. While these watersheds are not entirely within Portland's urban services boundary, Portland's actions can have significant benefits for the watershed as a whole. The following policies do not apply directly to individual applications for development.

Columbia River Watershed

- Policy 7.37** **In-water habitat.** ~~Enhance~~ Encourage in-water habitat for native fish and wildlife, particularly in the Oregon Slough and near-shore environments along the Columbia River in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.38** **Sensitive habitats.** ~~Enhance~~ Encourage native grassland, beach, riverbanks, wetlands and other key habitats for wildlife traveling along the Columbia River migratory corridor, while continuing to manage the levees and floodplain for flood control and in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.39** **Flood ~~protection~~management coordination.** Coordinate plans and investments with special districts and agencies responsible for managing and maintaining certification of levees along the Columbia River.
- Policy 7.40** **Floodplain ~~protection~~habitat and restoration.** Promote ~~restoration and protection~~ maintenance of the functions and values of significant inventoried floodplain habitats as a flood protection strategy.

Willamette River Watershed

- Policy 7.41** **Fish habitat.** ~~Provide~~ Encourage adequate intervals of ecologically-functional shallow-water habitat for native fish along the entire length of the Willamette River within the city, and at the confluences of its tributaries, in a manner that does not negatively impact the functionality of water-dependent and water-related uses, including but not limited to ongoing facility maintenance and dredging activities.
- Policy 7.42** **Stream connectivity.** ~~Improve~~ Encourage stream connectivity between the Willamette River and its tributaries.

Policy 7.43 **River bank conditions.** Encourage the maintenance of the functions and values of~~Preserve~~ existing inventoried significant river bank habitat and encourage the enhancement of functions and values ~~rehabilitation~~ of river bank sections that have been significantly altered due to development with more fish and wildlife friendly riverbank conditions, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.

ENVIRONMENT AND WATERSHED HEALTH

- Policy 7.44** South Reach ecological complex. ~~Enhance~~Encourage habitat quality and connections between Ross Island, Oaks Bottom, and riverfront parks and natural areas south of the Central City, to enhance the area as a functioning ecological complex.
- Policy 7.45** Contaminated sites. ~~Ensure that~~Encourage plans and investments that are consistent with and advance programs that facilitate the cost-effective cleanup, reuse, and restoration of the Portland Harbor Superfund site and other contaminated upland sites.
- Policy 7.46** Sensitive habitats. ~~Encourage the maintenance~~Protect and enhancement of the functions and values of inventoried significant native grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key functions and values of significant inventoried habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific flyway and the Willamette River corridor, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.47** Riparian corridors. ~~Encourage~~ increase ~~the width and quality~~functions and values of inventoried significant vegetated riparian buffers along the Willamette River where practicable, in a manner that does not negatively impact the functionality of water-dependent and water-related uses or does not otherwise negatively impact the adequacy of the inventory of employment land.
- Policy 7.48** Connected upland and river habitats. ~~Encourage~~ Enhanced quality of functions and services of significant inventoried habitat ~~quality~~ and connectivity between the Willamette riverfront and inventoried upland natural resource areas, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.49** Forest Park. Enhance Forest Park as an anchor habitat and recreational resource.

Columbia Slough Watershed

- Policy 7.50** Fish passage. ~~Encourage the R~~maintenance of functions and values of significant inventoried ~~stream~~ in-stream habitat and encourage improved fish passage within the Columbia Slough, including for salmonids in the lower slough, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.51** Flow constriction removal. Reduce constriction, such as culverts, in the slough channels, to improve the flow of water and water quality.

- Policy 7.52** **Riparian corridors.** Encourage the maintenance of~~increase the~~ width and quality~~functions and values~~ of significant inventoried vegetated riparian buffers along Columbia Slough channels where practicable, while also managing the slough for flood control, and in a manner that does not negatively impact the functionality of water-dependent and water-related use.
- Policy 7.53** **Sensitive habitats.** Encourage the enhancement of the functions and values of significant inventoried native grasslands and wetland habitats in the Columbia Slough, such as those found in the Smith and Bybee Lakes and at the St. Johns Landfill site, to provide habitat for sensitive species, and for wildlife traveling along the Columbia and Willamette river migratory corridors.
- Policy 7.54** **Connected rivers habitats.** Encourage the~~maintenancenhance~~ of the functions and values of significant inventoried upland habitat connections to the Willamette and Columbia rivers, in a manner that does not negatively impact the functionality of water-dependent and water-related use.

ENVIRONMENT AND WATERSHED HEALTH

Policy 7.55 Contaminated sites. ~~Ensure that~~Encourage plans and investments that are consistent with and advance programs that facilitate the cleanup, reuse and restoration of contaminated sites that are adjacent, or that discharge stormwater to the Columbia Slough.

Fanno and Tryon Creek Watersheds

Policy 7.56 Stream connectivity. Encourage the daylighting of piped portions of Tryon and Fanno creeks and their tributaries.

Policy 7.57 Riparian and habitat corridors. ~~Protect~~Encourage the maintenance of the functions and values of inventoried significant ~~and enhance~~ riparian habitat quality and connectivity along Tryon and Fanno creeks and their tributaries. Enhance connections between riparian areas, parks, anchor habitats, and areas with significant tree canopy. Enhance in-stream and upland habitat connections between Tryon Creek State Natural Area and the Willamette River.

Policy 7.58 Reduced hazard risks. Reduce the risks of landslides and streambank erosion by ~~protect~~maintaining trees and vegetation that absorb stormwater, especially in areas with steep slopes or limited access to stormwater infrastructure.

Johnson Creek Watershed

Policy 7.59 In-stream and riparian habitat. Encourage the maintenance of the functions and values of inventoried significant ~~Enhance~~ in-stream and riparian habitat and improve fish passage for salmonids along Johnson Creek and its tributaries.

Policy 7.60 Floodplain restoration. ~~Enhance~~Encourage the maintenance of the functions and values of inventoried significant Johnson Creek floodplain functions to increase flood-storage capacity, improve water quality, and enhance fish and wildlife habitat.

Policy 7.61 Connected floodplains, springs, and wetlands. Encourage the maintenance of the functions and values of inventoried significant ~~Enhance~~ hydrologic and habitat connectivity between the Johnson Creek floodplain and its springs and wetlands.

Policy 7.62 Reduced natural hazards. Reduce the risks of landslides, streambank erosion and downstream flooding by ~~protect~~conserving seeps, springs, trees, vegetation, and soils that absorb stormwater in the East Buttes.

Policy 7.63 Greenspace network. Enhance the network of parks, trails, and natural areas

near the Springwater Corridor Trail and the East Buttes to enhance habitat connectivity and nature-based recreation in East Portland.

For additional policy guidance regarding geographically-specific issues and opportunities, see Chapter 4 —Design and Development.

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Figure 7-1. Portland's Watersheds

