

Portland Planning & Sustainable Commission

Re: Comprehensive Plan

My name is Jeanne Galick. I'm a long-time greenway advocate and recently served on the SAC for the West Quadrant.

A troubling style that flows throughout the comp plan is the vague and unenforceable language applied to environmental issues. Verbs such as “encourage”, and “consider” are used repeatedly – but what do they really mean? Not much. These words are wide-open to interpretation and, I can tell you from experience, it is nearly impossible to protect a resource when this is the kind of wish-washy wording you have to work with. This constitutes aspirational language and land use lawyers can easily demonstrate that it has no legal merit, reducing most environmental goals and polices to wishful thinking.

Clear, specific language is necessary if the city's objective is to protect our environment and achieve measureable sustainability. Specificity avoids both ambiguity and land use fights.

I urge you to make the following changes:

Change encourage to require in policies **4.58, 4.59, 4.62, 4.63, 4.64** and **7.11**.

Policy 7.47 is basically about the **Willamette Greenway**. Currently, Riparian Corridors reads: Increase the width and quality of vegetated riparian buffers along the Willamette river where practicable.” **Remove “where practicable”**. This is the type of language that shouts “loophole.”

Willamette Greenway: I walk the greenway daily and it is obvious that better regulations and the enforcement are desperately needed. I am aware that the city is currently revising the greeway guidelines. However, **it is such an important natural resource and civic asset that the comp plan should also boldly address it**. This will strengthen future guidelines and confirm the city's commitment to the Willamette River.

Rewrite 7:47 to read:

Increase the existing 25' setback along the Willamette River to a minimum 100' and encourage even larger setbacks and adjacent public open spaces; increase and protect riparian habitat throughout the Portland Harbor from the south reach to the confluence with the Columbia River. Ensure that mature native tree and shrubs are planted along both river banks.

Enforcement needs to be addressed. In particular, we need better tree protection along the greenway (both private landowners and homeless camps are removing trees and vegetation albeit for different reasons); removal of trash along the east side esplanade and a concrete solution for the number of boats that have morphed into floating homeless camps. If Portland is serious about cleaning up the Willamette River and providing healthy riparian habitat, we need to have strong tools to make it happen.

At the West Quad SAC meetings we were told that issues which affect the entire city would be included in

the comp plan. This includes:

- bird-friendly design guidelines
- specific benchmarks for green infrastructure beyond the tree canopy
- river bank restoration (below from Bob Sallinger, Portland Audubon):
 - 1) specifically state that it will maintain or increase current setbacks for development from the river
 - 2) develop overall quadrant targets for linear feet of riverbank enhancement
 - 3) include specific enhancement actions (location and number of linear feet) for each of the districts bordering the river. We would note that prior drafts actually did contain some district level actions for riverbank restoration which were removed from the final draft without explanation.

Also, the plan refers to “in-water habitat” in several places. This should be corrected to reflect that fact that river restoration requires in-water, riparian and upland components.

Are these issues included and do they include tools for achieving them?

My testimony starts and ends with a plea for specificity. Clarity helps everyone in achieving a sustainable, healthy city.

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