



May 26, 2015

Dear Chair Baugh and Members of the Portland Planning and Sustainability Commission,

Please accept the following comments from the Audubon Society of Portland regarding the SE Quadrant Plan. Audubon served on the advisory committees for the Northeast and West Quadrants.

In general we are concerned that the problems that manifested themselves in the initial PSC draft West Quadrant Plan have reoccurred in the SE Quadrant. Specifically we are concerned about a lack of focus, prioritization and detail on natural resources and specifically the Willamette River. These issues were ultimately resolved via the PSC and Council in the West Quadrant Plan. Similar attention will need to be focused on the SE Quadrant Plan in order to ensure that it adequately promotes protection and restoration of natural resources, green infrastructure and access to nature. As currently written the SE Quad Plan fails to protect or build upon the City's green legacy. The following are our primary concerns:

- 1) **The introductory sections of the SE Quadrant Plan fail to highlight natural resource protection and green infrastructure as priorities in the SE Quad.** This includes the overall goal of the plan (Executive Summary on Page i), "big ideas," and priorities. Instead the focus is primarily and almost exclusively on industrial jobs. While industrial jobs are important, the plan should represent a holistic vision for the Central City. It is surprising and disappointing that the introductory sections are so one dimensional.
- 2) **The Natural Resource Summary in the Introductory Sections is very weak:** This section seems to focus more on access than actually assessing the ecological state of the landscape. It appears cursory at best. This is surprising since the City provided very strong overview materials on this subject as part of the advisory committee process.
- 3) **The targets for green infrastructure such as tree canopy, pervious surface, ecoroofs and other green infrastructure are placeholders:** It is difficult to understand why the City has once again relegated these important issues to post process consideration. It is critical that these objectives be integrated with other goals of the plan, not relegated to afterthoughts. It is notable that the City has managed to develop specific and often measurable objectives in all other aspects of this plan. By leaving aside green infrastructure and also utilizing extremely weak language such as "where possible" (for example see page V 24) the City has relegated green infrastructure, and thus the health of our communities and the environment, to a much lower level of priority than other aspects of this plan

- 4) **Policy 40, Willamette River Health and Water Quality:** The Plan states that the goal is “fishable/swimmable.” This is the lowest possible bar for compliance with the Federal Clean Water Act. The City must do better and restore the Willamette to health for both people and wildlife including helping recover listed salmonid species. This is the first time we have seen the City default to absolute minimum federal standards---it is a truly disappointing policy that suggests that the City has abandoned aspirations for a healthy restored Willamette and far less than the City’s past policy and practice.
- 5) **Policy 44, Habitat:** This policy should include restoration as well as enhancement and should include riparian as well as in water habitat. It is critical that the city maintain an objective of a continuous restored and enhanced greenway along the Willamette. While this objective may not be achievable in the lifespan of this Central City Plan, over the course of many decades opportunities that are not visible today may well become apparent. However this will only happen if the City maintains a vision of a continuous restored greenway including areas that today do not appear to offer immediate opportunities.
- 6) **UD 12, Green Loop:** The Green Loop Concept appears to have become significantly watered down from what was articulated in the West Quadrant. The SE Quad Plan fails to identify a specific route and makes the green loop subservient to compatibility with freight transportation. It also downplays the “green” in the green loop focusing more on the concept as an “active transportation” corridor. We urge the City to define a specific corridor for the green loop and to ensure that it includes a strong green infrastructure component. To do otherwise at this point is to relegate the concept to the realm of nice ideas that will likely never happen.
- 7) **Willamette River Section:** This section is absolutely anemic. The section only contains one policy and the focus of that policy is on access. The section should contain policies on restoration and specific objectives outlining how and where that restoration will occur. While we understand that much of this information is contained in the Central City Wide sections, we believe that as will other goals, the individual quadrants should also have stepdown policies, goals and objectives.
- 8) **Willamette River Greenway Expansion:** The Plan suggests that consideration of expansion of the greenway will be considered “as necessary.” This is virtually meaningless. The 25 foot setback is too narrow to achieve recreational, transportation and natural resource objectives associated with the greenway. The Central City Plan should be bold in this arena and set policy and objectives of changing the greenway code to promote a 100 foot setback over time. In fact we believe that expanding the greenway could and should be one of the signature achievements of the Central City Plan (“big ideas”). This kind of change will only occur by putting strong policies in place now and understanding that it will be achieved over decades as the City redevelops.
- 9) **Commercialization of the Greenway:** There are several places in the plan where it appears that the city is promoting increased development and commercialization of the greenway itself. Audubon strongly opposes this direction. The greenway should be preserved for openspace, habitat and river access. It is at its core a linear park and natural area. While it make sense to include policies that promote development on properties adjacent to the greenway that is oriented toward activating the greenway, that policy should not extend to increasing development in the greenway, itself.
- 10) **Climate Change:** The sections on climate change preparation are anemic. The City has developed a tremendous amount of information on strategies to address climate change from both an

adaptation and mitigation approach. It is unclear to us why this work is not manifesting itself more clearly in the Central City Plan. We would urge the City to crosswalk the SE Quad Plan with the Climate Action Plan.

- 11) **Floodplains:** The Plan suggests obliquely that development along the river can help address protection of floodplains and new federal floodplain regulations that may emerge in the near future. However, the plan provides absolutely no detail what-s-ever as to how this will occur. As written, the plan seems to suggest that development is intrinsically a strategy to protect floodplains which is the absolute antithesis of what is actually true. The plan should be much clearer about the need to avoid, minimize and mitigate floodplain development.
- 12) **The West Quadrant Plan Called for moving forward within one year on at least two restoration sites, while the SE Quad only calls for a single site:** The SE Quad should be consistent with the West Quad and require at least two sites.
- 13) **In general the SE Quadrant Plan appears to be an order or magnitude less detailed than the West Quadrant Plan:** Basically this plan still seems to be full of fuzzy concepts.

We hope as with the West Quad Plan, that this City will continue to work with natural resource stakeholders to remedy these substantial deficiencies.

Thank you for your consideration of these comments.



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