

June 22, 2015

Houck comments on Growth Scenarios Report, May 2015 Update

In preparation for tomorrow's PSC hearing and decision on the Growth Scenarios Report I wanted to give you my comments and questions in advance.

1). Page 5, Access to Parks: At the recent Parks SDC discussion with City Council Parks and Recreation staff made it clear that, in their opinion, there is not sufficient available land within the city to remedy the significant inequities in access to park land through acquisition. The bureau, instead, says it will address the gap between acres needed to accommodate increased population and existing inequities through "other means." I have significant concerns with this approach and would like clarification from Portland Parks and Recreation with regard to how, as is stated in this document, they can possibly "increase the number of households with good access to parks" (which can be attributed to) "an increase in the number of areas in the CSP that fill gaps in areas underserved by parks to reduce disparities." There is no mention of natural areas in this language. Portland Parks and Recreation has an existing natural area acquisition strategy, but this is not referred to either. I'd like clarification from PP&R how the Growth Scenario Report squares with statements from the recent SDC decision.

The decision to not rely on acquisition of new park land, owing to lack of available land for purchase, as has been noted in earlier discussions regarding the Economic Opportunities Analysis, flies in the face of heroic efforts to provide industrial land through rezoning golf courses, and other measures. Why would the city go to extreme measures to squeeze additional industrial acres while simultaneously accepting the fact that limited land supply will necessitate moving from acquisition based strategies to add park land as the city absorbs more population? Adding additional park land is just as important to providing essential urban services as with industrial land and jobs.

2). Page 16, Core ideas from Metro 2040 Growth Concept: There is no mention of one of the most significant precepts of Metro's 2040 planning process. Metro took 200 feet on both sides of streams and river, wetlands, floodplains, and steep slopes out of the buildable lands inventory. There is no mention of this in presenting Metro's 2040 planning process as a context for Portland's Growth Scenarios Report. It is important, I believe, that Metro acknowledged the need to prohibit/discourage development in riparian corridors, in floodplains, on steep slopes, etc and as a result removed many thousands of acres from what it described as the region's buildable lands inventory. Metro's adoption of Title 3 and Title 13 were both intended to develop regulatory means to protect these landscapes.

3). Page 38, Density reductions farther from identified Centers and Corridors, particularly in outer East Portland. Is there an explicit nexus with the above regarding the rationale for density reductions related to natural landscapes, above and beyond access to transit and related issues?

4). Page 40: Performance Measures: I see no reference to the Bureau of Environmental Services *Watershed Score Card*. Given the whole purpose of the Watershed Score Card is to track progress toward improved watershed health the Score Card should figure prominently in efforts to measure performance of the Comp Plan.

5). Page 41: Performance Measure: By 2035 all Portlanders will live within a half-mile walking distance of a park or greenspace. In this measure park and greenspace is used, which is a generic term, and on the next page the maps reference parks and natural area access. My concern is consistency. I prefer using natural area, as opposed to greenspace, in this context so there is consistency between the verbiage and mapped access.

I would also question why trails were not included. There is a map for low-stress bicycle network, but no mention of local trails, which are an incredibly important element of the park system and active transportation network, including the regional trail network.

I would suggest the verbiage read, "By 2035 all Portlanders will live within a half-mile walking distance of a park or natural area. ~~greenspace~~

By 2035, all Portlanders can conveniently get to and enjoy the Willamette and Columbia Rivers. The local and Bi-state Regional Trail System is substantially complete and is an integrated component of a Healthy Connected City and regional network.

(this takes into account, and includes the Bi-State Trail System adopted by Metro and local park providers).

6). Watershed Score Card should be referenced

7). Page 69: Parks Access. Again there is lack of consistency between the Portland Plan language, which references greenspace and the Comp Plan verbiage which references natural area. The measure should be access to natural area, which is both more specific and what addresses access to nature.

(Is this data consistent with the Coalition for a Livable Future's *Equity Atlas* maps?)

8). Page 70: Is the proposed increase in performance for access to parks predicated on acquisition of additional park land or merely intensifying uses of existing parks, as contemplated in the recent Park SDC debate?

Why isn't access to trails covered here? Trails are a critical element of the local and regional interconnected parks, trails, and natural areas system.

9). Page 72: Watershed Health: An important option is missing, Restoration of habitat on the Willamette mainstem and its tributaries and upland habitats.

Shift in Development Approaches: the Ecoroof Incentive program is referenced. That program no longer exists. I would reword to read: "Additional tools include incentives and mandatory efforts to increase ecofoofs and other green infrastructure programs across the city."

10). Page 76: reword as follows, "The Portland region's 40-mile loop and other elements of The Intertwine---the bi-state system of parks, trails, and natural areas---provide access....."

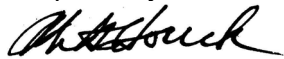
The chart on page 77 depicts, whatever the scenario a loss of access to natural areas. Portland Parks and Recreation as a natural area acquisition strategy which implies there

are additional natural areas still on its inventory. It's hard to believe that the Proposed Plan anticipates zero additional of natural areas which would provide additional access to natural areas, whether actual on the ground or visual such as has recently occurred with 45 acre addition of Ross Island, which my agreement does not provide direct human access but certainly does provide visual access. Riverview Natural Area will provide limited pedestrian access at a minimum in the future. We know we need to provide restored and created shallow water fish habitat in the Portland harbor. This will also ensure additional access to natural areas along both banks of the Willamette.

While it's true we have secured most of the larger "anchor" sites for habitat and other values, there are huge opportunities to improve access to nature within the most development urban matrix. Take the Vera Katz Eastbank Esplanade. Even with the very modest addition of willows along the banks of the Willamette there has been increased wildlife use. With weaving nature into the City; Habitat enhancement in large parks (Willamette for example?); and Development of Neighborhood Greenways and Transit Connections, why would we not increase access to nature, instead of the projected 1% loss of access?

11). Key Findings: No mention of Watershed Health, Access to Trails and Natural Areas? Access to parks is referenced only with regard to filling gaps in underserved areas, including East Portland. While that is an important goal, so too is providing additional natural areas and trails **throughout the city**.

Respectfully,



Commissioner Houck