

In 1990, journalist Neil Pierce wrote a prescient piece on Portland's pioneering work in linking the nascent bike trail movement with the protection and restoration of urban natural areas. A generation later, the Comprehensive 2035 Plan is set to advance Portland's long-standing legacy of securing a sustainable balance of the urban and natural environment. This letter is to support the **Greenway Overlay Zones** as follows:

1. 33.440.210.C.2

Establishing a 50-foot bare minimum setback. Ideally there should be an option to secure a 66-foot setback to provide 50 feet for re-vegetation and habitation restoration given that recreational trails measure a minimum of 16 feet.

2. 3.475.220 Landscaping

It is essential to support a landscaping standard is intended to increase vegetation along the Willamette River. Adding a diversity of vegetation within the river setback will improve multiple ecosystem functions and increase fish and wildlife habitat.

3. 33.475.440.J Standards for tree removal

These standards allow the removal of non-native trees, including those that are listed as nuisance or prohibited on the Portland Plant List. These trees must be replaced with native trees. This is a change from existing allowances for the rest of the city found in 33.430, Environmental Overlay Zones. Currently, nuisance and prohibited trees may be removed and replacement is not required.

4. Subareas shown on Figure 475-3 and described below.

There are three planting densities allowed within each subarea, and I strongly support the intent to create a mix of three types, densities, and Heights The within each subarea, and it is essential to more than one planting density may occur on a site. Although the city should insert language that mandates re-vegetation even in situations where there is no development but vegetation has been removed, even if the vegetation is non-native, invasive species. Removal of "nuisance species" like Himalayan blackberry on the riverbank without immediate re-vegetation with native species is highly problematic. Even non-native species provide habitat. Allowing property owners to remove non-native species without requiring immediate re-vegetation will not meet the goals of this plan. There should be no outright exemption for removal of non-native species without a strong, immediate requirement for re-vegetation with native species.

Yours in Sustainability,

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