

**River Plan / North Reach**  
**Planning Commission Worksession**  
**Reponses to comments on the Proposed Draft**  
**February 24, 2009**

**TOPIC: Greenway Trail**

**1. BRIEF SUMMARY OF COMMENTS ON THE TOPIC:** Many of the comments on the Willamette Greenway Trail are supportive of the trail alignment and the policies and actions items related to implementation of the trail alignment. Some comments ask for the trail alignment to be closer to the river, while others question the proximity of the trail to industrial operations. There is both support and opposition to the long-term trail alignment. Several comments ask for clarification about the implications of having the trail on the zoning maps versus long-term alignment shown in the plan.

**2. STAFF PROPOSED AMENDMENTS IN RESPONSE TO COMMENTS**

**a. Amendments for Discussion with Planning Commission**

Staff proposes amendments as outlined below. Related comments and responses are attached.

**Amendment 1:** Staff proposes to move the near-term greenway alignment off of the University of Portland and Union Pacific Railroad parcels in the area around Waud Bluff. This alteration of the trail alignment will ensure that neither the University of Portland nor the Union Pacific Railroad will be required to build the trail in this location. The bluff is steep and the flat area where the train track is located is not wide enough to accommodate a typical trail section. Staff has envisioned that the trail around Waud Bluff would be either cantilevered off the edge of the railroad right-of-way or located on a floating bridge or boardwalk similar to the floating segment of the Eastbank Esplanade. In either case, the cost of engineering, designing and building such a trail should be borne by the City of Portland rather than the University of Portland or Union Pacific Railroad.

RELATED COMMENTS: #15, #272, #358, #359

**b. Minor Amendments**

Comments and responses are attached. Minor amendments are included in the staff response section of each comment.

**c. Technical Amendments**

Comments and responses are attached. Technical amendments are included in the staff response section of each comment.



**3. COMMENTS THAT DO NOT REQUIRE AMENDMENTS**

Comments and responses are attached.

**2. a. PUBLIC COMMENTS RELATED TO AMENDMENTS FOR  
DISCUSSION WITH PLANNING COMMISSION**



## Report of River Plan Comments

Topic 1: Greenway Trail      Topic 2: All      Topic 3: All      Comment Type: Major policy  
Comment ID: All      Staff Entered: All      Commentor: All      Hearing Date: All  
Geo Area: All      Volume: All      TOC Section: All  
Staff Assigned: All      Comment Addressed?: All      Document Edited?: All      Individual Review: All

### Topic 1: Greenway Trail

|                    |  |                   |  |
|--------------------|--|-------------------|--|
| <b>Comment ID:</b> | 15   | <b>Commentor:</b> | University of Portland - Megan Walseth |
| <b>Comment:</b>    | The River Plan contemplates that the greenway trail will go around the base of Waud bluff, within the narrow strip between the railroad tracks and the water, on a boardwalk structure. (See Volume 1A, page 77). UP supports the City's design and construction of a boardwalk trail, but requests that the Plan be amended to clarify that this feat of engineering is not expected to be undertaken as a condition of UP campus development. Combined with a proposed "rough proportionality" formula that does not account for trail construction costs (Volume 1B, pages 82-86), this designation would undoubtedly become the subject of a legal challenge.  |                   |  |
| <b>Response:</b>   | The trail alignment in this location will be amended to ensure that the University of Portland is not required to build the boardwalk or floating trail around Waud Bluff. The trail alignment will be placed in the water adjacent to the bluff. This will ensure that the cost of building this segment of the greenway trail is borne by the City.  |                   |  |
| <b>Comment ID:</b> | 272  | <b>Commentor:</b> | Union Pacific - Brock Nelson           |
| <b>Comment:</b>    | The second trail alignment issue of particular concern to UPRR relates to the area around Waud Bluff. We understand that staff proposes to have the zoning map designate a trail partly on railroad property and partly on University of Portland property running along the base of the bluff and beyond. We agree with the University's comment that constructing a trail around the base of the bluff will be an engineering challenge and disproportionately costly, compared with trail construction costs elsewhere. The University's suggested remedy of moving the trail designation wholly onto the railroad's property is no solution. The better course for the commission would be to seek a design solution that interferes neither with the railroad's operations and maintenance nor with the University's expansion plans. |                   |  |
| <b>Response:</b>   | The trail alignment in this location will be amended to ensure that neither the University of Portland nor Union Pacific is required to build the boardwalk or floating trail around Waud Bluff. The trail alignment will be placed in the water adjacent to the bluff. This will ensure that the cost of building this segment of the greenway trail is borne by the City.  |                   |  |
| <b>Comment ID:</b> | 358  | <b>Commentor:</b> | University of Portland - Renee France  |
| <b>Comment:</b>    | The University has concerns about the combination of the proposed location of the Greenway Trail on University property around the base of the bluff and the highly-engineered boardwalk contemplated along that segment of the trail alignment. The University is requesting that either the trail be relocated - and we're working with other groups to figure out if there is another location that's preferable. If that can't be done, then we simply ask that there be a clarification in the River Plan that the University is not responsible for the financial cost of constructing or developing the trail because the cost of that sort of walkway would be greatly disproportionate to the impact created by the University.   |                   |  |
| <b>Response:</b>   | The trail alignment in this location will be amended to ensure that the University of Portland is not required to build the boardwalk or floating trail around Waud Bluff. The trail alignment will be placed in the water adjacent to the bluff. This will ensure that the cost of building this segment of the greenway trail is borne by the City.  |                   |  |

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| <b>Comment ID:</b> | 359  | <b>Commentor:</b> | npGreenway - Curt Sneider |
| <b>Comment:</b>    | We share the University of Portland's concern about having to fund, possibly, an engineered, elevated esplanade around the bluff. I don't think that is solely their job to pay for that. So we do support a broader payment for that, whether it's me as a private property taxpayer. On the other hand, I don't see another location for the trail, which is one of the options given - either relocate the trail or take them off the hook of trying to build around the bluff. |                   |                           |
| <b>Response:</b>   | The trail alignment in this location will be amended to ensure that the University of Portland is not required to build the boardwalk or floating trail around Waud Bluff. The trail alignment will be placed in the water adjacent to the bluff. This will ensure that the cost of building this segment of the greenway trail is borne by the City.  |                   |                           |

## **2. b. PUBLIC COMMENTS RELATED TO MINOR AMENDMENTS**





## Report of River Plan Comments

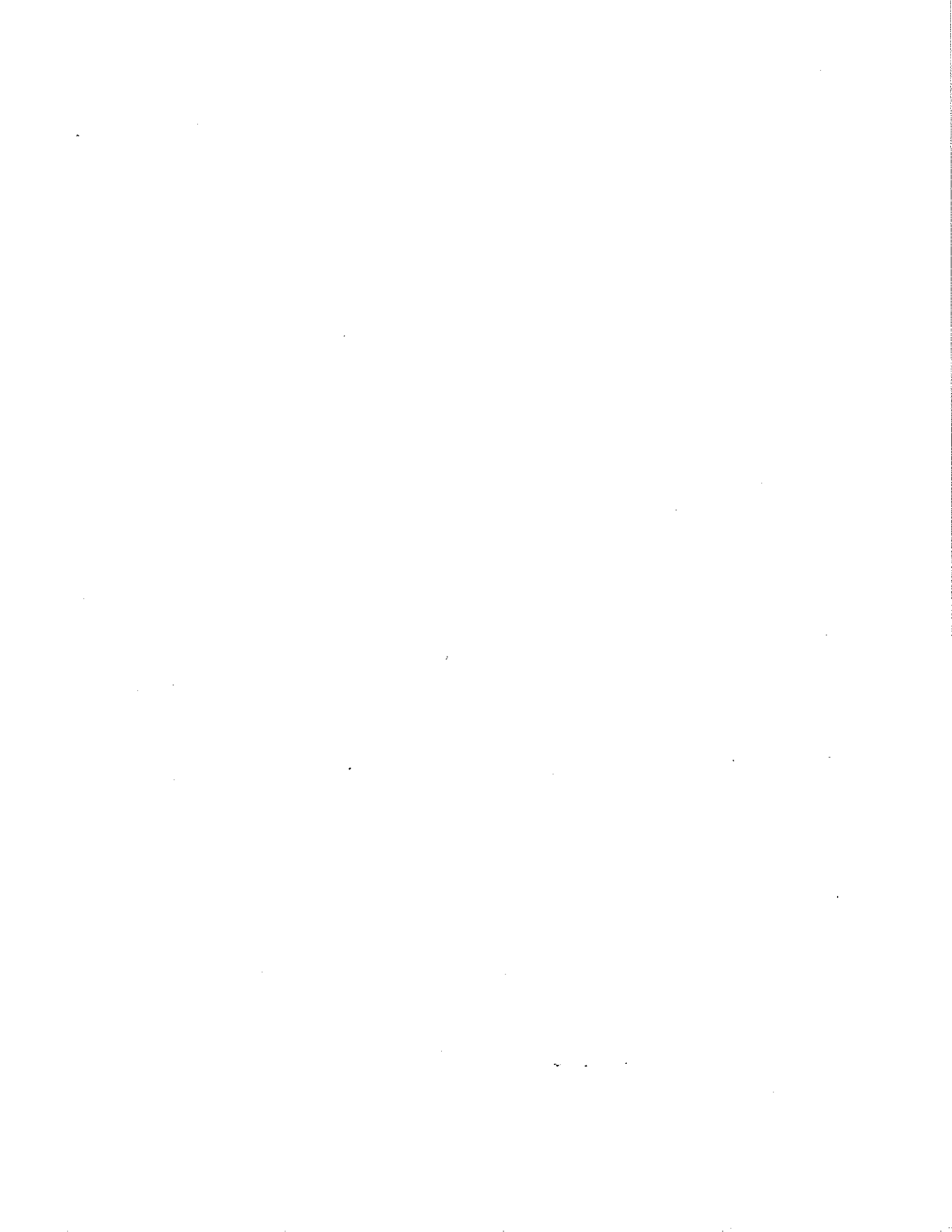
|                                |                                |                               |                                   |
|--------------------------------|--------------------------------|-------------------------------|-----------------------------------|
| <u>Topic 1:</u> Greenway Trail | <u>Topic 2:</u> All            | <u>Topic 3:</u> All           | <u>Comment Type:</u> Minor policy |
| <u>Comment ID:</u> All         | <u>Staff Entered:</u> All      | <u>Commentor:</u> All         | <u>Hearing Date:</u> All          |
| <u>Geo Area:</u> All           | <u>Volume:</u> All             | <u>Document Edited?:</u> All  | <u>IOC Section:</u> All           |
| <u>Staff Assigned:</u> All     | <u>Comment Addressed?:</u> All | <u>Individual Review:</u> All |                                   |

### Topic 1: Greenway Trail

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|--------------------|---|-------------------|-------------|
| <b>Comment ID:</b> | 3   | <b>Commentor:</b> | Todd Roll   |
| <b>Comment:</b>    | I strongly support npGreenway's proposal for the multiuse trail along the east bank of the Willamette River.  |                   |             |
| <b>Response:</b>   | Thank you for the comment.  |                   |             |
| <b>Comment ID:</b> | 44  | <b>Commentor:</b> | Paul Maresh |
| <b>Comment:</b>    | Proposed changes to the alignment principles listed on page 39 of Volume 1A -<br>--- Principle 2 should read, "Where the land is being preserved for river-dependent industrial uses, a trail along the riverfront is generally not feasible at this time due in part to current security and safety issues. River Renaissance recognizes that transportation options enhance the economic viability of river-dependent industrial uses. Therefore the City of Portland Transportation and Planning Bureaus will endeavor to resolve safety and security issues in a way that benefits both property owners and potential users".<br>--- Principle 5 should read, "if conditions ... North Reach shall be revisited".<br>Staff does not support these recommended changes to the trail alignment guiding principles. Principle 2 as drafted describes the rationale staff and the Trail Alignment and Design Task Group used for eliminating the option of a riverfront trail in the river industrial overlay zone. As revised by the commentor the principle reads more like a recommendation or action item for future planning processes rather than a direct description of why the trail alignment is located away from the riverfront in the river industrial overlay zone. Staff is also not supportive of amending the language in Principle 5 because as written the principle reflects the thinking and discussion of the Trail Task Group. Staff does recommend adding the following action item to the list of Access action items in response to this comment: During the next scheduled update of the Willamette Greenway Plan, staff will evaluate the land use conditions along the waterfront in the North Reach and will reconsider the potential for establishing a river front trail. |                   |             |
| <b>Comment ID:</b> | 56  | <b>Commentor:</b> | npGreenway  |
| <b>Comment:</b>    | Proposed language for alignment principle #5, Volume 1A page 39 -<br>If conditions in the North Reach change over time and the City policies regarding preserving land for river-dependent activities change, then the possibility of a riverfront trail in the North Reach shall be revisited.<br>Staff does not support amending the language in Principle 5 because as written the principle reflects the thinking and discussion of the Trail Task Group. Staff does recommend adding the following action item to the list of Access action items in response to this comment: During the next scheduled update of the Willamette Greenway Plan, staff will evaluate the land use conditions along the waterfront in the North Reach and will reconsider the potential for establishing a river front trail.   |                   |             |
| <b>Response:</b>   |   |                   |             |

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|--------------------|--|-------------------|-------------|
| <b>Comment ID:</b> | 58   | <b>Commentor:</b> | np Greenway |
| <b>Comment:</b>    | Proposed language for section 33.272.070, Hours of Use, in Volume 1B -   |                   |             |
| <b>Response:</b>   | <p>The trail and access paths must be open to the public 24 hours a day.</p> <p>The section mentioned, 33.272.070, currently states that the recreational trail must be open to the public between the hours of 5 am and 10 pm. The section does not preclude the possibility that the trail could be open 24 hours a day. That said, the commentors point is that trails provide more than just a recreational purpose and in order to ensure that the transportation purpose of trails are recognized, the trail should be open 24 hours a day. One of the follow-up actions that staff proposes in the River Plan is for city agencies to work together to address city wide trail issues including alignment and designation of the trail as a transportation facility, recreation facility or both. River Plan staff recommends that the issue raised by this comment be folded into the broader trail project.</p> |                   |             |

## **2. c. PUBLIC COMMENTS RELATED TO TECHNICAL AMENDMENTS**



## Report of River Plan Comments

|                        |                |                            |     |                           |     |                      |                          |
|------------------------|----------------|----------------------------|-----|---------------------------|-----|----------------------|--------------------------|
| <u>Topic 1:</u>        | Greenway Trail | <u>Topic 2:</u>            | All | <u>Topic 3:</u>           | All | <u>Comment Type:</u> | Editorial/technical edit |
| <u>Comment ID:</u>     | All            | <u>Staff Entered:</u>      | All | <u>Commentor:</u>         | All | <u>Hearing Date:</u> | All                      |
| <u>Geo Area:</u>       | All            | <u>Volume:</u>             | All | <u>Document Edited?:</u>  | All | <u>IOC Section:</u>  | All                      |
| <u>Staff Assigned:</u> | All            | <u>Comment Addressed?:</u> | All | <u>Individual Review:</u> | All |                      |                          |

### Topic 1: Greenway Trail

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|--------------------|--|-------------------|--------------------------------|
| <b>Comment ID:</b> | 43   | <b>Commentor:</b> | Paul Maresh                    |
| <b>Comment:</b>    | Requested adjustment to Volume 1B - Section 33.272.070 should read, "The trail and access paths shall be open to the public twenty four hours of the day" because shift workers need access to and from their jobs all hours of the day.   |                   |                                |
| <b>Response:</b>   | The section mentioned, 33.272.070, currently states that the recreational trail must be open to the public between the hours of 5 am and 10 pm. The section does not preclude the possibility that the trail could be open 24 hours a day. That said, the commentors point is that trails provide more than just a recreational purpose and in order to ensure that the transportation purpose of trails are recognized, the trail should be open 24 hours a day. One of the follow-up actions that staff proposes in the River Plan is for city agencies to work together to address city wide trail issues including alignment and designation of the trail as a transportation facility, recreation facility or both. River Plan staff recommends that the issue raised by this comment be folded into the broader trail project. |                   |                                |
| <b>Comment ID:</b> | 133  | <b>Commentor:</b> | Bureau of Development Services |
| <b>Comment:</b>    | 33.272.020.A. In the second sentence, not sure what the phrase "...determined to be logically related..." means. Seems we would be applying the standards solely to determine rough proportionality, not rough proportionality and when "logically related". Potentially delete phrase "logically related."  |                   |                                |
| <b>Response:</b>   | The term "logically related" is intended to address the need for a nexus between the requirement and the proposal. Staff will work with BDS to clarify the language while retaining the meaning.   |                   |                                |
| <b>Comment ID:</b> | 134  | <b>Commentor:</b> | Bureau of Development Services |
| <b>Comment:</b>    | 33.272.020.B & D. Why not apply the exception to the South Waterfront sites when a cleanup project is under review? The trail easement has been a major issue with these sites and recently the City Attorney expressed concern about the legality of the code. Why not take this opportunity to address this issue?   |                   |                                |
| <b>Response:</b>   | River Plan staff will clarify that the public recreational trail standards of 33.510.253 do not apply when the proposal is for removal or remediation of hazardous substances conducted under ORS 465.200 through .545 and 465.900.  |                   |                                |
| <b>Comment ID:</b> | 213  | <b>Commentor:</b> | Metro - Mary Anne Cassin       |
| <b>Comment:</b>    | Shouldn't the table (A1) mention that Metro has been awarded a \$1.7 million grant to build the bike/ped bridge across RR tracks between Pier an Chimney Parks? Portland Parks provided match funds and will own and operate the bridge. Metro will design/construct bridge with ODOT TE grant. Construction should be complete in 2011.   |                   |                                |
| <b>Response:</b>   | Yes. Action Agenda item A1 will be amended to reflect that Metro has been awarded \$1.7 million to construction the bike/ped bridge across the railroad tracks between Chimney and Pier parks.   |                   |                                |

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| <b>Comment ID:</b> | 214   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | We realize that the Smith and Bybee Wetlands Natural Area is not included in the North Reach Study Boundary, but the proposed Greenway Trail is shown as it travels through the Natural Area. Why isn't reference made to ongoing studies and investments related to proposed trails on the St. Johns landfill and a bike/ped bridge over the N. Slough in the vicinity of the St. Johns landfill. These trails and bridge are integral parts of the proposed trail shown on Map 8. Would a logical place to mention this be following A1 in the table?   |                   |                          |
| <b>Response:</b>   | The action items in the Action Agenda tables are directed toward City agencies because the River Plan is City of Portland planning project. That said, coordination with other agencies in the region is an important element of the River Plan. While the action agenda tables may not be the right place for a discussion of work that Metro will take on in the coming years, the section of the River Plan document devoted to description of the Future of the North Reach is a good place to describe the trail in and near the St. Johns Landfill. Staff will amend the future section to reference the bike/ped bridge. |                   |                          |
| <b>Comment ID:</b> | 216   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | Add a recommendation to "work with Metro where goals and actions overlap along trail segments between Willamette Cove and the Port of Portland Trail."  |                   |                          |
| <b>Response:</b>   | The action agenda items for the section Working With Our Partners reflect the recommendation from that section and are aimed at improving coordination between the land use review staff in the Bureau of Development Services and state and federal agencies that regulate contaminated site clean up and development in the river. The greenway trail is covered in the section titled Access. Staff will revise the action agenda table for the Access section to more clearly state that the City lead agencies should work with Metro on the greenway trail where goals and actions overlap.                               |                   |                          |
| <b>Comment ID:</b> | 217   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | Several Trail Access Locations are omitted. Add Trail Access Locations for the Columbia Slough Trail, the Marine Drive Trail, and all trails in Forest Park, including Firelane 12, BPA Road, Newton Road, Springfield Road, Salzmann Road, a.k.a., Westside Regional Trail, and Firelane 1.  |                   |                          |
| <b>Response:</b>   | River Plan staff is working with staff from Portland Parks and Recreation to add these trail access points to Map #8: Access--Proposed Willamette Greenway Trail and Viewpoints.  |                   |                          |

### **3. PUBLIC COMMENTS THAT DO NOT REQUIRE AMENDMENTS**





## Report of River Plan Comments

|                 |                |                     |     |                    |     |               |                  |
|-----------------|----------------|---------------------|-----|--------------------|-----|---------------|------------------|
| Topic 1:        | Greenway Trail | Topic 2:            | All | Topic 3:           | All | Comment Type: | No edit required |
| Comment ID:     | All            | Staff Entered:      | All | Commentor:         | All | Hearing Date: | All              |
| Geo Area:       | All            | Volume:             | All | Document Edited?:  | All | TOC Section:  | All              |
| Staff Assigned: | All            | Comment Addressed?: | All | Individual Review: | All |               |                  |

| Topic 1: Greenway Trail |  |            |                         |
|-------------------------|--|------------|-------------------------|
| Comment ID:             | 1  | Commentor: | Jack Newlevant          |
| Comment:                | I strongly support npGreenway's proposal for the multiuse trail along the east bank of the Willamette River.   |            |                         |
| Response:               | Thank you.   |            |                         |
| Comment ID:             | 2  | Commentor: | James Male              |
| Comment:                | I strongly support npGreenway's proposal for the multiuse trail along the east bank of the Willamette River.   |            |                         |
| Response:               | Thank you for your comment.  |            |                         |
| Comment ID:             | 4  | Commentor: | 40-Mile Loop Land Trust |
| Comment:                | The 40-Mile Loop Land Trust recommends that you fully support North Portland Greenway Trail Planning. This important gap in the 40-Mile Loop would provide a multipurpose recreational trail and transportation connection linking North Portland neighborhoods, Swan Island employment center, North Portland Business Districts and St Johns Town Center to Kelley Point via the Willamette Greenway trail's tie-in to the Eastbank esplanade and the rest of our regional trail system for walkers and bike riders. It is important to provide off-street multi-use trails for recreational experience, children's safety, alternative access, and health for citizens of the region. |            |                         |
| Response:               | Thank you for the comment.   |            |                         |

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| <b>Comment ID:</b> | 8   | <b>Commentor:</b> | Kinder Morgan, BP, NuStar - Phil Grillo |
| <b>Comment:</b>    | <p>Critical Infrastructure Protection (CIP) - The location of public trails and "restoration sites" directly adjacent to critical infrastructure significantly threatens these critical facilities. These draft policy choices do not take into account the need for Critical Infrastructure Protection and should therefore be rejected.</p> <p>Objection to the location of a public trail through prime industrial land and critical infrastructure in Linnton - Maps 8 and 9 in Volume 1A propose that a public trail cross the Portland and Western Railroad (PWRR) line at two locations in Linnton, looping through IH-zoned industrial land, then along the riverfront, adjacent to the Kinder Morgan energy facility in Linnton. This trail would require the creation of two at-grade pedestrian and bike crossings of the busy PWRR through Linnton that would be extremely dangerous. Furthermore, several large petroleum tanks and other storage and distribution facilities are located within a few feet of these proposed public trails. This trail location violates several comprehensive plan policies that are designed to reduce land use conflicts. These trails are also inconsistent with the federal and state protections required for critical infrastructure and prime industrial land.</p> <p>Support focus of redevelopment in Linnton within existing commercially-zoned areas - The location of trails shown in the current draft of the River Plan is not the product of a collaborative effort and is unacceptable to us. We believe that any discussion of Linnton's redevelopment should start with a critical examination of its existing commercial area, and that efforts should initially be focused there, not on trying to create a trail system through the industrial area where critical infrastructure and prime industrial land needs to be protected.</p> <p>The commentors raise important issues regarding the proposed trail alignment through downtown Linnton. Staff believes that all of the issues can be addressed through the design of the future trail. The trail is proposed to cross the railroad tracks at NW 107th and at NW 112th. Both of these crossings are combined with existing public right-of-way crossings. There are many examples of well-designed trail and track crossings across the country. The trail is also proposed to be developed with the NW Front Avenue right-of-way between NW 107th and 112th. NW Front is adjacent to the SW corner of the Kinder Morgan facility. The trail will be within the public right-of-way and could be designed to address the security issues that Kinder Morgan raises. The trail is also proposed along the waterfront between NW 107th and the southern property line of the Kinder Morgan facility. The trail is not designated to loop back to NW Front Avenue, therefore the terminus of the waterfront trail could be located and designed with the input of Kinder Morgan and so that the security issues are addressed.</p> |                   |   |
| <b>Response:</b>   |   |                   |   |
| <b>Comment ID:</b> | 20  | <b>Commentor:</b> | Friends of Baltimore Woods              |
| <b>Comment:</b>    | <p>The Friends and their partners hope to create a link in the regional trail system. The Friends' preferred trail alignment along Decatur Street, which the City supports, will connect with the NP Greenway trail and the 40 mile Loop, creating a continuous bike and pedestrian trail that stretches from downtown to Smith and Bybee wetlands. The "Baltimore Woods" section of this trail from Cathedral Park to Pier Park will offer opportunities for residents and visitors to experience the unique habitat along the trail as well as the industrial activities along the river.</p> <p>Thank You.</p>   |                   |   |
| <b>Response:</b>   |   |                   |   |
| <b>Comment ID:</b> | 21  | <b>Commentor:</b> | Cesar del Rosario                       |
| <b>Comment:</b>    | <p>The multiuse trail along the east bank of the Willamette River will provide a traffic free/safe route to Swan Island and downtown Portland for alternative modes of transportation (i.e., bikers, walkers) as well as access to the natural habitat along the Willamette River. This trail will provide North Portland with increased access to jobs, a connection to nature and a place to recreate. Thus there are economic, environmental and health benefits this trail will provide directly to North Portland and the interconnected community. I strongly support npGreenway's proposal for the multi use trail along the east bank of the Willamette River.</p> <p>Thank you for your support of a trail on the east side of the river.</p>  |                   |   |
| <b>Response:</b>   |   |                   |   |

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| <b>Comment ID:</b> | 22   | <b>Commentor:</b> BNSF Railway Company - Terry Finn |
| <b>Comment:</b>    | <p>We want to express our concern about the plan's anticipation of bike and pedestrian trails near heavy rail and truck activity in an area where transportation, trade and general business activities are so critical to city and state economies. Of particular concern is the plan's depiction of a bike or pedestrian trail sharing BNSF's Willamette River rail bridge with our very active rail lines. Safety and liability concerns can increase dramatically when pedestrians, bicycles or even general vehicles cross or run closely parallel to rail lines. Mixed use within the North Reach can have little effect other than to reduce transportation efficiency and introduce jarring incompatibilities that compromise safety and economic development. We also note that we are unaware of any discussion of this idea between City and BNSF representatives or of any contacts made concerning this issue. For these reasons, BNSF opposes the incursion of such uses and specifically opposes the plan's juxtaposition of a bike/pedestrian trail with our rail tracks on the Willamette River bridge.</p> |   |
| <b>Response:</b>   | <p>The proposed trail alignment along the BNSF railroad bridge is identified as a long-term alignment in the River Plan because the feasibility of a trail adjacent to the bridge has not been fully determined. Being a long-term alignment means that the alignment will not be included on the zoning maps. The vision of a trail adjacent to an active railroad bridge has merit because the situation has successfully occurred along several rail-with-trails in this country--most notably the Steel Bridge in downtown Portland. That said, the specific issues and constraints regarding the BNSF bridge need to be examined in detail and with the involvement of the Burlington Northern Santa Fe Railroad. Without the long-term designation there would be no nexus for continuing to explore and study the alignment. Regarding contact with BNSF, River Plan staff have had several conversations with representatives of BNSF over the years.</p>  |   |
| <b>Comment ID:</b> | 23   | <b>Commentor:</b> Sally Hood                        |
| <b>Comment:</b>    | <p>In September 2007, I bought a row house on North Decatur Street in North Portland. One of the main reasons I bought this house is because of its privacy. Thus, my primary concern about the River Plan is the location of the trail that is currently under consideration behind my house and the access to the trail. If the trail is immediately behind the row houses, my deck and all windows facing the river will no longer have the privacy that I currently enjoy. If there is access to the trail at Reno Street and Decatur Street (not thorough fares and not full width streets), not only will privacy be an issue, but also noise and parking congestion.</p>  |   |
| <b>Response:</b>   | <p>[Ms. Hood also asked several questions related to the exact location of the trail and the implications of River Plan proposals in the industrial-residential interface.]</p> <p>The final design and alignment of the trail will be established at the time of development of the trail. Trail development will likely not occur for several years and could be triggered if the property is developed. Issues regarding privacy and the juxtaposition of the trail to neighboring properties will be taken into consideration as the trail is being designed and built. The trail in this case will likely be designed in coordination with Portland Parks and Recreation. The Map 8 in the River Plan shows several access points including the access point at Reno and Decatur. These access points are intended to be illustrative and show locations where there are neighborhood connections to the trail. They are not intended to be designated access points.</p>   |   |

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| <b>Comment ID:</b> | 24   | <b>Commentor:</b> | Portland and Western Railroad - Paul Zalec |
| <b>Comment:</b>    | <p>Of great importance and concern is the non-related rail access to our railroad right of way. Specifically the line segments between Willibrige (Linnton) and north, what we call the "A" Line. The proposed location of trails and putting citizens in close proximity to active rail lines is not a good idea. Recently the U.S. Department of Homeland Security issued their Final Rule. This rule will establish security requirements for freight railroads. One of many security actions recommended is Access Control Security Practices focusing proactive community safety and security outreach and trespasser abatement programs in areas adjacent to company-designated critical infrastructure to reduce the likelihood of unauthorized individuals on company property and to enhance public awareness of the importance of reporting suspicious activity. In addition, activity along the waterfront is also regulated by the Maritime Security Act which prohibits access except for the pre-approved.</p> <p>The proposed zone changes in the North Reach Plan are troubling in that no considerations are given to the negative impact on the transportation services we provide the working harbor. In our view any zoning code changes should be consistent with the working harbor transportation requirements and consistent with the State's direction for a sound, safe, efficient and economical transportation network. It is critical that the railroads be able to continue to operate safely and efficiently to continue to serve our customers in the working harbor and the communities along our routes.</p>   |                   |  |
| <b>Response:</b>   | <p>With all do respect we request that the PC redraw the pedestrian trail to outside the boundaries of the railroad right of way and the Working Waterfront.</p> <p>Issues of safety and security for trail users and adjacent property owners are legitimate concerns for this and any rail-with-trail proposal, and these concerns are among the reasons why the trail alignment along the Portland and Western rail right-of-way is designated as a long-term alignment rather than a near-term alignment. Staff recognizes that the issues surrounding the feasibility of this trail alignment needs to be studied further. Safety and security is always an issue when evaluating a rail-with-trail segment. Many trails across the country have successfully dealt with safety and security through trail design techniques. In almost all cases, developed rails-with-trails have resulted in fewer instances of trespassing and illegal track crossings. Safety and security are underscored by the federal security programs that the commentor mentions. However, it is our understanding after speaking with representatives of the Coast Guard and the Federal Railroad Administration that there is nothing in the Maritime Transportation Security Act or the Rail Hazmat Routing Rule that would explicitly or otherwise directly prohibit the placement of a trail along an active railroad line. This is not to suggest that the issues are less important, merely that the door is still open to discussion and study of a rail-with-trail that meets all of the needs and concerns of the public and property owners. Furthermore, because the proposed trail along the Portland and Western rail right-of-way is designated as a long-term alignment it will not be identified on the zoning maps and there will not be any zoning changes associated with the long-term alignment. The designation in the River Plan recommends that the city work with Portland and Western and Burlington Northern Santa Fe railroads to study the feasibility and possibilities for designing and implementing a trail that addresses all of the concerns and issues presented by routing a rail-with-trail along this active rail line.</p> |                   |  |
| <b>Comment ID:</b> | 25   | <b>Commentor:</b> | Kim Elliot                                 |
| <b>Comment:</b>    | <p>We strongly support npGreenway's proposal for the multiuse trail along the east bank of the Willamette River.</p>   |                   |  |
| <b>Response:</b>   | <p>Thank you.</p>  |                   |  |
| <b>Comment ID:</b> | 41   | <b>Commentor:</b> | Paul Mares                                 |
| <b>Comment:</b>    | <p>The North Portland Greenway Trail is an important piece of transportation infrastructure that will connect the North Portland Peninsula, Portland's Gateway to Nature, to the rest of the Metro region and the Willamette Valley. We want a streamside alignment, not one blocks away from the River. A streamside alignment is an important educational opportunity for our youth to understand the importance of Portland's Working Waterfront and the importance of preserving the wondrous ecology of the riparian environment.</p> <p>The proposed greenway trail alignment has been carefully crafted to balance the desire for a waterfront trail and the interests of the river-dependent and heavy industrial business community in conducting their work in a predictable and safe environment. The trail alignment is close to the Willamette River in as many places as it reasonably can be. Along the route, there will be several opportunities for viewing the working harbor and the riparian environment along river.</p>   |                   |  |

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| <b>Comment ID:</b> | 42  | <b>Commentor:</b> | Paul Maresh                                     |
| <b>Comment:</b>    | <p>Staff has endured a lot of pressure from one or two governmental agencies and a small vocal minority of commercial property owners to remove the trail from zoning maps in riparian areas. Therefore, and apparently for budgetary reasons, there does not appear to be a commitment to acquire portions of the trail or designate the eventual trail in locations within proximity to the river (e.g. between River Ave. and Swan Island). Although a feasibility study is proposed, it appears that implementation is not possible except through a zone change.</p> <p>I urge the Planning Commission to put the greenway trail on the map along the N River St. alignment to N Channel and along the Waud Bluff shoreline, continuing along the shoreline through the Triangle Park, McCormick and Baxter and Willamette Cove properties, to Cathedral Park and along the Baltimore Woods alignment preferred by Friends of Baltimore Woods.</p>   |                   |   |
| <b>Response:</b>   | <p>The River Plan/North Reach proposed draft includes a designated trail alignment between N. River Street and N. Port Center Way on Swan Island. The trail alignment is designated as a long-term alignment because staff does not anticipate that the trail could be built within the lifetime of this plan (approximately 20 years). The River Plan proposed draft also recommends that PDOT continue to explore the potential for developing additional bicycle, pedestrian and vehicular access between the Lower Albina industrial area and Swan Island. If a trail or other right-of-way configuration is feasible in less than 20 years, no zone change would be required to implement the trail or right-of-way.</p> <p>The trail designation from Waud Bluff through the parcels known as Triangle Park, McCormick and Baxter, and Willamette Cove is identified near the railroad corridor because it is the most direct path for a multi-use trail. A trail at the rivers edge along the parcels will likely be a soft walking path and not a paved multi-use trail because of the impacts to riparian habitat of a multi-use trail. The designation along the railroad track is not intended to preclude a walking path along the waterfront, it is merely to indicate that the multi-use trail should be in the most direct alignment and away from the riparian habitat.</p> |                   |   |
| <b>Comment ID:</b> | 45  | <b>Commentor:</b> | Paul Maresh                                     |
| <b>Comment:</b>    | <p>Requested adjustment to Volume 1B - Strike paragraph 5 under section 33.272.090. It is antithetical to the concept of establishing a public commons to cede control of a portion of the commons to a private militia.</p> <p>The language in Section 33.272.090.A.5 City Maintenance reads as follows:<br/>If the applicant desires to use a private security force to patrol the trail area, the owner has signed an agreement holding the City harmless from all claims, suits, or actions of any nature, caused or arising out of the actions of the private security force, its subcontractors, agents, or employees.</p> <p>This language is currently part of the Portland Zoning Code recreational trail regulations. The River Plan did not reevaluate this requirement and staff has no knowledge of any opposition to this standard other than the opposition voiced by this comment.</p>  |                   |   |
| <b>Comment ID:</b> | 48  | <b>Commentor:</b> | Kinder Morgan, Working Waterfront - Rob Mathers |
| <b>Comment:</b>    | <p>In certain areas, River Plan proposes to allow incompatible-use that invites conflict, increases safety-risk, and places the public in harm's way.</p>   |                   |   |
| <b>Response:</b>   | <p>Safety and security are legitimate issues to raise, and they are two of the issues that will be paramount in the design phase of trail development. And, safety and security are always on-going issues for trail managers. The proposed trail in the vicinity of the Kinder Morgan Linnton facility is located in an existing public right-of-way (NW Front Avenue) and along the Linnton waterfront between NW 107th and 112th avenues. The waterfront trail is intended to provide the community of Linnton access to the waterfront along a safe and secure path. The waterfront trail is designated to end before it reaches the southern property line of the Kinder Morgan facility. The portion of the trail in NW Front Avenue as it passes the Kinder Morgan facility will be designed in coordination with Kinder Morgan and with safety and security in mind.</p>  |                   |   |

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| <b>Comment ID:</b> | 50  | <b>Commentor:</b> | npGreenway |
| <b>Comment:</b>    | <p>npGreenway strongly supports adoption of the Greenway Trail alignment as shown in Volume 1A, page 124, with the following changes -<br/>         ---Use the Baltimore Woods alignment as shown on Attachment 1<br/>         ---Construction of the multipurpose trail above the Big Pipe that is to be located immediately to the eastside of the Lagoon, then along the Lagoon to Ensign Ave., then easterly to Basin Ave. on Swan Island instead of that shown exclusively show on Basin Avenue.</p>   |                   |            |
| <b>Response:</b>   | <p>Staff reviewed the Baltimore Woods trail feasibility study dated January 2009 and confirmed that the River Plan proposed trail alignment is consistent with the Friends of Baltimore Woods preferred alignment. Regarding the trail alignment in N. Basin Avenue on Swan Island, staff does not support moving the alignment to the waterfront along the lagoon. Staff understanding is that the easement for the Big Pipe is actually under N. Basin and not under the waterfront area. In addition, any easement the City has for the Big Pipe is an underground easement and does not give rights to the City for use of the property above ground.</p> |                   |            |
| <b>Comment ID:</b> | 51  | <b>Commentor:</b> | npGreenway |
| <b>Comment:</b>    | <p>npGreenway strongly supports including all segments of the near-term Greenway trail alignment shown in Volume 1A on Map 2 (proposed overlay zones), on the Parks and Recreation Trail Maps, and the Transportation System Plan, Bicycle Master Plan, and Pedestrian Plan as soon as possible.</p>  |                   |            |
| <b>Response:</b>   | <p>Thank you for the comment.</p>   |                   |            |
| <b>Comment ID:</b> | 52  | <b>Commentor:</b> | npGreenway |
| <b>Comment:</b>    | <p>npGreenway strongly supports conducting feasibility studies to evaluate rail-with-trail proposals adjacent to the BNSF Railroad Bridge and connecting Lower Albina with Swan Island.</p>   |                   |            |
| <b>Response:</b>   | <p>Thank you for the comment.</p>   |                   |            |
| <b>Comment ID:</b> | 53  | <b>Commentor:</b> | npGreenway |
| <b>Comment:</b>    | <p>npGreenway strongly supports all of the access projects listed on page 65 of Volume 1A.</p>  |                   |            |
| <b>Response:</b>   | <p>Thank you for the comment.</p>   |                   |            |
| <b>Comment ID:</b> | 54  | <b>Commentor:</b> | npGreenway |
| <b>Comment:</b>    | <p>npGreenway strongly supports working with Metro to include all segments of the planned trail alignment in the Regional Trail Plan.</p>   |                   |            |
| <b>Response:</b>   | <p>Thank you for the comment.</p>   |                   |            |

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| <b>Comment ID:</b> | 55   | <b>Commentor:</b> | npGreenway                       |
| <b>Comment:</b>    | <p>Proposed alternative language for alignment principle #2, Volume 1A, page 39 -</p> <p>Where the land is being preserved for river-dependent industrial uses, a trail along the riverfront is generally not feasible at this time due in part to current security and safety issues. River Renaissance recognizes that transportation options enhance the economic viability of river-dependent industrial uses. Therefore the City of Portland Transportation and Planning Bureau will endeavor to resolve safety and security issues in a way that benefits both property owners and potential users.</p>  |                   |                                  |
| <b>Response:</b>   | <p>Staff does not support the amendments to trail alignment guiding principle #2. Principle #2 as drafted describes the rationale that staff and the Trail Alignment and Design Task Group used for eliminating the option of a riverfront trail in the river industrial overlay zone. As revised by the commentor the principle reads more like a recommendation or action item for future planning processes rather than a direct description of why the trail alignment is located away from the riverfront in the river industrial overlay zone.</p>   |                   |                                  |
| <b>Comment ID:</b> | 57   | <b>Commentor:</b> | npGreenway                       |
| <b>Comment:</b>    | <p>npGreenway is concerned that the zoning map does not include the designated trail between River Ave and Swan Island (the Comprehensive Plan shows a trail location). Although a feasibility study is proposed, it appears that no implementation is possible except through a zone change that would 'permit' the trail. npGreenway feels the trail should be included on the map together with specific language that would enable the City, or other body, to work with the property owners to acquire the property necessary for the multipurpose trail.</p>   |                   |                                  |
| <b>Response:</b>   | <p>No zone change will be required to build a trail or other right-of-way configuration between N. River Street and N. Port Center Way on Swan Island. The designation of the alignment as a long-term greenway trail in the River Plan allows the City to work with the property owners overtime to get the trail or other connection built. The fact that the alignment is designated long-term vs. near-term reflects that making this connection will likely take more than 15-20 years (the lifetime of the River Plan).</p>  |                   |                                  |
| <b>Comment ID:</b> | 64   | <b>Commentor:</b> | Port of Portland - Susie Lahsene |
| <b>Comment:</b>    | <p>A primary concern for the Port with the River Plan proposal is that there is a lack of recognition of the limitations imposed by the maritime security act and TSA to address safety and security of the waterfront. This issue with the code spells continued uncertainty for business, additional time and cost for development, which will substantially dampen further investment.</p>  |                   |                                  |
| <b>Response:</b>   | <p>The River Plan/North reach proposal recommends that the greenway trail avoid the waterfront area in the North Reach where the waterfront is being preserved for or used by river-dependent industry. Issue of safety and security and the Maritime Transportation Security Act are directly related to this recommendation. Access objective #1 recommends approval of the proposed trail alignment. In the discussion about the location of the trail alignment there are six guiding principles that explain the policies behind where the trail alignment is located in the North Reach. Principle #2 states that, for the foreseeable future, the greenway trail will avoid the waterfront where the waterfront is being preserved for, and used, by river-dependent industry. The reasons given for this policy include current security issues (including the MTTSA) and the levels and types of river-dependent industrial uses.</p> |                   |                                  |

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| <b>Comment ID:</b> | 69   | <b>Commentor:</b> | Friends of Baltimore Woods - Summer Sharpe                         |
| <b>Comment:</b>    | <p>The neighbors are concerned about protecting the woods from Baltimore to Catlin. Our study is for a habitat and trail connection from Cathedral Park to Pier Park. We want to protect existing habitat, but also encourage new habitat restoration and enhancement on privately owned property. Our report will be available to the City in January. We have been meeting with property owners about restoration opportunities on their sites as well as the trail alignment, and there may be different possibilities [from the alignment suggested in the River Plan] based on the discussions. We want to know how detailed the trail alignment line is on the map. We want to make sure to leave the door open to solve the problem because we're already working with property owners to get easements and we need flexibility to make it work. We have seen maps with two possible alignments and there could be a third. We want to make sure the flexibility to slightly modify the alignment in the future is preserved.</p>   |                   |  |
| <b>Response:</b>   | <p>Once adopted, the near-term trail alignment will be shown on the zoning maps. This means that if development occurs on a site that has the trail designation, the property owner will be required to dedicate an easement for the trail and build the trail if dedication and construction are proportional to the impacts from the proposed development. Because of these requirements, the near-term trail alignment should be shown on parcels where the trail will be located and not on parcels where the trail will not be located. In other words, because the trail designation triggers the trail regulations, the trail designation should only be shown on parcels where we know we want the trail to be located. Because a zone change will be required to remove the trail designation from the zoning maps, we should know now which parcels should have the trail designation. The exact location of the trail within a parcel is not set in stone by the trail designation on the zoning maps. Once approved, there is flexibility to shift the alignment around within a parcel but there isn't much flexibility to shift the alignment from one parcel to another.</p> <p>Staff will continue to work with the Friends of Baltimore Woods to ensure that the near-term trail alignment is located where it will have the most feasible and flexible location.</p> |                   |  |
| <b>Comment ID:</b> | 90   | <b>Commentor:</b> | Friends of Cathedral Park - Barbara Quinn                          |
| <b>Comment:</b>    | <p>We strongly support the goals of the group npGreenway in advocating for the Willamette Greenway Trail and ask that trail alignments be placed in or adjacent to greenway areas rather than on-street whenever possible to enhance the trail. We would also like to be part of the solution for combining habitat areas with the trail in a way that allows both and creates educational opportunities on the importance of restoration and stewardship of one of our last remaining urban greenways.</p>  |                   |  |
| <b>Response:</b>   | <p>Thank you for the comment.</p>  |                   |  |
| <b>Comment ID:</b> | 169  | <b>Commentor:</b> | Piedmont Neighborhood Association - Janis McDonald                 |
| <b>Comment:</b>    | <p>We support the vision of npGreenway for the North Portland Willamette Greenway Trail and ask for your support. The multi-purpose trail has the potential to become a central component of the region's multi-modal transportation infrastructure, serving thousands of cyclist and pedestrian commuters and recreational users. We urge that the North Portland Greenway Trail be put on official zoning and comprehensive plan maps, and that land acquisition and development decisions be made in support of the trail.</p>  |                   |  |
| <b>Response:</b>   | <p>Thank you.</p>  |                   |  |
| <b>Comment ID:</b> | 175  | <b>Commentor:</b> | Swan Island Transportation Management Association - Lenny Anderson |
| <b>Comment:</b>    | <p>The goal of the Swan Island TMA is to move freight on and off of Swan Island, and we do this by increasing the transportation options for employees. Trails are an important piece of providing access to work. We're going to be a knowledge-driven economy in the future. I hope you take an expansive view as you consider this proposal.</p>  |                   |  |
| <b>Response:</b>   | <p>Thank you.</p>  |                   |  |



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| <b>Comment ID:</b> | 193   | <b>Commentor:</b> | Friends of Baltimore Woods - Jim Barnas |
| <b>Comment:</b>    | I invite everyone to come out to look at the site and see where the trail would go on the northern part of the Baltimore Woods corridor. I want to emphasize the buffer and habitat connectivity corridor aspects - that allow that corridor to connect to Smith & Bybee and Kelley Point and the Oak/Madrone escarpment. Property owners should realize that the buffer and habitat will add value to their properties and they will want to participate much more.  |                   |   |
| <b>Response:</b>   | Thank you.  |                   |   |
| <b>Comment ID:</b> | 207   | <b>Commentor:</b> | Metro - Mary Anne Cassin                |
| <b>Comment:</b>    | Metro and Portland Parks entered into an iGA in 2004 related to trail development in the vicinity of the Natural Area and since then have been collaborating closely to complete the Willamette River Greenway trail in the area (Smith and Bybee Wetlands Natural Area Trail Feasibility Study 2005). The Metro Council approved trail alignment shown on the attached map and excerpted from the 2005 Feasibility Study updates the alignment shown in the 1990 NRMMP. As you will note, the alignment shown within the Natural Area on the attached map is also consistent with the one shown on Map 8 in Volume 1A of the River Plan. |                   |   |
| <b>Response:</b>   | Thank you.  |                   |   |
| <b>Comment ID:</b> | 210   | <b>Commentor:</b> | Metro - Mary Anne Cassin                |
| <b>Comment:</b>    | The alignment of the trail segment between Pier Park and the NW corner of the St. Johns Landfill is the same on the attached map and Map 8 in Volume 1A. However the alignments differ for the segment between Pier Park and other on-street segments. Please confirm that the segments shown on the attached map between the western boundary of Pier Park and the Peninsula Crossing trail will still be valid even though they are not being shown on Map 8.   |                   |   |
| <b>Response:</b>   | The on-street trail segments between Pier Park and the Peninsula Crossing Trail that Metro shows on the map attached to their comments are not included on Map 8 of the River Plan proposal because the segments are not segments of the Willamette River Greenway Trail alignment. The on-street alignments between Pier Park and the Peninsula Crossing Trail are currently identified as city bikeways on the Transportation System Map. We recommend that Metro check in with the Portland Office of Transportation as the PDOT staff are currently updating the City's Bicycle Master Plan.  |                   |   |
| <b>Comment ID:</b> | 211   | <b>Commentor:</b> | Metro - Mary Anne Cassin                |
| <b>Comment:</b>    | How do the terms 'near term greenway trail' and 'long-term greenway trail' differ?  |                   |   |
| <b>Response:</b>   | The term "near-term greenway trail" means that the trail will likely be constructed within the coming 15 to 20 years (the life of the River Plan). The long-term alignments require additional study and likely won't be built within the life of this plan. The near-term alignment will be shown on the zoning maps. The long-term alignment will not be shown on the zoning maps.  |                   |   |
| <b>Comment ID:</b> | 212   | <b>Commentor:</b> | Metro - Mary Anne Cassin                |
| <b>Comment:</b>    | It appears that the existing greenway trail shown on Map 7 and map 1/4 Section 1721 (existing) will no longer be valid when the proposed greenway trail shown in Map 8 is adopted. If at sometime in the future when the St. Johns Landfill is completely integrated into the Natural Area and Metro wishes to complete the greenway trail around the entire perimeter of the landfill, will Map 1/4 Section 1721 (River Plan/North Reach Proposed Zoning) prevent that from happening, since stars will not be shown on that section of the landfill road?   |                   |   |
| <b>Response:</b>   | The lack of trail stars on the zoning maps will not prevent Metro from constructing a trail around the entire perimeter of the landfill site if that becomes desirable. While staff intends to place the stars in the most realistic location for the trail, the stars on the zoning map do not represent a final trail alignment within a parcel. At a minimum the stars on the zoning maps indicate on which parcels the trail should traverse. The final location for the trail is often worked out at the time of construction.   |                   |   |

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| <b>Comment ID:</b> | 215   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | It appears that an important segment is missing from the background information on access. There is no information about the proposed trail alignment between Pier Park and the termination of the existing Port of Portland Trail north of the St. Johns landfill. This portion of the trail is shown on Map 8 in Volume 1A, so shouldn't it be illustrated and discussed here as well? When applying for grants to develop the various sections of this trail it is important to be able to point to existing policy and code that documents project need and this segment seems to have been left out of the discussion. This omission could work against the overall success of the trail implementation. Metro would be happy to assist in providing this background.  |                   |                          |
| <b>Response:</b>   | River Plan staff contracted with Alta Planning + Design to produce conceptual illustrations of four of the greenway trail alignments that are proposed on Map 8. The illustrations show photos of site conditions and comparable trail designs that could work for the segment. The illustrations were used during the Greenway Trail Alignment and Design task group phase of the River Plan/North Reach and helped to further refine these four alignments. Staff did not have Alta produce conceptual designs for every segment of the greenway trail. The conceptual illustrations were included in the final report of the Greenway Trail Alignment and Design Task Group. This information has been provided as background for the River Plan/North Reach proposal. The River Plan/North Reach proposal includes discussion and maps showing the trail alignment between Pier park and the termination of the Port of Portland Trail north of the St. Johns Landfill site. The zoning maps will also include the trail alignment. |                   |                          |
| <b>Comment ID:</b> | 218   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | As shown on the attached map, there are two viewpoints proposed along the future trails on the St. Johns landfill that are not shown on Map 8. Shouldn't these viewpoints be shown?   |                   |                          |
| <b>Response:</b>   | The viewpoints shown on Map 8 in the River Plan proposed draft represent Willamette River Greenway viewpoints. The viewpoints that Metro proposes for the St. Johns Landfill site are important viewpoints, however they are not views of the Willamette River Greenway, which is the focus of the River Plan.  |                   |                          |
| <b>Comment ID:</b> | 219   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | Map 1/4 Section 1921: Public Trail stars should be placed on tax lot 1N1W02A-02100, Crown Beverage Packaging Inc, 11000 N Lombard Street.   |                   |                          |
| <b>Response:</b>   | The trail stars are currently proposed for the Crown Cork tax lot directly south of the lot that Metro identifies in this comment. Both lots are owned by Crown Cork. The trail stars are currently aligned with N. Bruce Ave which has been the most recently preferred location for a crossing of N Lombard Street. River Plan staff prefer to keep the trail alignment as shown on proposed Map 8 because of the N. Lombard Street crossing. River Plan staff have discussed this preference with the Metro staff who submitted the comment and Metro staff are now in agreement with River Plan staff.  |                   |                          |
| <b>Comment ID:</b> | 220   | <b>Commentor:</b> | Metro - Mary Anne Cassin |
| <b>Comment:</b>    | Map 1/4 Section 2020: Public Trail stars should be placed on tax lot 1N1W02DA-05900, Union Pacific Railroad Co, 10200 N Lombard Street.   |                   |                          |
| <b>Response:</b>   | Adding the trail alignment stars to these parcels (owned by Union Pacific Railroad) is not consistent with the City's proposed alignment which is based on the preferred alignment of the Friends of Baltimore Woods. River Plan staff talked with Metro staff regarding their request and Metro agreed that the River Plan proposed alignment should not be changed.   |                   |                          |
| <b>Comment ID:</b> | 235   | <b>Commentor:</b> | NAIOP - Mike Wells       |
| <b>Comment:</b>    | River General (g) overlay zone will have an increased Greenway Setback from 25' - 50' from top of bank, restricting useable property.   |                   |                          |
| <b>Response:</b>   | The river setback for the river general overlay zone and the river recreational overlay zone are proposed to increase from 25 feet landward of top of bank to 50 landward of top of bank. The modification is intended to be more in keeping with current thinking about urban form in relation to the river. The South Waterfront greenway setback is currently 100 feet landward of top of bank and a 50 foot setback is more in keeping with current understanding about the functions of a riparian area.   |                   |                          |

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| <b>Comment ID:</b> | 236  | <b>Commentor:</b> | NAIOP - Mike Wells                         |
| <b>Comment:</b>    | Increased trail alignments have the potential for conflicts with the inherent characteristics of industrial uses and provide additional expense to construct.  |                   |  |
| <b>Response:</b>   | The proposed Willamette Greenway trail alignment in the River Plan / North Reach has been developed in coordination with industrial stakeholders and trail advocates in order to provide a better experience for trail users and to reduce conflicts with industrial uses. Some of the sections may be expensive to build but it is anticipated that a variety of funding sources will be utilized to accomplish that goal.  |                   |  |
| <b>Comment ID:</b> | 270  | <b>Commentor:</b> | Working Waterfront Coalition - Ann Gardner |
| <b>Comment:</b>    | Issue #7: Vision of Greenway Trail presents safety challenges.<br>- Some proposed locations too close to industrial operations and critical transportation infrastructure. Presents safety and security issues.  |                   |  |
| <b>Response:</b>   | Recommendation:<br>-Relocate trails away from industrial areas and rail/pipeline corridors for human health and safety.<br>Safety and security are legitimate issues to raise, and they are two of the issues that will be paramount in the design phase of trail development. And, safety and security will be on-going issues for trail managers. Trail improvements, including signage and fencing between the trail and adjacent properties, have often improved safety and security. A study conducted by the Federal Highway Administration found that instances of trespassing and vandalism reduce once a trail is constructed and people are funneled to an appropriate location.   |                   |  |
| <b>Comment ID:</b> | 271  | <b>Commentor:</b> | Union Pacific - Brock Nelson               |
| <b>Comment:</b>    | Union Pacific Railroad Company owns and operates Albina Yard. As we understand it, the staff report proposes designation of a trail across portions of that yard on the City's long-term planning map (the "vision map"), but not on the zoning map. Staff's approach strikes a reasonable balance between the competing interests of desiring a continuous riverside trail and recognizing that this goal is not achievable during the 20-year planning cycle. As such, we can support it.<br><br>UPRR is not keen to have the trail designation remain even on the vision map. (See attached May 14, 2007 letter to the Trail Alignment Task Group that explains UPRR's concern that the trail would have pedestrians and bicyclists cross no less than four separate rail spurs in an active switching yard.) We agree with staff that designating the trail on the zoning map would be poor planning. The zoning map represents improvements that the City anticipates seeing constructed during the 20-year planning cycle. As such, designating the trail there would be premised on UPRR's abandonment of the yard, something that it has absolutely no plan to do. We understand that the infeasibility of a trail along Albina Yard means that the City needs to look at alternative alignments. We are happy to help the City in that process. |                   |  |
| <b>Response:</b>   | Thank you.   |                   |  |
| <b>Comment ID:</b> | 273  | <b>Commentor:</b> | Union Pacific - Brock Nelson               |
| <b>Comment:</b>    | UPRR owns the Steel Bridge. After extensive negotiations with the City, UPRR agreed to allow a pedestrian path to be located there. UPRR's decision to allow that path at this location was based on site-specific considerations that should not be misinterpreted as proof that pedestrian paths and railroad bridges are necessarily compatible. We have also reviewed the study mentioned by Metro's Blue Ribbon Committee, as well as the Oct. 17, 2008 report by ALTA Planning + Design. We see many ideas for connecting bicycle/pedestrian trails to light rail, but nothing supporting their placement near heavy rail lines. Please understand that heavy rail, such as that operated by UPRR, BNSF, and P&W, is materially distinct from light rail. The latter invites public ridership. Heavy rail freight operations are conducted with the expectation no one other than trained employees will be on or near the rail yard tracks.   |                   |  |
| <b>Response:</b>   | Thank you for this information.  |                   |  |

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| <b>Comment ID:</b> | 316  | <b>Commentor:</b> | Port of Portland - Greg Theisen                  |
| <b>Comment:</b>    | Chapter 33.272. Trails.<br>The percentage of trips expected by bike and pedestrians is not valid for large lot industrial areas. The use of this standard as described in the commentary is unrealistic. What does the data indicate for high acreage sites with lower employment densities?   |                   |  |
| <b>Response:</b>   | The River Plan proposal includes a formula for determining whether the requirements to dedicate and construct a public trail are roughly proportional to the impacts of the proposed development. The proposed formula has three steps: (1) determine the percent of impact; (2) determine the percent of exaction; and (3) determine rough proportionality. For step one, staff proposes to derive the expected number of bicycle and pedestrian to a site based on a percentage of the total number of trips to the site. The Office of Transportation uses the ITE manual to identify how many trips a particular use will generate. Industrial uses generate relatively fewer overall trips than other uses. River Plan staff propose that either 10 percent or 16 percent of the total trips to a site will be made by bicyclists or pedestrians. The specific percentage will be based on location in the city. The percentages are based on two sources of data: (1) the Auditor's Office annual Service Efforts and Accomplishments report which contains information on commuting habits; and (2) data used to support the transportation SDC. Staff recommends that the percentage be refined overtime as additional data on mode split becomes available. |                   |  |
| <b>Comment ID:</b> | 334  | <b>Commentor:</b> | npGreenway                                       |
| <b>Comment:</b>    | We further [beyond our testimony on December 9, 2008] urge you to be sure that the other players in this process, i.e. Portland Bureaus of Transportation and Parks and Recreation are 'solidly behind this plan' and that this will be implemented through adequate funding of those Bureaus who will have a large responsibility for implementation of the many recommendations in the plan.   |                   |  |
| <b>Response:</b>   | Portland Parks and Recreation and the Portland Office of Transportation have been integral partners in developing the River Plan/North Reach proposal. Staff also agrees that adequate funding should be allocated for implementing aspects of this plan.  |                   |  |
| <b>Comment ID:</b> | 335  | <b>Commentor:</b> | npGreenway                                       |
| <b>Comment:</b>    | The River Plan, via the Willamette River Greenway Trail, completes major gaps in our region's trail and transportation network. The trail is a piece of infrastructure that will ensure the economic viability of the industrial zoned parcels on the North Portland peninsula connecting residents with jobs on the working waterfront while also affording a connection to the rest of the city.   |                   |  |
| <b>Response:</b>   | Thank you.   |                   |  |
| <b>Comment ID:</b> | 413  | <b>Commentor:</b> | Portland Freight Committee - Corky Collier, Gary |
| <b>Comment:</b>    | While the draft proposes broad new powers and fees for the City, it inadequately treats federal security concerns as reflected in the Maritime Transportation Security Act (MTSA). We recommend that the City accommodate industry's need to comply with MTSA and operate safely.  |                   |  |
| <b>Response:</b>   | Staff believes that MTSA concerns have been addressed by keeping the trail alignment away from the waterfront in the river industrial overlay zone. The River Plan/North reach proposal recommends that the greenway trail avoid the waterfront area in the North Reach where the waterfront is being preserved for or used by river-dependent industry. Issue of safety and security and the Maritime Transportation Security Act are directly related to this recommendation. Access objective #1 recommends approval of the proposed trail alignment. In the discussion about the location of the trail alignment there are six guiding principles that explain the policies behind where the trail alignment is located in the North Reach. Principle #2 states that, for the foreseeable future, the greenway trail will avoid the waterfront where the waterfront is being preserved for, and used, by river-dependent industry. The reasons given for this policy include current security issues (including the MTSA) and the levels and types of river-dependent industrial uses.   |                   |  |