

Comment ID:	210	Commenter:	Andrew Jansky
Comment:	This code is too prescriptive and may actually degrade the river health: "2. Examples of bioengineered structures include....soil cells wrapped in geotextile fabrics." This failed on the Willamette in 2009, where erosion exposed Geotextile fabric.		
Response:	River Plan staff met with Mr. Jansky and the code section in question has been amended to address the concern.		
Comment ID:	211	Commenter:	Andrew Jansky
Comment:	Frequent use of the word 'prohibited' prevents creativity and integration of new methods and technology.		
Response:	A uniform standard is necessary to ensure that all sites are held to the same level of on-site planting requirements. Flexibility is provided through the applicant's ability to choose the vegetation enhancement option that best fits their specific site and operations, and through discretionary review when alternative ways to meet the vegetation enhancement standard can be evaluated.		

Commenter: Ann Littlewood

Comment ID:	276	Commenter:	Ann Littlewood
Comment:	I strongly support the existing draft river plan and ask that you adopt it.		
Response:	Thank you for your comment.		
Comment ID:	279	Commenter:	Ann Littlewood
Comment:	This plan was developed after a lengthy process and should not be weakened now by river industries.		
Response:	Thank you for your comment.		
Comment ID:	277	Commenter:	Ann Littlewood
Comment:	Please do not yield to industry efforts to weaken this plan. Industry must be required to mitigate their impacts to the river.		
Response:	Thank you for your comment.		
Comment ID:	278	Commenter:	Ann Littlewood
Comment:	The city should not abandon its regulatory authority.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Ash Grove Cement - Glen Dollar

Comment ID:	110	Commenter:	Ash Grove Cement - Glen Dollar
Comment:	Even with the current economy, Ash Grove continues to explore business opportunities for our facilities located in the North Reach. The River Plan will play a key role in these discussions.		

Response:	Thank you for your comment.		
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Comment ID:	112	Commenter:	Ash Grove Cement - Glen Dollar
Comment:	The River Plan in its current form contains details which are critical to the success of the plan which we would like to see worked out before the plan is adopted.		

Response:	Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations. With a proposed effective date of January 1, 2011, the policies, objectives and regulations of River Plan / North Reach can be adopted, leaving time for refinement of technical details. River Plan staff will continue to hold meetings throughout the year to brief interested parties about the results of an upcoming independent science panel review of the mitigation calculation method and further work on the development of the in-lieu-fee. Staff will bring the package to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		
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Comment ID:	43	Commenter:	Ash Grove Cement - Glen Dollar
Comment:	Ash Grove continues to explore opportunities for our Rivergate facility. We are here tonight to encourage you to adopt regulations within the River Plan that will not deter investments in our facilities located in the Portland Harbor. We believe a mitigation bank would realize greater environmental benefit and be more cost effective if administered by a third party with a successful mitigation track record. We have concerns that the river review process will further complicate the permitting process and add considerable delays and cost to any future development.		

Response:	The development of a third party mitigation bank is welcomed and the proposed amendments to the River Plan allows applicants to purchase credits from any mitigation bank that is certified by the City, not just a City's own mitigation bank. Regarding the comments about added delays and cost, the recommended draft and amendments includes several code changes that should make the River Plan code less of a burden than the existing Greenway code including: 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement.		
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Comment ID:	113	Commenter:	Ash Grove Cement - Glen Dollar
Comment:	We believe a fee in lieu of going through River Review will be less of a deterrent for future investment in our facilities and at the same time support environmental projects within the working harbor.		
Response:	River Plan staff have worked with stakeholders to find a balance between allowing development without River Review and ensuring that impacts to remaining natural resources are minimized and mitigated. To that end, the recommendation includes development standards and exemptions that will allow some development to avoid River Review. Staff does not support a situation where all development in the River Environmental overlay zone can avoid River Review by paying a fee. The City has an interest in ensuring that significant impacts from development are minimized to the extent practicable and that mitigation for unavoidable impacts is provided. A fee-in-lieu of River Review does not directly address impacts from development to natural resources areas and can not ensure that adequate mitigation is provided.		
Comment ID:	111	Commenter:	Ash Grove Cement - Glen Dollar
Comment:	Ash Grove Cement Company supports the views of the Working Waterfront Coalition.		
Response:	Thank you for your comment.		

Commenter: Audubon Society of Portland - Bob Sallinger

Comment ID:	212	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	The Portland Audubon Society is in strong support of the River Plan. We believe that the City has proposed a wise and reasonable path forward-one which at long last sets the river on a gradual course towards ecological health. It is time to move forward and adopt the River Plan.		
Response:	Thank you for your comment.		
Comment ID:	217	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	We encourage the City to establish a stakeholder committee to monitor the implementation of the plan, to create benchmarks for success and to set a time certain for a comprehensive review of the plans on the ground efficacy.		
Response:	The Office of Healthy Working Rivers will convene a North Reach Advisory Committee within the near future to evaluate implementation of the River Plan / North Reach.		
Comment ID:	218	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	We urge the City to move forward and to respect the extended public process that has brought us to this point. Please adopt the River Plan.		
Response:	Thank you for your comment.		

Comment ID:	214	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	We oppose the decision to allow industry to pay a fee in lieu rather than planting within or adjacent to the e-zone when they meet "standards" for projects such as conveyor belts. The planting requirement in the Draft River Plan was included after extensive discussion and was meant to ensure that the integrity and connectivity of the E-zone would be maintained while still allowing industry a fast track for development of certain types of projects. The amended proposal leaves certainty on the industry side but eliminates certainty on the environmental side. The development standards portion of the River Plan was one of the areas where Audubon felt the environmental community made significant concessions. We would not have been able to support that standards approach at all if we had known that the compensation would result simply in a fee in lieu rather than immediate plantings within or adjacent to the impacted environmental zone.		
Response:	We understand your concern. Thank you for your comment.		
Comment ID:	216	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	We applaud the City in establishing new funding mechanisms which would require industry to pay to mitigate for their direct habitat impacts and contribute limited additional funds to restoration. The alternatives that have been proposed by the Working Waterfront Coalition would continue to set industry's financial contributions far below their actual environmental impacts. We urge you to remain steadfast in adopting the funding mechanisms described in the Draft River Plan.		
Response:	Thank you for your comment.		
Comment ID:	213	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	The Conservation Community has compromised and we are at the line where further compromise would result in a plan that facilitates continued degradation rather than recovery. To that end, we are concerned about some last minute amendments that were added to the plan. We oppose the decision to change the bluff at the University of Portland from a P-Zone to a C-Zone. The decision to put a P-Zone on the bluff was extensively reviewed and affirmed by staff, committees and the Planning Bureau. We urge the City to require University of Portland to find more environmentally responsible ways to link their upper and lower campuses. If in fact the University of Portland is going to be allowed to develop on the bluff, the city should retain review authority via a C-Zone to ensure that environmental impacts are at least minimized and mitigated.		
Response:	Mayor Adams and Commissioner Fish are sponsoring a resolution directing the Bureau of Planning and Sustainability and others to draft a development agreement between the City and University of Portland that will allow the removal of the environmental conservation zone in exchange for mitigation commensurate with the impacts from the proposed gateway structure.		
Comment ID:	215	Commenter:	Audubon Society of Portland - Bob Sallinger
Comment:	We applaud the City in not abandoning regulatory authority, especially below Ordinary High Water. We urge you to stay steadfast in retaining the City's regulatory authority as described in the Draft River Plan.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Bernert Barge Lines - Jerry Grossnickle

Comment ID:	23	Commenter:	Bernert Barge Lines - Jerry Grossnickle
Comment:	Portland's Climate Action Plan, Objective 7, calls for protecting freight interconnections to increase the efficiency of the freight system. Where we have docks and land uses that are dependent on river traffic, we ought to protect and encourage them as much as we can, for these intermodal connections are vital to our region's prosperity and can sometimes be key to transportation efficiency. When a project comes along to increase dock capacity, especially if it will result in transportation efficiencies like modal shifts from truck to barge, Portland should encourage such as project with assistance. We definitely should not discourage such a project with high fees and unnecessary regulatory hoops.		
Response:	The River Plan / North Reach attempts to optimize multiple goals for the land along the Willamette River. The Plan recognizes the working harbor as a critical economic engine for the city and the importance of the multimodal system. The definition of river-related has been refined to allow more flexibility for industries that switch between primary reliance on river and rail transportation. Supporting transportation efficiencies is an important goal, but it is not the only goal for this area.		
Comment ID:	22	Commenter:	Bernert Barge Lines - Jerry Grossnickle
Comment:	We are currently talking with a company in the North Reach about beginning a new barge service taking about 7,000 tons a month on the river, which would replace about 235 truck-loads. In order to move our customer's product by barge, they will need to expand their dock facility. Under the proposed River Plan the added costs and added review time may result in a no-build decision. The fees, particularly the off-site mitigation fees, may be too high for the project to pencil out.		
Response:	Staff has worked closely with stakeholders and technical experts to develop reasonable and workable regulations. The plan reduces regulatory uncertainty and revises many unclear regulations. The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code. The off-site mitigation fee referenced in the comment is an example of the flexibility built into the River Plan code. The applicant will now have the option to conduct mitigation for the impacts of development on-site or off-site. The fee in lieu is a voluntary allowance that is not offered by the City today. The cost of the fee will be set at no more than what it will cost the City to conduct the mitigation at an off-site location.		
Comment ID:	24	Commenter:	Bernert Barge Lines - Jerry Grossnickle
Comment:	We should concentrate our remediation efforts on shoreline and waters adjacent to river frontage industrial properties that are not dependent on the river for their business operations. I like the formulation of environmental pearls strategically placed along the river.		
Response:	A key component of the overall River Plan / North Reach is the establishment and implementation of a City program dedicated to natural resource restoration in the North Reach - the River Restoration Program. The mission of the program is to acquire, restore and manage in perpetuity, key sites (or "pearls") for long term public benefits such as fish and wildlife habitat, water quality, and flood storage. The "pearls" alone will not go far enough toward achieving the River Plan goals of maintaining, conserving and enhancing natural resource features in the North Reach. The River Plan also includes strategies for achieving incremental improvements throughout the North Reach over time, as development or alterations occur. Together the pearls and the enhancement strategy will result in a more contiguous "string" that connects the key restoration sites.		
Comment ID:	25	Commenter:	Bernert Barge Lines - Jerry Grossnickle
Comment:	Let's come up with a reasonable plan to have a highly efficient and competitive transportation system and have ecosystems that work. Let's not have a regulatory system and fee structure that discourage efficient water transportation, and let's target fees that, combined with tax support from the broader public, are specific to well-thought-out riverfront projects that can be shown to significantly benefit native and endangered species.		
Response:	Thank you for your comment. The River Plan / North Reach represents a balance between enhancing the working harbor and its water-based transportation system and restoring natural resources in the North Reach.		

Commenter: BLET - Mike Neale

Comment ID:	12	Commenter:	BLET - Mike Neale
Comment:	The proposed Greenway trail crosses the P & W tracks at-grade several times in Linnton. Since trains don't have steering wheels the engineers can't swerve to avoid people, so any at-grade crossing of the tracks is a great safety concern for both our members and for the general public. The P & W has worked for several years with ODOT and the FRA to reduce the number of at-grade crossings to improve safety. I would urge you to take the time to work with the P & W to come up with alternate trail alignments that would avoid such unnecessary crossings of the railroad.		
Response:	Safety along the greenway trail is a priority for the River Plan and the issue has been a priority in all trail alignment discussions. The recommended trail alignment crosses the railroad track only where it must in order to make a complete trail connection (for example the trail must cross the tracks in NW 107th Ave in order to access the trail along the Linnton beach). It is also important to point out that bicycle and pedestrian trails coexist with and cross rail road tracks safely and securely in many locations across the country. The River Plan fully supports improving all at grade crossing to ensure the safety of people using the trail and people running trains along the track. City staff will work with P&W Railroad in the design of safe at grade crossings.		
Comment ID:	13	Commenter:	BLET - Mike Neale
Comment:	I am concerned about the negative financial impact the River Plan would impose on freight customers in Linnton. The plan as drafted looks very complicated and could end up delaying development as well as being very expensive. It seems that this plan will hurt our customers and could result in the loss of family wage jobs not only to our members but also to BLET and UTU divisions on the BNSF and UP railroads. I urge you to take additional time to work through the concerns of all business and come up with a truly balanced River Plan.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff will continue to work with stakeholders to refine the draft plan to address these multiple objectives as directed by City Council.		

Commenter: Brtherhd Locomotive Engr./Trainmen - Michael Neale

Comment ID:	114	Commenter:	Brtherhd Locomotive Engr./Trainmen - Michael Neale
Comment:	The Greenway Trail's proposed additional crossings of the railroad at grade and close proximity to both the railroad and our freight customers is a security concern, in terms of vandalism and terrorists. We are under the jurisdiction of the TSA in the Linnton area and our workers must have TWIC identification to work in such close proximity to port facilities. The Linnton area is included as part of a High Urban Threat Area so providing the public with additional access to sensitive areas via a trail seems to be a security concern.		
Response:	The Greenway Trail is a key component of the River Plan / North Reach. During the development of the plan, staff worked with stakeholders to identify a trail alignment that respects the safety, security and operational concerns of river-dependent industrial facilities, increases transportation options in the North Reach, and brings people to and along the river where possible. The vision for the Linnton waterfront trail is to provide access to the river without negatively impacting safety, security or industrial operations. Staff believes that this can be accomplished through careful design, and the City will work with all affected property owners when the time comes to discuss and study the feasibility of designing a trail that meets everyone's needs and expectations.		
Comment ID:	115	Commenter:	Brtherhd Locomotive Engr./Trainmen - Michael Neale
Comment:	The Greenway Trail's proposed additional crossings of the railroad at grade and close proximity to both the railroad and our freight customers is a concern for public safety. These crossings increase the risk of hazardous material spills due (if a train is forced to brake to avoid hitting someone) and somebody will get hurt.		
Response:	Safety along the greenway trail is a priority for the River Plan and the issue has been a priority in all trail alignment discussions. The recommended trail alignment crosses the railroad track only where it must in order to make a complete trail connection (for example the trail must cross the tracks in NW 107th Ave in order to access the trail along the Linnton beach). It is also important to point out that bicycle and pedestrian trails coexist with and cross rail road tracks safely and securely in many locations across the country. The River Plan fully supports improving all at grade crossing to ensure the safety of people using the trail and people running trains along the track.		

Comment ID:	324	Commenter:	Brtherhd Locomotive Engr./Trainmen - Michael Neale
Comment:	Recently I have become aware of the plans for the North Reach and I applaud the city's efforts. However, my union position focuses on the safety and health of our members, and there are a couple of areas in the River Plan that concern me.		
	I noticed that in Linnton the proposed Greenway Trail crosses the P&W tracks as-grade several times. Since trains don't have steering wheels the engineers can't swerve to avoid people, so any at-grade crossing of the tracks is a great safety concern for both our members and for the general public. In fact, the Portland & Western has worked for several years with ODOT and the FRA to reduce the number of at-grade crossings to improve safety. I would urge you to take the time to work with the Portland Western to come up with alternate trail alignments that would avoid such unnecessary crossings of the railroad.		
Response:	Safety along the greenway trail is a priority for the River Plan and the issue has been a priority in all trail alignment discussions. The recommended trail alignment crosses the railroad track only where it must in order to make a complete trail connection (for example the trail must cross the tracks in NW 107th Ave in order to access the trail along the Linnton beach). It is also important to point out that bicycle and pedestrian trails coexist with and cross rail road tracks safely and securely in many locations across the country. The River Plan fully supports improving all at grade crossing to ensure the safety of people using the trail and people running trains along the track.		
Comment ID:	325	Commenter:	Brtherhd Locomotive Engr./Trainmen - Michael Neale
Comment:	Recently I have become aware of the plans for the North Reach and I applaud the city's efforts. However, my union position focuses on the safety and health of our members, and there are a couple of areas in the River Plan that concern me.		
	I am concerned about the negative financial impact the River Plan would impose on freight customers in Linnton. The plan as drafted looks very complicated and could end up delaying development as well as being expensive. I'm a locomotive engineer, not a civil engineer or planner, but it seems to me that this plan will hurt our customers and could result in the loss of family wage jobs not only to our members but also to BLET and UTU divisions on the BNSF and UP railroads.		
Response:	Under the new River Plan / North Reach regulations it should not take longer to get a City permit, although it may cost more due to the requirement to mitigate for development impacts. Mitigation is a requirement that applies currently on all water bodies in the City except the Willamette, due to the age of the regulations. However, the Plan contains several key recommendations that support economic prosperity in the North Reach, including removal of the greenway setback in the river industrial overlay zone, strengthening protection of the industrial land supply, creating a standards track that allows certain development to bypass review and creating an optional process for coordinated permit reviews by local, state and federal agencies.		
Comment ID:	117	Commenter:	Brtherhd Locomotive Engr./Trainmen - Michael Neale
Comment:	I encourage you to continue working with the Portland & Western Railroad to solve concerns about safety and security along the Greenway Trail.		
Response:	When it comes time to actually design a trail, the City will be sure that safety (e.g. at-grade crossings, rail-with-rail alignments) and security (e.g. separation, fencing, and signage) are addressed. The portion of the trail that crosses the tracks can be designed in coordination with Portland & Western Railroad, with safety and security in mind.		
Comment ID:	119	Commenter:	Brtherhd Locomotive Engr./Trainmen - Michael Neale
Comment:	I encourage the city to continue to work with all stakeholders to come up with a plan that maintains healthy businesses in the North Reach.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff will continue to work with stakeholders to refine the draft plan to address these multiple objectives as directed by City Council.		

Comment ID:	326	Commenter:	Brtherhd Locomotve Engr./Trainmen - Michael Neale
Comment:	I urge you to take additional time to work through the concerns of all businesses and come up with a truly balanced River Plan.		
Response:	Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations. The River Plan / North Reach will not go into effect until January 1, 2011. During the time between adoption of the plan's policies, objectives and regulations, and January 1, 2011 staff will continue to work with stakeholders to finalize the technical details of the mitigation fee-in-lieu. The plan resolution includes a workplan that directs staff to bring the details to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		
Comment ID:	118	Commenter:	Brtherhd Locomotve Engr./Trainmen - Michael Neale
Comment:	The second concern I have is the ultimate financial impact the River Plan and specifically the River Review, could have on businesses that are ultimately P&W's freight customers in the North Reach. While the City has working hard to try to coordinate the permitting process, these new regulations will still add time and financial burden causing our customers to cancel plans for expansion or to relocate.		
Response:	The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code (for example, it allows off site mitigation through fees-in-lieu).		

Commenter: Carl Levin and Laura Zalent

Comment ID:	316	Commenter:	Carl Levin and Laura Zalent
Comment:	We request that the Portland City Council adopt the Willamette River Greenway Trail alignment as envisioned in the River Plan North Reach Recommended Draft November 2009 now.		
Response:	Thank you for your comment.		
Comment ID:	317	Commenter:	Carl Levin and Laura Zalent
Comment:	We request that no mitigation sites be designated in areas where the trail is to be located as it is our understanding that mitigation sites would not permit any conflicting uses such as a trail.		
Response:	Staff supports the development of the greenway trail on sites where the trail alignment is identified. The fact that a site might also be a mitigation bank site should not preclude development of the greenway trail. Volume 1A has been amended to make this policy statement clearly, and the City's future mitigation bank certification process will ensure that trails may not be excluded from bank sites.		

Commenter: Cathy Hume

Comment ID:	320	Commenter:	Cathy Hume
Comment:	I request that the Portland City Council adopt the Willamette River Greenway Trail alignment as envisioned in the River Plan North Reach Recommended Draft November 2009 now.		
Response:	Thank you for your comment.		

Comment ID:	321	Commenter:	Cathy Hume
Comment:	I request that any mitigation or restoration sites that are to be designated not preclude the development of the multipurpose Willamette River Greenway Trail alignment.		
Response:	Staff supports the development of the greenway trail on sites where the trail alignment is identified. The fact that a site might also be a mitigation bank site should not preclude development of the greenway trail. Volume 1A has been amended to make this policy statement clearly, and the City's future mitigation bank certification process will ensure that trails may not be excluded from bank sites.		

Commenter: Cesar del Rosario

Comment ID:	266	Commenter:	Cesar del Rosario
Comment:	I support the trail alignment proposed in the North Reach River Plan. This alignment combined with the bike master plan strengthens the commitment to more safe, off-street trails. This trail will take cars off the road providing more capacity for industrial and commercial use.		
Response:	Thank you for your comment.		

Commenter: Coalition for a Livable Future - Mara Gross

Comment ID:	123	Commenter:	Coalition for a Livable Future - Mara Gross
Comment:	You have before you a balanced plan that addresses social, economic, and environmental objectives. In fact, community groups have made significant concessions to achieve this balance.		
Response:	Thank you for your comment. Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations.		
Comment ID:	126	Commenter:	Coalition for a Livable Future - Mara Gross
Comment:	The plan has been nearly a decade in development. It included a wide array of stakeholders, and was reviewed extensively by the planning commission. Kudos to the city for the hard work it took to get here. You, and we, have worked in good faith, creating a plan that should not be undermined at the 11th hour.		
Response:	Thank you for your comment.		
Comment ID:	127	Commenter:	Coalition for a Livable Future - Mara Gross
Comment:	A healthy river is important to a healthy city and a healthy region. This plan helps us get there. In sum, CLF believes that no further changes should be made to the draft River Plan. Please adopt the Plan.		
Response:	Thank you for your comment.		

Comment ID:	124	Commenter:	Coalition for a Livable Future - Mara Gross
Comment:	Industry needs to pay its fair share, so the river doesn't continue to degrade and so citizens don't have to cover costs of development rather than externalizing them.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. The proposed River Plan regulations are intended to ensure that all development proposals within the River-environmental Overlay pay proportionate and fair compensation for unavoidable impacts to natural resources and functional values.		
Comment ID:	125	Commenter:	Coalition for a Livable Future - Mara Gross
Comment:	It is important that the city maintain its regulatory authority in the North Reach. Much more than state and federal agencies, you speak for us, for our community and our river.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Columbia Slough Watershed Council - Jane Van Dyke

Comment ID:	303	Commenter:	Columbia Slough Watershed Council - Jane Van Dyke
Comment:	The proposed North Portland Greenway Trail would provide a critical link in Metro's 40-mile loop trail system and will connect many of the existing trail sections and North Portland to the rest of the City. Likewise, it will provide an important link for the City to North Portland. This will make the Columbia Slough Watershed more accessible to a greater number of residents of the Metro area, which is one of the key elements of the Columbia Slough Action Plan.		
Response:	Thank you for your comment.		
Comment ID:	304	Commenter:	Columbia Slough Watershed Council - Jane Van Dyke
Comment:	There is widespread support in the Columbia Slough Watershed community for increased bike connectivity to all parts of the City and region. While the proposed North Portland Greenway Trail provides some of the connectivity, the proposed alignment may conflict with operations, safety and security at waterfront facilities in the Willamette Harbor. Determining the final route of the alignment will be a challenging proposition. Placing the trail away from the water to minimize or avoid potential conflict with specific waterfront uses should be weighed against the loss of rewarding experiences from proximity and vistas offered by the river. We understand that this is a fine balancing act and all parties must be willing to compromise if a trail alignment is to be agreed upon. Some property uses depend entirely on access to the river, could not thrive otherwise, and truly represent the highest and best use. Significant disturbances to such properties and their operations should be avoided.		
Response:	The Greenway Trail is a key component of the River Plan / North Reach. During the development of the plan, staff worked with stakeholders to identify a trail alignment that respects the safety, security and operational concerns of river-dependent industrial facilities, increases transportation options in the North Reach, and brings people to and along the river where possible. When it comes time to actually locate and design a trail connection, the City will be sure that safety (e.g. at-grade crossings, rail-with-rail alignments) and security (e.g. separation, fencing, and signage) are addressed.		

Comment ID:	305	Commenter:	Columbia Slough Watershed Council - Jane Van Dyke
Comment:	The Columbia Slough Watershed Council encourages the City to continue its efforts and discussions with the ultimate goal of defining a North Portland Greenway Trail that can be accepted by the neighboring property owners and business operations as well as those residents of the metro area who will benefit from its adoption and construction. We believe that a workable compromise can be achieved and embraced by all parties.		
Response:	Thank you for your comment.		

Commenter: Commercial Real Estate Economic Coalition

Comment ID:	133	Commenter:	Commercial Real Estate Economic Coalition
Comment:	There is no more important element to this economic strategy than the Portland Harbor, which provides 20,000 high paying traded-sector jobs and substantial spin off employment, estimated at one of every nine jobs in the city. Portland is also a competitive ocean port. It is very important for the City to protect and promote the harbor, to accommodate the retention/expansion of existing companies and attraction of new companies. Do not endanger the economic vitality of the Portland Harbor.		
Response:	River Plan staff agree that promoting economic prosperity in the North Reach is a very important goal, but this goal must be balanced with other plan objectives, including watershed health. The River Plan contains several key recommendations that support economic prosperity in the North Reach, including removal of the greenway setback in the River Industrial overlay zone, strengthening protection of the industrial land supply, creating a standards track that allows certain development to bypass review and creating an optional process for coordinated permit reviews by local, state and federal agencies.		

Comment ID:	135	Commenter:	Commercial Real Estate Economic Coalition
Comment:	We urge the City Council to balance the economic and environmental benefits of the plan. Keep working with the WWC to assure this balance is achieved.		
Response:	Staff has worked closely with stakeholders, including the WWC, and technical experts to develop reasonable and workable regulations.		

Comment ID:	134	Commenter:	Commercial Real Estate Economic Coalition
Comment:	Don't add extra time and costs to permitting that could discourage the expansion of existing and attraction of new companies.		
Response:	<p>The River Plan will implement code changes that could reduce the amount of time it takes to get a permit:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. 		

Commenter: Conf. Tribes of the Grand Ronde - Michael Karnosh

Comment ID:	85	Commenter:	Conf. Tribes of the Grand Ronde - Michael Karnosh
Comment:	Grand Ronde people eat fish from the Willamette River and have done so for thousands of years, so their health and well being depend on the availability of healthy, uncontaminated fish. Unless these fish and the habitats they depend on are given high priority in the face of development pressures, their populations will continue to decline, and the cultures of Grand Ronde will likewise struggle to survive. For these reasons, the protection, restoration and enhancement of water quality and juvenile native fish habitat should receive top priority from the City and other governments.		
Response:	Thank you for your comment. Development over time in the North Reach has resulted in habitat loss and fragmentation and the alteration of natural systems. One of the key watershed health objectives of the River Plan / North Reach is to enhance and restore watershed functionality within, and directly adjacent to, the North Reach, in order to improve conditions for fish and wildlife, improve watershed health and protect public health and safety.		
Comment ID:	84	Commenter:	Conf. Tribes of the Grand Ronde - Michael Karnosh
Comment:	In the box on page 54, entitled "Native Peoples of the Willamette Valley" it says, "Eventually, treaties were signed with the tribal governments..." In fact, there was only one treaty ratified by Congress that gave ownership of the Willamette Valley to the United States. That treaty was called the Treaty with the Kalapuya, Etc. of January 22, 1855. Please correct the above mentioned sentences to reflect that a single treaty ceded ownership of the Willamette Valley to the United States.		
Response:	Thank you for this information. Staff will correct the document to reflect your comments.		
Comment ID:	87	Commenter:	Conf. Tribes of the Grand Ronde - Michael Karnosh
Comment:	Grand Ronde is happy to see that increasing the frequency and depth of communication with tribal governments is a high priority project for the City. Grand Ronde looks forward to continuing one on one, government-to-government dialogue with the City.		
Response:	Thank you for your comment. The City greatly appreciates the Grande Ronde's involvement with the River Plan.		
Comment ID:	88	Commenter:	Conf. Tribes of the Grand Ronde - Michael Karnosh
Comment:	There are many known archaeological sites along and near the Lower Willamette River, and many unknown sites are suspected to be in the vicinity. Often local governments and other permittees will rely on the Army Corps of Engineers' permitting process to initiate consultation with tribes regarding Traditional Cultural Properties (TCPs). It is Grand Ronde's hope that the City, when planning and implementing ground-disturbing projects, will initiate government-to-government consultation regarding TCPs directly with Grand Ronde before the Army Corps of Engineers permit process begin.		
Response:			
Comment ID:	89	Commenter:	Conf. Tribes of the Grand Ronde - Michael Karnosh
Comment:	Grand Ronde, as a member of the Portland Harbor Natural Resources Trustee Council, greatly appreciates the City's support and assistance in planning restoration projects within the Portland Harbor Study Area. Many of the same projects found in the River Plan/North Reach are found in the Trustee Council's Restoration Plan. The City's coordination and communication with the Trustee Council has been a large benefit, and will be vital to the success of habitat restoration related to the Portland Harbor Cleanup, the Natural Resources Damage Assessment and beyond. Many of the processes associated with Portland Harbor have not been quick or easy, but we are confident the City will continue doing an excellent job of coordinating its own efforts with those of the Trustee Council.		
Response:	Thank you for your comment. The River Plan / North Reach has benefited from the stakeholder input of the Portland Harbor Natural Resources Trustee Council and it's staff. The City will look forward to continued coordination with the Grande Ronde tribe and the Trustee Council, as appropriate.		

Commenter: Dan Dishongh

Comment ID:	377	Commenter:	Dan Dishongh
Comment:	During the testimony given on February 17th, George Webb the owner of Harmer Steel, stated that the only land available for his business to expand is the land that is part of Linnton Plywood Mill Site. This is not true. I have provided you with a case study of the land in the Linnton Industrial area other than the mill site. The study area runs from the rail road track to the river and from 107th Ave. to 112th Ave. All the property in this area is for sale and is blighted industrial area. Harmer Steel has room to expand business to places other than the Mill Site. Harmer Steel is also underutilizing the land he has today. Linnton does not have access to the river. There is a way for industry to work with the Community of Linnton to give us access to the river in our front yard.		
Response:	Thank you for your comment.		

Commenter: Darise Weller

Comment ID:	28	Commenter:	Darise Weller
Comment:	Emergency preparedness has a place in the North Reach Plan and was left out. I recently heard Yumei Wang, state geologist, Emergency Response Team Leader talk about how unprepared we are for the major Cascadia subduction zone earthquake which is overdue to occur. 90% of our fuel sources for our region are located in the Linnton-Wilbridge area. To keep from crippling the recovery of our city and to protect the Willamette from devastating pollution, the North Reach Plan should include relocating fuel sources to other areas and investigate how to access critical fuels that will be isolated in the event of a major earthquake.		
Response:	Emergency preparedness is a citywide initiative that is led by the Portland Office of Emergency Management (POEM) and will likely be a key component of the Portland Plan. The River Plan is not proposing changes in the North Reach that would exacerbate conditions in an emergency but we are also not recommending relocation of the tank farms or pipelines. We are recommending a variety of transportation improvements which, if implemented, could improve evacuation capacity in addition to the facilitating freight movement.		
Comment ID:	136	Commenter:	Darise Weller
Comment:	Emergency preparedness has a place in the North Reach Plan and was left out. I recently heard Yumei Wang, state geologist, Emergency Response Team Leader talk about how unprepared we are for the major Cascadia subduction zone earthquake which is overdue to occur. 90% of our fuel sources for our region are located in the Linnton-Wilbridge area. To keep from crippling the recovery of our city and to protect the Willamette from devastating pollution, the North Reach Plan should include relocating fuel sources to other areas and investigate how to access critical fuels that will be isolated in the event of a major earthquake. To keep from crippling the recovery of our city and to protect the Willamette river from potential devastating pollution, the NRP should include relocating fuel sources to other areas of less risk and investigate how to access critical fuels that will be isolated in the event of a major earthquake.		
Response:	Emergency preparedness is a citywide initiative that is led by the Portland Office of Emergency Management (POEM) and may be a component of the Portland Plan. The River Plan is not proposing changes in the North Reach that would exacerbate conditions in an emergency but we are also not recommending relocation of the tank farms or pipelines. We are recommending a variety of transportation improvements which, if implemented, could improve evacuation capacity in addition to the facilitating freight movement.		

Commenter: Darlene Betat

Comment ID:	247	Commenter:	Darlene Betat
Comment:	Please adopt the Draft River Plan with Mayor Adam's proposed amendments. It is time to restore habitat for fish, wildlife and people!		
Response:	Thank you for your comment.		
Comment ID:	245	Commenter:	Darlene Betat
Comment:	Based on my personal observations, the river, its wetlands and its uplands are a vital resource for birds and wildlife during all seasons. I love that river and all the wildlife it supports. It is a Portland gem that needs to be polished, cared for again.		
Response:	Thank you for your comment.		
Comment ID:	248	Commenter:	Darlene Betat
Comment:	It is time to ask Industry to pay their fair share. Industry should mitigate for their impacts to the river and should contribute to helping restore the river.		
Response:	Thank you for your comment.		
Comment ID:	246	Commenter:	Darlene Betat
Comment:	It is truly unimaginable that the city would give up its regulatory authority below ordinary high water. Please preserve my right, your right, and every Portlander's right to have a say over what happens in our river!		
Response:	Thank you for your comment.		

Commenter: David Jolma

Comment ID:	226	Commenter:	David Jolma
Comment:	I urge you to adopt the draft River Plan for the North Reach of the Willamette River. You don't have to choose between the environment and jobs. I've seen many instances where environmental restoration and habitat can (and should) co-exist, without interfering with the work that needs to be done.		
Response:	Thank you for your comment.		

Comment ID:	227	Commenter:	David Jolma
Comment:	The river needs help and the modest increases in regulation this Plan proposes will be a big help. Please do not let the waterfront employers push the city into giving up its regulatory authority over what happens along the river's edge.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: David Maier

Comment ID:	268	Commenter:	David Maier
Comment:	I request the Portland city Council adopt the Willamette River Greenway Trail alignment as envisioned in the River Plan North Reach Recommended Draft November 2009 now.		
Response:	Thank you for your comment.		
Comment ID:	269	Commenter:	David Maier
Comment:	The Willamette River Greenway Trail alignment will become a vital and necessary link in the regional trail and transportation system (that includes the 40-Mile Loop Trail, the Eastbank Esplanade, Springwater Trail and others. To date, the North Portland segment represents a major gap in the Regional network. The Willamette River Greenway trail is a piece of infrastructure connecting residents with jobs on the working waterfront while also affording a connection to the rest of the city.		
Response:	Thank you for your comment.		
Comment ID:	270	Commenter:	David Maier
Comment:	I request that no mitigation sites be designated in areas where the trail is to be located as it is my/our understanding that mitigation sites would not permit any conflicting uses such as a trail.		
Response:	Trails will not be excluded from mitigation bank sites in the North Reach. With proper design, trails and ecologically sensitive sites can coexist. Development of the Greenway Trail is an important public policy objective as is conservation of significant natural resource areas. In the North Reach, as in other parts of the city, development of the trail will be subject to additional development standards and/or land use review approval criteria aimed at avoiding and minimizing the impacts from the trail on the resource area.		

Commenter: David Thompson

Comment ID:	236	Commenter:	David Thompson
Comment:	I want to strongly register my support for preserving the Baltimore Woods habitat and making this area permanently accessible to pedestrians and non-motorized vehicles by establishing a greenway trail.		
Response:	Thank you for your comment.		

Commenter: Deanna Mueller-Crispin

Comment ID:	65	Commenter:	Deanna Mueller-Crispin
Comment:	Many people have had input into the making of this Plan. It's high time that we started making it happen.		
Response:	Thank you for your comment.		
Comment ID:	280	Commenter:	Deanna Mueller-Crispin
Comment:	My husband and I have sail boated on the North Reach, and have benefited from its beauty and the restorative recreation it offers us city-dwellers. The Draft Plan will enhance both the recreational and commercial potential of the River. In order to maintain and restore river quality for fish, wildlife and people, I urge City Council to adopt the Draft River Plan with the Mayors proposed amendments.		
Response:	Thank you for your comment.		
Comment ID:	282	Commenter:	Deanna Mueller-Crispin
Comment:	The Plan has been developed over several years, and has undergone long review. It should not be subject to last-minute industry demands.		
Response:	Thank you for your comment.		
Comment ID:	281	Commenter:	Deanna Mueller-Crispin
Comment:	Without a strong funding structure, the Plan will not be implemented. Industry must do its part to clean up the river. Industry has a responsibility to restore past degradation of the river, and equal responsibility to mitigate any future adverse impacts of development/operation.		
Response:	Thank you for your comment.		
Comment ID:	64	Commenter:	Deanna Mueller-Crispin
Comment:	I support the North Reach River Plan with the mayor's proposed amendments. The current Plan supports the River Concepts' guiding principles that the city's economic and natural systems are interrelated, and that the costs and impacts of reestablishing the river must be allocated equitably among the citizens including corporate citizens. Industry has not had to incorporate environmental costs of doing business in the past; in needs to provide its fair share in the future. To make this all work, the City needs to maintain its regulatory authority below "ordinary high water."		
Response:	River Plan Staff agrees that it is important to maintain regulatory authority below ordinary high water. Thank you for your comment.		

Commenter: Doug Geisler

Comment ID:	265	Commenter:	Doug Geisler
Comment:	I live in St. Johns and would love the opportunity to ride from there to downtown along the river on a path free from cars and trucks.		
Response:	Thank you for your comment.		
Comment ID:	264	Commenter:	Doug Geisler
Comment:	I support the North Reach River Plan.		
Response:	Thank you for your comment.		

Commenter: Ed and Lynn Stover

Comment ID:	228	Commenter:	Ed and Lynn Stover
Comment:	I support the trail alignment proposed in the North Reach River Plan. A waterfront trail would be wonderful, particularly one that connects North Portland with the bridge/trail system downtown. Certainly people who commute to work by bike or foot would use it, as would retired people such as ourselves.		
Response:	Thank you for your comment.		

Commenter: Elisabeth Minthorn

Comment ID:	272	Commenter:	Elisabeth Minthorn
Comment:	As a member of Audubon Portland, I urge you to consider adopting the draft River Plan which has been in process for a number of years.		
Response:	Thank you for your comment.		
Comment ID:	274	Commenter:	Elisabeth Minthorn
Comment:	We all care deeply about our beautiful Northwest and I am sure a plan for those concerned can be created.		
Response:	Thank you for your comment.		
Comment ID:	273	Commenter:	Elisabeth Minthorn
Comment:	I urge you to restore the riverside areas for wildlife and give industry a chance to develop and pay for appropriate use of this rapidly degrading area. One only has to drive past Montgomery Park and access Highway 30 West to become aware of the intense industrial odors in the area.		
Response:	Thank you for your comment.		

Commenter: Friends of Baltimore Woods

Comment ID:	310	Commenter:	Friends of Baltimore Woods
Comment:	The Friends of Baltimore Woods enthusiastically supports the proposal to move ahead with the planning and ultimate construction of the North Portland Willamette Greenway trail from the Steel bridge to Kelley Point park with Regional Flexible Funding.		
Response:	Thank you for your comment.		
Comment ID:	311	Commenter:	Friends of Baltimore Woods
Comment:	The Willamette Greenway trail would create important access to the regional trail system for walkers and bikers since it connects to the 40-Mile Loop trail. The trail will create a safe, fast route for bike commuting to work, school, and local shopping without the concern of on street auto traffic and it would be important addition to Portland's transportation infrastructure.		
Response:	Thank you for your comment.		
Comment ID:	312	Commenter:	Friends of Baltimore Woods
Comment:	We ask you to support Regional Flexible funding for the planning of the North Portland Willamette Greenway trail.		
Response:	Thank you for your comment.		

Commenter: Friends of Cathedral Park NA Board

Comment ID:	68	Commenter:	Friends of Cathedral Park NA Board
Comment:	The Friends of Cathedral Park NA board members ask you to support recovery of riverbank habitat for threatened water species and create better standing regulation. Existing regulation have not been enough to keep the North Reach from intense degradation environmentally.		
Response:	Thank you for your comment.		
Comment ID:	69	Commenter:	Friends of Cathedral Park NA Board
Comment:	The Friends of Cathedral Park NA board members ask you to support adoption of the plan now without delaying any longer to keep the momentum going toward environmental restoration.		
Response:	Thank you for your comment.		

Comment ID:	71	Commenter:	Friends of Cathedral Park NA Board
Comment:	The Friends of Cathedral Park NA board members ask you to insist industry should pay its fair share. The alternative fee being proposed is less than their fair share and would not lead to restoration of the Willamette River.		
Response:	The City is interested in ensuring that all development proposals within the proposed River-environmental Overlay keep existing natural resource functionality in place as much as practicable and that lost resource function is fully replaced on the same site or on another site within the North Reach. The proposed River Plan regulations are intended to ensure that development pays proportionate and fair compensation for unavoidable impacts to natural resources and functional values.		
Comment ID:	70	Commenter:	Friends of Cathedral Park NA Board
Comment:	The Friends of Cathedral Park NA board members ask you to retain regulatory authority over the river so citizens have a voice over what happens in the river.		
Response:	Thank you for your comment. The River Plan proposal intends to retain regulatory authority. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans and the complete ecology of the area around the development site.		

Commenter: Friends of Cathedral Park Neighborhood Association

Comment ID:	357	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	We support the proposed alignment of the east side Willamette Greenway Trail.		
Response:	Thank you for your comment.		
Comment ID:	49	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	In 2 ½ years of meetings about the River Plan, it is shocking that after hours and hours of meetings and taxpayer resources, our industrial partners have rejected all options and even complain about standing regulations that have contributed to the endangered species crisis we are now facing. I urge the City Council to adopt the North Reach Plan without further delay.		
Response:	Thank you for your comment. River Plan staff have and will continue to work with stakeholders to strike the right overall balance among the multiple objectives of the plan as directed by City Council.		
Comment ID:	355	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	I would like to reiterate our support for the North Reach Plan and urge you to pass it.		
Response:	Thank you for your comment.		
Comment ID:	50	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	The eleven-mile stretch which makes up the North Reach once offered at least 25+ miles of prime riverside habitat necessary for now endangered species. There is currently close to zero riverside habitat in the same stretch. The restoration of the North Reach will greatly affect the health of the entire river both north and south.		
Response:	Thank you for your comment.		

Comment ID:	356	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	We agree with the zoning overlay changes that will support preservation for our remnant natural areas and connectivity such as Baltimore Woods in St. Johns.		
Response:	Thank you for your comment.		
Comment ID:	358	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	I would also like to say a few words about balance or the lack of it that has led us to the current environmental crisis on the Willamette River. The Oregon Aquatic Habitat guide lists restoration goals as: "change the trend of aquatic habitat function from one of a diminishing ability to support salmonids and other organisms to one that supports a complex, self sustaining system." We should not lower our standards to less than this. I think the forward thinking people of Portland deserve better.		
Response:	Thank you for your comment.		
Comment ID:	359	Commenter:	Friends of Cathedral Park Neighborhood Association
Comment:	The people of Portland understand the river as community property. It is a wider community value to have a restored, healthy river that supports life. But in order to protect it, we also have to protect the riverbanks. If we were to truly seek balance, as our industrial partners like to say, we would follow the advice of biologists and make all land within 200 feet of the river edge on either side a riparian setback in other words community owned property. Then we could do restoration work. If we were to adopt such an ordinance, industries could then negotiate their use of the riparian areas. If the proposed use resulted in negative impacts such as an outfall, chemical contamination, etc, our city representatives could simply deny the proposal until it was to standard. That would be the beginning of balance.		
Response:	Thank you for your comment.		

Commenter: Frnd Kellogg/Mt.Scott Creeks Wtrshd-Steve Berliner

Comment ID:	258	Commenter:	Frnd Kellogg/Mt.Scott Creeks Wtrshd-Steve Berliner
Comment:	We strongly support and recommend adoption by Portland of the Draft North Reach River Plan.		
Response:	Thank you for your comment.		
Comment ID:	259	Commenter:	Frnd Kellogg/Mt.Scott Creeks Wtrshd-Steve Berliner
Comment:	Please do not let the polluters make the rules or avoid them. The Willamette River is the greatest geologic, scenic, recreational, and commercial treasure the citizens of the Portland Region have, and it should be protected for all of us, not left prey to the narrowly focused industrial interests and property owners.		
Response:	Thank you for your comment.		

Comment ID:	261	Commenter:	Frnd Kellogg/Mt.Scott Creeks Wtrshd-Steve Berliner
Comment:	Please adopt the Draft River Plan, and do not make concessions to narrow interests like individual property owners. The River is too important to the general welfare of all citizens to shop its habitat and health up into pieces that suit only a few here, a few there.		
Response:	Thank you for your comment.		
Comment ID:	263	Commenter:	Frnd Kellogg/Mt.Scott Creeks Wtrshd-Steve Berliner
Comment:	A great deal of time and energy have gone into drafting an effective Plan that meets the needs of the City and the citizenry, and importantly the fish and the wildlife. Do not compromise it now!		
Response:	Thank you for your comment.		
Comment ID:	260	Commenter:	Frnd Kellogg/Mt.Scott Creeks Wtrshd-Steve Berliner
Comment:	We are doing all we can, and working hard to contribute clean, high quality waters of the State to the Willamette River. Please send the message out to all tributary reaches of our region that the Willamette River habitat and water quality is a top priority of your City.		
Response:	Thank you for your comment.		

Commenter: Gabriel Sheridan

Comment ID:	229	Commenter:	Gabriel Sheridan
Comment:	I support the preservation of the Baltimore Woods in the Cathedral Park area of St. Johns. It provides a much needed connection with Oregon White Oaks for wildlife and hiking between Cathedral Park and Pier Park. Please vote to save and purchase this area for all residents of our city.		
Response:	Thank you for your comment.		

Commenter: Gunderson & The Greenbrier Companies - Dave Harvey

Comment ID:	40	Commenter:	Gunderson & The Greenbrier Companies - Dave Harvey
Comment:	Remaining issues with the River Plan include conversion of industrial property.		
Response:	The proposed River Plan does not require conversion of industrial property to vegetated area. The recommended vegetation enhancement standard has been designed to be flexible. It will accommodate on-site planting where ever the property owner prefers, including on the roof of a building. The standard also includes an incentive for planting on or near the river bank that if utilized will result in less overall planting area. And, the standard allows the applicant to pay a fee-in-lieu of planting on-site.		

Comment ID:	74	Commenter:	Gunderson & The Greenbrier Companies - Dave Harvey
Comment:	Remaining issues with the River Plan include a process that is complicated and duplicative.		
Response:	The improvements to the regulatory process proposed by the River Plan provide clearer and more flexible regulations, and also recommends process improvements to facilitate coordination among agencies that review projects that affect the river below the ordinary high water mark. The proposed Willamette River Early Project Review process is intended to foster collaborative dialogue among project sponsors and regulatory agencies. This will result in clarification of agency requirements and decrease the risk of conflicting or out-of-sequence governmental requirements that may result in project delays. Please see the flow chart in the amendments to the River Plan.		
Comment ID:	75	Commenter:	Gunderson & The Greenbrier Companies - Dave Harvey
Comment:	Remaining issues with the River Plan include proposed mitigation fees that are not proportional to actual impact.		
Response:	The proposed River Plan regulations require mitigation for unavoidable impacts from development to be in-kind and to compensate for the actual impacts caused to the natural resources and functional values on the site. If on-site mitigation is not practicable or ecologically beneficial, off site mitigation may be provided through a fee in-lieu or the purchase of credits from a City-certified mitigation bank. River Plan staff agrees that the proposed fees must be proportional to actual impact. The methodology will be reviewed by a science review panel, a peer group of experts, to ensure that they are sound. The costs will be the subject of discussion with stakeholders over the summer.		
Comment ID:	41	Commenter:	Gunderson & The Greenbrier Companies - Dave Harvey
Comment:	The City's insistence in approving work that occurs below the Ordinary High Water Mark represents a broken process because it is duplicative of multiple state and federal agencies and industry has demonstrated that, for a project whose impact is below OHW, if you do what is good for the salmon, you will do what is good for the environment. We are willing to spend money but not willing to waste money.		
Response:			

Commenter: Gunderson LLC

Comment ID:	144	Commenter:	Gunderson LLC
Comment:	We hope that the final River Plan and code will be livable IF a number of statements are actually acted upon. Many have not yet been acted upon and we do not see them reflected in the wording of the Plan or the Code. Thus the need for further development until we actually see if we have agreement or not.		
Response:			
Comment ID:	140	Commenter:	Gunderson LLC
Comment:	Gunderson supports the goals of the River Plan, to improve the river environment in a sustainable way.		
Response:	Thank you for the comment.		

Comment ID:	141	Commenter:	Gunderson LLC
Comment:	Gunderson supports the goals of the River Plan: to support a streamlined permitting process that will support a healthy environment and healthy business. We have spent money and are committed to spending more money on improving the river, but we want to spend money on improving the river, not on more paperwork. A consultant's study showed that with the River Review process, off-site mitigation, and vegetation- in- lieu would add costs of approximately \$185,000 for a proposed expansion project, or 6% of project costs.		
Response:	We do not know how you have arrived at a \$185,000 figure and therefore cannot respond to that comment.		
Comment ID:	143	Commenter:	Gunderson LLC
Comment:	We are asking that you not take action on any of the plan until the details are resolved. These details are not trivial and include such issues as how natural resource values will be calculated and the cost of mitigation. Let's keep working on this thing to actually complete it, rather than approve it when it is not fully baked.		
Response:	The River Plan / North Reach will not go into effect until January 1, 2011. During the time between adoption of the plan's policies, objectives and regulations, and January 1, 2011 staff will continue to work with stakeholders to finalize the technical details of the mitigation fee-in-lieu. The plan resolution includes a workplan that directs staff to bring the details to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		

Commenter: Harmer Steel - George Webb

Comment ID:	66	Commenter:	Harmer Steel - George Webb
Comment:	Three branches of the Greenway Trail in the Linnton area will significantly impact our industrial operations: the NW 107th St branch, the NW Front Avenue branch and the top-of-bank branch. Overall, we do not believe that it is appropriate for any business to be so severely impacted by the Trail. Putting pedestrians and bicyclists in direct conflict with our heavy industrial operation is not appropriate, and in the end will create significant safety, security, operational and liability impacts. We would ask that the Greenway Trail not be located in these areas. At the very least, we would ask that the NW 107th and top-of-bank branches be eliminated.		
Response:	The vision for the Linnton waterfront trail is to provide access to the river without negatively impacting safety, security or industrial operations. Staff believes that this can be accomplished through careful design, and hope that Harmer Steel and other property owners will work with us when the time comes to discuss and study the feasibility of designing a trail that meets everyone's needs and expectations.		
Comment ID:	137	Commenter:	Harmer Steel - George Webb
Comment:	Three branches of the Greenway Trail in the Linnton area will significantly impact our industrial operations: the NW 107th St branch, the NW Front Avenue branch and the top-of-bank branch. Overall, we do not believe that it is appropriate for any business to be so severely impacted by the Trail. Putting pedestrians and bicyclists in direct conflict with our heavy industrial operation is not appropriate, and in the end will create significant safety, security, operational and liability impacts. We would ask that the Greenway Trail not be located in these areas. At the very least, we would ask that the NW 107th and top-of-bank branches be eliminated.		
Response:	The vision for the Linnton waterfront trail is to provide access to the river without negatively impacting safety, security or industrial operations. Staff believes that this can be accomplished through careful design, and hope that Harmer Steel and other property owners will work with us when the time comes to discuss and study the feasibility of designing a trail that meets everyone's needs and expectations.		

Commenter: ILWU - Bruce Holte

Comment ID:	148	Commenter:	ILWU - Bruce Holte
Comment:	Make the plan balanced. The plan doesn't propose an economic development strategy- it simply lists the assistance programs already available. It would be better if the plan committed the city to increase investment in the working harbor, especially on freight mobility.		
Response:	The River Plan / North Reach contains several key recommendations that support economic prosperity in the North Reach, including preserving the industrial land supply, creating a standards track that allows certain development to bypass review and revising the proposed zoning code regulations to create more certainty. The Plan also recommends a 10-year program of public investments that improve competitiveness or expand development capacity in the North Reach. Although the River Plan does not ensure funding for implementation, creation of the investment list helped elevate a public-private investment partnership, support intergovernmental coordination and identify economic development priorities among the broad range of potential investments. Staff worked to ensure that the projects are in line with the priorities of the implementing agencies and on their capital improvement lists, where possible. The NoRAC is charged with implementing the Plan including the action agenda.		
Comment ID:	147	Commenter:	ILWU - Bruce Holte
Comment:	Make the plan balanced. The plan is supposed to create a path for both environmental and economic investments. The way it is now, it will discourage investment by creating uncertainty and complexity. That means no jobs and no money for environmental investments.		
Response:	The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The proposed permitting process will be both more predictable and more flexible than today's code.		
Comment ID:	149	Commenter:	ILWU - Bruce Holte
Comment:	Keep working with us. We appreciate all the work the City has put into this plan, but we think it can be made better. Tonight we ask you to keep working on the important details and bring back a plan that is complete.		
Response:			
Comment ID:	21	Commenter:	ILWU - Bruce Holte
Comment:	At a time when unemployment is hovering around 11% and the dropout rate is 68%, we must be focused on how this proposal impacts jobs in the harbor. I cannot overstate how important it is to protect the diversity of jobs that are housed in the harbor. These are unique jobs, as they are for a diversity of skill and education levels. I am concerned because it seems like the River Plan is adding more regulation and cost. I worry that industry cannot absorb this and continue to grow. I urge you to continue to work with industry to ensure that this is a plan that we can move forward with together.		
Response:	<p>The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards, and by updating code that has been vague and confusing. There are several code changes that should make the River Plan code less of a burden than the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. 		

Comment ID:	145	Commenter:	ILWU - Bruce Holte
Comment:	Don't endanger the working harbor. The businesses from Portland's Working Harbor and the jobs they create are in the very competitive global economy. They are sensitive to increased costs.		
Response:	The River Plan / North Reach balances multiple goals for the land along the Willamette River. The Plan recognizes the working harbor as a critical economic engine for the city. Supporting a prosperous working harbor is an important goal, as are the goals for improving watershed health and increasing public access to and along the river. Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations.		
Comment ID:	146	Commenter:	ILWU - Bruce Holte
Comment:	Don't add extra time and costs to permitting. Businesses in the working harbor already have to meet stringent rules when developing in the Willamette. Don't add more process and uncertainty. Businesses have already offered to pay a fee instead of going through this unnecessary process. That would be better for job growth and would ultimately mean more money for environmental restoration.		
Response:	<p>The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards, and by updating code that has been vague and confusing. There are several code changes that should make the River Plan code less of a burden than the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. <p>A fee-in-lieu of River Review proposal does not directly address impacts from development on natural resources areas so is not acceptable to the City. The value of the project has no relation to the level of impact the development may have on natural resources. Therefore, the fee paid may not fully compensate for the impacts of the proposal and may not meet the goal of no net loss.</p> <p>Because a fee-in-lieu proposal does not relate to actual impacts from development, and can not ensure that there will be no net loss of resource functionality, the fee paid will likely not be considered adequate mitigation by DSL, the Army Corps, and NMFS. Therefore, additional mitigation for impacts to resources may be required by those agencies, thereby possibly "doubling" the amount of mitigation paid by the applicant. The River Plan proposal includes mechanisms (e.g. explicit code language, the mitigation bank, the inter-jurisdictional coordination) to ensure that "double" mitigation does not happen.</p>		

Commenter: ILWU - Jeff Smith

Comment ID:	165	Commenter:	ILWU - Jeff Smith
Comment:	I know you have been working on this plan for a long time, but it doesn't make a lot of sense to me to adopt the plan when so many of the vital details are unresolved. Take the time to iron out the details; keep working with those of us who work on the river everyday.		
Response:			

Comment ID:	164	Commenter:	ILWU - Jeff Smith
Comment:	Please don't add unnecessary complexity and time to the process of maintaining and improving the infrastructure that makes these numerous and high paying jobs possible.		
Response:	<p>The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards, and by updating code that has been vague and confusing. The are several code changes that should make the River Plan code less of a burden than the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. 		

Commenter: Jan Secunda

Comment ID:	102	Commenter:	Jan Secunda
Comment:	I request that there be sufficient emphasis placed on the fact that the amended Plan is strictly a beginning point. I think we were wrong to have backed down on the money and the land allotted for environmental purposes. Conceding to greed only serves to encourage wrongheaded craving for power and control and it weakens the City's position just when we need to beef up our environmental stance.		
Response:	River Plan staff respectfully disagree that we have "backed down". The River Plan balances the goals of maintaining and supporting the working harbor, improving watershed health, and increasing public access to the river.		
Comment ID:	103	Commenter:	Jan Secunda
Comment:	Tank farms need to be separated out from one another and moved to safer location. The locations need to stay off a large body of water, away from a floodplain, away from a fire zone, away from an earthquake fault line, away from schools, businesses and residences (unlike the locations now). And located in a place that is going to remain accessible during a catastrophic event. That would give is a better chance of having some fuel survive the earthquake or other disaster so that we can enable ourselves to mount some viable emergency response operations.		
Response:	<p>Emergency preparedness is a citywide initiative that is led by the Portland Office of Emergency Management (POEM) and may be a component of the Portland Plan.</p> <p>The River Plan is not proposing changes in the North Reach that would exacerbate conditions in an emergency but we are also not recommending relocation of the tank farms or pipelines. We are recommending a variety of transportation improvements which, if implemented, could improve evacuation capacity in addition to the facilitating freight movement.</p>		
Comment ID:	104	Commenter:	Jan Secunda
Comment:	Here in Portland, we need to engage the oil companies in dialogue immediately to ensure they make some necessary changes to stop destroying the environment.		
Response:	Your comment appears to be beyond the scope of the River Plan. However, one of the key watershed health objectives of the River Plan / North Reach is to enhance and restore watershed functionality within, and directly adjacent to, the North Reach, in order to improve conditions for fish and wildlife, improve watershed health and protect public health and safety. The proposed River Plan regulations are intended to ensure that proportionate and fair compensation for unavoidable impacts to natural resources and functional values is provided for all development proposals within the River-environmental Overlay.		

Commenter: Jason Locken

Comment ID:	334	Commenter:	Jason Locken
Comment:	First-in urging your support for a bold and ambitious North Reach River Plan- I ask you to remember the primary thing that makes Portland such a great place to live: our fantastic access to nature and tradition of ecological stewardship. The North Reach of the Willamette River is perhaps the most polluted and degraded urban landscape in Oregon. That is why I urge you to take bold steps to reverse more than a century of degradation in the North Reach and make it a model for an ecological diverse urban community where people and wildlife flourish together. I urge the City Council to adopt the Draft River Plan with Mayor Adams' proposed amendments including the provisions that require industrial users to both mitigate for their impacts to the river and contribute to helping restore the river.		
Response:	Thank you for your comment.		
Comment ID:	335	Commenter:	Jason Locken
Comment:	The voters and households have regularly supported funding for ecological restoration and conservation. Business and industry should do more than simply benefit from these public investments and help restore our urban ecosystems.		
Response:	The proposed River Plan regulations are intended to ensure that incremental enhancement of the natural resources in the North Reach is achieved as development or redevelopment occurs and that proportionate and fair compensation is provided for unavoidable impacts to natural resources and functional values.		
Comment ID:	336	Commenter:	Jason Locken
Comment:	Most importantly the city should not give up any of its regulatory authority. The notion that the public would give up its authority to protect public trust resources (its own property) is absurd enough. But it would also be extreme folly to let go of a critical tool for fostering ecologically viable cities. To the contrary, we should be breaking new ground with the regulatory tools we apply to the North Reach.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Jeanne Galick

Comment ID:	95	Commenter:	Jeanne Galick
Comment:	Extend the greenway with new trail alignments and access to the river. At the open house I heard one person declare the greenway plan "a failure." An understandable statement since progress has been slow and the greenway remains disjointed, narrow, and often not along the river at all.		
Response:	The Greenway Trail is a key component of the River Plan / North Reach. The recommended alignment brings people to and along the river where there are appropriate opportunities. During the development of the plan, staff spent many months working with stakeholders to identify a trail alignment that respects the safety, security and operational concerns of river-dependent industrial facilities, increases transportation options in the North Reach, and brings people to and along the river where possible.		

Comment ID:	92	Commenter:	Jeanne Galick
Comment:	I showed up last night at 5:30 to testify in favor of the plan and its amendments. Unfortunately, after sitting through hours of solid corporate testimony, a remedial lesson on the difference of federal, state and local jurisdiction, council became mired down in discussing amendment details with staff. I left near 9pm without speaking- as did many other citizens who had come to advocate for a better, healthier environment. I also left knowing that Council would never take the time to go, step by step, through the issues raised by Audubon or the Urban Greenspaces Institute like they did last night for the Working River Council.		
Response:	Thank you for this information. The River Plan team regrets your frustration with the Council hearing proceedings.		
Comment ID:	93	Commenter:	Jeanne Galick
Comment:	Approve the plan with Mayor Adams' amendments.		
Response:	Thank you for your comment.		
Comment ID:	94	Commenter:	Jeanne Galick
Comment:	Keep jurisdiction below Ordinary High Water- this should be seen as a pre-emptive, cost-controlling measure as it can prevent problems from escalating to state or federal levels. It is not a duplicative measure.		
Response:	<p>Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.</p> <p>The City has a legitimate regulatory role below OHW that is not duplicative of state and federal agencies. The resources that the City cares about below ordinary high water include open water, shallow water (0-20 feet), beaches, floodplain and flood areas, wetlands and ponds, and riparian vegetation. While Federal and state regulations may nominally cover many of these resources, in practice their reviews only apply to discreet resources not all resources, and in limited circumstances.</p>		

Commenter: Jeff Lesh

Comment ID:	249	Commenter:	Jeff Lesh
Comment:	It is time to reverse more than a century of degradation in the North Reach of the Willamette. It is time to restore habitat for fish, wildlife and people. City Council should adopt the Draft River Plan.		
Response:	Thank you for your comment.		
Comment ID:	252	Commenter:	Jeff Lesh
Comment:	The plan is the product of years of public input and spent more than six months under review at the Planning Commission. Giving into last minute demands by industry would be disrespectful of public process.		
Response:	Thank you for your comment.		

Comment ID:	250	Commenter:	Jeff Lesh
Comment:	Industry should pay their fair share. They should mitigate for their impacts to the river and they should contribute to helping restore the river.		
Response:	Thank you for your comment.		
Comment ID:	251	Commenter:	Jeff Lesh
Comment:	The city should not give up its regulatory authority. The people of Portland have a right to have a say over what industry does in our river.		
Response:	Thank you for your comment.		

Commenter: Jennifer Parks

Comment ID:	360	Commenter:	Jennifer Parks
Comment:	As a native Oregonian and concerned citizen, I am writing to show my support of the Willamette River North Reach Plan.		
Response:	Thank you for your comment.		
Comment ID:	361	Commenter:	Jennifer Parks
Comment:	I would very much like the City Council to adopt the North Reach River plan and quit trying to appease individual property owners.		
Response:	Thank you for your comment.		
Comment ID:	364	Commenter:	Jennifer Parks
Comment:	I hope that the well being of our river and wildlife along the Willamette will be the primary concern here and not the last minute demands being made by either industry or individual property owners; otherwise the public process and months that have been put into this plan will be undermined.		
Response:	Thank you for your comment.		
Comment ID:	362	Commenter:	Jennifer Parks
Comment:	I believe that industry should be held accountable and pay their fare share to mitigate their impacts to the river and help restore it.		
Response:	Thank you for your comment.		

Comment ID:	363	Commenter:	Jennifer Parks
Comment:	I feel very strongly that the city should not give up its regulatory authority. I have the right along with other Portland citizens to have a say over what the industry does in our river.		
Response:	Thank you for your comment.		

Commenter: Jolanta Piatkowska

Comment ID:	83	Commenter:	Jolanta Piatkowska
Comment:	The plan is the product of years of public input and for more than six month was under the review at the Planning Commission. Giving in to the last minute demands by industry would be disrespectful of public process.		
Response:	Thank you for your comment. Staff has worked closely with stakeholders and technical experts to develop reasonable and workable regulations.		

Comment ID:	81	Commenter:	Jolanta Piatkowska
Comment:	It is time to reverse more than a century of degradation in the North Reach of the Willamette. It is time to restore habitat for fish, wildlife, and people! Therefore, City Council should adopt the Draft River Plan.		
Response:	Thank you for your comment.		

Comment ID:	82	Commenter:	Jolanta Piatkowska
Comment:	It is time to reverse more than a century of degradation in the North Reach of the Willamette. It is time to restore habitat for fish, wildlife and people! Industry should pay its fair share. Industry should have to mitigate for its impacts on the river and it should contribute to helping restore the river.		
Response:	The proposed River Plan regulations are intended to ensure that development pays proportionate and fair compensation for unavoidable impacts to natural resources and functional values is provided for all development proposals.		

Comment ID:	80	Commenter:	Jolanta Piatkowska
Comment:	I urge you to prevent further environmental damage to the Willamette River by impeding industry demands designed to severely weaken the plan. The City of Portland should NOT give up its regulatory authority. The people of Portland have a right to have a say over what industry does in our river!		
Response:	River Plan Staff agrees that it is important to maintain regulatory authority below ordinary high water. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans and the complete ecology of the area around the development site. The City review will also ensure that any lost resource function due to proposed development is fully replaces on the same site or on another site within the North Reach.		

Commenter: Kenton Neighborhood Association

Comment ID:	314	Commenter:	Kenton Neighborhood Association
Comment:	We support the vision of the npGreenway for the North Portland Willamette Greenway Trail, and ask for your support.		
Response:	Thank you for your comment.		
Comment ID:	315	Commenter:	Kenton Neighborhood Association
Comment:	The trail will enhance Portland's place as a good walking and bicycling city and our future as a leader in providing infrastructure for clean transportation choices. 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 goal to create a first class multipurpose trail from the Steel Bridge through St. Johns.		
Response:	Thank you for your comment.		

Commenter: Kinder Morgan - Rob Mathers

Comment ID:	4	Commenter:	Kinder Morgan - Rob Mathers
Comment:	Kinder Morgan believes that the city needs to eliminate, not increase, conflicting land-uses in heavy industrial areas along the working waterfront. Operational-constraints & conflicting-uses are likely to be exacerbated (e.g., a proposed greenway trail immediately adjacent to our Linnton terminal; a proposed restoration site next to our dock and other docks in the main North Reach tanker basin).		
Response:	The proposed River Plan is a comprehensive, multi-objective plan that is intended to balance economic prosperity, watershed health, access to the river and livable riverfront communities. Both habitat improvements and a public greenway trail can coexist in a prosperous working harbor where the waterfront serves many functions. One of the trail alignments is being removed by the Mayor's proposed amendments. The safety and security concerns associated with the proposed trail alignment can be addressed through an inclusive design process.		
Comment ID:	6	Commenter:	Kinder Morgan - Rob Mathers
Comment:	We respectfully urge re-consideration and modification of key elements of the River Plan before the city adopts any code amendments. In this regard, the Working Waterfront Coalition has offered many ideas, proposals, and compromises throughout the process. Please re-consider these to arrive at a plan and policy that's realistic and workable.		
Response:	River Plan staff have and continue to work with the Working Waterfront Coalition and other stakeholders to refine the River Plan / North Reach to address the multiple objectives of the plan and to achieve a plan that is both realistic and workable.		
Comment ID:	106	Commenter:	Kinder Morgan - Rob Mathers
Comment:	Before any part of the Plan is adopted, we need complete answers to our questions & concerns about the River Review process, about the methodology for assessing natural resource values & real impacts of development, and about the mechanism for 'paying in-lieu' for projects in developed areas.		
Response:	Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations. With a proposed effective date of January 1, 2011, the policies, objectives and regulations of River Plan / North Reach can be adopted, leaving time for refinement of technical details. River Plan staff will continue to hold meetings throughout the year to brief interested parties about the results of an upcoming independent science panel review of the mitigation calculation method and further work on the development of the in-lieu-fee. Staff will bring the package to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		

Comment ID:	1	Commenter:	Kinder Morgan - Rob Mathers
Comment:	Kinder Morgan supports natural resource restoration along the Willamette River. The company is willing to pay more in up-front development costs to help make this happen. Kinder Morgan is not willing to pay unreasonable and unjustifiably-high additional development costs for this purpose. As proposed today, River Plan's cost is far too burdensome		
Response:	The River Plan includes development regulations related to the stated policy goals of maintaining, conserving and enhancing natural resources in the North Reach. Several of the regulations allow the applicant to pay a fee-in-lieu of meeting the requirement on-site. Staff has worked closely with stakeholders and technical experts to develop reasonable and workable regulations. Paying a fee-in-lieu of meeting the regulation on-site is a voluntary option and the cost for the fee will be set to cover only the cost to the City for performing the service.		
Comment ID:	3	Commenter:	Kinder Morgan - Rob Mathers
Comment:	Kinder Morgan needs a permitting-environment and approval process that's not more cumbersome and complex than that which exists today. The River Review process is duplicative (especially for in-water development) & too uncertain.		
Response:	Staff does not agree that the River Review process is duplicative below the Ordinary High Water Mark. The City is interested in ensuring that development activities that occur below OHW are reviewed in the context of City land use plans and the complete ecology of the area around the development site. State and federal agencies focus more closely on biological systems, particularly listed species, and on jurisdictional habitats such as wetlands, and on navigation. Staff has worked closely with stakeholders and the state and federal agencies that also have jurisdiction in the water to ensure that the River Plan code does not present a more complex and cumbersome permit review process. The River Plan recommends and outlines a joint agency early review process intended to help applicants through the permitting process and ensure coordination among agency staff conducting the reviews. The goal is to reduce permitting time, coordinate decisions, and coordinate mitigation.		
Comment ID:	5	Commenter:	Kinder Morgan - Rob Mathers
Comment:	As proposed today, River Plan will discourage investment in industrial and energy infrastructure along the North Reach and will undermine the city's efforts to improve natural resource habitat in the area.		
Response:	Staff does not agree with the assertion that River Plan regulations and development requirements will discourage investment in the working harbor. On the contrary, the regulations and the review process proposed by the River Plan are more clear and more flexible than the existing greenway code. The River Plan will facilitate coordination among agencies with authority to review development in the water.		
Comment ID:	107	Commenter:	Kinder Morgan - Rob Mathers
Comment:	During the initial stages of River Plan, we were hopeful that a balance of goals could be achieved. We were hopeful that more certainty would be achieved in the permitting process rather the currently-proposed plan further complicates the permitting process.		
Response:	The River Plan / North Reach should result in more certainty for applicants. Currently, virtually all development proposed within 50 feet of top of bank must go through a review process and meet broadly worded and vague approval criteria and design guidelines. After the River Plan is adopted many more development proposals will be exempt from review. The review requirement proposed under the new River Plan has been narrowed to only those instances when development will impact a natural resource area (River Environmental overlay zone). Approximately 4.5 miles of the North Reach riverbank will not be subject to a review. In the areas with a river environmental overlay, some development such as rail spurs or conveyers will be allowed through specific standards without going through a discretionary review. These standards will allow common development types to move quickly and surely through the permitting process.		

Comment ID:	108	Commenter:	Kinder Morgan - Rob Mathers
Comment:	During the initial stages of River Plan, we were hopeful that a balance of goals could be achieved. We were hopeful that more effective use of permit-fees would be made for mitigation purposes rather, the currently proposed plan creates disincentives for additional investment.		
Response:	Staff does not agree with the assertion that River Plan regulations and development requirements will discourage investment in the working harbor. On the contrary, the River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code (for example, it allows off site mitigation through fees-in-lieu). The River Plan also recommends a joint agency early review process that will facilitate coordination among all agencies with authority to review development in the water.		
Comment ID:	109	Commenter:	Kinder Morgan - Rob Mathers
Comment:	During the initial stages of River Plan, we were hopeful that a balance of goals could be achieved. We were hopeful that land use conflicts would be averted in the working harbor rather, as currently proposed, the River Plan invites more conflict along the industrial waterfront. (Ex. A restoration-site within the Willbridge tanker basin & a greenway trail crossing industrial RR tracks next to our Linnton terminal).		
Response:	Economic prosperity, watershed health and access to and along the river are all key components of the River Plan. During the development of the plan, staff worked with stakeholders to identify potential restoration sites and a trail alignment that respects the safety, security and operational concerns of river-dependent industrial facilities, that have the potential to improve habitat at key points along the river, increases transportation options in the North Reach, and brings people to and along the river where possible.		
Comment ID:	174	Commenter:	Kinder Morgan - Rob Mathers
Comment:	KM supports natural resource restoration along the Willamette River. The company is willing to pay more up-front development costs to help make this happen. What KM is not willing to do is to pay unreasonable and unjustifiably-high additional development costs for this purpose.		
Response:	The River Plan includes development regulations related to the stated policy goals of maintaining, conserving and enhancing natural resources in the North Reach. Several of the regulations allow the applicant to pay a fee-in-lieu of meeting the requirement on-site. Staff has worked closely with stakeholders and technical experts to develop reasonable and workable regulations. Paying a fee-in-lieu of meeting the regulation on-site is a voluntary option and the cost for the fee will be set to cover only the cost to the City for performing the service.		

Commenter: Kristina Raum

Comment ID:	327	Commenter:	Kristina Raum
Comment:	While I feel my sentiment on the matter was expressed in the testimony of others, I would like to reiterate that this plan, while obviously not perfect (too lenient on industry, not strong enough in environmental protection), is a step in the right direction and I feel strongly that a lack of action on your parts would poorly serve this city and its citizens. What we fail to do now in protecting our city and its resources we will pay for later, in further habitat loss, ecosystem degradation, diminished quality of living, loss of economic resources, loss of industry, etc. Please do right by Portland and its citizens by passing the North Reach River Plan (with Mayor Adams' amendments) without further delay.		
Response:	Thank you for your comment.		

Comment ID:	328	Commenter:	Kristina Raum
Comment:	Having attended both the December meeting as well as Wednesday night, I must say that I was taken aback by the lack of respect shown to those who came to support the river plan. As you know, at December's meeting attendees were forced to wait for nearly two hours past the scheduled meeting time before the council session even began. Many who wanted to testify in support of the river plan had to leave before their names were called to speak. Of course, it was clear that others at the meeting were "on the clock" and could rest easy knowing their overtime would not go uncompensated. The lack of balance was evident last night. Perhaps not as many pro-plan supporters signed up to testify (not surprising in light of the December meeting debacle), however it is your job to make sure all sides are represented and that citizens have a voice in council sessions. Allowing industry personnel, consultants, lawyers, etc. to repeatedly present the same canned (and impersonal) testimony was both frivolous and unfair.		
Response:	Thank you for this information. The River Plan team regrets your frustration with the Council hearing proceedings.		
Comment ID:	329	Commenter:	Kristina Raum
Comment:	I have confidence that you will do the right thing, by passing the plan without further fuss or delay.		
Response:	Thank you for your comment.		
Comment ID:	330	Commenter:	Kristina Raum
Comment:	Please do not give up our voice as a city. This is our river and if federal and state law were sufficient to protect it, the north reach of the Willamette would not be in the sorry state it is today.		
Response:	Thank you for your comment.		

Commenter: Lani Bennett

Comment ID:	322	Commenter:	Lani Bennett
Comment:	I support the River Plan/North Reach with Mayor Adams' proposed amendments.		
Response:	Thank you for your comment.		
Comment ID:	67	Commenter:	Lani Bennett
Comment:	I want to express my support for the River Plan / North Reach with Mayor Adams' proposed amendments. I think we have a responsibility to repair the degradation to the North Reach area of the Willamette. I believe that improving the health of the North Reach will ultimately benefit wildlife, people and industry.		
Response:	Thank you for your comment.		

Comment ID:	323	Commenter:	Lani Bennett
Comment:	I think we have a responsibility to repair the degradation to the North Reach area of the Willamette. I believe that improving the health of the North Reach will ultimately benefit wildlife, people, and industry.		
Response:	Thank you for your comment.		

Commenter: Linda Robinson

Comment ID:	224	Commenter:	Linda Robinson
Comment:	It's time to adopt the River Plan for the North Reach of the Willamette River.		
Response:	Thank you for your comment.		

Comment ID:	225	Commenter:	Linda Robinson
Comment:	Please stand up to business and industry wanting to oppose and/or water down the environmental protections and the funding sources identified in the plan. I urge you to adopt the Plan without further delay or modification.		
Response:	Thank you for your comment.		

Commenter: Lindsay Parks

Comment ID:	271	Commenter:	Lindsay Parks
Comment:	I am in favor of the trail alignment proposed in the North Reach River Plan. It will take cars off the road providing more capacity for industrial and commercial use. This will strengthen our city's commitment to more safe, off street trails.		
Response:	Thank you for your comment.		

Commenter: Linnton Neighborhood Association - Edward Jones

Comment ID:	179	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The action agenda includes a suggested project to evaluate the potential for combining accesses and improving safety on St. Helens Road. The neighborhood desires improved rather than reduced access to the riverfront and will pay close attention to this study. Since there are only two public access points to the riverfront, "combining accesses" has a worrisome sound to it. The word choice suggests a pre-disposition to close the crossing at 112th and leave only one access point to the waterfront on 107th. This is a bad idea for both safety and circulation reasons. Implementation would be inconsistent with other aspects of the NRP (See illustration #7, page 79, volume 1A).		
Response:	The Access Action Agenda recommends several additional studies related to the greenway trail in Linnton. One study recommends exploring alternative designs for community access in Linnton along NW 107th Avenue to the river bank that will be compatible with rail and industrial operations and provides secure access to the waterfront. A second recommended study looks at the trail along NW St. Helens Road and ways to improve an off-street bicycle path between the BNSF Bridge and the City limits north of Linnton. The comments about safety are relevant for these two studies.		
Comment ID:	181	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	As with the Greenway path, community access to the river will serve multiple purposes and play an important part in the re-vitalization of the Linnton Downtown. (Project A11, Community Access to the River: Beach Trail).		
Response:	Thank you for your comment.		
Comment ID:	353	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The mayor's amendment project A19 calls for a study exploring alternative designs for community access to the river in Linnton along the 107th Ave right of way. The language is an improvement over the NRP earlier draft which called for a circulation study (with no mention of access) and an improvement over the mayor's first proposed amendment, which called for access that "does not interfere with rail lines and industrial operations." The new wording is that the connection should be "compatible with rail and industrial operations." The neighborhood strongly supports such a study, and believes it must occur simultaneously with the current negotiations over the future of the mill site. To delay will be to lose a valuable opportunity for habitat and access improvement in the North Reach. The ranking of this project as a medium and the assignment to Portland Parks and PDOT are unsatisfactory. This project should be assigned to BPS, which can capitalize on its experience with Linnton. Given the current negotiations over the mill site, and the danger that those negotiations, if they occur without active participation by the city and the neighborhoods, will foreclose achievement of the NRP and neighborhood goals, the ranking should be High.		
Response:	The City ranked the projects in the Action Agenda based on several ranking criteria, including secure funding, constituency and momentum behind the project. It is anticipated that lead organizations will try to act on the higher ranked action items first, but they will also take advantage of implementation opportunities as they arise, regardless of the ranking listed in this action agenda.		
Comment ID:	175	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The city should abandon the restriction on quasi-judicial amendments to the Comprehensive Plan for Prime Industrial Land. The proposal is a solution to non-problem and undermines the land use process as a whole by suggesting that the quasi-judicial process cannot be relied on to enforce land use policy.		
Response:	Prime industrial lands are areas possessing characteristics that are difficult or impossible to replace in the region. The prime industrial land in the working harbor functions as intact, buffered districts and supports a significant share of the region's economic base and reduces freight transportation costs for Oregon consumers and exporters. The economic viability of the working harbor would be undermined by converting prime industrial land to another zone. For these reasons, Planning Commission recommends that quasi-judicial comprehensive plan map amendments be prohibited for specifically mapped prime industrial land.		

Comment ID:	350	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	I hope you have reviewed the Portland Harbor Business Environmental Initiatives summary which was provided by the Working Waterfront Coalition and compared it to the testimony from individual members of the WWC. The contrasts are enlightening, and it is tempting to use my limited time here to explore them. These documents reveal a profound lack of insight into or even concern about the health of the river.		
Response:	River Plan staff has reviewed the Portland Harbor Business Environmental Initiatives summary provided by the Working Waterfront Coalition.		
Comment ID:	351	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	In general terms, our concern is that the North Reach Plan sets its goals too low and asks too little of the North Reach businesses whose years of effort have created the superfund site we all have to live with.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations.		
Comment ID:	77	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	While both the NOAA and the NRP concepts for the future of the Linnton waterfront have time lines which make them little more than dreams, they reflect a growing consensus about the best use of the site. The Linnton neighborhood has embraced the concept of habitat restoration on the Linnton waterfront and believes the City should embrace it as well.		
Response:	Thank you for your comment.		
Comment ID:	78	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The Linnton neighborhood wants an explicit statement in the NRP that the Linnton waterfront is not Prime Industrial Land (or, in Metro talk, a Regionally Significant Industrial Area) and will not be so designated.		
Response:	The River Plan / North Reach maps show the Linnton waterfront outside of the Prime Industrial Land area. Please see Map #4 on page 131 of Volume 1A.		
Comment ID:	178	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The NRP makes zoning changes in Linnton's core area. All of the changes are improvements over prior designations, but none will be sufficient to achieve any of the city or the neighborhood's goals. The NRP should include a fresh immediate re-start of the Linnton Village Plan with the explicit goal of revitalizing the downtown area.		
Response:	The River Plan objectives and recommendations support revitalization of the downtown Linnton area. Staff worked closely with the neighborhood and other stakeholders to develop an effective plan with reasonable and workable recommendations. The River Plan aims to implement some of the actions outlined in previous planning work in Linnton, encourage reinvestment in the Linnton main street, and recommend a process to develop an action plan to help shape the future of Linnton's industrial waterfront. The River Plan does not recommend a re-start of the Linnton Village Plan.		
Comment ID:	180	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The development of an "action program" to improve the vitality of Linnton Village is ranked as a "medium" with a timeline of start within two years. This is much too slow, the council should reclassify the program as a "high" and insist the action program start immediately so conclusions can be ready for inclusion in the Portland Plan.		
Response:	The City ranked the projects in the Action Agenda based on several ranking criteria, including secure funding, constituency and momentum behind the project. It is anticipated that BPS will complete high priority action items first, but staff will also take advantage of opportunities as they arise, regardless of the priority listed in this action agenda. Unfortunately, due to budget constraints, district liaison staff resources will be limited.		

Comment ID:	182	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	Linnton Area Habitat Restoration calls for daylighting of the outflow now piped to river along 107th and the restoration of the bank from 107th north to 112th. Total cost is estimated at \$12 to \$18 million and the priority is "high-medium". This project should be a "high" as it has an active constituency (both neighborhood and industrial) and substantial momentum as well.		
Response:	The ranking designation is based on a combination of factors, including secured funding, constituency and momentum behind the project.		
Comment ID:	348	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	We believe the city has set out on the wrong path by locking itself into restrictions on the use of riverfront property at a time when our uncertain future makes flexibility and thoughtfulness the best approach.		
Response:	The River Plan / North Reach recommends that quasi judicial zone changes be prohibited on Prime Industrial land in the North Reach in order to prevent the displacement of industrial and employment uses and preserve land primarily for these uses. This preservation of industrial land is especially crucial during these times of financial uncertainty. The proposal does not prevent a future planning project from reconsidering the comprehensive plan designations or zoning.		
Comment ID:	349	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	We believe there are opportunities inherent in the pending negotiations over the sale of the Linnton mill site which could serve as a model for the larger scale restoration of the North Reach.		
Response:	Thank you for the comment. We are encouraged by this news.		
Comment ID:	176	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	There is a lack of urgency related to the river restoration effort. If the city cannot find a way to gain control of as many of the restoration sites as possible while the economy remains weak, the entire effort will be compromised. The river cannot afford years of process while habitat continues to disappear.		
Response:	The acquisition, restoration and ongoing management of specific key sites in the North Reach is the mission of the proposed River Restoration Program. Funding for the restoration program will come from numerous sources including fees in-lieu of meeting existing and proposed landscape and vegetation standards. Other sources of revenue for program funding could include City investments in watershed health and grants from state and federal programs and foundations. Restoration sites located on private property will be acquired from willing sellers as opportunities and funding become available.		
Comment ID:	177	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	The proposed one percent restoration fee is too small to achieve the goals of the plan. It should be set at three percent because even when investment resumes historic levels, if it ever does, one percent will not generate sufficient cash to make a meaningful contribution to the necessary habitat restoration. Three percent, on new development, when mitigation or vegetation cannot be done on site is a reasonable contribution to the health of the river.		
Response:	Thank you for your comment.		
Comment ID:	183	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	Projects RS17 and RS18 (Owens Corning and Harborton Wetlands) which are the next two sites downriver from the Linnton waterfront are also immediate opportunity sites. The City needs to move aggressively to gain control of these sites.		
Response:	The acquisition, restoration and ongoing management of specific key sites in the North Reach is the mission of the proposed River Restoration Program. Restoration sites located on private property will be acquired from willing sellers as opportunities and funding become available.		

Comment ID:	354	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	<p>I have a petition signed by more than a hundred and thirty people from the Linnton neighborhood. We gathered these signatures to ensure the council understands that at least the Linnton neighborhood is following the NRP closely. It does matter to us. We have had a long and often disappointing experience with the planning process, but remain committed to engagement with the city and the other stakeholders.</p> <p>The LNA wants the council to support current efforts to create an environmental sanctuary on the Linnton Waterfront. There are several proposals under consideration, one from BP and one from NOAA, which include such a sanctuary. Both proposals have promise and deserve consideration by all involved parties. The LNA is either already actively participating, or intends to be engaged, in dialogues about these proposals. City leadership could be critical in bringing all parties into agreement on the future of the Linnton Waterfront.</p>		
Response:	Thank you for your comment.		
Comment ID:	352	Commenter:	Linnton Neighborhood Association - Edward Jones
Comment:	<p>The mayor's amendment, WP11, and focuses on the "engagement" of the city with the North Reach neighborhoods. The task is divided among multiple city agencies, is ranked as "medium" and is set to start within two years.</p> <p>The ranking, the time line, and the lack of accountability implicit in the assignment to multiple agencies are all inconsistent with the city's announced goal of public involvement in the North Reach process. Neighborhood engagement should be a centerpiece of the NRP, not something that starts in years. The city needs to move this item up, assign it to a specific bureau, and make sure that neighborhoods in the North reach have the skill and resources to fully participate in the future of the North Reach. One positive step would be to make sure that the North Reach Advisory Committee project (listed at WP12) includes neighborhood participation. The neighborhoods are an important counterweight to other stakeholders in the process but will not be able to act effectively without substantial city support.</p>		
Response:	The City ranked the projects in the Action Agenda based on several ranking criteria, including secure funding, constituency and momentum behind the project. The Office of Healthy Working Rivers has indicated that they can begin this within 6 months, so the action agenda has been amended.		

Commenter: Lloyd Transportation Mngmnt Assoc. - Rick Williams

Comment ID:	306	Commenter:	Lloyd Transportation Mngmnt Assoc. - Rick Williams
Comment:	North Portland Willamette Greenway Trail Project when completed will provide a marvelous asset to North Portland and the entire City of Portland.		
Response:	Thank you for your comment.		
Comment ID:	307	Commenter:	Lloyd Transportation Mngmnt Assoc. - Rick Williams
Comment:	<p>The North Portland Willamette Greenway Trail Project truly meshes with our strategic goals for the Lloyd District, particularly for the 9%-15% of our employees who currently live north of the district. Like the Eastbank Esplanade and the Springwater Corridor, the envisioned water-level trail connection from Cathedral Park to the Steel Bridge has the potential to become a central component of the region's multi-modal transportation infrastructure, serving thousands of cyclist and pedestrain commuters and recreational users. We are confident that many can and will be Lloyd bound trips. Particularly important for the Lloyd District is that the trail will link North Portland with the Eastbank Esplanade, downtown across the Steel Bridge and other neighborhoods and business districts south. Lloyd's place along the trail will add to its significance as a central link to the rest of the Central City.</p>		
Response:	Thank you for your comment.		

Comment ID:	308	Commenter:	Lloyd Transportation Mngmnt Assoc. - Rick Williams
Comment:	We know that the trail will be designed to assure a high level of quality and safety. It is our hope that everyone invloved can see the positive contribution such a link can make to meet our multi-modal transportation goals and work positively and creatively to arrive at a project that is truly unique, if not world class. The LTMA Board immediately recognized the positive impact this project will have on the accesibility and attractiveness of our business district.		

Response:	Thank you for your comment.		
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Comment ID:	309	Commenter:	Lloyd Transportation Mngmnt Assoc. - Rick Williams
Comment:	Please use this endorsement as you move forward to communicate the LTMA's full support for this important project. 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 this goal.		

Response:	Thank you for your comment.		
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Commenter: Lynn Herring

Comment ID:	284	Commenter:	Lynn Herring
Comment:	The North Reach is in desperate need of some help that will restore and sustain its former riparian integrity and biodiversity. I urge you to adopt the draft North Reach River Plan. The general framework of the draft Plan under discussion for more than two years promotes increased baseline protection for in-water, riparian and upland habitat and methodology to link banks and uplands, including a system of twenty-one permanently protected and restored sites providing safe haven to listed juvenile salmon desperately seeking their way to the ocean.		

Response:	Thank you for your comment.		
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Comment ID:	59	Commenter:	Lynn Herring
Comment:	The North Reach is in desperate need of ecological help that will restore and sustain its former riparian integrity and biodiversity. The general framework of the North Reach River Plan under discussion for more than two years promotes increased protection for riparian habitat, methodology to link banks and uplands as well as a system of twenty-one permanently protected and restored sites. The City Council should adopt the Draft River Plan with Mayor Adams' proposed amendments. Environmental zoning will provide baseline protections for the most important in-water, riparian and upland resources.		

Response:	Thank you for your comment.		
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Comment ID:	61	Commenter:	Lynn Herring
Comment:	My understanding is that the River Plan includes more than \$500 million in public dollars for infrastructure to support industrial development in the North Reach along with new and better trail access to the river. Industrial property owners must be held accountable for their impacts to the river.		

Response:	The River Plan identifies and prioritizes capital improvement projects for the North Reach that will support continued development and redevelopment in the working harbor. The River Plan itself does not include the funding. The River Plan identifies projects that need to be funded. The cost for the projects that are not yet funded is estimated to be \$389 million.		
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Comment ID:	286	Commenter:	Lynn Herring
Comment:	North Reach stewardship must include the industrial property owners, doing their part to fully mitigate/replace existing habitat destroyed in the course of development and a restoration fee that will go toward supporting habitat restoration. My understanding is that the draft River Plan proposes more than \$500 million in public dollars for new infrastructure to support river industries along with new trail alignments in the North Reach.		
Response:	Thank you for your comment.		
Comment ID:	60	Commenter:	Lynn Herring
Comment:	The City must retain permitting authority below ordinary high water to cover the gap left for protecting species not covered by state and federal agencies and help prevent future listings. This action is necessary to help meet River Plan environmental objectives. Furthermore, state and federal regulations clearly have not been sufficient, because our river continues to degrade.		
Response:	River Plan Staff agrees that it is important to maintain regulatory authority below ordinary high water. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans and the complete ecology of the area around the development site. The City review will also ensure that any lost resource function due to proposed development is fully replaced on the same site or on another site within the North Reach.		
Comment ID:	285	Commenter:	Lynn Herring
Comment:	The City must retain permitting authority below ordinary high water to cover the gap left for protecting species not covered by state and federal agencies and help prevent future listings. This action is necessary to help meet River Plan environmental objectives.		
Response:	Thank you for your comment. River Plan Staff agrees that it is important to maintain regulatory authority below ordinary high water. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans and the complete ecology of the area around the development site. The City review will also ensure that any lost resource function due to proposed development is fully replaced on the same site or on another site within the North Reach.		

Commenter: Manufacturing 21 Coalition - Norm Eder

Comment ID:	63	Commenter:	Manufacturing 21 Coalition - Norm Eder
Comment:	Our riverfront manufacturing economy is perhaps even more important today as we struggle to maintain, and even build, living wage jobs against the intense winds of international competition. The members of Manufacturing 21 urge you to listen to industry voices very closely as you chart the future of our river.		
Response:	The River Plan / North Reach recognizes the working harbor as a critical economic engine for the city, but needs optimize multiple goals for the land along the Willamette River. Staff has and will continue to work with and listen closely to industrial stakeholders.		

Commenter: Marilyn Block

Comment ID:	267	Commenter:	Marilynn Block
Comment:	We need to aggressively clean up the North Reach of the Willamette. The toxic river water emptying into the ocean is causing pollution of our coastal shellfish and kelp. The phytoplankton in the ocean are dying. These tiny aquatic plants make 60% of our oxygen, more than the trees.		
Response:	Thank you for your comment.		

Commenter: Meg Ruby

Comment ID:	290	Commenter:	Meg Ruby
Comment:	City Council should adopt the Draft River Plan with Mayor Adams' proposed amendments. The River Plan is the product of years of public input and involvement- please respect that public process and adopt the River Plan to restore our river.		
Response:	Thank you for your comment.		
Comment ID:	291	Commenter:	Meg Ruby
Comment:	The costs of production should not be unfairly shifted to the environment or the people of Portland. It is important that industry pay its fair share. Part of the reason that the river is so degraded today is that industry has not had to incorporate environmental impacts into the cost of doing business. If industry does not pay its fair share, then we will either have to pay for them or the river will continue to degrade.		
Response:	Thank you for your comment.		
Comment ID:	292	Commenter:	Meg Ruby
Comment:	The city should not give up its regulatory authority below ordinary high water. The people of Portland have a right to have a say over what industry does in our river.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Multnomah County Oregon - Jeff Cogen

Comment ID:	313	Commenter:	Multnomah County Oregon - Jeff Cogen
Comment:	The North Willamette Greenway Trail has been talked about in this region for many years. Now there is a specific proposal before you to move the planning and ultimate construction of the trail ahead with Regional Flexible Funding. The trail will link North Portland, Rivergate, Swan Island and the University of Portland residents and businesses with downtown and the rest of the region for bike commuting and walking. I urge you to approve Regional Flexible Funding for the North Willamette Greenway Trail, RFFA ID 50077 on your list of projects.		
Response:	Thank you for your comment. The City supports exploring several funding options for implementing the Greenway Trail, including regional funding.		

Commenter: Nancy Mattson

Comment ID:	254	Commenter:	Nancy Mattson
Comment:	The city council should take advantage of the years of hard work that have gone into the North Reach River Plan by passing the plan as proposed.		
Response:	Thank you for your comment.		
Comment ID:	257	Commenter:	Nancy Mattson
Comment:	The plan as proposed is an opportunity to leave a legacy of improvements by reversing the current pattern of continual degradation of our river. I urge the City Council to take this opportunity to act as enlightened stewards of this precious resource by voting to adopt the North River Reach Plan.		
Response:	Thank you for your comment.		
Comment ID:	256	Commenter:	Nancy Mattson
Comment:	I feel that business interests who benefit from development of our river resources should have a hand in financing the maintenance of the river's health for future generations.		
Response:	Thank you for your comment.		
Comment ID:	255	Commenter:	Nancy Mattson
Comment:	Please do not be swayed by last minute attempts to alter the plan or to give up our city's existing regulatory authority over the river.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Norman Tolonen

Comment ID:	99	Commenter:	Norman Tolonen
Comment:	The strides to make and keep Portland green rely heavily on this plan and plans that support restoring habitat for fish, wildlife and for people. I am writing to show my support of the Willamette River North Reach Plan.		
Response:	Thank you for your comment.		

Comment ID:	100	Commenter:	Norman Tolonen
Comment:	I believe that industry should be held accountable and pay their fair share to mitigate their impacts to the river and help restore it.		
Response:	The River Plan balances multiple objectives, including environmental health and economic prosperity. The proposed River Plan regulations are intended to ensure that proportionate and fair compensation for unavoidable impacts to natural resources and functional values is provided for all development proposals within the River-environmental Overlay.		
Comment ID:	101	Commenter:	Norman Tolonen
Comment:	I feel very strongly that the city should not give up its regulatory authority.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: npGREENWAY - Curt Schneider

Comment ID:	128	Commenter:	npGREENWAY - Curt Schneider
Comment:	We thank you for your continued support of the Willamette River Greenway Trail. As stated in the now adopted Portland Bicycle Master Plan for 2030, the Willamette River Greenway Trail is designated a major city bikeway and transportation link. We ask that you follow up with necessary amendments to other plans i.e. Transportation, Pedestrian, Parks and Recreation etc. as quickly as feasible to ensure that the multipurpose trail can be planned and constructed in the most expeditious manner.		
Response:	Thank you for your comment. The Access Action Agenda in River Plan / North Reach Volume 1A indicates specific projects, implementing organization and ranking related to the construction of the Willamette River Greenway Trail.		
Comment ID:	131	Commenter:	npGREENWAY - Curt Schneider
Comment:	npGreenway has been very active in the development of the npGreenway Trail. Last October, np Greenway sponsored a North Portland Willamette River Greenway Trail Community Design Workshop. We can share and provide results of the workshop and assist various staff and city officials in the design and implementation of the trail. We ask for your support of the highest possible priority for its funding and construction.		
Response:	The River Plan supports funding for trail development. Thank you for your comment.		
Comment ID:	294	Commenter:	npGREENWAY - Curt Schneider
Comment:	We, along with numerous businesses and organizations, feel the Willamette River Greenway Trail is a vital link in the regional transportation system (that includes the 40 mile Loop Trail, the Eastbank Esplanade, Springwater Trail and others). The North Portland segment represents a major gap in the regional network. By creating new ways for workers to access the Working Waterfront, and for others to get to and use the Willamette River and expanding the network of parks, trails and open space in the North Reach, the River plan Willamette River Greenway Trail completes major gaps in our region's trail and transportation network. The Willamette River Greenway 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.		
Response:	Thank you for your comment.		

Comment ID:	296	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly recommend adoption of the Willamette River Greenway Trail alignment as shown in Volume 1A on Map 8 (page 139) entitled Access: Proposed Willamette Greenway Trail, Viewpoints and Action Items with the following change: construction of the multipurpose trail above the Big Pipe that is to be located immediately adjacent 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 on Basin Avenue (we understand that this will necessitate working/negotiating with local property owners but feel the trail users will benefit by having this safer and more secure route than along the much heavier used Basin Ave route).		
Response:	River Plan staff does not support the proposed change. There are multiple river-dependent uses along the riverbank on the east side of the Swan Island Lagoon. The trail is more appropriately placed along N. Basin where there is sufficient right-of-way to incorporate a bicycle/pedestrian facility.		
Comment ID:	297	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly support including all segments of the near-term Willamette River Greenway Trail alignment shown in Volume 1A (with the exception of the change to the Basin Ave route) on the Parks and Recreation Trail Maps, the Transportation System Plan, Bicycle Master Plan, and the Pedestrian Plan as soon as possible.		
Response:	Thank you for the comment.		
Comment ID:	298	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly support conducting feasibility studies to evaluate rail-with trail proposals adjacent to the BNSF Railroad Bridge (reference A15, page 145) and connecting Lower Albina with Swan Island (reference A 14, page 145) as noted in Volume 1A.		
Response:	Thank you for your comment.		
Comment ID:	299	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly support all the projects A1 through A15 listed on page 145 of Volume 1A.		
Response:	Thank you for your comment.		
Comment ID:	300	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly support working with Metro to include all segments of the planned Willamette Greenway Trail alignment in the Regional Trail Plan.		
Response:	Thank you for the comment.		
Comment ID:	301	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly support revision of the plan to include waterfront trail when uses are no longer river dependent over time.		
Response:	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. Staff does not support the suggested revision for development of waterfront trail based on conversion of uses, as this would result in a piecemeal and fragmented trail with no guarantee of eventual connectivity.		

Comment ID:	130	Commenter:	npGREENWAY - Curt Schneider
Comment:	We applaud the proposal to create a North Reach Advisory Committee in order to evaluate the effectiveness of the plan. We would request that the committee include a position for advocates of multipurpose trails. We also ask that a member of npGreenway be appointed to serve on the committee.		
Response:	Thank you for your comment. Your request will be taken into consideration.		
Comment ID:	132	Commenter:	npGREENWAY - Curt Schneider
Comment:	npGreenway supports and urges your immediate adoption and implementation.		
Response:	Thank you for your comment.		
Comment ID:	295	Commenter:	npGREENWAY - Curt Schneider
Comment:	With Respect to the Recommended Plan (November 2009) we urge that the City Council adopt it now, not six months or a year from now.		
Response:	Thank you for your comment.		
Comment ID:	129	Commenter:	npGREENWAY - Curt Schneider
Comment:	We thank you for your suggested language addition that clarifies that trails can be included in mitigation sites. With reference to the suggested amendments package to Volume 1A it is noted that on pages 32-33 that "the mitigation bank must account for the trail." However, in reviewing the suggested code language for mitigation that that particular language is not included. We ask that the code amendments include adding that provision (perhaps to Section 33.865.100.B.2.d Mitigation).		
Response:	The recommended amendment to Volume 1A referred to in the comment is regarding trails in mitigation bank sites. The goal is to ensure that where the greenway trail is shown on a property that will be part of a mitigation bank, the trail continues to be a priority and is not excluded because the site will function as a mitigation bank. The zoning code sections regarding mitigation are applied when development occurs in the River Environmental overlay zone. In this case, the mitigation criteria require that unavoidable impacts from the development are mitigated on-site unless impracticable or ecologically infeasible. The language about trails in mitigation banks sites would not be appropriate in the River Review mitigation approval criteria because these on-site mitigation areas will not be part of a mitigation bank.		
Comment ID:	302	Commenter:	npGREENWAY - Curt Schneider
Comment:	We strongly support that any mitigation or restoration sites that are to be designated not preclude the development of the multipurpose Willamette River Greenway Trail alignment references above.		
Response:	Staff also supports the development of the greenway trail on sites where the trail alignment is identified. The fact that a site might also be a mitigation bank site should not preclude development of the greenway trail. Volume 1A has been amended to make this policy statement clearly, and the City's future mitigation bank certification process will ensure that trails may not be excluded from bank sites.		

Commenter: Oregon Environmental Council - Teresa Huntsinger

Comment ID:	365	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	We support the North Reach River Plan and urge you to approve the plan at your February 17 hearing.		
Response:	Thank you for your comment.		
Comment ID:	368	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	We appreciate that the City has spent years working with stakeholders to develop this plan, and we believe the plan adequately balances industrial development and habitat restoration in a way that will allow both the economy and the environment to thrive within the city.		
Response:	Thank you for your comment.		
Comment ID:	366	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	Extensive damage has already occurred in this stretch of river, but it cannot simply be written off because endangered salmon species must pass through it to reach their spawning and feeding areas. This plan firmly states that we will not give up on the Willamette and we will not give up on Oregon's iconic salmon.		
Response:	Thank you for your comment.		
Comment ID:	367	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	As a statewide organization, we are not always able to comment on local planning issues. However, we believe this plan is significant because it seeks to restore the most polluted and degraded stretch of river in the state. We want you to know that the environmental community is paying attention to your hard work.		
Response:	Thank you for your comment.		
Comment ID:	371	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	We applaud your efforts to update the zoning code and design guidelines for this stretch of river in order to restore habitat and improve public access, and we believe the designated restoration sites are an important step in creating safe passage for endangered salmon species. The Environmental Zoning and the mitigation funding structure will help reverse the trend of degradation and put the lower Willamette on a path toward rehabilitation.		
Response:	Thank you for your comment.		
Comment ID:	369	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	It is necessary for the City to maintain its regulatory authority below ordinary high water.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Comment ID:	370	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	We encourage you and your staff to continue working with businesses, conservation groups and other stakeholders to ensure that implementation of the plan takes place as smoothly, transparently, and predictably as possible.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff will continue to work with stakeholders through NoRAC to ensure the successful implementation of the River Plan.		
Comment ID:	376	Commenter:	Oregon Environmental Council - Teresa Huntsinger
Comment:	We appreciate the City's efforts to create a process that streamlines the various local, state, and federal agency permitting processes.		
Response:			

Commenter: Patricia and Joe Campbell

Comment ID:	283	Commenter:	Patricia and Joe Campbell
Comment:	Please support the North Reach River Plan. For the last 36 years my husband and I have sustainably farmed 150 acres of vineyard at 4 different sites near the Portland Metro Area. We have worked hard to make sure that the water which ultimately drains into the Willamette from our properties is clean and free of pesticides. The water we strive to keep clean eventually flows into the North Reach area. For the sake of the Salmon, birds, mammals and all the amazing trees which remove carbon dioxide from the air we breathe, please preserve the small amount of natural habitat that remains in our great city.		
Response:	Thank you for your comment.		

Commenter: Paul Maresh

Comment ID:	29	Commenter:	Paul Maresh
Comment:	The proposal for a North Portland Willamette Greenway Trail is the result of at least four legislative processes, one State and three City, that were both thorough and arduous. I implore you to speed development of the North Portland Willamette Greenway Trail and to instruct staff to ensure the River Plan abides by the spirit and the letter of Oregon's Statewide Land Use Goal 15: Willamette River Greenway. It appears that statutory requirement such as boundaries of the approved Willamette River Greenway being shown on the comp plan map, and public access, are not being met.		
Response:	The River Plan supports the North Portland Willamette River Greenway Trail and the plan complies with Statewide Land Use Planning Goal 15. The plan recommends that the boundary of the Willamette River Greenway be amended in the North Reach. and as described in the findings for the plan, staff will follow all State mandated procedures for altering the boundary.		

Comment ID:	30	Commenter:	Paul Maresh
Comment:	There are some well meaning people who are in favor of turning Willamette Cove into a mitigation site. The major problem with this idea is that it will require the exclusion of people from property that the public has bought twice. First, in the 1980's we bought it with UDAG money. Second, in 1996 we bought Willamette Cove with money from Metro's 1995 Greenspaces Ballot measure, for the acquisition of natural areas to integrate with the Willamette Greenway and to provide access to nature. To turn Willamette Cove into a mitigation site would be to essentially give a public resource to a private entity to use to mitigate violations of environmental laws and regulations in the estuary.		
Response:	According to staff with the US Army Corps of Engineers and the Oregon Department of State Lands (agencies that approve wetland mitigation banks in Oregon), trails are not automatically excluded from mitigation bank sites, and in fact a mitigation bank site in Eugene includes a trail. Any potential trail in or adjacent to a mitigation bank site should be included in the plan from the beginning so that the impact of the trail on the number and type of mitigation credits available can be accounted for from the outset.		

Commenter: Pete Colt

Comment ID:	337	Commenter:	Pete Colt
Comment:	And I noticed that the Watershed Health Task Group's data for the River Plan is four years old. So in order to help the City Council in its decision-making process, I've enclosed links to more current scientific data. Based on United States Environmental Protection Agency data, just 2-3 days worth of feces from only 100 dogs, when the feces is left on the ground, is enough feces to contaminate water within 5 - 20 square miles and make the water toxic to swim in and toxic to eat shellfish from (links below). The only way the City of Portland can protect the Willamette River and by extension our watershed from dog feces is by limiting the number of dogs allowed in the city. Appropriate fines that are enforced are needed.		
Response:	Thank you for your comment. The impacts from dogs in the City of Portland is beyond the scope of the River Plan.		

Commenter: Peter Teneau

Comment ID:	62	Commenter:	Peter Teneau
Comment:	My point tonight is about the responsibility of a City to its citizens and the power of citizens to uphold it against that of corporations and all power structures driven primarily by commercial motives and aligned in opposition. The City has spent two years on the North Reach Plan with citizen input. It has met its responsibility to its citizens and I compliment them for the vision and the effort that has gone into it. To those who would chip away at the Plan, make end runs around it, sabotage it or emasculate it I say back off. The citizens want the waterfront cleaned up and protected as an expression of their values.		
Response:	Thank you for your comment. River Plan Staff have and will continue to work with stakeholders to strike the right overall balance among the multiple objectives of the plan as directed by City Council.		
Comment ID:	139	Commenter:	Peter Teneau
Comment:	What happens to the North Reach River Plan depends upon the will and courage of the City Council to uphold the integrity of the River Plan as written. The single greatest natural feature of this City, the river, defines Portland. Save it, restore it and earn the gratification of future generations to enjoy it in full beauty and health.		
Response:	Thank you for the comment.		

Comment ID:	138	Commenter:	Peter Teneau
Comment:	The strength of the River Plan is its serious long awaited focus on the environment (restoration, preservation and mitigation) and public access- the opportunity for citizens to enjoy the amenities of a huge natural asset.		
Response:	Thank you for the comment.		

Commenter: Phillip Grillo

Comment ID:	373	Commenter:	Phillip Grillo
Comment:	Despite some of the changes that have been incorporated into the plan, the current version of the River Plan still discourages new investment in the Working Waterfront. In the North Reach, River Plan discourages investment in the harbor primarily because it replaces Greenway Review with a highly complex and extremely confusing set of new local land use regulations and fees. These regulations and fees create significant uncertainty, delay, and costs for businesses as they consider whether or not to invest in the property along the Willamette River in Portland. We must find a way to implement River Plan that encourages reinvestment along the river. Discouraging investment in the harbor is not something we should be willing to risk.		
Response:	<p>Staff does not agree with the assertion that River Plan regulations and development requirements will discourage investment in the working harbor. On the contrary, the River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards, and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code. There are several code changes that should make the River Plan code an improvement over the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. <p>The River Plan also recommends a joint agency early review process that will facilitate coordination among all agencies with authority to review development in the water.</p>		

Comment ID:	374	Commenter:	Phillip Grillo
Comment:	What is unique about River Plan is its potential to create a series of restoration sites ("pearls") along the working harbor, where environmental mitigation and restoration efforts can be concentrated. The potential benefits of these restoration sites are both ecological and economic. If implemented effectively, these sites can help protect other prime industrial lands, facilitate development and redevelopment in the working harbor, and can eventually become the focus of our restoration efforts in the North Reach.		
Response:	Thank you for your comment.		

Commenter: PlanGreen - Mary Vogel

Comment ID:	96	Commenter:	PlanGreen - Mary Vogel
Comment:	It is not good for business as global enterprise moves towards measures of sustainability as a fundamental decision-making tool. I believe the River Plan will help us counteract the "most toxic U.S. cities" rankings and should be implemented post haste.		
Response:	Thank you for your comment.		
Comment ID:	97	Commenter:	PlanGreen - Mary Vogel
Comment:	The City should not give up its regulatory authority below Ordinary High Water. The people of Portland have a right to have a say over what industry does in our river.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Port of Portland - Bill Wyatt

Comment ID:	167	Commenter:	Port of Portland - Bill Wyatt
Comment:	Continue to work with businesses in the harbor- they are your greatest asset- impressed by the business interest in this - that should tell you something.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff has worked extensively with the Working Waterfront Coalition throughout the planning process, including at least three meetings between the February 17 and April 1st hearings.		
Comment ID:	168	Commenter:	Port of Portland - Bill Wyatt
Comment:	Investment in the harbor are business decisions not political ones. Continue to work out the details so we can support this plan as partners.		
Response:	Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations. The River Plan / North Reach will not go into effect until January 1, 2011. During the time between adoption of the plan's policies, objectives and regulations, and January 1, 2011 staff will continue to work with stakeholders to finalize the technical details of the mitigation fee-in-lieu. The plan resolution includes a workplan that directs staff to bring the details to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		

Comment ID:	166	Commenter:	Port of Portland - Bill Wyatt
Comment:	We support the plan's basic premise that new fees from business expansion or new business location will help fund watershed improvements. In order for both jobs and environmental quality to benefit, these new fees must be reasonable, a process navigable, otherwise, there will be neither adequate funds for restoration nor jobs to strengthen the city's economic base. Having a healthy working harbor also means having the resources to do restoration and other critical investments - a foundation of our environmental policy.		
Response:	Thank you for your comment. The River Plan / North Reach balances economic prosperity, watershed health and public access to the river by: <ol style="list-style-type: none"> 1. Reducing regulation where possible, 2. Revising the vegetation enhancement/greenway landscape standard so that is flexible for property owners; 3. Focusing City review on areas where development could significantly impact remaining natural resources, and requiring mitigation for unavoidable significant impacts; 4. Offering property owners the option to pay a fee for off-site vegetation enhancement and mitigation. The cost for these optional fees will be limited to the actual cost for the City to conduct the work and maintain the area overtime. 		

Commenter: Port of Portland - Greg Theisen

Comment ID:	105	Commenter:	Port of Portland - Greg Theisen
Comment:	The Port's contributions toward improving water quality and habitat have helped result in, according to the Bureau of Environmental Services MS4 Annual Report, water quality in the North Reach that has trended upward over the last 12 years. We hope that with the eventual adoption of a workable River Plan the improvements continue and are even more meaningful for species and functional values identified in the plan.		
Response:	Thank you for your comment. Though water quality has steadily made improvements over the last 50+ years, the Lower Willamette is still classified as water quality limited (i.e., not consistently meeting water quality standards) for a host of pollutants, including pesticides, PCBs (polychlorinated biphenyls), PAHs (polycyclic aromatic hydrocarbons), heavy metals, bacteria and temperature. Development over time in the North Reach has resulted in habitat loss and fragmentation and the alteration of natural systems. One of the key watershed health objectives of the River Plan / North Reach is to enhance and restore watershed functionality within, and directly adjacent to, the North Reach, in order to improve conditions for fish and wildlife, improve watershed health and protect public health and safety.		

Commenter: Port of Portland - Marla Harrison

Comment ID:	150	Commenter:	Port of Portland - Marla Harrison
Comment:	The Port has maintained our Objectives and Targets program in our Environmental Management system and plan to continue to do so. The key to this program is that the Port establishes a baseline and measures progress against that baseline. This is the hallmark of any worthy environmental improvement program. The River Plan should strive for this as well.		
Response:	The draft Willamette River Natural Resources Inventory (NRI) establishes a baseline and documents the location of existing natural resource features (streams, wetlands, vegetation, etc.) in the North Reach. The plan also contains performance measures that can be used to track progress against the baseline.		

Comment ID:	151	Commenter:	Port of Portland - Marla Harrison
Comment:	The Port does a lot of in-water permitting so that we can fulfill our public mission. We are concerned that the new City River Review process will make our job more complex, costly and time consuming without a lot of environmental gain. To change the River Plan from one of extraction to one of achievement, we think it would be more efficient and better for the environment to pay a straight percentage fee in areas of developed terminals, as outlined in the Working Waterfront's letter to the Mayor.		
Response:	The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The River Plan code will result in a process that is both more predictable and more flexible than today's greenway code (for example, it reduces regulation on many parts of the river, and allows off site mitigation through a fee-in-lieu). The Working Waterfront Coalition's proposal to pay a fee and avoid River Review does not ensure that impacts from development on remaining natural resource areas are minimized and mitigated to the extent practicable. Staff has worked with the WWC and others to craft exemptions and development standards that allow a level of development without review.		
Comment ID:	153	Commenter:	Port of Portland - Marla Harrison
Comment:	Having worked in the permitting world for many years, I hope that the River Plan will not make an already challenging process, more difficult and less protective of the environment. This is my fear. Instead, we should focus on results, not more process.		
Response:	<p>The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards, and by updating code that has been vague and confusing. There are several code changes that should make the River Plan code less of a burden than the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the standards allow the payment of a fee-in-lieu of meeting the requirement. 		

Comment ID:	152	Commenter:	Port of Portland - Marla Harrison
Comment:	In many recent in-water permits, the permit was issued by Federal agencies at the last moment prior to the start of construction. In these common occurrences, this would not leave enough time for additional City Review. We are concerned that adding the City's additional requirements will necessarily complicate the process thereby adding time without demonstrated value, whereas the proposed fee would guarantee progress toward the City's goals without complicating the development process.		
Response:	<p>The River Plan includes an optional enhanced coordination process for projects that require multiple-agency reviews. Based on an existing successful model, the coordinated review process is designed to provide early direction to applicants and coordination among city, state and federal agencies for projects below the ordinary high water mark. The intention is to greatly increase the efficacy of this coordination, and ensure that conflicts are reduced, not made worse. A comparison of permitting timelines among the state, federal and city agencies indicates that the River Review process is the fastest of the reviews and can take place within the timeframe of the other reviews, allowing time for successful coordination amongst agencies. Please see the flowchart in the River Plan amendments.</p> <p>A mitigation fee based on project value does not directly address impacts from development on natural resources areas so is not acceptable to the City. The value of the project has no relation to the level of impact the development may have on natural resources. Therefore, the fee paid may not fully compensate for the impacts of the proposal and may not meet the goal of no net loss.</p> <p>Because industry's proposal does not relate to actual impacts from development, and can not ensure that there will be no net loss of resource functionality, the fee paid will likely not be considered adequate mitigation by DSL, the Army Corps, and NMFS. Therefore, additional mitigation for impacts to resources may be required by those agencies, thereby possibly "doubling" the amount of mitigation paid by the applicant. The River Plan proposal includes mechanisms (e.g. explicit code language, the mitigation bank, the inter-jurisdictional coordination) to ensure that "double" mitigation does not happen.</p>		

Commenter: Port of Portland - Sebastian Degens

Comment ID:	18	Commenter:	Port of Portland - Sebastian Degens
Comment:	The City of Portland, through its River Plan, is best served by establishing a climate for investment in the North Reach, so that industry, large and small, is encouraged to modernize, rehabilitate, expand, and, in some cases, choose to locate in our seaport.		
Response:	River Plan staff agree that fostering a climate for investment in the North Reach is an important goal. Balancing this economic prosperity goal with the other important policy topics of watershed health, access, riverfront communities and working with our partners is paramount to the River Plan's success. Staff will continue to work with stakeholders and technical experts to ensure that the River Plan / North Reach strikes the appropriate balance.		
Comment ID:	20	Commenter:	Port of Portland - Sebastian Degens
Comment:	The keys to success that the Port, its tenants, and other members of the Working Waterfront require to invest in the modernizations, capacity expansions, and facility upgrades on their developed sites are flexibility and the ability to move fast and move forward with clear objectives.		
Response:	The River Plan / North Reach is designed to provide more flexibility and certainty for development applicants. Key recommendations include removing the greenway setback in the River Industrial overlay zone, adopting development standards that allow certain development to move forward without a discretionary review, limiting the river review requirement to instances where development will impact a natural resource area and creating an optional process for coordinated permit reviews by local, state and federal agencies.		

Comment ID:	19	Commenter:	Port of Portland - Sebastian Degens
Comment:	Without an encouraging investment climate, we are unlikely to every successfully return the brownfield sites in the harbor, those challenged by contamination and unsustainable past practices, to a productive use.		
Response:	The River Plan / North Reach supports a climate of investment in the working harbor. The River Plan contains recommendations to implement the Harbor ReDI (Harbor Redevelopment Initiative) and develop strategies to address citywide industrial brownfields issues. Ultimately, achieving industrial redevelopment of brownfields may require incentives from government at the state and federal level as well as local initiatives.		

Commenter: Portland & Western Railroad - Ronald G. Russ

Comment ID:	9	Commenter:	Portland & Western Railroad - Ronald G. Russ
Comment:	I am extremely concerned about the potential hazards to public safety that develop when any person crosses a rail line at grade. The current proposed trail alignment in Linnton indicates several at-grade trail crossings of railroad tracks and PNWR is seriously opposed to any such configuration. I suggested to staff that in PNWR could obtain a more detailed map of the area's proposed trails and at-grade crossings, I would work with my civil engineering team and ODOT-Rail Division to offer alternative configurations.		
Response:	Safety is a legitimate concern and it will be paramount in the design phase of the future trail development. The trail is proposed to cross the railroad tracks at NW 107th. This crossing is combined with an existing public right-of-way crossing. There are many examples of well-designed trail and track crossings across the country. The portion of the trail that crosses the tracks can be designed in coordination with Portland and Western Railroad, with safety and security in mind. The City is committed to working with the railroad on design solutions when funding is secured.		
Comment ID:	8	Commenter:	Portland & Western Railroad - Ronald G. Russ
Comment:	I support the Working Waterfront Coalition and its concerns and am here tonight to ask you to provide certainty of outcome and a balanced approach to take in the concerns of all stakeholders in this planning process.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff will continue to work with stakeholders to refine the draft plan to address these multiple objectives as directed by City Council.		
Comment ID:	7	Commenter:	Portland & Western Railroad - Ronald G. Russ
Comment:	If I were to decide on a further or new investment in the North Reach it is not clear at this point if permitting would require the current 36 to 40 months or if it would be closer to 48 to 60 months. Since the permitting time period is unclear, a prudent funds manager would be hard pressed to be justified in approving any initial permitting process and pre-engineering expenditure in the North Reach without some assurances at the end of the day there would be successful outcome to the permitting process. Also, the longer the permitting time period and the complexity of that process could reduce investment returns. I could not recommend to my board that we go with the location that could potentially cost us more time and investing dollars due to the complications associated with permitting over an uncertain time period.		
Response:	The City's review process for development in the North Reach will not take 36 months or more. State law limits the amount of time that the City has to make a decision on a land use review case (such as a greenway review, design review or river review) to 120 days. In accordance, all City land use review timelines are 120 day or less. The state law allows applicants to extend the timeline up to 245 extra days. The River Plan recommends a joint agency early review process that is intended to coordinate the decision making processes of the multiple agencies that review development in the water. The goal of this new and voluntary process is to reduce permit timelines, coordinate decisions and coordinate mitigation requirements. Please see the flow chart in the amendments to the River Plan.		

Comment ID:	10	Commenter:	Portland & Western Railroad - Ronald G. Russ
Comment:	The River Plan, as it appears to me from the latest version, will be more of a burden than an enhancement to our City's North Reach industrial cluster. The specific proposals regarding vegetation mitigation, river review and mitigation banking continue to be of great concern to all the members of the waterfront industrial community, and I believe the concerns have merit.		
Response:	<p>The are several code changes that should make the River Plan code less of a burden than the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. 		
Comment ID:	11	Commenter:	Portland & Western Railroad - Ronald G. Russ
Comment:	If businesses choose not to expand or locate due to the extraordinary regulatory and development requirements suggested by the City, it will be impossible to fund the mitigation plans the City's planning staff has developed. It is my sincere belief the very guidelines being developed to restore the North Reach are so onerous they will have an effect upon the community that will yield exactly the opposite results they are proposed to achieve.		
Response:	<p>Staff does not agree with the assertion that River Plan regulations and development requirements will discourage investment in the working harbor. On the contrary, the revised greenway regulations recommended by the River Plan are more clear and more flexible than the existing greenway code. The are several code changes that should make the River Plan code less of a burden than the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. 		

Commenter: Portland Business Alliance - Bernie Bottomly

Comment ID:	16	Commenter:	Portland Business Alliance - Bernie Bottomly
Comment:	The City's economic development strategy calls for the creation of 10,000 jobs in five years. The North Harbor's industrial jobs are just the kind of employment growth we need: family wage jobs with benefits. The Portland Plan Analysis points out that the one employment land area where we have a deficit is in general industrial transportation. We believe the draft plan makes investment in the North Reach more expensive and more difficult and hurts our ability to achieve the goals of the economic development strategy, regain our historical level of job capture and increase median family incomes.		
Response:	River Plan staff agree that growing jobs in the North Reach is a very important goal, but this goal must be balanced with other plan objectives, including watershed health. The River Plan contains several key recommendations that support economic prosperity in the North Reach, including removal of the greenway setback in the river industrial overlay zone, strengthening protection of the industrial land supply, creating a standards track that allows certain development to bypass review and creating an optional process for coordinated permit reviews by local, state and federal agencies.		

Comment ID:	17	Commenter:	Portland Business Alliance - Bernie Bottomly
Comment:	The Working Waterfront Coalition has proposed changes which we believe strike the appropriate balance that will both accomplish significant enhancements to the river, require businesses to pay substantial fees and meet strict environmental requirements while at the same time making investment in the Harbor attractive from a financial and regulatory perspective.		
Response:	Thank you for your comment. The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff will continue to work with stakeholders to refine the draft plan to address these multiple objectives as directed by City Council.		
Comment ID:	14	Commenter:	Portland Business Alliance - Bernie Bottomly
Comment:	The provisions of the draft plan that make it significantly more expensive and bureaucratically burdensome to redevelop in the harbor run counter to our adopted regional land use strategy – which the city has strongly endorsed.		
Response:	The River Plan includes policy statements and code amendments that strengthen the industrial sanctuary and river-dependent land use strategies that support the working harbor. Staff has worked closely with stakeholders and technical experts to develop reasonable and workable regulations. The plan reduces regulatory uncertainty and revises many unclear regulations. The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code (for example, it allows off site mitigation through fees-in-lieu).		
Comment ID:	15	Commenter:	Portland Business Alliance - Bernie Bottomly
Comment:	The vast majority of sites being targeted for brownfield redevelopment through the Harbor ReDI effort are simply uneconomic due to the remediation costs and the uncertainty associated with the superfund cleanup. The recommended draft would make remediating these sites even more difficult by adding costs, reducing the economic viability of projects and increasing bureaucratic uncertainty.		
Response:	<p>The River Plan / North Reach contains recommendations to implement the Harbor ReDI (Harbor Redevelopment Initiative) and develop strategies to address citywide industrial brownfield issues. Ultimately, achieving industrial redevelopment of brownfields may require incentives from government at the state and federal level as well as local initiatives.</p> <p>Under the new River Plan regulations it should not take longer to get a City permit, although it may cost more due to the requirement to mitigate for development impacts. However, the Plan contains several key recommendations that support economic prosperity in the North Reach, including removal of the greenway setback in the river industrial overlay zone, strengthening protection of the industrial land supply, creating a standards track that allows certain development to bypass review and creating an optional process for coordinated permit reviews by local, state and federal agencies.</p>		

Commenter: Rebecca Freeman

Comment ID:	275	Commenter:	Rebecca Freeman
Comment:	I support the trail alignment in the North Reach. It is time to make progress towards more off-road trails for cyclists in North Portland. Many more folks will use bicycles for routine transportation when they can do so without risking their lives. It is time to make the North Portland Greenway a reality. Getting folks onto bikes makes citizens and the environment healthier and relieves traffic congestion.		
Response:	Thank you for your comment.		

Commenter: Roberta Schwarz

Comment ID:	287	Commenter:	Roberta Schwarz
Comment:	Please adopt the draft of the North Reach River Plan. It is time to reverse more than a century of degradation in the North Reach of the Willamette. It is time to restore habitat for fish, wildlife and people!		
Response:	Thank you for your comment.		
Comment ID:	288	Commenter:	Roberta Schwarz
Comment:	Industry should pay their fair share. They should have to mitigate for their impacts to the river and they should contribute to helping restore the river.		
Response:	Thank you for your comment.		
Comment ID:	289	Commenter:	Roberta Schwarz
Comment:	The City should not give up its regulatory authority. The people of Portland have a right to have a say over what industry does in our river!		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Ron Gouguet

Comment ID:	205	Commenter:	Ron Gouguet
Comment:	There are many other issues that are left open, are not resolved, or are not discussed in the City's proposal. As a result of this uncertainty and yet to be developed process, it is not possible to accurately estimate the financial impact on the regulated community. The city should not adopt this unfinished.		
Response:	Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations. With a proposed effective date of January 1, 2011, the policies, objectives and regulations of River Plan / North Reach can be adopted, leaving time for refinement of technical details. River Plan staff will continue to hold meetings throughout the year to brief interested parties about the results of an upcoming independent science panel review of the mitigation calculation method and further work on the development of the in-lieu-fee. Staff will bring the package to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		
Comment ID:	206	Commenter:	Ron Gouguet
Comment:	A team needs to be convened and charged with assembling the outstanding 'details' into a coherent framework. In my experience, the best results can be obtained by including representatives of the regulated community and the Public in the development in to assure their buy-in, trust, and acceptance. Once the framework is defined, accurate evaluation of the impacts and potential 'value added' of this program could be completed.		
Response:	The River Plan includes an upcoming independent science panel review of the mitigation calculation method and further development of the in-lieu-fee. Staff will bring the package to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		

Comment ID:	200	Commenter:	Ron Gouguet
Comment:	The city proposes to couple HIS and HEP with HEA in a modeling framework to serve as a natural resource services accounting system. This will be used by the City to assess mitigation fees or require credits to be purchased by a bank when there is development. I strongly urge the City Council to take the time to understand the financial impacts of this methodology before adopting the River Plan. The fact is the City's application is novel and new, subjective, and setting up the models will be complex and time consuming. While it may be a good approach, it takes time to get it right. Until then it creates uncertainty for everyone.		
Response:	<p>According to staff at the NOAA's National Marine Fisheries Service, the use of HEA, which measures performances of habitat, is scientifically robust and based on the best available science. While, like all models and approaches including the Willamette Partnership model, there is some subjectivity as it is applied on a site-specific basis, it is transparent and repeatable and widely used by the agencies.</p> <p>The use of HSI and HEP to populate the HEA model is also appropriate and follows the model used by NOAA at the Commencement Bay remediation in Puget Sound. HSI and HEP are an appropriate way to value habitats. Where HSIs do not exist for specific species or specific life stages, then they will need to developed based on the best available science. NOAA did this for some species in Puget Sound and the City is doing this for some species in the North Reach, subject to peer review by the independent science panel. NOAA thought this was an appropriate approach to ensure that the model always reflects the best available science.</p> <p>City staff will take the time necessary to formalize the mitigation fee-in-lieu methodology and rules prior to the date the river plan code goes into effect. The plan will not be effective until January 1, 2011. During the intervening months, staff will work with a panel of scientists to review the HSI and HEP/HEA models, will report to stakeholders and the City Council on progress, and finally hold an additional hearing on the final methodology and rules.</p>		
Comment ID:	201	Commenter:	Ron Gouguet
Comment:	Alternative methods for assigning habitat values have been developed in Oregon. City representatives participated in development Willamette Partnership's state of the art mitigation crediting and debiting system. I strongly recommended that the City incorporate and apply the Willamette Partnership credit and debit approach, along with Partnership's proposed process for evaluation and updating ecosystem service accounting.		
Response:	The use of the HSI/HEP and HEA application differs from the Willamette Partnership approach in a number of ways that are neither good nor bad, just different for different applications and uses. The Willamette Partnership approach does not incorporate a temporal component - how the performance of habitat changes over time. The use of HEA does. Further, the geographic scope is different. The Willamette Partnership approach focuses on species and methodologies appropriate for tributary and upland species, and less so for large river systems like the Willamette. The use of the HSI/HEP and HEA the City is utilizing is designed for a large river system like the Willamette River. The Willamette Partnership model also allows mitigation to take place outside the project area and sometimes outside the Willamette Valley. The City's approach prioritizes mitigation on-site and in-kind first, and limits off-site mitigation (still in-kind) to the North Reach.		
Comment ID:	202	Commenter:	Ron Gouguet
Comment:	The City's proposed approach for developing inputs, using HSI and HEP, for the summation in the HEA model will be difficult to implement and prone to personal opinion, subjective judgments, etc. and will significantly increase permit application complexity and development time.		
Response:	The HSIs used for the HEP valuation have been drafted based on the best available science, and will be vetted through a scientific panel. The intent is to have a transparent and repeatable methodology.		

Comment ID:	203	Commenter:	Ron Gouguet
Comment:	The ecological "baseline condition" of the properties within the North Reach is highly altered with limited ecological function or service. Any approach to evaluating habitat quality must be based on baseline conditions and the communities that actually exist rather than the theoretical conditions or prescriptive HIS inputs. There is an underlying assumption at present that the potentially affected parcels or areas in this part of the LWR currently provide ecological functions similar to the HIS "ideal." Some factor to correct for this disparity should be considered.		
Response:	Evaluation of the ecological "baseline condition" within the area of development activity is effectively taken into consideration as the data for actual existing conditions is entered into the HEP model.		
Comment ID:	204	Commenter:	Ron Gouguet
Comment:	In the current environmental review process non-habitat services (e.g., change in water quality due to alteration in impermeable surface area or rates of erosion) are assessed relative to the proposed project; however, potential benefits or impacts associated with non-habitat services are not included in the City's ecosystem services accounting approach. These non-habitat services should be included in the City's proposed credit/debit approach.		
Response:	The HSIs that will be used for the HEP valuation have been drafted based on the best available science and are intended to provide a numerical value of the habitat on the site both prior to and after development or restoration alters the habitat. The question about non-habitat services can be presented to the science panel who will review the HSIs.		

Commenter: Ross Is. Sand & Gravel Co - A. Charles Steinwandel

Comment ID:	169	Commenter:	Ross Is. Sand & Gravel Co - A. Charles Steinwandel
Comment:	RIS&G supports the vision of the River Plan, RIS&G remains concerned that certain aspects of the Recommended Draft will negatively impact businesses along the North Reach. RIS&G is concerned about the cost of complying with the vegetated area requirements. Although the Recommended Draft provides for a payment in lieu option, the 15 percent standard is much more extensive than under existing greenway review, particularly because the new vegetated area standard is triggered by any development anywhere on the site. RIS&G supports the ongoing efforts to provide multiple options for complying with the standard.		
Response:	<p>The existing greenway code requires that the area within and riverward of the greenway setback be landscaped with one tree for every 20 feet of river frontage, one shrub for every 2 feet of river frontage, and living ground cover over all areas that are not paved. The landscape standard is triggered by development anywhere in the greenway overlay zone. The standard can be waived when planting vegetation will significantly interfere with a river-dependent or river-related use or development. On sites with an existing use, coming into compliance with the landscape standard is capped at 10% of project value.</p> <p>The River Plan proposes a revised vegetation standard that is also triggered when development occurs in the river overlay zone (as opposed to anywhere on the site). The vegetation planting standard is one tree, three shrubs, and four other ground cover plants for every 100 square feet of planting area. The new standard requires that the applicant spend 1% of project value on planting vegetation anywhere in the river overlay zone. The new standard does not limit the planting to the river bank, but instead provides an incentive for planting on or near the river bank. If it is more appropriate from the applicants perspective to plant vegetation in another location on a site, then the owner will now have the flexibility to plant where ever they prefer, including on the roof of a building. In addition, the standard allows the applicant to pay a fee-in-lieu of planting on-site. This option will ensure that vegetation is enhanced in the North Reach even when there is no opportunity to enhance vegetation on heavily developed sites.</p>		

Comment ID:	170	Commenter:	Ross Is. Sand & Gravel Co - A. Charles Steinwandel
Comment:	RIS&G supports the vision of the River Plan, RIS&G remains concerned that certain aspects of the Recommended Draft will negatively impact businesses along the North Reach. The Recommended Draft will make it even more difficult to remediate contaminated sites along the Willamette River. Although the Oregon Department of Environmental Quality currently seeks the City's feedback in its administration of the state's cleanup program, under the Recommended Draft, the City's role would be formalized, adding yet another layer to an already cumbersome process. Such a change will cause significant delays in DEQ's ability to process applications and result in unnecessary cost to businesses like RIS&G.		
Response:	The River Plan code amendments provide clear guidance for cleanup activities and go a long way toward reducing regulatory barriers to cleanup in the North Reach. Applicants for state-led cleanups are currently required to address the City's substantive requirements but do not have follow the City's review process. The Plan recommendations are designed to improve coordination among the City, DEQ, and EPA on cleanup matters while achieving cleanup solutions that meet the City's goals for the river and its adjacent lands.		

Commenter: Ruth Lane

Comment ID:	238	Commenter:	Ruth Lane
Comment:	Baltimore Woods should be preserved to fill the gap in green connectivity between natural areas in the North Reach.		
Response:	Thank you for your comment.		
Comment ID:	239	Commenter:	Ruth Lane
Comment:	We agree with the proposed Special Habitat Area and conservation overlay designation for Baltimore Woods for connectivity and native Oregon oak. Native oak have the highest wildlife habitat value among trees and should be preserved.		
Response:	Thank you for your comment.		
Comment ID:	240	Commenter:	Ruth Lane
Comment:	We agree with the proposed alignment of the Willamette Greenway Trail in the Baltimore Woods corridor.		
Response:	Thank you for your comment.		
Comment ID:	242	Commenter:	Ruth Lane
Comment:	The plan should be adopted without further delay.		
Response:	Thank you for your comment.		

Comment ID:	237	Commenter:	Ruth Lane
Comment:	We recognize that riverbank restoration is the most important problem that needs to be addressed in the North Reach Plan due to the crisis of endangered river species. Yet we also feel that upland connectivity is an important goal for the next 30 years of the Plan, especially since there is also a sharp decline in bird, reptile, amphibian and land species in the North Reach.		
Response:	Thank you for your comment.		
Comment ID:	241	Commenter:	Ruth Lane
Comment:	We need to have tightened regulations to restore the riverbank habitat rather than allow further degradation.		
Response:	Thank you for your comment.		
Comment ID:	244	Commenter:	Ruth Lane
Comment:	Industry needs to pay its fair share. The proposed alternative fee is less than their actual impact and would lead to continued habitat losses in the North Reach.		
Response:	Thank you for your comment.		
Comment ID:	243	Commenter:	Ruth Lane
Comment:	The citizens of North Portland and the city want to retain a voice in what happens in their river. Don't give up regulatory authority over the river.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Sauvie Island Conservancy- Donna Matrazzo

Comment ID:	90	Commenter:	Sauvie Island Conservancy- Donna Matrazzo
Comment:	The City Council River Plan North Reach Hearing was truly the worst hearing I've ever attended in terms of moving the proceedings along to give everyone attending the opportunity to speak up in a timely manner. As a result, you did not get to hear the full scope of testimony that people came prepared to offer.		
Response:	Thank you for your comment. The River Plan / North Reach hearing was continued to give all interested parties an opportunity to testify. The River Plan team regrets your frustration with the Council hearing proceedings.		

Comment ID:	91	Commenter:	Sauvie Island Conservancy- Donna Matrazzo
Comment:	The North Reach plan directly impacts wildlife, habitat and residents of Sauvie Island. Sauvie Island residents are all on well water, and thus dependent on the water quality of the aquifers from the river system. Half of the island is a state Wildlife Area and a significant stop on the Pacific Flyway. The island is full of rivers, lakes and sloughs- an important connection to the whole North Reach river ecosystem. Therefore, we concur with the testimony of the Environmental Panel at the February City Council Hearing (Mike Houck, Bob Sallinger, and Travis Williams).		
Response:	Thank you for your comment.		

Commenter: Schnitzer Steel Industries - James Wilson

Comment ID:	154	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	As we move toward making River Plan regulatory and investment choices, it is imperative that we clearly outline the desired outcomes and use the best available technical information.		
Response:	The River Plan / North Reach contains specific objectives and action items related to the multiple policy goals of the plan. Staff has worked closely with stakeholders and technical experts to develop an effective plan with reasonable and workable regulations.		

Comment ID:	155	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. It is unclear in the draft report how the NRIU will be used. We recommend adding language that will clarify its application.		
Response:	<p>This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008.</p> <p>The Natural Resource Inventory and the corresponding Economic, Environmental, Social and Energy Analysis provide the basis for the application of the River Environmental Overlay Zone, the Environmental Conservation Overlay Zone, and the Environmental Protection Overlay Zone. The resource inventory information in the NRI report will inform any River Review that takes place as a result of development occurring in one of the above listed environmental overlay zones. Volume 1A of the River Plan / North Reach describes the policies and objectives related to the inventory and the ESEE and the application of the environmental overlay zones. Please see pages 30 through 32 in Volume 1A for the details.</p>		

Comment ID:	156	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. Model inputs should be included in the report for greater transparency and evaluation.		
Response:	<p>This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008.</p> <p>The model inputs are the natural resource features (e.g., river, vegetation, flood plain). For a summary of the inventory methodology, please see pages 13 through 23 of River Plan Volume 3A.</p>		

Comment ID:	157	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. Maps should include map symbology, displaying intermediate functions used to create summary figures.		
Response:	This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008.		
Comment ID:	158	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. It is inappropriate to use the 2005 Oregon Department of Fish & Wildlife study as basis for designating beach areas as "Special Habitat Areas." The study did not conclusively find statistically significant results that would support this designation.		
Response:	<p>This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008.</p> <p>The Special Habitat Area criteria was revised in 2008 to include NOAA designated Critical Habitat for salmonids. The ODFW study is used as a reference to describe the relationship between salmonids and shallow water areas.</p>		
Comment ID:	159	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. Two of the criteria used to designate the Schnitzer Steel riverfront as medium to high riparian function are questionable. Criterion 3, bank stability, is a result of the built environment. Because this is an industrial site, the bank may be altered to meet business needs. We therefore cannot assume that this condition will be there in the future. Also, Criterion 5, we disagree that the streambank at this location affects channel dynamics or provides large woody debris.		
Response:	<p>This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008.</p> <p>The criteria were revised in 2008 to more accurately reflect the extent of bank hardening in the North Reach. Please see pages 14 through 15 of River Plan Volume 3A for the current inventory criteria.</p>		
Comment ID:	160	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. We recommend that the inventory should include a contextual map that presents piers, rip rap and other improvements.		
Response:	<p>This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008.</p> <p>Bank treatment data was added in 2008 and used to review criteria related to bank functions. Please see pages 13 through 14 of River Plan Volume 3A for additional details.</p>		

Comment ID:	161	Commenter:	Schnitzer Steel Industries - James Wilson
Comment:	The NRIU could be an important tool used to formulate the River Plan. A developed flood plain, such as found on the Schnitzer property, does not provide the ecological functions of an undeveloped flood plain. The report should describe the functions that this developed flood plan actually provides.		
Response:	This letter pertains to the draft Natural Resource Inventory Update report, produced in 2007. The comments were addressed through revisions of the NRIU Project Report (Volume 3B) and through completion of the River Plan document and supporting materials. For a summary of how technical comments on the draft NRIU were addressed, please see River Plan Volume 3B, NRIU Appendix 5: Willamette Natural Resources Inventory Technical Review - January 2008. Please see pages 13 through 14 of River Plan Volume 3A for additional details regarding the current inventory criteria.		

Commenter: Schnitzer Steel Industries - Jeff Swanson

Comment ID:	162	Commenter:	Schnitzer Steel Industries - Jeff Swanson
Comment:	Industrial and freight mobility interests support the goals of the River Plan - a healthy river system for all stakeholders. The practical mechanism for balanced attainment of those goals is clearly at issue, and so it is wise to take more time as you have determined to do to examine policy impacts, ecological and economic.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. The River Plan / North Reach will not go into effect until January 1, 2011. During the time between adoption of the plan's policies, objectives and regulations, and January 1, 2011 staff will continue to work with stakeholders to finalize the technical details of the mitigation fee-in-lieu. The plan resolution includes a workplan that directs staff to bring the details to City Council for a public hearing so that all can understand and comment on the temporary fee prior to implementation.		
Comment ID:	163	Commenter:	Schnitzer Steel Industries - Jeff Swanson
Comment:	Portland is truly a dynamic, complex, and vital multi-modal highway, rail and marine transportation hub. Many of the connection points between modes that make this hub function occur on private industrial lands in the North Reach. It is critical that these businesses continue to be able to invest in the infrastructure that allows for selection and use of the most cost-effective and sustainable modes of transportation available. As we look for ways to reduce our carbon footprint, one of our most effective methods is to shift modes of transportation, for example is to shift from truck to barge for shipping, but this would require construction of additional dock facilities on site. The River Review process is likely to exacerbate permitting time length and cost, making it harder for construction and expansion projects to secure capitol.		
Response:	The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code (for example, it allows off site mitigation through fees-in-lieu). The River Plan also recommends a joint agency early review process that will reduce permitting time and ensure coordination among all agencies with authority to review development in the water. The River Plan / North Reach attempts to optimize multiple goals for the land along the Willamette River. The Plan recognizes the working harbor as a critical economic engine for the city and the importance of the multimodal system. Supporting transportation efficiencies is an important goal, but it is not the only goal for this area.		

Commenter: Simone Streeter

Comment ID:	318	Commenter:	Simone Streeter
Comment:	I request that the Portland City Council adopt the Willamette River Greenway Trail alignment as envisioned in the River Plan North Reach Recommended Draft November 2009 now.		
Response:	Thank you for your comment.		
Comment ID:	319	Commenter:	Simone Streeter
Comment:	I request that any mitigation or restoration sites that are to be designated not preclude the development of the multipurpose Willamette River Greenway Trail alignment.		
Response:	Staff supports the development of the greenway trail on sites where the trail alignment is identified. The fact that a site might also be a mitigation bank site should not preclude development of the greenway trail. Volume 1A has been amended to make this policy statement clearly, and the City's future mitigation bank certification process will ensure that trails may not be excluded from bank sites.		

Commenter: Steve Engel

Comment ID:	98	Commenter:	Steve Engel
Comment:	I urge the Mayor and City Commissioners to support the draft of the North Reach River Plan because it is an opportunity to improve its health and increase public opportunity for access to a local natural resource that will have a positive impact on our community for decades.		
Response:	Thank you for your comment.		

Commenter: Swan Island Bicycle Commuter Group - James Kysela

Comment ID:	253	Commenter:	Swan Island Bicycle Commuter Group - James Kysela
Comment:	We, The Swan Island Bicycle Commuter Group, believe that we deserve a better commuting infrastructure than is currently presented to us. We may not be located in the hippest section of town, and possibly are left out of consideration at times in the bike planning process, but are excited by plans published in the recent North Reach proposal and the 2030 Bike Plan. Specifically we would like to see the Swan Island - Lower Albina connector route (Project A14 in the North Reach Plan - High Priority ranking) put into the south as part of the North Portland Greenway. A secondary consideration would be for the Mock's Crest trail (Project A 13 - Low Priority ranking) for bike/pedestrian access put in to the east.		
Response:	Thank you for your comment.		

Commenter: Swan Island Bicycle Commuters Group

Comment ID:	207	Commenter:	Swan Island Bicycle Commuters Group
Comment:	The SIBCG would like to submit this letter in favor of a "Swan Island 2nd Access" route that would link the central city more directly and safely to the ten thousand jobs in Swan Island Industrial Area. The route would also provide a safe and scenic connection to other existing and planned bike/trail infrastructure in North Portland and beyond.		
Response:	Thank you for your comment.		
Comment ID:	208	Commenter:	Swan Island Bicycle Commuters Group
Comment:	The Swan Island Bicycle Commuters Group looks forward to working with the City and all stakeholders to make the vision of safe, scenic and convenient cyclist and pedestrian access to the thousands of jobs located on Swan Island and Mock's Bottom a reality. It is our view that the integration of this Willamette Riverside connection route into Portland's existing and planned bicycle infrastructure will be a great and necessary achievement for a future world-class, bicycle-friendly, green city.		
Response:	Thank you for your comment.		

Commenter: Swan Island Business Association - Dave Panchot

Comment ID:	172	Commenter:	Swan Island Business Association - Dave Panchot
Comment:	SIBA endorses a North Portland Greenway Trail from the Eastbank Esplanade to St. Johns.		
Response:	Thank you for your comment.		
Comment ID:	173	Commenter:	Swan Island Business Association - Dave Panchot
Comment:	SIBA does not support a Trail segment through the Shipyards! SIBA urges the City of Portland to move decisively to construct segments where publicly owned right of way and/or public/private partnerships offer once in a lifetime opportunities.		
Response:	Thank you for your comment. The Greenway Trail is a key component of the River Plan / North Reach. The River Plan / North Reach does not recommend that the greenway trail be built in the shipyard on Swan Island. During the development of the plan, staff worked with stakeholders to identify a trail alignment that respects the safety, security and operational concerns of river-dependent industrial facilities, increases transportation options in the North Reach, and brings people to and along the river where there are appropriate opportunities.		

Commenter: Swan Island TMA - Lenny Anderson

Comment ID:	223	Commenter:	Swan Island TMA - Lenny Anderson
Comment:	Going Street sidewalk is primarily steeper than ADA requirements, uneven, and narrow. Revitalization of this corridor has the potential for broadly positive results affecting job creation, transportation, safety, habitat restoration and storm water management. This is a compelling case for this project to go forward.		
Response:	Thank you for your comment.		

Commenter: Terrafirma Building, Inc. - David Hassin

Comment ID:	171	Commenter:	Terrafirma Building, Inc. - David Hassin
Comment:	We would like to voice our support of the npGreenway vision for the North Portland Greenway Trail. As real estate developers in the North Portland area, we understand the need for, and positive impact projects like this have on our community and the city in general.		
Response:	Thank you for your comment.		

Commenter: The Forest Park Conservancy - Stephen Hatfield

Comment ID:	233	Commenter:	The Forest Park Conservancy - Stephen Hatfield
Comment:	We are also encouraged by the potential for expansion of the regional trail system along the river, including the npGreenway, which would facilitate recreational access for residents of North Portland- both to the river and to Forest Park.		
Response:	Thank you for your comment.		

Comment ID:	230	Commenter:	The Forest Park Conservancy - Stephen Hatfield
Comment:	The Forest Park Conservancy fully supports adoption of the River Plan.		
Response:	Thank you for your comment.		

Comment ID:	235	Commenter:	The Forest Park Conservancy - Stephen Hatfield
Comment:	We acknowledge that a tremendous amount of time and energy has already been invested in this plan, and believe that the time has come to adopt the River Plan and begin moving forward with efforts to restore the river for fish, wildlife, and the people of Portland.		
Response:	Thank you for your comment.		

Comment ID:	231	Commenter:	The Forest Park Conservancy - Stephen Hatfield
Comment:	Historically, the connectivity between Forest Park and the Willamette River was once very strong, and we believe that elements of this plan could help pave the way for future restoration efforts that, among other favorable outcomes, could benefit wild populations of salmon and steelhead.		
Response:	Thank you for your comment.		

Comment ID:	232	Commenter:	The Forest Park Conservancy - Stephen Hatfield
Comment:	We need permanently protected restoration sites as well as connectivity between those sites. We believe that environmental zoning on industrial lands is essential, to provide baseline protection for riparian and upland resources, and to minimize the further loss of natural resource function along this stretch of the Willamette River.		
Response:	Thank you for your comment.		

Comment ID:	234	Commenter:	The Forest Park Conservancy - Stephen Hatfield
Comment:	We feel strongly that the City should not abandon its regulatory authority below ordinary high water. The residents of Portland have every right to dictate what industry can and cannot do in our river.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Tualatin Riverkeepers - Sue Marshall

Comment ID:	197	Commenter:	Tualatin Riverkeepers - Sue Marshall
Comment:	I am here today on behalf of the Tualatin Riverkeepers in strong support of the North Reach River Plan. In keeping with your demonstrated commitment to improve fish and wildlife species and water quality in Portland, we urge your support of the North Reach River Plan. Please help assure that salmonid species have a safe passage back to the inland waters of the Tualatin River and we will continue to do our utmost to assure they find a healthy place to spawn and rear.		

Response:	Thank you for your comment.		
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Comment ID:	199	Commenter:	Tualatin Riverkeepers - Sue Marshall
Comment:	The Willamette River Plan parallels and integrates with both the superfund cleanup and upland cleanup efforts. It is important to view these collective efforts as supporting each other.		

Response:	<p>As you may know, the Portland Harbor Superfund study area is within the boundaries of the River Plan / North Reach, but the two programs have different authorities, implementation approaches, and goals. Superfund focuses on cleaning up contamination from past operations. The North Reach Plan tries to improve future conditions through development and redevelopment. The two programs should have complimentary results because both ultimately will improve human health and the environment.</p> <p>The River Plan / North Reach is very well synced with the Portland Harbor Superfund cleanup study and state-led cleanups in that the River Plan clarifies and illuminates City policy and zoning regulations regarding land use and development in the working harbor at a time when there will be increased cleanup activity in the area. This clarity will be important as cleanup remedies are designed.</p>		
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Comment ID:	198	Commenter:	Tualatin Riverkeepers - Sue Marshall
Comment:	Local regulatory oversight is an essential part of assuring implementation of the plan. The city has made significant investment of public dollars in clean water and is essential to maintain a local voice and a proactive approach as the plan is implemented.		

Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		
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Commenter: Univeristy of Portland

Comment ID:	122	Commenter:	Univeristy of Portland
Comment:	<p>The University of Portland does not object to the presences of EC and EP zoning on its bluff property, even though this property is removed from the river. We do not object to the specific location of EP and EC zoning along the McCosh frontage. We understand that the Bureau of Planning and Sustainability (BPS) would support an amendment that moves the proposed boundary between the EC and EP zoned property on the bluff. Specifically, the EP zone along the McCosh frontage between Portsmouth and the western street lot line of Van Houten would be replaced with an EC zone. This results in an adjustment of the EP/EC zone boundary by approximately 240 feet.</p> <p>The University of Portland requests that the City remove the EC and EP zone along the McCosh frontage to a depth of 165 feet in order to accommodate a gateway building, central to the University's river campus expansion.</p>		
Response:	Thank you for your comment. Mayor Adams and Commissioner Fish plan to introduce a resolution directing staff to draft a development agreement with the University of Portland.		

Commenter: University of Portland - Christe White

Comment ID:	184	Commenter:	University of Portland - Christe White
Comment:	<p>The only exception we have to the broad support of the River Plan, is a small area of new EC and EP zoning on the bluff along the McCosh Street frontage. This is the area of the University's long planned gateway building. We appreciate Commissioner Leonard's solution to this conflict. With the removal of the EC zone from this small area of the campus, the University would agree to comply with the standards for resource mitigation in the EC zone but not be required to perform an alternatives analysis.</p>		
Response:	Mayor Adams and Commissioner Fish are sponsoring a resolution directing City staff to draft a development agreement between the City and University of Portland that will allow the removal of the environmental conservation zone in exchange for mitigation comensurate with the impacts from the proposed gateway structure.		

Commenter: Urban Greenspaces Institute - Mike Houck

Comment ID:	220	Commenter:	Urban Greenspaces Institute - Mike Houck
Comment:	We urge you to adopt the River Plan and get on with it's implementation.		
Response:	Thank you for your comment.		
Comment ID:	221	Commenter:	Urban Greenspaces Institute - Mike Houck
Comment:	The Plan does an excellent job of integrating environmental and industrial interests in the working harbor.		
Response:	Thank you for your comment.		

Comment ID:	222	Commenter:	Urban Greenspaces Institute - Mike Houck
Comment:	I understand there has been a request to strip Waud's Bluff at the University of Portland of its Environmental Protection Zone so that development can occur without environmental oversight. Waud Bluff is not only one of the most significant upland habitats in the Portland Harbor but the ponderosa pine and Oregon white oak forest is unique within the city of Portland. If any development at all is allowed on this incredibly steep slope, we would argue that development on the bluff is ill advised from both a hazard and environmental perspective, it should be only with the strictest environmental standards. That means maintaining the existing Environmental Protection zoning.		
Response:	Mayor Adams and Commissioner Fish are sponsoring a resolution directing City staff to work with the University of Portland to draft a development agreement that will allow removal of the environmental overlay zone in a relatively small area of Waud Bluff in exchange for mitigation that will be commensurate with the impact a building in this location would have on the habitat provided by the resources on the bluff. Council will review the development agreement to ensure that it meet the needs of the City and the University of Portland.		
Comment ID:	219	Commenter:	Urban Greenspaces Institute - Mike Houck
Comment:	We are pleased that the issue of whether to delay the process further and relinquish the city's jurisdiction below Ordinary High Water has been resolved in the negative.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: Veronica Kelly

Comment ID:	331	Commenter:	Veronica Kelly
Comment:	In urging your support for a bold and ambitious North Reach River Plan- I ask you to remember the primary thing that makes Portland such a great place to live: our fantastic access to nature and tradition of ecological stewardship. I urge the City Council to adopt the Draft River Plan with Mayor Adams' proposed amendments including the provisions that require industrial users to both mitigate for their impacts to the river and contribute to helping restore the river.		
Response:	Thank you for your comment.		
Comment ID:	332	Commenter:	Veronica Kelly
Comment:	The voters and households have regularly supported funding for ecological restoration and conservation. Business and industry should do more than simply benefit from these public investments and help restore our urban ecosystems.		
Response:	The proposed River Plan regulations are intended to ensure that incremental enhancement of the natural resources in the North Reach is achieved as development or redevelopment occurs and that proportionate and fair compensation is provided for unavoidable impacts to natural resources and functional values.		

Comment ID:	333	Commenter:	Veronica Kelly
Comment:	Most importantly the city should not give up any of its regulatory authority. The notion that the public would give up its authority to protect public trust resources (its own property) is absurd enough. But it would also be extreme folly to let go of a critical tool for fostering ecologically viable cities. To the contrary, we should be breaking new ground with the regulatory tools we apply to the North Reach.		
Response:	Thank you for your comment. The City is interested in ensuring that development activities that occur below ordinary high water are reviewed in the context of City land use plans (including the desire to have river dependent industrial uses) and the complete ecology of the area around the development site. The City review will ensure that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development does occur, that any lost resource function is fully replaced on the site or somewhere else in the North Reach.		

Commenter: West Mult. Soil & Water Cons. Dist - Dick Springer

Comment ID:	27	Commenter:	West Mult. Soil & Water Cons. Dist - Dick Springer
Comment:	The District supports opportunities for NW Portland and Multnomah county residents to re-establish access to the Willamette River and viewing points at stream confluences where bank vegetation buffers, habitat and fish migration refugia can be restored.		
Response:	Thank you for your comment.		
Comment ID:	26	Commenter:	West Mult. Soil & Water Cons. Dist - Dick Springer
Comment:	The District supports and endorses the comments and recommendations of the Portland Audubon Society regarding the River Plan.		
Response:	Thank you for your comment.		

Commenter: Wilfred Thompson

Comment ID:	72	Commenter:	Wilfred Thompson
Comment:	I am writing to show support for protection of the Baltimore Woods which fill several missing pieces in the North Reach. The Baltimore Woods serves as a buffer between industry and residential use.		
Response:	Thank you for your comment.		
Comment ID:	73	Commenter:	Wilfred Thompson
Comment:	The Baltimore Woods contain mature oak groves within close proximity to the river, and form a connectivity corridor for wildlife. Baltimore Woods has been given a Special Habitat designation because of this, but this is not reflected in protections of it.		
Response:	The area known as the Baltimore Woods is identified in the Willamette River Natural Resource inventory as a special habitat area, and the River Plan recommends application of environmental overlay zoning on all of the special habitat area. The recommended zoning is a combination of environmental protection and environmental conservation, and the application is consistent with the Economic, Environmental, Social and Energy analysis required by State Land Use Planning Goal 5 and Metro Title 13.		

Commenter: Willamette Riverkeeper - Travis Williams

Comment ID:	338	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	In our view the Portland City Council should approve this plan.		
Response:	Thank you for your comment.		
Comment ID:	340	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	The mitigation requirement for entities that wish to develop their lands, but degrade habitat is fair, transparent, and open. In the end, more riverside habitat will be restored as a result of this requirement.		
Response:	Thank you for your comment.		
Comment ID:	345	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	Some will say that we need to stop, start over, and seek common ground. The problem is that the argument against proposals like the North Reach River Plan is always the same. You need only look back to the days of Tom McCall seeking to improve treatment of wastewater at industrial facilities up and down the Willamette. Those who opposed his effort made the exact same arguments that we hear today- that it is unfair, hurts business and costs jobs. Of course, the next morning the sun still rose, companies managed to keep on producing what they had always produced, people kept on working, and the river managed to become quite a bit cleaner as a result. We should remember this reality as the North Reach Plan is considered tonight.		
Response:	Thank you for your comment. Staff appreciates your historical comparison.		
Comment ID:	44	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	We believe that this plan is an essential component of improving the Willamette River's ecological function in the North Reach, which has been greatly diminished due to the myriad activities that have taken place there over the decades. In addition to the Superfund Cleanup, and upholding the Clean Water Act, the River Plan can play an essential and timely role in improving habitat along the Willamette River.		
Response:	Thank you for your comment.		
Comment ID:	45	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	If we get Portland Harbor wrong, and fail to undo some of the damage that has been done to riverside habitat, we risk losing a tremendous amount of investment in habitat restoration that is occurring upstream and will continue to occur.		
Response:	Thank you for your comment.		

Comment ID:	46	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	Too many people have gotten used to the degradation that has affected much of the riverside land in Portland Harbor, and justify it on the grounds that business will suffer if they are required to mitigate for the impact their development has. This is a false choice. There can be sound environmental improvements to riverside lands in the Harbor area, and thriving businesses.		
Response:	Thank you for your comment.		
Comment ID:	47	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	With this Plan, we are talking about a fundamental issue of fairness. In essence, most of the riverside landowners in this stretch are not voluntarily stepping up to do the right thing today.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. The proposed River Plan regulations are intended to ensure that proportionate and fair compensation for unavoidable impacts to natural resources and functional values is provided for all development proposals within the River-environmental Overlay.		
Comment ID:	339	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	Willamette Riverkeeper supports the aspects of this plan that improve habitat in the Portland Harbor Stretch of the Willamette River. The plan has been years in the making, and has received significant evaluation and input from a wide range of interests.		
Response:	Thank you for your comment.		
Comment ID:	341	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	The funding structure for the acquisition and restoration of habitat is much needed, and again, a relatively small price to pay for redevelopment of riverside land.		
Response:	Thank you for your comment.		
Comment ID:	342	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	Restoring habitat along this stretch of the Willamette River is essential to the health of the Spring Chinook, and can aid these fish as they pass through this portion of the Willamette. If we don't improve the habitat along the final few miles of the Willamette River. Having areas of relatively natural habitat along this stretch can be important to their survival. The North Reach Plan helps ensure that companies will do their part.		
Response:	Thank you for your comment.		
Comment ID:	343	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	In our view, we need to change our mentality about what is right along this stretch of river. We have heard often that requiring companies to do a bit more for clean water and healthy habitat "costs jobs" or "hurts our economy" in essence, "hurting business." What does it say about our society when we sacrifice entire stretches of river for the sake of what some define "business." We need to change the way we do business because at this point, it is business as usual that has degraded this portion of river to the point where it is too often a contaminated mess with little in the way of healthy habitat for fish and other wildlife.		
Response:	Thank you for your comment.		

Comment ID:	344	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	Holding ourselves to a higher standard should be our goal. Companies and entities have said they want to take bold steps for habitat restoration, but then seek to derail proposals like the River Plan. We need to require some form of action to improve what we see today.		
Response:	Thank you for your comment.		
Comment ID:	48	Commenter:	Willamette Riverkeeper - Travis Williams
Comment:	We have heard a lot about this plan being somehow "unfair" to business, and that it demands too much of them on top of the legal requirement for some entities to clean up the highly contaminated Superfund site. One must recall that Superfund is a separate responsibility that is far different from how one redevelops a riverside property today, the negative environmental impact it may have, and the associated level of mitigation that is needed.		
Response:	Thank you for your comment. Staff agrees that the two programs have different authorities, implementation approaches and goals. Superfund tries to remedy contamination from past operations. The North Reach plan tries to improve future conditions and is triggered by proposed development activities.		

Commenter: Working Waterfront Coalition - Alan Sprott

Comment ID:	51	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	I am here representing the Working Waterfront Coalition. We are here to support the vision and goals of the River Plan. Our members firmly believe that we can improve the quality and environmental functions of the river in the North Reach, and maintain a prosperous working harbor providing opportunities for continued job growth and creation. The proposed River Plan offers many features to reach this goal.		
Response:	Thank you for your comment.		
Comment ID:	52	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	The Working Waterfront Coalition supports the creation of enhancement sites, strategically located along the river, where resources can be focused to make meaningful improvements in the North Reach.		
Response:	Thank you for your comment.		
Comment ID:	53	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	The Working Waterfront Coalition supports paying a vegetation fee equivalent to 1 percent of a new project's cost to help fund improving these enhancement sites.		
Response:	Thank you for your comment. The vegetation enhancement standard contains flexible options for meeting the requirements, including planting on site, payment in lieu of planting or creation of an ecoroof, all capped at spending the equivalent of up to 1% of the project value or \$200,000, whichever is less.		
Comment ID:	54	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	The Working Waterfront Coalition appreciates that the River Plan will eliminate land use review for some projects that are now subject to the outdated Greenway Review.		
Response:	Thank you for your comment.		

Comment ID:	55	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	The Working Waterfront Coalition remains concerned that the implementing tools, most specifically the River Review, will prevent all of us from achieving our collective goals of a prosperous and healthy working harbor. River Review will add cost, complexity and uncertainty to precisely those kinds of projects that are possible only in the working harbor, and will discourage the kind of investment the plan seeks to protect and promote.		
Response:	Staff does not agree with the assertion that River Review will add cost, complexity and uncertainty. On the contrary, the revisions to the City greenway code recommended by the River Plan reduce regulation in some instances, and provide clearer and more flexible standards and approval criteria when review is required. The River Plan also recommends an interjurisdictional permitting process for projects that affect the river below ordinary high water.		
Comment ID:	56	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	The Working Waterfront Coalition respectfully requests that together we revisit the River Review process, and seriously consider our offer to help invest in the resource enhancement sites through the proposed fee-in-lieu.		
Response:	River Plan staff met with representatives of the Working Waterfront Coalition and the Port of Portland 3 times between Feb 25 and March 9 to discuss the River Environmental overlay zone standards and exemptions, and the River Review approval criteria and application requirements. The amendments package that City Council will consider at the April 1st hearing includes additional code changes that emerged from the recent discussions. Staff believes that the current recommendation with amendments strikes the right balance between development allowed without a River Review and ensuring that impacts on natural resources are minimized and mitigated to the extent practicable.		
Comment ID:	58	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	Most of the industrial activity in the North Reach is traded sector, and the wealth that our businesses bring into the region contributes significantly to the high quality of life that we all enjoy. We should not unnecessarily handicap our businesses and economic development institutions from competing. Otherwise, all of us will suffer for it, and in the end the river enhancement projects we all seek to accomplish will not achieve any of our expectations.		
Response:	The River Plan / North Reach balances multiple goals for the land along the Willamette River. The Plan recognizes and supports the working harbor as a critical economic engine for the city. Supporting a prosperous working harbor is an important goal, as are the other River Plan goals for improving watershed health, and increasing public access to the river.		
Comment ID:	57	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	We believe it is important to consider the long-term consequences of the impending Superfund cleanup. Every company in the North Reach will contribute to the projected billion dollar cleanup and mitigation for natural resource damages. The cost to businesses and the scale of mitigation projects resulting from this effort will be significant, and must be considered in the River Plan given the time frame in which the cleanup will unfold.		
Response:	The Portland Harbor Study Area is within the geographic area covered in the River Plan / North Reach, but the two programs have different authorities, implementation approaches and goals. Superfund tries to remedy contamination from past operations. The North Reach plan tries to improve future conditions and is triggered by proposed development activities.		

Comment ID:	76	Commenter:	Working Waterfront Coalition - Alan Sprott
Comment:	Most projects subject to the proposed River Review will already be reviewed and permitted by nine federal and state agencies staffed with experts in natural resources, and will be required to mitigate for any losses. The City will still be at the table through this process, as it is now.		
Response:	<p>The City is interested in maintaining regulatory authority below Ordinary High Water (OWH) to ensure that development activities that occur below OWH are reviewed in the context of City land use plans and the complete ecology of the area around the development site. City review ensures that the development will have the least detrimental impact on natural resources and functional values among all of the practicable alternatives, and that when development activities do occur, there is no net loss of resource function in the North Reach and that any lost resource function is fully replaced on the site or somewhere else in the North Reach.</p> <p>State and federal agencies focus more closely on biological systems, particularly listed species, and on jurisdictional habitats such as wetlands, and on navigation. All of these are evaluated against the development proposed at that time, but not the full context including the surrounding conditions, potential future development in the surrounding area or an applicant's future development plans. It is site and project specific and not integrated or based on an ecological perspective. The extent to which the state or federal agencies will require an alternative design or an alternative location for the development can be limited by the species on which they focus. In the same way, mitigation will be limited to those features that the species use—which may not cover the full spectrum of resource functions and values identified in the City's Natural Resources Inventory.</p>		

Commenter: Working Waterfront Coalition - Ann Gardner

Comment ID:	185	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	We request that you direct staff to work with WWC members to amend the River Plan code as outlined in the proposal submitted.		
Response:	The River Plan attempts to balance multiple objectives, including environmental health and economic prosperity. Staff has worked extensively with the WWC throughout the planning process, including at least three meetings between the February 17 and April 1st hearings.		
Comment ID:	186	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	We recommend that you establish a 60-day period for the amendments to be completed. At the completion of the 60 days, the River Plan would be ready for final adoption by City Council.		
Response:	The second hearing on the River Plan is scheduled for Aril 1, 2010, approximately 60 days form the date of your letter.		
Comment ID:	187	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	This proposal is presented as a package. That is, if only some of the elements are accepted, the WWC believes the River Plan will not go far enough toward achieving the economic and environmental goals and we will have no other option but to oppose it. We are hopeful that this proposal is acceptable so that we can move forward on River Plan adoption and implementation. This package of seven recommendations would retain the City's jurisdiction below ordinary high water and would also ensure local considerations are incorporated into avoid, minimize and mitigate decisions where they make a difference in environmental outcomes.		
Response:	River Plan staff has responded directly to the Working Waterfront Coalition's proposed amendments. The February 12, 2010 document is titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review, and addresses each of the WWC's seven recommendations.		

Comment ID:	196	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	Much progress was made during the meetings hosted by the Mayor, but WWC, City staff and other stakeholders have not seen the results in the form of final draft code language. Minor language changes may be necessary after WWC review, for example on the Vegetation Standard. We recommend providing draft code language for review to confirm understandings prior to adoption; finalize code language, if necessary, during 60-day period.		
Response:	Revised amendments to the Recommended Draft have been available for public review prior to the Council hearings. Drafts were also shared with the WWC prior to publication.		
Comment ID:	188	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	River Review is triggered by the river environmental overlay zone. Aerial photography was basis for determining this overlay zone (the NRI), and in some cases it has resulted in misrepresentation of on the ground vegetation and habitat functions. E.g. The surface area on piers with no vegetation are identified as high or medium value natural resources and are subject to extensive environmental River Review. We recommend providing an opportunity for map corrections in two ways: (1) before adoption/effective date of river plan, and (2) after adoption through an administrative process. Also establish a clear opportunity to ground truth the City NRI during river review.		
Response:	The Willamette River Natural Resource Inventory identifies the river as a high ranked resource. The surface of piers and docks are not listed as resources in the NRI. The River Environmental overlay zone specifically exempts development on existing paved surfaces, docks, piers and wharfs because there are no resources on those surfaces to protect. Development on a pier will not be subject to environmental River Review. In terms of opportunities for map corrections, staff has agreed to conduct site visits between the date of adoption and the date of implementation and will correct any zoning maps that warrant correction. After adoption, the zoning maps can be corrected during a river review or through the City's map correction process.		
Comment ID:	189	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	Application requirements for development within River environmental zone have increased. We propose streamlining the application by using same material from State and Federal applications only.		
Response:	The City does not generally require more information than the state and federal agencies require, however the City does require a written narrative explaining how the application meets the City approval criteria. The narrative is the applicants opportunity to present their case as to why they believe the application meets the City's approval criteria. All City land use reviews require a similar narrative. Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		
Comment ID:	190	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	HEP/HEA model will determine mitigation in lieu fees paid by development project. HEP/HEA model is complex and still under development by City. No models exist today where HEP combined with HEA have been used this way. Thus, the economic impact of river review is unknown by staff, WWC and City Council until values are fixed and process is established. We recommend involving WWC in development of HEP/HEA and bring adoption back to city council for approval so that City Council understands economic impact prior to implementation. River Plan is not effective until this Second Check-in with Council.		
Response:	The City Council will hold a hearing prior to the implementation date of the code to receive comments on the mitigation in lieu fee and HEP/HEA the model used to calculate the mitigation fee. Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		

Comment ID:	192	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	Current standards in code are a good start, but they have one fatal flaw: the mitigation component is onerous rendering the utility of the standard meaningless. For example, mitigation is based purely on surface area of project and requires 3:1 mitigation off-site prior to implementation of the development project. There is no option for a fee in lieu. In addition, the list of standards are limited- more than anywhere else in the City. We recommend adding standards for some uses and modify existing standards to streamline review for certain projects. Improve existing standards by allowing for payment in lieu of mitigation for the projects that go through the "standard track" based on percentage of project costs. While this will require more upfront work by staff and WWC, WWC believes improved and increased standards would help provide predictability. Standards can be evaluated and improved as necessary based on actual projects at the 2-year review.		
Response:	The River Environmental overlay zone mitigation development standard has been revised to allow payment of a fee for off-site mitigation. The development standards were drafted with the help of stakeholders and reflect real development proposals that have occurred in the North Reach. Staff have also worked with the WWC and the Port to revise several of the overlay zone exemptions. Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		
Comment ID:	193	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	The additional process and uncertainty associated with river review adds time, cost and possible delays to projects. It also puts projects at greater risk of appeal. We recommend improving the administrative process of river review. (e.g. impose time limits on City review, require City to provide option for enhanced permit review for all permit applications, provide option for Type III appeal, etc.)		
Response:	State law limits the amount of time that the City has to make a decision on a land use review--120-days. The River Plan / North Reach includes an option for enhanced permit review. The proposed Willamette River Early Project Review process is intended to foster collaborative dialogue among project sponsors and regulatory agencies. This will result in clarification of multiple agency's requirements and decrease the risk of conflicting or out-of-sequence governmental requirements that may result in project delays. Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		
Comment ID:	194	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	When adopted, an applicant will have two options for River Review: Mitigate On-site (preferred) or Pay Fee in Lieu. Ultimately, a multi-jurisdictional Mitigation Bank is the River Plan's Goal and WWC supports this. However, such a market is not yet established. For a multi-jurisdictional mitigation bank to work, it must be approved by multiple state and federal agencies. The code dictates that all banks use the City's HEP and HEA combined credit system- a combination that has NEVER been used by state and federal agencies for such a purpose. This may limit market opportunities. For example, Senate Bill 513 convened a state-wide Sustainability Board to work toward ecosystem market development, including mitigation and conservation banks. The city should remain open to coordinating with these other state, federal and private market led efforts. We recommend keeping preference for HEP/HEA but provide flexibility in code in support of Mitigation Bank Markets so that City staff can opt to approve a bank in the event other market-driven methodologies are approved by state and federal agencies in coordination with the City. The code could require that this alternative be equivalent to the HEP/HEA methodology. Also provide flexibility in code for City to approve similar methods for calculating in lieu fees.		
Response:	The River Plan code has been amended and the City will not require that any particular model be used by a mitigation bank. However, the City wants to be sure that whatever model is used is scientifically based and accounts for the loss of resources over time. In addition, the City wants a model that the state and federal agencies can agree to use collectively to determine the required mitigation requirements for a project. This is what we have called "one-stop shopping". Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		

Comment ID:	195	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	Vegetation fees and mitigation in-lieu fees are paid into a City-administered River Restoration Fund. In prior conversations, everyone agreed there needs to be transparency and accountability for how those funds are spent. However, the code does not impose any requirements or limitations on the use of those funds. Ultimately, the City will hold industry accountable for improved habitat results; likewise industry must hold the City accountable to use the money contributed into the River Restoration Fund to achieve results. We all want to see success at 2-year, 5-year and 10-year milestones. We recommend creating a separate fund with "firewalls" restricting use to habitat improvements (land acquisition, design construction, and long-term maintenance) at restoration sites in the North Reach; include restrictions in code language.		
Response:	The funds from in-lieu-fees will be deposited into a BES sub account. The City will restrict the use of the funds to activities directly associated with restoration (e.g., land acquisition, design, construction, and long-term maintenance). Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		
Comment ID:	191	Commenter:	Working Waterfront Coalition - Ann Gardner
Comment:	Where there is already dense existing river-dependent uses and structures, the applicant and City staff will spend time and money on paperwork and transactions with little to no environmental improvement. The T6 Honda Dock and BP Case Studies presented by the City are evidence of this (BP showed no additional mitigation required; T6 Honda Dock showed \$2,000 in additional mitigation owed). As a result, existing businesses have less flexibility in redeveloping their existing facilities for changing market needs. We propose adding an exemption for redevelopment that occurs at already developed in-water structures (docks, piers) below ordinary high water that are not adjacent to high or medium value upland resource. Include a fee in lieu based on project cost to put money toward habitat improvement. This is based on the following policies: state and federal agencies requires the party to avoid, minimize and mitigate; City workshop examples demonstrated that additional mitigation above state and federal requirements is zero to minimal where there are already existing highly altered banks and in-water structures; helps meet river plan goal of encouraging business to retrofit existing areas that are already highly altered and strengthen protection of existing industrial land uses; effectuate City's goal to "de-regulate" 4.5 miles of working harbor.		
Response:	Please reference River Plan staff's February 12, 2010 response to each of the Working Waterfront Coalition's recommended amendments, titled Response to the Working Waterfront Coalition's Table 1: Specific Recommendations to Improve River Review.		

Commenter: Working Waterfront Coalition - Phil Grillo

Comment ID:	32	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that River Plan provides certainty to industry by bolstering sanctuary policy and prohibiting conversion of industrial land to non-industrial uses. However, Metro's regulations already require the City to prohibit quasi-judicial conversion of industrial land to non-industrial uses. The City was simply implementing what it was already required to do under Metro's regulations.		
Response:	Regional requirements do not prohibit quasi-judicial conversion of industrial land to non-industrial zoned land. To comply with Title 4, Metro's Urban Growth Management Functional Plan, applicants requesting a change from an Industrial or Employment designation must meet additional approval criteria and regulations. This requirement applies citywide on properties with an Industrial Sanctuary or Mixed Employment Comprehensive Plan Map designation and was incorporated into the Zoning Code through RICAP 4 in 2009. These changes were intended to prevent the displacement of industrial and employment uses and preserve land primarily for these uses. River Plan / North Reach further recommends that quasi judicial zone changes be prohibited on Regionally Significant Industrial Land in the North Reach.		

Comment ID:	36	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that River Plan fuels the Harbor Reinvestment Strategy through coordinated public and private investments in infrastructure and land development. Since many of the projects listed in the Harbor Reinvestment Strategy will be or are already funded by the Port, the private sector, grants or gas taxes, River Plan by itself does little to actually commit the City to reinvest in the working harbor.		
Response:	The River Plan / North Reach recommends a 10-year program of public investments identified as part of the Working Harbor Reinvestment Strategy (WHRS) as short-term investments that improve competitiveness or expand development capacity in the North Reach. Most of the recommended projects are already on capital improvements plans, and their inclusion in River Plan is intended to identify them as priorities among lengthy project lists that exceed expected public budgets. Some of the recommendations are also new projects added to capital improvements plans or need-areas identified for further study. These recommendations are based on an updated, district-wide infrastructure needs analysis conducted through River Plan. Many of the projects will be implemented by the City and its public agency partners, such as the Port of Portland. Although their inclusion in the River Plan does not ensure funding for implementation, creation of the investment list aims to elevate a public-private investment partnership, support intergovernmental coordination and identify economic development priorities among the broad range of potential investments.		
Comment ID:	31	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	Despite some of the changes that have been incorporated into the plan, the current version of River Plan still discourages new investment in the Working Waterfront. In the North Reach, River Plan discourages investment in the harbor primarily because it replaces Greenway Review with a highly complex and extremely confusing set of new local land use regulations and fees that create significant uncertainty, delay and costs for businesses. The City's perceived business advantages of River Plan are overstated and offset by significant disadvantages created elsewhere in the plan.		
Response:	<p>Staff does not agree with the assertion that River Plan regulations and development requirements will discourage investment in the working harbor. On the contrary, the River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards, and by updating code that has been vague and confusing. The proposed permitting process is both more predictable and more flexible than today's code. There are several code changes that should make the River Plan code an improvement over the existing Greenway code:</p> <ol style="list-style-type: none"> 1. Compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay. 2. Even where River Review is required, some types of development activities will be exempt from this review if the applicant can satisfy clear and objective development standards. 3. The greenway setback has been eliminated for development within the River Industrial overlay zone. 4. Several of the regulations allow the payment of a fee-in-lieu of meeting the requirement. <p>The River Plan also recommends a joint agency early review process that will facilitate coordination among all agencies with authority to review development in the water.</p>		
Comment ID:	33	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that River Plan strengthens the River Industrial Overlay Zone (i overlay) as a tool to reserve riverfront industrial land for river-dependent and river-related uses. However, the minor adjustments to nonconforming use and land division provisions in the i overlay are more than offset by the additional local regulations and fees imposed on development within this overlay zone, particularly on river-related and river-dependent uses and development along the shoreline and in the water, that will now be subject to the new River Environmental Overlay Zone.		
Response:	The River Plan recommends many policy, regulatory and action items that strengthen and support the working harbor and the industries that are located there, including many infrastructure improvements that will sustain the working harbor as it grows over time. The plan reduces regulatory uncertainty and revises many unclear regulations. The River Plan / North Reach is designed to reduce permit complexity through the use of exemptions and standards and by updating code that has been vague and confusing. The River Plan is a multi-objective plan, so while it strives to support the working harbor it also works to maintain, conserve and enhance natural features in the North Reach and improve public access in a safe manner.		

Comment ID:	34	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that River Plan improves regulations to increase predictability and flexibility for industrial development and expansion. However, the special standards for bulkheads, cargo conveyors, and rail ROW in River Plan were purposely crafted by the City to have limited applicability and as such, provide limited benefit. The minor increases in predictability and flexibility for development do not offset the much more significant economic and regulatory impacts created by the River Environmental Overlay Zone and River Review.		
Response:	The River Environmental overlay zone development standards were crafted to allow lower impact development that can be easily mitigated through a standard planting requirement. The standards for bulkhead replacement, cargo conveyors and rail ROW expansions were written in consultation with the Port of Portland and represent real development types and thresholds. The current greenway code does not have a standards track option--therefore almost all development within or riverward of the greenway setback must go through a land use review process. The River Plan code also includes several more exemptions than the existing code allows. Overall, compared to the current Greenway Review, fewer proposed development activities will be required to go through a discretionary land use review. River Review is limited to circumstances where natural resources will be affected by proposed development. Greenway Review is currently required for a much broader array of activities within the greenway overlay.		
Comment ID:	35	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that River Plan eliminates the greenway setback in the River Industrial zone. This is an advantage for businesses who intend to develop within the setback, so long as the area within the existing greenway setback is not located within either the new River Environmental Overlay Zone or within newly designated Environmental Conservation or Environmental Protection Overlay Zone areas. The economic and regulatory burdens associated with these new regulations significantly outweigh the burdens currently imposed by the existing greenway review. The upland areas that are not burdened with these new regulations do not contain medium or high value resources, and therefore have been over-regulated for many years by local greenway review.		
Response:	The greenway setback has been eliminated within the River Industrial overlay zone. In areas where significant natural resources have been identified, the River Environmental overlay zone replaces the setback. These changes should be advantageous to property owners in three ways. First, the existing setback serves as a strict limitation on development that is not river-dependent or river-related. In other words, the setback is a no build zone for development that is not river-dependent or river-related. The elimination of the setback frees up the setback area for any type of development and removes one hurdle to locating development within 25 feet of the top of bank. The second advantage is that development within the River Environmental overlay zone does not always trigger a land use review. Current code automatically requires a greenway review when river-dependent or river-related development will be located within or riverward of the setback. The River Environmental overlay zone regulations contain exemptions and development standards that will allow several types of development to proceed without a land use review, cutting down on time and cost. The third advantage is that in places where there are no identified significant natural resources, greenway review is eliminated and mitigation for impacts is not required. There are at least 4.5 miles of hardened, unvegetated river bank in the North Reach that are currently within or riverward of the greenway setback that are not in the proposed River Environmental overlay zone.		
Comment ID:	38	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that River Plan provides options for off-site mitigation. This is important. However, River Plan does not provide assurances that an applicant can mitigate off-site. As long as off-site mitigation is a discretionary decision made by the City as part of a local land use permit decision, the possibility of off-site mitigation provides no certainty. Rather, it adds additional uncertainty, cost and delay. Instead, off-site mitigation should be allowed by right, and should be coupled with the option of a fee-in-lieu for any mitigation required by River Plan.		
Response:	When appropriate, on-site mitigation can provide much needed connectivity between larger natural resource restoration and mitigation sites. On the other hand, it makes little sense to shoehorn small or isolated mitigation areas onto highly developed sites or where future development will occur. The off-site mitigation criterion has been amended to clearly state the factors to be considered when evaluating on-site versus off-site mitigation. The amendments have been made to address concerns raised by stakeholders about when off-site mitigation will be approved. The factors to consider include the potential for the long-term success of the on-site mitigation area, the size, shape and connectivity potential of on-site mitigation, and the location of mitigation in relation to existing, proposed or future development. The goal is to take advantage of any reasonable and sustainable on-site mitigation opportunities before going to an off-site mitigation scenario.		

Comment ID:	39	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	The City asserts that an important aspect of the River Plan is that it allows in-lieu fee options to meet vegetation requirements. However, under the existing greenway code, vegetation requirements are much less than what would be required under River Plan. The new vegetation requirement is triggered by any development anywhere on the site, rather than by development within the greenway or greenway setback, and the 15 percent standard is more extensive than it would be under existing greenway review.		
Response:	<p>The existing greenway code requires that the area within and riverward of the greenway setback be landscaped with one tree for every 20 feet of river frontage, one shrub for every 2 feet of river frontage, and living ground cover over all areas that are not paved. The landscape standard is triggered by development anywhere in the greenway overlay zone. The standard can be waived when planting vegetation will significantly interfere with a river-dependent or river-related use or development. On sites with an existing use, coming into compliance with the landscape standard is capped at 10% of project value.</p> <p>The River Plan proposes a revised vegetation standard that is also triggered when development occurs in the river overlay zone (as opposed to anywhere on the site). The vegetation planting standard is one tree, three shrubs, and four other ground cover plants for every 100 square feet of planting area. The new standard requires that the applicant spend 1% of project value on planting vegetation anywhere in the river overlay zone. The new standard does not limit the planting to the river bank, but instead provides an incentive for planting on or near the river bank. If it is more appropriate from the applicants perspective to plant vegetation in another location on a site, then the owner will now have the flexibility to plant where ever they prefer, including on the roof of a building. In addition, the standard allows the applicant to pay a fee-in-lieu of planting on-site. This option will ensure that vegetation is enhanced in the North Reach even when there is no opportunity to enhance vegetation on heavily developed sites.</p>		
Comment ID:	37	Commenter:	Working Waterfront Coalition - Phil Grillo
Comment:	We continue to disagree with the City's assertion that River Review will be integrated with state and federal permit reviews. River Review is inherently a separate local review process and is subject to all of the usual land use procedural requirements. Those requirements and the potential for appeal add significant cost, uncertainty, and delay to a project, well above and beyond the cost, uncertainty, and delay associated with state and federal permit processes.		
Response:	River Plan staff agrees that River Review is a separate review and process than the state and federal reviews. Each agency has its own regulations stemming from its own regulatory authority. The River Plan includes an optional enhanced coordination process for projects that require multiple-agency reviews. Based on an existing successful model, the coordinated review process is designed to provide early direction to applicants and coordination among city, state and federal agencies for projects below the ordinary high water mark. The intention is to greatly increase the efficacy of this coordination, and ensure that conflicts are reduced, not made worse. A comparison of permitting timelines among the state, federal and city agencies indicates that the River Review process is the fastest of the reviews and can take place within the timeframe of the other reviews, allowing time for successful coordination amongst agencies. Please see the flow chart in the River Plan amendments.		