



CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Michael Jordan, Director

November 7, 2017

To: Michelle Kunec-North, Bureau of Planning and Sustainability (BPS)

From: Mike Jordan, Director, Bureau of Environmental Services (BES)

cc: Nick Fish, Commissioner
Tom Armstrong, Susan Anderson, Jane Bacchieri, Shannah Anderson, Jennifer Devlin,
Mike Abbate', Maya Agarwal, James Allison, Rachel Felice, Emily Roth, Jill Van Winkle

Re: Portland Off-Road Cycling Plan – Potential for Expanded Recreation at River View Natural Area

Thank you for providing BES with the opportunity to participate in the process of developing the Portland Off-Road Cycling Plan (ORCP). Two of our staff participated on the Project Advisory Committee (PAC) and we appreciated the opportunity to provide input on BES properties as well as watershed resources associated with the City's natural areas.

We understand that BPS has included River View Natural Area as a candidate location for off-road cycling trails. Because BES has made significant investments in the acquisition and restoration of this property, we want to provide BPS and the PAC with an overview of the property's natural resources and environmental sensitivity, as well as our concern that expanded recreational use, including off-road cycling, is not compatible with the site's primary function as a natural area.

BES, Portland Parks and Recreation (PP&R), Metro, and the Trust for Public Land purchased River View Natural Area in 2011 with the primary purpose of protecting and restoring natural resources. River View Natural Area contains a number of special status habitat types (i.e., rare or significant in Portland), including interior forest, forested wetlands, riparian buffers, and two miles of surface streams. The landscape naturally manages stormwater and delivers cold water and nutrients to a reach of the Willamette River that is a refuge for migrating salmonids listed under the Endangered Species Act. The property also has a perched water table that supports wetland hydrology.

Soil types (Cascade Silt Loam and Haploxerolls) on the property are prone to slow permeability. They have a moderate-to-high erodibility designation by the Natural Resource Conservation Service, which indicates the potential for severe erosion and the need for frequent maintenance on roads or trails.

The City and River View's many stakeholders have conducted large-scale restoration activities on the site. This included the removal of extensive populations of invasive species, erosion control measures, and the installation of over 75,000 native trees and shrubs.

Some of River View's streams have experienced various levels of degradation caused, in part, by the network of unauthorized bike and pedestrian trails. PP&R and BES have dramatically improved the

environmental quality of the site since acquisition through trail closures, installation of signage and boundary markers, and revegetation. Development of future social trails is a reasonable assumption, however, given past activities.

BES is concerned about the ability of the property's sensitive natural resources to sustain the impact that would result from the inclusion of multiple users and the volume of use that could bring. Given the approximate 4.4-mile trail proposed in the *River View Natural Area Management Plan*, the property would fall into the ORCP's Level of Service category associated with being a "District" site in southwest Portland. Nat Lopes of *Hilride*, trail consultant for the ORCP, indicated on a River View site visit that it would be necessary to develop some way of limiting the number of people using the site because its size could not sustain intensive use.

The *River View Natural Area Management Plan* is the property's principal guidance document and identifies actions to improve the ecological health of the natural area, inform policy changes, and guide monitoring efforts. Data gaps identified in this plan include baseline water quality and streambank conditions, wetland functions and buffers, and use of the property by wildlife species. Collection and analysis of that data are priority actions in the Natural Area Management Plan and are crucial to informing management decisions, including the extent of public access.

One of the Natural Area Management Plan's ecological prescriptions addresses the response and reduction of non-compliant uses that cause habitat degradation through the development of an enforcement plan with triggers for remedial action, increased ranger enforcement, and development of an adaptive management plan that outlines monitoring and feedback loops to inform corrective actions. Implementation of a trail plan on River View would necessitate not just funding for construction, but resources for all of the management and maintenance activities noted above.

There are restrictions on the type of funding that can be used for River View's maintenance. If recreational use of the property results in an expenditure of ratepayer funds to accommodate the use, whether that comes in the form of damage repair or the construction of amenities, it may be necessary for the City's general fund to reimburse the sewer fund.

It is the opinion of BES that other sites in southwest Portland that were recommended through the ORCP process seem more appropriate for fulfilling recreational needs. BES remains concerned that River View Natural Area is not large enough to support the users expected as a designated property in an off-road cycling network, given the topography, erodible soils, habitat types and above-ground streams. We also believe that adequate time has not been dedicated within the ORCP process to make a sound technical decision about recreational use at this property.

We appreciate your consideration, and welcome your questions or comments. Please contact Shannah Anderson at (503) 823-2605 for more information.

Sincerely,

A handwritten signature in black ink that reads "Michael Jordan". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michael Jordan, Director