

# Best Practices for Riverfront Communities

## Public Comment and Response Log

FROM: Ray Wheeler

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NOTE: All comments have been summarized or abbreviated below for purposes of this tracking tool; however, the full text and illustrations of the comment were considered. In addition, the original comments were renumbered to be sequential.

### GENERAL COMMENTS

Comment:	Response
see attached narrative	<i>Thank you for the time and effort put into this comment document. We appreciate your thoughtful consideration of the Best Practices for Riverfront Communities draft, and the Blueprint Jordan River.</i>

### SPECIFIC COMMENTS:

Comment:	Response
<p><b>New BP 1</b></p> <p><b>Region-specific study of the economic benefits of wildlife corridor expansion/improvement</b></p>	<p><i>The Best Practices document is attempting to provide specific tools and practices that can be immediately implemented by river stakeholders. We appreciate this suggestion for an additional project/study, and will add it to a list of possible efforts for the JRC Board to consider and potentially undertake at a future time.</i></p>
<p><b>New BP 2</b></p> <p><b>Corridor-comprehensive inventory of open space and wildlife habitat restoration resources</b></p>	<p><i>The Best Practices document is attempting to provide specific tools and practices that can be immediately implemented by river stakeholders. We appreciate this suggestion for an additional project/study, and will add it to a list of possible efforts for the JRC Board to consider and potentially undertake at a future time.</i></p> <p><i>The concept of prioritizing an inventory of land within the river that provides opportunities for open space, habitat, and restoration has been incorporated into the narrative on page 9, under "Addressing Challenges in Land Use Regulation."</i></p>
<p><b>New BP 3</b></p> <p><b>Best Practices for trash management</b></p> <p>1. Each city should fund one or more paid staff positions for person to serve as recruiters and mobilizers of a citizen volunteer labor force....</p> <p>2. Employ homeless people already living along the river to remove (rather than leave) trash from the river banks...and then have them pay part of this cost back as a reasonable rental fee for comfortable and convenient housing in old rental properties situated near the river.</p> <p>3. Install trash receptacles for both regular and recyclable trash at every pedestrian bridge, boat dock, and other place where people approach the river.</p>	<p><i>1. The JRC is currently working to expand volunteer labor and community stewardship of the river corridor, and will be leading multiple clean-up events along the river corridor during the year. In addition many cities and counties along the river already have volunteer coordinator positions on their staff. Rather than include this item in the Best Practices document itself, outreach and education on the needs for volunteer trash cleanup along the river will be included within our Best Practice education efforts for local governments and river stakeholders.</i></p> <p><i>2. This suggestion falls beyond the scope of the JRC, but could be an opportunity for a partnership with the Road Home or other community partners. We will initiate a dialogue on this issue to explore possible opportunities for collaboration.</i></p> <p><i>3. This suggestion has been added to the How To section of the best practice, Recreation: Encourage river access where appropriate, on Page 26.</i></p>

	<p>4. Design and install trash collection weirs or nets at strategic locations along the river.</p> <p>5. Recruit boaters who live on the river to serve as volunteer "river garbage rangers"</p>	<p>4. <i>This is a suggestion for an additional project, and will be added to a list of possible efforts for the JRC Board and its members to consider and potentially undertake at a future time.</i></p> <p>5. <i>This suggestion fits well into an ongoing effort of the JRC to expand volunteer labor and community stewardship of the river corridor. Rather than include this item in the Best Practices document itself, it will be included within our ongoing community outreach and education efforts for local governments and river stakeholders.</i></p>
<p><b>New BP 4</b></p>	<p><b>Best Urban Riparian Forest management practices</b></p> <p>1. Except where indicated in a native plant or riparian forest improvement plan, no removal of whole trees, under any circumstances, simply because they have branches extending over the river.</p> <p>2. Policy of no removal of whole trees or tree branches except when a tree or branch touches the river surface.</p> <p>3. When individual branches touch the river surface, removal of that branch along rather than the whole tree.</p> <p>4. Every removal of a whole tree that has fallen into the river to be accompanied by a planting or two or more.</p> <p>5. Systematic inventory by each city of all JR stream bank trees, and development of a systematic riparian restoration master plan for gradual, staged removal of non-native trees, and planting of new native trees.</p> <p>6. Where beaver populations are decimating stream bank trees...beaver management strategies</p>	<p>1 - 4. <i>This idea has been incorporated into the Description section of Best Practice: Improve and restore native plant diversity and communities, on Page 23. The addition consists of a broader statement about evaluating the level of tree removal and trimming necessary to minimize flood hazards, and to ensure any necessary tree removal is coordinated with a restoration effort.</i></p> <p>5. <i>This is a suggestion for an additional project/study, and will be added to a list of possible efforts for the JRC Board and its members to consider and potentially undertake at a future time.</i></p> <p>6. <i>The need to manage beaver impacts has been addressed in the BP document on page 21, Manage Invasive and Nuisance Species. In addition, new technical resource documents have been added to the document appendix that list specific beaver management strategies appropriate for Utah.</i></p>
<p><b>New BP 5</b></p>	<p><b>Best practices for transient/homeless population management on the river corridor</b></p> <p>1. Provision of subsidized housing in low income neighborhoods along the river, where they can live in exchange for labor improving the river corridor.</p> <p>2. Establishment of camp sites along the margins of the river corridor where people can live comfortably in tents at low cost, while working as laborers on the river.</p> <p>3. Video oral history programs in each city to capture rich cultural diversity and compelling stories of those living bravely and at the edge of survival in urban wilderness areas on the margins of our society.</p>	<p>1 - 3. <i>These suggestions fall beyond the scope of the JRC, but could be an opportunity for a partnership with the Road Home, the Center for Documentary Expression and Art, or other community partners. We will initiate a dialogue on this issue to explore possible opportunities for collaboration.</i></p>

<p><b>Page 9</b> comment #1</p>	<p><b>Foundation for river protection</b> We strongly recommend against promotion of the "cluster subdivision" concept for this reason: it is antithetical to the mandate to protect all remaining open space within the JR meander corridor...</p>	<p><i>Thank you for the comment; however, we have decided not to make changes to the document in response. Considering current zoning, private property rights, land use law and the limitations of the JRC's authority, there are limited legal mechanisms for prohibiting development of private property along the river. The JRC was created in part to help fund preservation and restoration projects along the river, and this continues to be a major goal of the organization. We currently do not have a sufficient revenue stream for property acquisition, but we are working on fundraising strategies for this purpose.</i></p> <p><i>While funds are being raised and preservation projects are being developed, development will likely occur in places along the river. We believe that some permanently protected open space is better than none. Absent any regulatory incentives or ordinances to require open space preservation, these projects have the potential to entirely consume a parcel leaving no open space at all. It is well documented that through the application of clustered development patterns, cities can effectively preserve significant tracts of open land along the river that might not otherwise be set aside.</i></p>
<p><b>Page 11</b> comment #2</p>	<p><b>Protect large undisturbed areas and hydrologic regime</b> Suggest use of the following quote and sidebar to highlight that the consensus of conservation biology scientists is that the ecological value of "core" natural areas is proportionately greater as habitat "patch" size increases....</p>	<p><i>Due to space limitations, the entire suggested sidebar and quote could not be incorporated into the document. However, the spirit of this comment, that the ecological value of open space increases with the size of the preserve, is already included in the document on Page 18:</i></p> <p><i>"Larger habitat patches have the potential to support a greater variety and number of species. However, smaller areas (patches) are often the focus of restoration projects in fragmented landscapes and are suitable for species with smaller habitat requirements. Habitat patch size and connectivity varies along the length of the Jordan River corridor; therefore, it is important not to view available habitat in isolation but rather as a mosaic of fragmented patches that have the potential to be linked."</i></p>
<p><b>Page 12</b> comment #3</p>	<p><b>Land Use: Encourage Clustered and Compact Development Patterns</b> We oppose this whole concept for reasons given in comment 1 (on page 9) above...</p>	<p><i>Thank you for the comment. See the response to the comment #1, or on page 9 of the Best Practices document.</i></p>

<p><b>Pages 13-14</b> comment #4</p>	<p><b>Land Use: Green Site Design, ensure development is compatible with the river environment</b></p> <p>We agree with all of the recommendations in these sections, but are deeply concerned that the entire BP document essentially seeks to substitute "green washing" in place of preservation of open space, creation of net new open space, and rehabilitation/restoration of urban blight areas. Therefore we recommend the addition of one statement at the beginning of one or both of these sections:</p> <p>"By far the best way to enhance the economic and recreational value of the river corridor is to preserve all existing open space, and restore it to full ecological vitality. Green site design is not a substitute for preservation and restoration of ecosystem integrity. However, where housing or commercial development has already occurred...."</p>	<p><i>The spirit of this comment (paraphrased: While both compatibility and green site design are important, preservation and restoration should be the primary goals), has been incorporated into the document. However, we believe that it is important to acknowledge that new development will still likely occur within the river corridor and that green site design strategies should be employed in this projects as well.</i></p>
<p><b>Page 15</b> comment #5</p>	<p><b>Land Use: Ensure Development is compatible with river environment</b></p> <p>See comments regarding the inventory of opportunities for rehabilitation/restoration of urban blight and brownfield areas.</p>	<p><i>This idea of inventorying and repurposing land has been incorporated on page 9 of the Land Use section of the Best Practices document.</i></p>
<p><b>Page 17</b> comment #6</p>	<p><b>Environment intro</b></p> <p>We strongly support the recognition given in this section of the importance of preserving large patches of wildlife habitat and connectivity between them. This would be another place to use the quote and citation given in the comments on page 11...</p>	<p><i>Thank you for the comment. See the response to the comment #2, or on page 11 of the Best Practices document.</i></p>
<p><b>Page 18</b> comment #7</p>	<p><b>Environment</b></p> <p>We believe the Olympics medal system of arbitrary setback distances sends the wrong essential message about preservation of the lands within the floodplain. This system and all the references should be removed and replaced with the concept of protecting all remaining undeveloped lands within the meander corridor, to whatever extent possible, along every foot and mile of the river corridor from end to end...</p>	<p><i>Thank you for the comment. The medal system concept has been removed, and the discussion describes the recommendation to preserve a general "riparian buffer" that accomodates the variability in buffer widths needed to address specific management objectives: various specific animal species, nonpoint source pollution reduction, and water quality improvements.</i></p>

<p><b>Page 21</b> comment #8</p>	<p><b>Environment: Manage Invasive Species</b></p> <p>We recommend adding the beaver to this list, in a separate category of "species requiring special controls", for the following reasons:...</p> <p>We think the best practice would be:</p> <ul style="list-style-type: none"> <li>a. Create areas where beaver can follow their dam-building instincts without any need for intervention</li> <li>b. girdle mature indigenous and all ecologically desirable trees to prevent beaver from killing them</li> <li>c. where beaver populations are higher than is optimal for ecosystem recovery, either introduce predators, allow trapping , or trap and remove them to other areas of Utah where beavers are needed to reestablish their populations.</li> </ul>	<p><i>Thank you for the comment. The title of this Best Practice has been changed to "Manage invasive and nuisance species", and the narrative has been expanded to specifically address problem, but native, species such as beaver and muskrat.</i></p> <p><i>b. As a point of clarification, the term girdling is typically used to describe a method to kill undesirable trees by removing a strip of bark and xylem from the entire circumference of the tree trunk. However, the suggestion is understood, and the document now includes technical resources and mangement documents in the appendix that list several methods to protect desirable trees from damage from beaver.</i></p>
<p><b>Page 26</b> comment #9</p>	<p><b>Recreation: Provide river access where appropriate</b></p> <p>This narrative seems to suggest that more and still more pedestrian bridges should be inserted along the river whenever residents living nearby may wish to have a more convenient crossing point. It should be added that all bridges, without exception, have a deleterious effect on normal river function, which is to continuously water back and forth across the floodplain...</p> <p>Therefore a statement should be added to the effect that wherever possible, bridge removal should be considered and that every effort should be made to not add still more bridges anywhere along the river.</p>	<p><i>While there likely is a practical limit on the number of bridges that can cross the river without impacting its natural movement, it is beyond the authority of the JRC to prohibit new bridges. However, the Best Practice has been updated to: 1) Refer to the Jordan River Trail Master Plan for guidance on bridge locations, 2) recommend that bridges that serve no current purpose should be considered for removal, 3) encourage cities and counties to look for opportunities to share bridge access to minimize the number of new bridges over the river, and 4) ensure that any new bridges are carefully sized to ensure maximum space for natural river movement.</i></p>
<p><b>Page 26</b> comment #10</p>	<p><b>Recreation: Provide river access where appropriate</b></p> <p>Add: "All boat launch facilities should be placed within river eddies of sufficient size to accommodate several boats; this will protect both the ramps or docks, and the boaters from the power of the river current."</p>	<p><i>This suggestion has been incorporated into the document.</i></p>
<p><b>Page 27</b> comment #11</p>	<p><b>Recreation: Locate trails to protect river and habitat</b></p> <p>Add: "wherever the Jordan River Parkway trail is vulnerable to erosion because it is too close to the river bank, and wherever it may serve as a barrier to wildlife or to water moving between the river itself and adjacent wetlands or wildlife habitat, city planners should be alert for opportunities to move the trail further back away from the river."</p>	<p><i>This suggestion has been incorporated into the document.</i></p>

<p><b>Page 28</b> comment #12</p>	<p><b>Recreation: Integrate active recreation to minimize impacts on river function and wildlife</b></p> <p>Add: "In all existing parks, golf courses, and other river-adjacent recreational facilities, lay back or reposition dredge berms, add native plant buffer zones or if possible, river-adjacent swales or wetlands in swaths as wide as possible, to provide enhanced wildlife habitat and connectivity along the river banks. Existing golf courses can be redesigned to substantially expand the natural habitat envelope back away from the river's edge."</p>	<p><i>This suggestion has been incorporated into the document as a bullet in the How To section:</i></p> <p><i>"Enhance wildlife habitat potential by connecting river buffer zones and river adjacent swales or wetlands to existing parks, golf courses, and toher recreational facilities using native plan species."</i></p> <p><i>The concept of laying back or repositioning berms would need to be considered on a case-by-case basis. While parks and golf courses are opportunity areas, flooding would disrupt the programming and purposes for which these facilities were created, and would creating significant maintenance expenses. This may not be practical for active parks and recreational facilities, but a decommissioned golf course may create an opportunity. The idea of exploring opportunities for berm modification is noted, and this concept has been incorporated into the Best Practices: Improve Natural River Function, on Page 19</i></p>
<p><b>Page 29</b> comment #13</p>	<p><b>Recreation: Enhance east-west trail connections</b></p> <p>Add: " Wherever possible cities should build bike lands and paths that connect light rail stations to the Jordan River trailheads."</p>	<p><i>This suggestion has been incorporated into the document.</i></p>
<p><b>Page 37</b> comment #14</p>	<p><b>Utilities: Minimize impact so utility corridors</b></p> <p>Add to How To: "Develop a comprehensive wildlife management plan for lands within the north-south power line corridor running adjacent to the Jordan River, and maximize connectivity, forage and shelter for wildlife along this entire corridor through restoration of native plants."</p>	<p><i>The concept of planning for multiple-use utility corridors owners has been incorporated into the document in the Why Important section. The suggestion for an additional project/study will be added to a list of possible efforts for the JRC Board to consider and potentially undertake at a future time.</i></p>
<p><b>Page 39</b> comment #15</p>	<p><b>Riparian Protection Ordinance</b></p> <p>Add to purposes:</p> <p>6. Minimize costs of flood control through zoning by protecting as much as possible of the effective river meander corridor from build-out.</p>	<p><i>The numbered list of purposes is a sample of regulatory language reprinted as originally written in the Oro Valley, Arizona's ordinance, so this additional language cannot be added to that list. However, the descriptive paragraph about the Purpose section of an ordinance does list flood control as a purpose and benefit of implementing such an ordinance.</i></p>