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September 10, 2015

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Mayor Hales and Commissioners,

Adopting a new Comprehensive Plan is a once-in-a-generation opportunity. This Plan will shape the future of Portland by giving direction to land use, development, and public facility investment decisions between now and 2035.

The Recommended Plan includes a vision statement and guiding principles, goals and policies, a land use map, and a list of significant projects. The Plan addresses standard land use and growth topics like urban form, housing, environment, economy, and transportation. And it includes much more: it also expands the traditional view of a comprehensive plan to include topics such as equity, technology, and public health. The Planning and Sustainability Commission (PSC) unanimously recommends this Plan. We urge City Council adopt it and send it to DLCDD for their acknowledgement.

The Recommended Plan was designed to make Portland more prosperous, healthy, equitable, and resilient. The 12 Portland Plan “Measures of Success” served as guideposts for us. We urge you to keep those measurable goals for progress by 2035 in mind including:

- 80% of households live in complete neighborhoods (as measured by the Complete Neighborhoods Index);
- Carbon emissions 50% below 1990 levels;
- 33% tree canopy coverage citywide;
- 90% of households are economically self-sufficient;
- 84% of eighth graders are at a healthy weight; and
- 70% of people walk, bike, take transit, or use other less polluting ways to get to work.

Reaching these goals will be difficult and will require actions in addition to those that can be implemented by a land use plan. However, we strongly believe that good land use and development decisions are essential to move us in the right direction.

The PSC recommends this Plan to City Council after our extensive public process, hearings, and detailed deliberations. We also welcome the last round of community involvement and testimony that will be taken at the Council hearing to ensure the Plan meets the needs of all Portlanders for the next 20 years.



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As we transmit these recommendations, we would like to highlight several elements of the Plan that stand out to us as especially important.

Residential Growth Strategy

The Comprehensive Plan addresses how to accommodate and harness growth to meet our goals. In terms of residential growth, the Plan continues our commitment to growing diverse, livable, and accessible urban neighborhoods. One-third of the expected growth will be in Central City neighborhoods like the North Pearl, South Waterfront, the West End, and the Lloyd District. Outside of the Central City, we believe a “centers and corridors” strategy offers the best path to achieve our goals. As much as 50% of anticipated growth is forecast for centers and corridors – places like Lents, St Johns, Hollywood, Interstate Avenue, and Barbur Boulevard. The remaining 20% of anticipated growth can be accommodated as infill in single-dwelling neighborhoods.

The heart of the residential strategy is to build more complete communities. This means well-designed growth in centers and on corridors that serve surrounding neighborhoods. We seek complete communities that can benefit Portlanders through improved walkability and safety, expanded housing choices, stronger business districts, and full return on our investments in transit through compact development. This does not mean that the goal for complete communities means all places will be the same. The strategy is not “one-size-fits-all”. It is intended to build on the existing variety among neighborhoods, corridors, and centers.

Many close-in centers and corridors are already experiencing rapid market-driven development growth. The Plan targets significant growth in these areas. This is a good thing because these are places of opportunity in that are already walkable with transit, local-serving businesses, and easy access to jobs.

In other parts of the city, particularly East Portland and parts of West Portland, beneficial growth depends on providing the infrastructure, services, and other ingredients for complete communities. The new Comprehensive Plan recommends investments be made to close these gaps. These investments are needed to make sure growth happens in the right locations and in ways that benefit current as well as future residents and businesses. We need to address inequities by investing in improvements that benefit existing communities. We also need to address the affordability challenges that also can result.

Environmental Health

The new Comprehensive Plan includes many policies regarding improving fish and wildlife habitat, protecting the city’s biodiversity, preventing incremental environmental degradation, and ensuring ecosystem resilience.

Environmental zoning and regulations remain important tools to ensure natural resources are protected and restored. The new Comprehensive Plan adds to these tools. It recognizes that if we are to meet the multiple objectives, we need to improve ecological health on a watershed-wide basis and do so in a manner that ensures natural systems can adapt to climate change.

Environmental resource issues also were integrated into the urban design policies and the centers and corridors strategy. For instance, the Plan aims to weave nature into Portland’s neighborhoods, and direct growth where it is environmentally sustainable and cost-effective to serve.



Economic Growth Strategy

The Commission put significant energy into understanding and debating issues related to employment land supply. We made several conclusions that are built into the Recommended Plan:

- The desire to try to address growing income disparity and declining middle-class employment opportunities shaped the Recommended Plan. In the current economic recovery, well-paying jobs for people with high levels of education increased. Low-wage jobs also grew. Family-wage middle class career opportunities did not.
- It is important to maintain manufacturing and distribution jobs, because they serve as an upward mobility ladder for a large sector of the population – especially people of color and those without access to higher education.
- In order to maintain and grow our manufacturing and distribution job sector, Portland must use our existing employment land base more efficiently, *but this will require significant public investment*. There are 600 acres of industrial brownfields that could be returned to productive use. There are also important transportation investments recommended in the Transportation Systems Plan (TSP) that can increase the productivity of existing employment. The Economic Opportunity Analysis (EOA) assumed the low-end 2035 forecast for commodity shipping.
- Expanding middle-wage jobs, however, does not mean we should sacrifice environmental quality or accept industrial sprawl. Also of note, the PSC found that the 2035 industrial land supply would be sufficient to meet the jobs and economic development objectives without greenfield development on West Hayden Island.

Housing Affordability Challenge

The city has enough land zoned and served with infrastructure to accommodate expected residential growth. Unlike previous planning efforts, we do not need to recommend significant up-zoning as part of this Plan. However, as already noted, the current national and local challenges to affordability, housing choice, and equity in public services shaped the Recommended Plan:

- If Portland is to meet its goals to be affordable to a broad range of households, market-rate and affordable residential development must increase. Even with the growth in housing supply, more Portland households are forecast to experience excessive housing cost burdens.
- There is no single cause to the affordability challenge. It is part of nationwide trends, acute local supply/demand imbalance, and the persistent structural inequities behind growing income disparity. The demand for housing by households with more income, or those more able to manage the housing cost burden, drives up rents. This especially increases pressure on low-income households to move farther from the core and/or to live beyond their means. Opportunity-rich close-in neighborhoods will continue to lose diversity.
- The Comprehensive Plan plays an important role to ensure the private market can develop enough housing to keep up with demand, *but this is not enough*. It is clear to us that investment in affordable housing must be substantially increased over the next 20 years.



- We also have recommended a suite of anti-displacement policies for your consideration. The Recommended Plan includes policies that support increased affordable housing development and housing security. It includes policy support for additional funding tools such as inclusionary zoning, bonuses, and linkage fees. It recommends improved tenant rights protections. It recommends consideration of community benefit agreements where relevant.
- Some areas zoned for residential development under the old (current) Comprehensive Plan do not have adequate public services, or are exposed to natural hazards such as flooding or landslides. In some cases, building complete urban infrastructure (streets, pipes, etc.) will be extremely expensive. In some of these hard-to-serve areas we recommend reducing the allowed density.
- The David Douglas School District has experienced strong enrollment growth over the past 20 years, and they have not been able to raise money to finance needed school facilities. We believe the City Council can help ease growth pressures in this district by rolling back some of the most aggressive up-zoning that occurred through the Outer Southeast Community Plan – especially in locations not well served by transit.

Transportation

Transportation is often discussed in terms of mobility. But mobility is not the underlying reason people travel – they travel to get to specific places, to access opportunity, have new experiences, and to meet daily needs. With this in mind, we support the multi-objective goals of the TSP (see Chapter 9 policies) – including elements such as Vision Zero and integration of public health goals. The Plan includes several “big moves” in transportation that we would like to highlight.

- Unlike the previous TSP, the recommended transportation project list has been prioritized using explicit criteria developed with public input. The list also has been right-sized to match the amount of revenue PBOT expects to have. This financially-constrained list includes assumptions about future revenues. These assumptions depend on City action to secure more transportation funding from the State and through local sources such as a street use fee. These changes are a significant step, and it will help the public more easily understand how money is spent.
- The recommended transportation project list includes significant investment in East Portland – to build out more complete streets, connect people to transit, and carry out the already-adopted Bicycle Master Plan. This is an important investment in equity. This investment should happen before we consider further expansion of the streetcar in central Portland.



- The policies in this Plan move us farther toward multimodal evaluation of transportation system performance. We cannot continue to measure the success of our transportation system by measuring vehicle congestion. The safe movement of people and goods is more important. There is a limit to the number of single occupancy vehicles that can move through a given street segment, or intersection. In many cases we can increase road capacity by providing other transportation options, and in some cases that will involve prioritizing other modes.

While these changes are important, the recommended fiscally-constrained project list does not yet do enough to create the kind of multimodal transportation system we will need in the middle of the 21st century. With current levels of investment, we will not be able to complete the Bicycle Master Plan or complete the kind of transit system that provides real choices for all of Portland. Additional investment is needed!

Equity and Inclusion

One of the principle takeaways from the Portland Plan to acknowledge that Portland has persistent inequity in terms of outcomes for communities of color and other groups. Also, it made it clear Portland is becoming more diverse. Increased diversity will make us stronger, but we have to change how we do business.

The Recommended Plan features policies that bring a focus on increasing equity into how we grow, shape and invest in Portland's future. It includes equity as one of the five guiding principles of the Plan. It is built on the premise that we must consider the combined effect of Comprehensive Plan elements, such as housing, economy, and transportation, could have on the opportunities, stability and health of households. It incorporates the use of environmental justice considerations into future decision making.

The Plan also includes a significant overhaul of the public involvement program.

- Portland's neighborhood association system is at a crossroads and must adapt to become more inclusive and accountable.
- The City has a responsibility to expand direct outreach to underrepresented communities, through programs like the Diversity in Civic Leadership (DCL) Partners. We can't expect everybody to participate through traditional mechanisms like neighborhood meetings, open houses, and public hearings. We also have recommended stronger environmental justice policies to further emphasize the importance of involving those that could be adversely impacted by planning decisions.
- Planning and development processes and decisions should be communicated broadly to the public. During the development of the Portland Plan and Comprehensive Plan, expanded outreach through new tools like online surveys and mobile phone apps have generated more diverse participation, especially from younger people (who better reflect the demographics of Portland in 2035).



Plan Scope

Finally, we would like to address the scope of the Comprehensive Plan. Comprehensive plans are about the physical development of the city, growth, and related infrastructure. Typically, they include chapters on transportation, housing (especially housing design), the environment, and economic elements (usually land supply related). In our recommendation, we have pushed to address topics that are not traditionally included in Comprehensive Plans, but that we believe are critical to consider:

- Technology has become an essential ingredient in prosperity and access to opportunity. In 2015, access to communications infrastructure is as important as transportation infrastructure. Accordingly, we have recommended a suite of broadband and open data policies.
- In Portland today, it is impossible to discuss housing policy without discussing anti-displacement tools, tenant rights, and concepts of environmental justice and community benefits.
- We know that Comprehensive Plans do not govern City budget decisions, but this letter points out several aspects of the Recommended Plan cannot be successful without significant investment – hard decisions that Council will need to make – notably, brownfield cleanup, transportation systems, and affordable housing. We strongly urge you to make these a funding priority.

Thousands of Portlanders have participated in development of this Plan – the most significant multi-year planning exercise since the original Comprehensive Plan was adopted in 1980. The PSC accepted public testimony over a 9-month period and received over 4,000 public comments. We listened to the public, and worked with staff to make appropriate changes. We carefully considered state land use requirements and the requirements of our periodic review work order.

The Recommended Plan does not settle ongoing land use debates like industrial land supply. And it is unlikely that any one future decision will advance all of the policies in the Plan equally well. We believe the Recommended Plan provides a solid framework of considerations to weigh and balance going forward, to protect what is special about Portland.

Thank you for your consideration of this Recommended Comprehensive Plan.

Sincerely,



André Baugh
Chai

