

PORTLAND PLAN

Comprehensive Plan Evaluation

An introductory research paper to assist in the Portland Plan Work Program development

URBAN FORM Technical Working Group

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Introduction

Portland has a long and successful tradition of shaping its future through thoughtful planning. Much of what the community values about Portland is, at least in part, the legacy of the 1972 Downtown Plan, the 1980 Comprehensive Plan and the 1988 Central City Plan. However, these plans, which were intended to guide the city's growth over a 20-year period, are largely outdated. They no longer adequately prepare the community for the challenges and opportunities that lie ahead or provide guidance regarding how and where to make the next round of major investments in infrastructure and programs.

On November 13, 2007, the City received a letter from the state Department of Land Conservation and Development (DLCD) directing Portland to undertake Periodic Review of its Comprehensive Plan. The DLCD letter calls on Portland to evaluate the comprehensive plan provisions on economic development, housing, public facilities, transportation and urbanization to determine whether they are consistent with state law. The City will also evaluate supporting documents (e.g., forecasts, inventories, analyses and facilities plans) and implementing regulations (e.g., zoning). If the plan, supporting information or regulations are deficient, the City must prepare a Work Program to bring them into compliance with state law, and include a public outreach strategy that effectively involves the community in the planning effort.

Merely updating the comprehensive plan per state law will not provide the City with the coordinated, comprehensive guidance document needed to prepare for the opportunities and challenges that the community will likely face (e.g., global warming, a changing economy and projected population and job growth) or achieve the community's aspirations for the future.

Consequently, the City has launched a planning process to prepare a new over-arching plan for the City of Portland, the "Portland Plan." The Portland Plan will satisfy the state's Periodic Review requirements and address other issues and opportunities to prudently guide the City's physical, economic, social, and cultural development in a manner that meets community needs and aspirations.

To evaluate the current Comprehensive Plan and scope the Portland Plan, the City formed six Technical Working Groups (TWGs) to address the following topics: Economic Development, Environment, Housing, Infrastructure, Sustainability and Urban Form. Each topic had its own approach. Some existing committees, such as the Citywide Asset Managers Group that prepares the annual City Asset Report, were tapped to participate on the TWG. The groups began meeting in October 2007 and completed their discussions in February 2008. The number of meetings varied widely by topics. Generally, groups met at least monthly.

The TWGs were composed of staff from the Planning, Environmental Services, Housing and Community Development, Office of Sustainable Development and Transportation bureaus. In addition, staff from Parks and Recreation, Building and Development Services, Management and Finance, Water Bureau, Portland Development Commission, Port of Portland and the Housing Authority participated.

A transportation expert served on several TWGs because transportation concerns are woven into all the other topics. Transportation is also specifically addressed in the Comprehensive Plan Evaluation Report. This separate report summarizes the individual TWG reports.

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Additional input was also considered from the Portland-Multnomah Food Policy Council, community health advocates, Portland Peak Oil Task Force, ReCode Portland, a project facilitated through Tryon Life Community Farm to promote regulations that support grassroots sustainability, and visionPDX. This input loop will be continued in future community meetings and at public hearings before the Planning Commission and City Council.

The TWGs were asked to examine at the Comprehensive Plan, other plans and regulations to help define the initial focus issues and identify the known goals, policies, needs, challenges and opportunities that the Portland Plan should address. Specifically, the TWGs were asked to do the following:

1. Summarize and assess the existing policy frameworks, including the Comprehensive Plan, 1988 Central City Plan, and other current policy statements to identify the following:
 - a. Which policies remain relevant,
 - b. Which do not, and
 - c. What is missing.
2. Prepare draft assessments of conditions and trends that they believe are most relevant and critical to understanding the issues to be addressed by the Portland Plan.
3. Identify additional research or analysis that should be undertaken to develop the policies for the Portland Plan and the Central Portland Plan.
4. Suggest particular planning projects for the Work Program, the complete list of planning projects/tasks that will need to be done, and set forward any specific staff or resources needed to accomplish those projects.

Some groups also responded to a draft "Suggested Approach" to the Portland Plan process that offered "5 Framing Ideas" that represent the big issues facing the community including: (1) Global Climate Change, (2) World Economy, (3) Affordable Living, (4) Investment in Green Infrastructure and (5) Character of Place. Over time, these five ideas evolved and included other ideas. Each TWG considered the ideas that seemed most relevant to their topic.

As the TWGs held discussions on the topics listed above, they were asked to always consider the community values expressed in visionPDX: community connectedness and distinctiveness; equity and accessibility; sustainability, accountability and leadership; inclusion and diversity; innovation and creativity; and safety.

This report is the TWG's summary of their group discussions. It is intended to help to start a citywide conversation on the issues, challenges and opportunities. It is hoped that individuals and groups will add to the conversation started by these reports.

The Urban Form Technical Working Group was made up of staff from Bureaus of Planning, Environmental Services, Parks and Recreation, Development Services, and Transportation. Each of these bureaus' policies and regulations affect the city's urban form. The group began its work by identifying the regulations that have the most impact on the city's physical environment. The group's primary aim was to map the regulations, which implement current land use, transportation, environmental, and parks policies, onto one citywide map. The contents of this report, which focuses on an assessment of the city's written Comprehensive Plan policies, is part of the group's work. The mapping elements are not included.

I. Introducing Urban Form

Most people do not use the term “urban form” on a daily basis. Certainly, the Urban Form Technical Working Group’s understanding of the term evolved over time. This part of the report is intended to share the perspective from which the group approached the assessment and to provide a frame of reference for the reader.

What is urban form?

Urban form is the physical shape and structure of the city. It influences whether you walk or drive to the store. It influences how far local farmers must travel to reach neighborhood markets and how long it takes to leave the city to explore wilderness areas. Whether you live in a more urban area like the Pearl District, a lush and hilly neighborhood like Ash Creek, a neighborhood with ranch houses and tall Douglas Firs like Mill Park, or in an inner neighborhood with closely-knit houses and active commercial streets like SE Belmont Street, urban form influences your everyday life.

A city’s physical structure also influences how quickly a community can adapt to changing environmental, economic and social conditions. For example, a city with a very large and diffuse structure and without concentrations of development, might find it more difficult to adapt to a prolonged rise in fuel costs and the need to increase transportation options. A city with a limited tree canopy and little open space would find adapting to increased rainfall and stormwater runoff more challenging and more costly than a city with ample tree canopy and undeveloped land.

A city’s form, not only impacts residents’ daily lives and individual economic choices, it affects citywide policy and financial decisions. The shape, structure and organization of a city—its urban form—reflects a society’s values, needs, opportunities and constraints. Portland’s urban form is the cumulative *physical* result of numerous related and unrelated human decisions over time. Portland’s existing urban form reflects the influence of the natural landscape. The existing urban form also helps us understand our past and present values and needs.

What influences urban form?

Urban form – the shape and structure of a city – is influenced by many natural and human-made elements. In Portland, topography, rivers and streams, parks, freeways, streets, blocks, lots, and buildings all shape the physical environment. The presence or absence of these elements influences how residents, visitors, and even wildlife experience the city.

First, the ***land form*** shapes a city. Portland’s landscape begins with the way this region is nestled in fertile flood carved valleys between massive volcanic peaks at the confluence of two navigable rivers. Locally defining natural features—streams, hills, valleys and buttes—directed the location of development; they set the organizational framework for the streets and settlements within the city and the region.

Portland’s ***parks, natural and open space areas*** also shape the city. Some areas convey floodwaters or provide wildlife habitat for protected species. Some areas remain undeveloped because of their location; a significant amount of open space exists along the interstate highways that run through Portland. Many of Portland’s parks are less developed or undeveloped to ensure that residents have places of respite and places for recreation.

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Irrespective of the reasons for the existence of natural areas, open space, vacant land and park lands, the city's visually open areas provide the city with a natural structure and shape—esthetic and functional.

The need to connect communities to each other and to exchange goods and services greatly influences city structure. Today, **freeways, railroads, and light rail lines** traverse the city and are major organizing elements. Historically, these organizing elements may have followed the natural landscape, such as Sullivan's Gulch. Other times, new routes, roads, and bridges ran in opposition to the landscape, such as the construction of five new bridges over the Willamette River over a span of twenty years (1887-1907)¹.

While environmental conditions set the context for city form and the major transportation routes set the overall framework for how people and goods move through the city, the **local street networks** define the shape and structure of Portland's districts. The street networks in streetcar-era Portland, which is generally found in the inner eastside, is different from the street network in the West Hills, both of which are also different from the street network east of I-205. Arguably, the street networks in each of these areas influence individual transportation mode choices, the arrangement of buildings and the character of each of these broad districts. The district level street networks reflect the transportation technologies and economic needs that were prevalent when each district experienced the greatest amount of growth.

From the street network come the **lot lines** that define ownership patterns and **buildings** that create the places we experience in our daily lives.

At the citywide scale, only the most prominent elements can be identified – rivers, hills, freeways, major arterials and general land uses. At the district scale, more elements can be communicated – collector streets and block patterns. At the neighborhood scale the local street networks, lot lines, and building massing are evident.

Who is concerned about urban form?

Over the past few years, Portland residents have expressed concern over the loss of sunlight, informal places and trees in our neighborhoods as we grow.² At the same time, communities have expressed concern that the design of new higher-density residential development sometimes does not respect or continue the established characteristics, patterns, or scale of neighborhood residential areas and recommended developing design solutions that respond to different contexts^{3,4,5}. Residents are also concerned that the development and improvement of local streets and sidewalks in eastern and western Portland is not synchronized with development. Local leaders have echoed these sentiments

¹ Portland historical timeline. Portlandonline.

² City of Portland, Bureau of Planning, *Meeting Notes from Infill Development Discussions*, March 17, 2007.

³ City of Portland, Bureau of Planning, *Infill Design Project Report: Medium Density Residential Development*, October 10, 2005. Available at:

<http://www.portlandonline.com/planning/index.cfm?c=decfj>

⁴ City of Portland, Bureau of Development Services, *Land Development Code Monitoring Report Planning Commission Briefing Report*, May 2007. Available at:

www.portlandonline.com/shared/cfm/image.cfm?id=161623

⁵ City of Portland, Bureau of Planning, *East Portland Review* (Draft), November 2007. Available at: <http://www.portlandonline.com/planning/index.cfm?c=eeceh>

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about the current and future shape of Portland.⁶

The Metro 2040 Urban Growth Concept^{7,8} provides Portland with a regional growth strategy, which focuses growth in centers and along significant transportation corridors. It tells us where higher density centers should generally be located, where cities should encourage neighborhood-serving main streets and where to provide more and better transit service to accommodate our growing population. However, it does not tell us how to do it. It is Portland's responsibility to figure out where to locate housing for new residents and how to create a fertile and sustainable economy, while protecting our natural resources. It is Portland's responsibility to guide the city's shape and development.

In 2006, the Bureau of Planning's Regulatory Rethink Advisory Council of Experts (ACE) evaluated the City's approach to regulating development and recommended new approaches that may promote higher-quality development, while continuing to implement City plans and policies. The ACE's principle recommendation was to address the City's physical form and implement citywide design concepts through the creation of an Urban Form Plan.⁹

Although the ACE are the only ones who explicitly discussed the need for an Urban Form Plan, many of the concerns expressed by residents and community leaders through visionPDX, in the 2005 Infill Design Project Report, at the March 17, 2007 Infill Development Discussions, in the East Portland Review and at the October 2007 Planning Commission retreat, revolve around how the City and the community addresses, preserves, promotes and changes Portland's shape and structure.

These concerns, coupled with global trends that will affect the city, call for an intentional, coordinated and communicative Urban Form Plan to guide the future development of Portland.

What is an Urban Form Plan?

An Urban Form Plan would be an integrated plan that clearly communicates – with written policies and visual diagrams – the community's intentions for the future of its physical form. The Plan's components include urban development (such as intended development forms, generalized land uses, civic places and other key community places), transportation systems and street characteristics, parks, and natural and environmental features. Together, these elements characterize Portland's physical environment. An Urban Form Plan would focus on the organization of these elements, their characteristics, and the relationships between them at the citywide, district and neighborhood scales.

⁶ City of Portland, Planning Commission, *Planning Commission Retreat Summary*, October 2007.

⁷ Metro, *The Nature of 2040-The Region's 50-year Strategy for Managing Growth*, June 1, 2000. Available at: <http://www.metro-region.org/index.cfm/go/by.web/id/231>

⁸ Metro, *2040 Growth Concept Map*, January 9, 2006. Available at: <http://www.metro-region.org/index.cfm/go/by.web/id/231>

⁹ City of Portland, Bureau of Planning and Dyett & Bhatia Urban & Regional Planners. Regulatory Rethink White Paper, 2006. Available at: <http://www.portlandonline.com/planning/index.cfm?c=dagaj>

II. Global Trends

The Portland Plan management team identified five global trends that will significantly affect Portland. Each TWG was asked to consider how these trends relate to their areas of focus. Please note that the Urban Form TWG did not concentrate its efforts on this section of the report, so the trends' impacts on urban form were not fully explored and the descriptions provided below are not comprehensive.

A. Climate Change & Energy

Reports suggest that Pacific Northwest residents should expect to experience a greater number of warmer, wetter winter storms, drier summers and greater fire risk and reduced natural water storage capacity in the coming years. At the same time, reports also indicate that petroleum-based energy resources have become increasingly scarce and, as a result, costs of petroleum-based resources will likely rise. Additionally, use of petroleum-based resources has contributed to many of the climate changes noted above. Listed below are some of the major urban form implications of climate change and changing energy sources and related research questions.

Potential Significant Urban Form Implications

- Will we need to direct public and private development to reduce the need to travel by car?
- Will we need to direct public and private development to make it easier for Portlanders to walk, bike and take public transit on a daily basis to reduce our collective use of petroleum-based resources?
- Will we need to accommodate greater amounts of stormwater runoff? How can we minimize stormwater runoff?

Potential Research Questions

- Will we need to allocate more land to stormwater management and less to new development? If so, do we need to reconsider the areas we have identified for higher and more intense development due to flooding and fire concerns?
- If reducing impervious surface to manage stormwater runoff means constructing fewer new streets, how do we plan to increase connectivity in Portland's many neighborhoods?
- How might revised connectivity and street creation policies affect our transportation system plans?
- Do we need a new measure for determining how well our (multi-modal) transportation system functions?
- Do we need to create new development standards for areas where we need to protect streams, trees and vegetation, and pervious surfaces to ensure better stormwater infiltration and reduce the negative impacts of flooding?
- Will we need to reconsider allowing buildings to be located among or close to dense vegetation because of increased brush fire risk?
- Do our land use and zoning patterns support the ability for residents to access services without needing to rely on automobiles?

B. Population Shifts

Metro estimates that Portland's population will grow significantly over the next 30 years. In addition to increasing in number, consistent with national trends, a greater proportion of our residents will be older/retirement age and younger/school age than today. Listed below are some of the major urban form implications of the projected population shifts and related research questions.

Significant Urban Form Implications

- Our new residents may have different transportation and housing needs than our current population.
- As a region, with the creation of the Urban Growth Boundary we collectively decided to limit outward expansion, focus development in specific centers and corridors and keep new development out of most established neighborhoods. If we continue on this path and focus growth in our centers and corridors, we will see an increasing number of taller and bigger buildings along corridors. As constructed building heights increase along corridors, the relationship between new structures along corridors and existing houses in adjoining neighborhoods will become more critical and, very likely, contested.
- If we focus growth in our centers and corridors, many new Portlanders will live in higher density housing with less private open space. As we grow—whether it is a neighborhood coffee house or tavern, a public plaza, basketball court or a stream corridor—we need to make sure that residents of all ages have safe, attractive and nearby places of respite outside the home.
- As our population density increases, and if apartments and rowhouses comprise the majority of our new housing stock, not only will we have a greater number of park users per square mile, but they may have a broader diversity of recreational needs. This means that the city will need to provide more (and different) recreational and open space opportunities.
- In some residential areas, the constructed densities and heights are lower than the planned and allowed densities. Portland may see a great amount of change in the type of housing within established residential neighborhoods.

Potential Research Questions

- What types of housing will best suit our needs (aging population, changing family types) as we grow?
- Where should we expect more development? Which lands in the city can be divided?
- Where are land values more conducive to redevelopment?
- Where is commercial development occurring?
- What types of commercial projects are most common?
- What types of commercial projects are becoming more common?
- Where is multi-dwelling development occurring?
- What types of multi-dwelling developments are most common?
- Are there other types of open space that can be incorporated into the urban form? What types of open spaces are provided in other cities that have experienced recent

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population growth?

- Are there opportunity sites that may be particularly suited to accommodating higher-density development, due to factors such as site size and proximity to transit? Where are they?

C. A World Economy

According to the Economic Development TWG, transit-oriented development areas offer opportunities for growth, but the market potential of the city's commercial corridors is still relatively unknown. The Economic Development TWG also noted that some neighborhoods appear underserved by commercial land. The Urban Form Plan TWG also found this to be true. In some areas of East Portland, the limited amount of land available for commercial development has been recently developed with residential uses; residential uses are permitted in all commercial zones in Portland. Finally, the Economic Development TWG states that some large institutions have location-specific needs for campus growth. These concerns seem to be site-specific and may be possible to address, with the assistance of Planning and Bureau of Development Services, outside the scope of an urban form plan.

Potential Research Questions

- What is the economic role of Portland's commercial corridors?
- Should we consider creating some commercial sanctuary areas in the city as an economic development tool?
- Should we consider creating new commercial and mixed use areas in the city?
- Do our Comprehensive Plan map and land use designations allow Portland's businesses and economy to respond flexibly to changes in the world economy?

D. Growing Equity Gap

As noted in the Housing TWG Assessment Report, many families are moving from older Central City and close-in neighborhoods to East Portland, increasing the demand on housing in East Portland and influencing the type of new housing being constructed. Additionally, increasing fuel costs may spur the development or the need for more housing close to public transportation. These changes highlight the importance of addressing development, design and other urban form concerns in East Portland.

Significant Urban Form Implications

- Neighborhoods with fewer resources may have fewer improvements due to lack of funds and political capital.
- Pedestrian, transit and bicycle infrastructure may become more critical in certain parts of Portland, as it becomes increasingly expensive to commute by car on a daily basis?
- Increased densities are resulting in loss of trees and green spaces which exacerbates inequities that already exist in these areas.

Potential Research Questions

- Where are there gaps in our pedestrian and bicycle circulation systems and in our transit system?
- Do we provide an adequate mix of housing types (to ensure that housing for those at all income levels can be permitted)?

- How should the city focus its efforts to provide equitable access to parks, trees, and green spaces?

E. Public Health

There are community concerns about our collective health and vitality. Many community members are concerned that we have a preponderance of potentially lifestyle-related health problems such as childhood and adult obesity adult onset (Type II) diabetes, high blood pressure and heart disease. Additionally, exposure to toxics and increased environmental pollutants may be linked to declining public health. Conversely, access to nature and time outdoors have been correlated with improved attention and concentration skills in children.¹⁰ As we continue to produce new goods and products and continue to develop and redevelop and use fuels, we increase our exposure to potentially harmful pollutants and waste products.

Significant Urban Form Implications

- Need to provide opportunities for a variety of recreational needs and for walking and bicycling in all parts of the city.
- Need to assess the relative location of housing, schools and employment centers and pollutant sources.

Potential Research Questions

- Where are there gaps in our pedestrian and bicycle circulation systems?
- Where are there gaps in our park service?
- Where are parks and open space scarce?

III. Analysis of Existing Comprehensive Plan

Members of the Urban Form TWG reviewed the Comprehensive Plan Goals and Policies with the goal of identifying which policies remain relevant to urban form and which do not, and where urban form policy gaps exist.

In addition to completing these tasks, staff reviewed the organization of the Comprehensive Plan Goals and Policies with the intent to identify potential ways to reorganize and reformat the Portland Plan/Comprehensive Plan to improve readability, clarity and policy direction.

In this report, recommended revisions to the Portland Plan/Comprehensive Plan organization and policy approach are provided first, urban form-related policy gaps are provided second and specific comments on existing Comprehensive Plan policies are provided third.

¹⁰ Richard, Louv, *Last Child in the Woods: Saving Our Children from the Nature-Deficit Disorder*. (New York: Workman Publishing, 2005).

A. Recommended Comprehensive Plan Policy Approach & Organization

The Urban Form TWG raised some questions about the efficacy of the organization of the existing Comprehensive Plan; however, because the Portland Plan management team may decide to maintain the current structure of the Comprehensive Plan, staff provided comments on the individual policies and objectives. Additionally, even if the structure of the new Comprehensive Plan is different than the existing Comprehensive Plan, many of the policies, with some updates, should be retained.

Key Values

The community vision and values articulated through visionPDX will serve as the key values for the Portland Plan. As a reminder, those key values are:

1. *Equity and Access,*
2. *Community Connectedness, and*
3. *Sustainability.*

These values provide Portland residents and staff working on the Portland Plan with a lens through which to examine both the plan development process and the policies within the plan; well-articulated definitions of these values should be included in the Portland Plan. These three values are broader than the Operating Principles, which are described below.

Identify Operating Principles

It has become evident that there are certain operating principles, or ways that we should do things, that are important to many of the Portland Plan TWGs, including the Urban Form Plan TWG. These operating principles will establish and codify processes that will help us realize the visionPDX values and respond to significant global trends that will influence life in Portland for current and future generations. They are broad ideas and goals against which all future Portland policies should be evaluated prior to recommendation and adoption.

The Environmental TWG developed a set of operating principles that are very similar to those suggested by the Urban Form Plan TWG. The Environmental TWG developed the ideas behind the “Be Resilient and Adaptable” and the “Precaution Principle. The Urban Form Plan TWG would like to use some of their work.

1. Be Resilient and Adaptable

Ever and rapidly changing environmental systems require adaptable approaches and systemic redundancies. In addition, policies should encourage actions and practices that are proven to enhance rather than compete with nature and allow room for nature’s dynamic conditions. This language was provided by the Environmental TWG. This concept may be refined and amended to apply to all policy decisions. This concept is often referred to as “Adaptive Management”, which is defined as:

A structured, iterative process of optimal decision making in the face of uncertainty, with an aim to reducing uncertainty over time via system monitoring. In this way, decision making simultaneously maximized one or more resource objectives and, either passively or actively, accrues information needed to improve future management. [Adaptive Management] is often characterized as “learning by doing.”¹¹

¹¹ “Adaptive Management from Wikipedia.” Available at: http://en.wikipedia.org/wiki/Adaptive_management. Accessed: January 2007.

2. Manage Assets and Investments for the Long Term

The city has made significant infrastructure improvement investments, making the best use of investments should always be a key consideration.

3. Precaution

The City should consider adopting a “do-no-harm” approach. Every effort should be made to ensure that actions in one part of a system prevent direct and indirect deterioration elsewhere. In cases where scientific information is inconclusive about a potential environmental impact, the benefit of doubt falls in favor of the environment. This language was provided by the Environmental TWG. This concept may be refined and amended to apply to all policy decisions.

2. Recommended Policy Approach

Currently, the Comprehensive Plan separates policies into discrete topics: housing, environment, urban development, energy, transportation and so on. From an urban form perspective, this is far from ideal, given that housing, environmental, transportation, development and energy policies (and other policies) come together to create a city’s physical urban form. For example, energy policy influences our transportation system, environmental conservation initiatives change the location of development and our development standards have a bearing on the energy efficiency of our buildings. The current organization of the Comprehensive Plan does not recognize the physical outcomes of multiple policy objectives and it does not recognize the interdependent nature of each policy topic. Additionally, the current Comprehensive Plan format does not recognize that different policies reveal themselves at different physical scales. Therefore, the Urban Form Plan TWG submits the following policy approach recommendations to the Portland Plan management team for review.

1. Develop a Thematic Policy Approach

The Urban Form Plan TWG recommends reorganizing the Comprehensive Plan policy approach to acknowledge the interactive nature of our policies. Specifically, the Urban Form Plan TWG recommends grouping goals and policies according to broader themes to ensure that the outcomes of closely related policies and ideas are developed concurrently and with consistent goals.¹² Using larger organizing principles would make the entire policy set more intentional.

2. Address Scale of Impact – Regional, Citywide, District, Neighborhood and Site

Within each of the broader policy themes and goals, the Urban Form Plan TWG recommends separating goals and policies according to the scale of their impact. Some policies have citywide impacts, while others may only have an impact on certain areas of the city and, still, one may only notice the impact of other policies on individual sites. Knowing and stating the scale of impact of a policy will help prioritize implementation timelines and will provide a framework for beginning to determine which programs will best address specific problems. Therefore, the Urban Form Plan TWG believes it is important to identify the intended scale of impact of a policy. Alternatively, the entire Comprehensive Plan could be organized by scale.

¹² For an example of where the City could have benefited from a thematic or grouped policy approach, please refer to staff’s discussion of Comprehensive Plan Goal 2: Urban Development, which is addressed under the heading: Analysis of Specific Existing Comprehensive Plan Goals and Policies.

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3. Create a Policy Prioritization Framework and Timeline

Under our current policy and regulatory framework, most goals and policies are equally weighted. It would be useful to create a system that staff could use to determine which goals and policies are more important in specific circumstances and over time. Noting the scale of a policy outcome, as recommended above, may help with the creation of a policy prioritization framework, as will the trade-off mapping mechanism recommended below.

4. Create a Trade-off Mapping Mechanism

Many of the Comprehensive Plan policies have physical impacts. Developing a series of maps that show how one policy outcome interacts with another policy outcome on the ground may be a useful communication tool and a policy development aid. For example, if the City is considering expanding the boundaries of an environmental protection area that would limit the amount of buildable area, it may be useful to create a series of maps that show how the city will accommodate the same density, either through different building forms or by shifting the density to another location. This tool may be most useful during the plan development phase and could be used to illustrate policy options during discussions with the public.

5. Do not confuse implementation tools (how to accomplish an objective) with the objective (what to accomplish)

The purpose of a new Comprehensive Plan document should be made clear. Is its purpose to draw a picture of *what* the city should be (aesthetically and functionally)? Should it include *how* those objectives might be realized and *who* is responsible for various methods?

6. Link objectives with performance measures

Creating direct link between a policy and specific performance measures will help us evaluate whether a given implementation tool is working. Marin County, California provides a good example with an interactive website that demonstrates whether the County is progressing toward its goals.¹³ This website and plan is very user-friendly and informative. We would benefit from exploring their methodology and approach.

7. Incorporate Graphics (e.g., photos, illustrations, maps, etc.)

The current "Gray Book" which contains the Comprehensive Goals and Policies does not include any illustrations, graphics or the Comprehensive Plan Map, which is the principle illustration of the Comprehensive Plan. The majority of the Comprehensive Plan Goals and Policies have physical outcomes, yet none of the intended outcomes are depicted in the "Gray Book." Adding illustrations, photos and maps will help the public, development community and staff, understand the intended goals and aspirations of policies. Some people visualize physical outcomes by reading text, but many do not. It is critical to provide as many audiences as possible with a clear understanding policy of goals and aspirations. Incorporating a significant number of graphics in the Comprehensive Plan may help us to get there.

8. Expand the Glossary of Key Terms

There are many terms used throughout the Comprehensive Plan Goals and Policies that are not clearly defined. An expanded glossary of key terms would help the public

¹³ Marin County, California, *Marin Countywide Plan*, 2007. Available at: <http://www.co.marin.ca.us/depts/cd/main/fm/index.cfm>. Accessed on 2/7/08

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understand the policies and provide staff with clearer direction. Key terms to define include the following: urban form, urban design, open space, vacant land. Other, less abstract terms will also need to be included in this glossary.

9. Principles for Deliverables

The existing Comprehensive Plan goals and policies and maps are separated into many documents. Some of these documents are readily available online, while others are not. The Urban Form TWG proposes that we adopt some principles for the products we aim to deliver. The new Comprehensive Plan/Portland Plan should be in one organized document. It should be readily accessible to the general public, not only in language, but in format. The Plan, including all graphics and illustrations, should be readily available online and updated on a regular basis. Additionally, the files should be presented in an accessible format and not require specialized programs or highly sophisticated computers to view. All maps, illustrations and photographs should be offered in multiple printable formats, so that people can print out documents with a standard printer. Whenever possible, graphics should also be coded for black and white printing.

B. Urban Form Policy Gaps

Most of the existing urban form-related Comprehensive Plan Goals and Policies remain relevant and useful.¹⁴ However, the Comprehensive Plan Goals and Policies are silent on numerous significant urban form concerns. Listed below are a number of urban form-related issues that the Urban Form TWG believes the Portland Plan should address and include.

1. Overarching Growth Strategy

Metro 2040 Growth Concept provides the region with an overall growth strategy. Because the Comprehensive Plan was written before Metro 2040 Growth Concept was adopted, the Comprehensive Plan Map does not fully reflect the regional framework. Although the Comprehensive Plan supports growth in centers and corridors, the existing city maps do not show this focus. On our maps, some centers do not reflect the intensity of development called for in the Metro 2040 Functional Plan: West Portland Park Town Center, Raleigh Hills Town Center and station areas along I-205 and Milwaukie light rail alignments. Similarly, the city policies that support the Metro 2040 Growth Concept are scattered through the various Comprehensive Plan documents. The new Comprehensive Plan maps should be updated to better reflect the Metro 2040 Growth Concepts and the Metro 2040 supportive policies should be grouped together.

Comprehensive Plan Map

The current Comprehensive Plan map is one of the three components of the Comprehensive Plan. It was adopted in 1980, along with a set of policies and the Citywide Systems Plan. At the time, much of east Portland was unincorporated Multnomah County and was not included in the map. As the City has annexed areas, those areas have been given Comprehensive Plan designations and were included on the map. The map contains land use designations and trails. It does not contain broader topics such as lands that are undevelopable for various reasons (floodplain, environmental protection zoning, etc.) or the third dimension (height and bulk).

The Comprehensive Plan map is almost identical to the City's Zoning Map. Only 3% of the city has different Comprehensive Plan and zoning designations. Of that 3%, a

¹⁴ Urban Form related Comprehensive Plan Goals and Policies are discussed later in Part II of this report under the heading *Analysis of Specific Existing Comp Plan Goals & Policies*

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large percentage is from one residential zone to another. More importantly, the Comprehensive Plan doesn't reflect the Metro 2040 Growth Concept or other designations mentioned in the written policies.

Given all the factors mentioned, the Comprehensive Plan map is not useful in illustrating what the community's aspirations are for its future.

Metro Study Areas 93 and 94

Metro Study Areas 93 and 94 contain rural lands. Some of these areas are within the city limits, but not within the Urban Growth Boundary. Other portions of these areas are not within our city boundary or urban service area, but are very close by. Decisions regarding the future of these areas will affect Portland. During this plan process, we need to be cognizant of regional discussions that may affect this area and our boundaries. The City should consider adopting position statements regarding these study areas, as they have an affect on the city's form at a citywide scale

Clear Land Use Mix Goals

The Comprehensive Plan separates land use designations according to the assumed predominant use: commercial, residential, employment, industrial and so on. To more accurately reflect our broader land use policies we should be more explicit that we designate properties by predominant land use zones (residential, industrial, and open space) and mixed use zones. The mixed use zones include the eight commercial zones, EX, RH, and RX.

Building Form Guidance

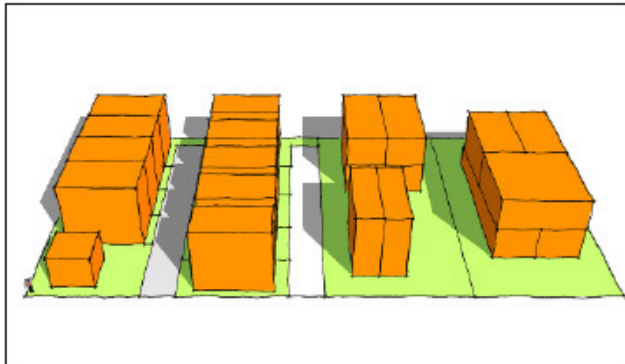
In many cases, the form that development takes on private property is unpredictable, which may conflict with outcomes called for in policy, such as neighborhood compatibility. While flexibility in building types may be desired, the Urban Form TWG is working on several diagrams that illustrate the variety of forms that can result from our existing regulations. Examples can be found in all zones. For example, in the R2.5 zone development on a property that allows for two dwelling units may result in a duplex, rowhouses, two narrow lots, or a flag lot. Target densities in multi-dwelling zones may be achieved by building an apartment building, a cluster of single-dwelling houses on their own lots or one common lot, or rowhouses. A single-dwelling house may be built on a commercially-zoned lot or a full block mixed-use building may be built. More commonly, however, is that the vision of pedestrian-friendly environments where a large percentage of the block frontage is occupied with buildings close to the street actually results in commercial buildings that are turned sideways and face the side parking lot. The Comprehensive Plan should be explicit whether the variety allowed in building forms is desirable.

URBAN FORM POLICY GAPS
1. Overarching Growth Strategy
- Building form guidance

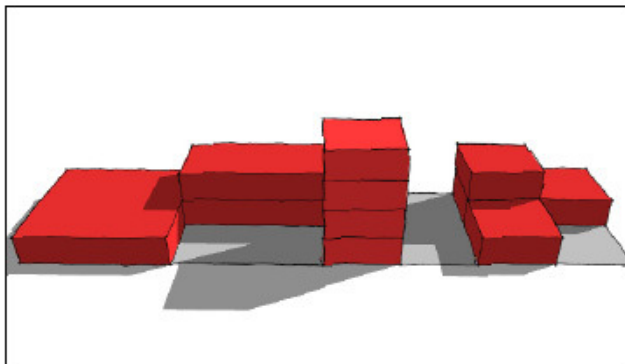
single-dwelling residential
2 d.u. 4 ways



multi-dwelling residential
5 d.u. 4 ways



commercial
1 : 1 FAR 4 ways



Commercial Sanctuary Policy

As is mentioned in other parts of this report, creating mixed-use communities is one of the driving principles behind the city's successful planning legacy. Among others, it contributes greatly to our sustainability and affordability goals. While the goal sounds worthy, without a look at the special distribution of mixed-use zones, it cannot be achieved. Imagine for a minute that the only place where commercial development was allowed was the central city. The goal of mixed-use communities

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could never be realized for the vast majority of our population. Upon inspection of our Comprehensive Plan map, it becomes evident that there are areas of the city where residents have no opportunity to walk to a commercial establishment. These areas are commercially-deficient. Not only do they not have commercial zoning, but in some case the commercially-zoned parcels have been recently developed with housing.

2. Neighborhood Typologies

Some Neighborhood and Community Plans identify different neighborhood types within their planning areas. Additionally, through a series of conversations between neighbors and staff, different neighborhood types (inner, western, eastern) were identified as having significantly different characters and development patterns. In an effort to understand our neighborhood types, we've observed that the Eastern neighborhoods have a nodal pattern for commercial development, while the Inner neighborhoods have a corridor-based pattern. Character can be defined by diverse things—from the role nature plays in the neighborhood to the predominant home style. These ideas should be explored, refined and defined through the Portland Plan. Neighborhood typologies may help serve as a framework for revising development strategies and related regulatory tools.

Neighborhood Character/Create a Compatibility Assessment Process

"We are distinct and different!" is a commonly heard sentiment at neighborhood meetings. Similar sentiments are included in each of the city's numerous Community and Neighborhood Plans and echoed in many city policies. If, as stated, one of our significant objectives is to preserve the character of our existing neighborhoods; from an urban form perspective, it is important to know the physical (e.g., built and natural forms) characteristics that define each of our neighborhoods and communities so that new developments and projects can be systematically evaluated against current conditions. Such an evaluation could be used to target City investment to enhance those characteristics.

Perhaps more importantly, we need to know what we mean by key terms, such as the following: preserve, enhance, maintain, compatible and character. In order to know what regulations to write, what sorts of developments should be permitted and promoted, we need to have a clear set of terms to work from and need to reach agreement about future neighborhood goals and redevelopment.

Livable Neighborhood Index

In some areas, the density of the tree canopy may define livability, while in other areas, residents may find that access to a shopping district is central to their neighborhood. In some places, highly developed parks are preferable to more natural open spaces. In short, livability means different things in different places. In order to figure out how to preserve neighborhood character while we grow, it makes sense to first gain a better understanding of what an area values most. Staff recommends developing a policy and process for determining what defines livability across the city and what defines livability in Portland's various districts.

3. Areas of Stability and Areas of Change

Existing policies and map are unclear about where change is expected and encouraged. While the overarching policy is to grow in centers and corridors, residential areas are also experiencing substantial changes.

There are many areas in the city where existing zoning regulations permit development that

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is significantly larger, more intense and denser than current development suggests. Existing zoning can also come into conflict with preservation policies and the desire to protect the historic character of established neighborhoods and historic districts and prevent demolition of historic resources. The Comprehensive Plan should identify those areas where change is expected under current regulation and identify what sort of changes can occur. Should residents and businesses expect changes in use, intensity (changes in the number of dwelling units) or form (changes in height and mass of buildings)?

Once areas of change and areas of stability are identified and the types of permitted change are clearly rendered, we can begin a conversation about how new development can be successfully integrated into the existing urban fabric. The proposed areas of stability and areas of change analysis may result in new implementation strategies and performance measures to ameliorate certain growth pangs and to ensure a continued high quality of life for Portland residents.

Similarly, the community should ask itself how we expect areas to grow and under what circumstances? For example, should the pace and location of development be decided by the private sector or should the City take an active role in fostering development in key locations? If we are seeing development that is significantly different from that which is desired, (according to adopted regulations and community comments), should we continue to accept what the market provides, allow interim development that does not preclude achievement of adopted goals or wait until the market will provide the type of development we would like to see on signatures sites?

4. Natural Systems-- Incorporate watershed plan and urban forestry goals and objectives and guidance for integrating Natural Systems into Planning and Development Processes

Effective implementation of the City's watershed and urban forestry goals and objectives will certainly influence the form Portland takes over time. Incorporating these policies and objectives into the Comprehensive Plan is a first step toward putting these issues on par with other key goals the city hopes and needs to achieve; but this is not enough. Historically, planning and development practices have treated natural conditions as problems to overcome rather than as a foundation for designing distinctive and healthy communities. The city needs to develop additional guidance and approaches to protect and restore the overall health and function of the natural systems in Portland's watersheds, through a mix of conservation, development and redevelopment.

Defined Set of Parks, Recreation and Open Space System Goals

After reading the entire Comprehensive Plan, the reader may glean that parks and open space are part of the city's infrastructure, help build community, connect people and green spaces, are necessary for stable neighborhoods, protect the environment, give the city character and identity, provide visual relief and are good for the economy. Indeed, parks and open space are an integral and defining part of the city. Unfortunately, the existing Comprehensive Plan lacks a unifying and defined set of parks, recreation and open space goals. The park, recreation and open space policies are scattered throughout the Comprehensive Plan.

Given the important role that parks, recreation and open space objectives play in daily life, parks, recreation and open space goals should be given greater prominence in the Comprehensive Plan. Additionally, in light of global trends, namely climate change, the city should re-examine the role of parks and open space in the city and ask some of the following questions: What are the roles of open space in the

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city? What are the roles of parks in the city? Do we have policies for potentially multi-purpose areas, like freeway lands? Have we considered the role parks and open space contribute to public health? What will we need to do to provide the necessary amount of park and open space to continue to function well—socially and ecologically?

Additionally, Statewide Land Use Planning Goal 7 needs to be incorporated into the Comprehensive Plan.

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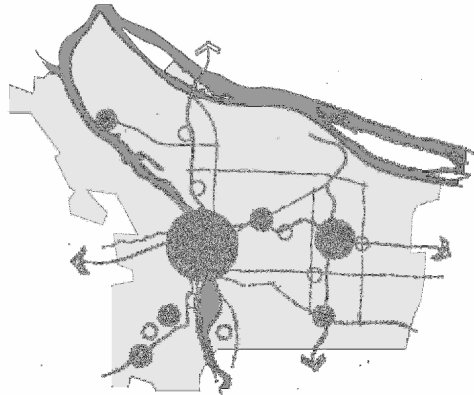
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5. Citywide Urban Design Concept Diagram

Although the Comprehensive Plan includes an Urban Design Goal (Goal 12), the Plan lacks an overall framework for approaching design in the city and lacks a list of the city's important places. Instead, the City implements design policies and guidelines on a neighborhood scale. If the city is committed to maintaining, improving and creating places of civic importance, the city must create an illustrative Citywide Design Plan and an accompanying implementation strategy. One implementation strategy could be to leverage the city's resources to create well-designed places in concert with development.

This diagram consolidates elements that make up the design of the city; its primary aim is to identify areas of civic importance and to give spatial order to the city. It should be the diagrammatic component of the Urban Form Plan and draws on what our adopted plans have said about design and illustrates what areas may need more design attention. Provided below is an example of a citywide urban design concept diagram. It shows the location of our city center and other areas of concentrated development.

Draft Example:



Placemaking Goal and Implementation Strategy

Our streets, parks and plazas, local coffee houses and taverns are the places where we create, define and (re)affirm our community identity and community character. These places are where we form community connections. As we grow, and we will grow, maintaining our existing public community places and creating opportunities for making new places is essential to staying true to our character and sustaining existing and supporting new community connections. We do not current have a focused or comprehensive placemaking strategy.

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Unifying Goal for the Public Realm

The Comprehensive Plan lacks a unifying goal for the public realm. Some mention of the role of the public realm can be found in the various discussions of public parks and open space. However, much more of the public realm that we experience everyday is integrated within our street system; it is the network of sidewalks and bikeways. One quarter of land in the city is located in these areas. While the Comprehensive Plan includes policies on bikeway classifications (6.7), pedestrian classification (6.8), and street design (6.11), it lacks a unifying discussion on the public realm within the street system.

If we consider these parts of our streets important connections between neighborhoods and places of civic importance—or perhaps even consider them an extension of our park system—then discussion of how these aspects of the street should be designed and built should be elevated. Thus, a broader policy discussion about how the public realm can be purposely shaped to create active public spaces should be incorporated into the Portland Plan. The policy should emphasize preferred form, massing, and arrangement of development that abuts the public realm. The policy might also include generalized street section diagrams. These can better communicate the policy's intentions and expectations along specific street types described in existing policies (6.7, 6.8, and 6.11).

C. Analysis of Specific Existing Comp Plan Goals & Policies

In the 1980 Comprehensive Plan, urban form was not a topic that was explicitly addressed. Including it as a topic area in this Comprehensive Plan Assessment Report begins an effort to use planning tools for this new Comprehensive Plan that were unavailable to us nearly 30 years ago.

Given that other topics in this report influence the city's physical environment – they also contribute to shaping the city's urban form – this chapter is limited to an assessment of the Comprehensive Plan policies regarding the built environment. As a result, this assessment is not comprehensive and was conducted mainly by Bureau of Planning staff.

Although most of the urban form-related Comprehensive Plan Goals and Policies related to the built environment are still relevant, many of them may still benefit from some reorganization, clarification and editing. Provided below are limited, but specific, recommendations for the existing Comprehensive Plan Goals and Policies that relate to the built environment.

The following Comprehensive Plan Goals are addressed: Goal 2: Urban Development; Goal 3: Neighborhoods; Goal 4: Housing; Goal 5: Economic Development; Goal 6: Transportation; Goal 7: Energy; Goal 8: Environment; Goal 10: Plan Review and Administration; Goal 11: Public Facilities and Goal 12: Urban Design. Also, adopted neighborhood plans figure prominently in urban form and livability discussions; a cursory assessment of them is provided under Goal 3 (Neighborhoods).

Please note that each goal within the Comprehensive Plan is formatted slightly differently; therefore, the structure of the analysis of each of the Comprehensive Plan goals varies.

1. Urban Development – Goal 2

Maintain Portland's role as the major regional employment, population and cultural center through public policies that encourage expanded opportunity for housing and jobs, while retaining the character of established residential neighborhoods and business centers.

Goal 2: Urban Development addresses topics that range from population growth to buffering residential areas from adjacent commercial and industrial areas and each of the 27 policies in Goal 2 effect and influence Portland's urban form at many spatial scales.

While, individually, many of the policies in Goal 2 remain relevant, given the breadth of topics addressed in Goal 2, reorganizing the policies thematically and within each theme, according to scale of impact, may greatly improve its readability and clarity. The recommendation to group policies according to theme and scale is also provided in Section III.A. of this report.

Goal 2 Suggested Policy Revisions and Recommendations

a. Transit-oriented and Mixed-use Development – There are at least eight policies closely related to transit-oriented and mixed-use development scattered throughout Goal 2. While these policies do not necessarily conflict, they do not reference each other, nor do they provide coordinated guidance.

The City should create a consolidated set of policies for mixed-use, infill and redevelopment and transit-oriented development, with clearly identified implementation strategies that align with the City and Metro's adopted growth strategy.

For example, Policy 2.10 addressed Downtown Portland and Policy 2.11 addresses the need to strengthen Commercial Centers. However, neither of these policies mentions Metro's 2040 Urban Growth Concept, which organizes centers into a clear hierarchy with differing goals and roles. Notably, Policy 2.15 refers to the Metro-designated regional and town centers. These policies should be consolidated, coordinated and aligned.

Policy 2.12 (Transit Corridors) calls for increasing residential densities on residentially-zoned lands within one-quarter mile of existing and planned transit routes to transit-supportive levels. This policy may be obsolete as it predates the Metro 2040 Design Concept map and subsequent City efforts that more strategically call for concentrating development in centers and specified corridors. This aspect of this policy should be reconsidered to be more strategic, instead of its blanket approach of calling for higher-densities within a specific distance of all transit corridors.

Reference to the "Livable City growth principles" should be reconsidered, as the "Livable City" document now little known or used and some of its concepts have been supplanted by the Metro 2040 Growth Concept.

Policies that relate to transit-oriented and mixed-use development include, but are not limited to the following: 2.11, 2.12, 2.15, 2.17, 2.18, 2.19, 2.22 and 2.23.

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b. Open Space and Vacant Land – Goal 2 contains one policy about Open Space (2.6) and another policy about Utilization of Vacant Land (2.20). Grouping these two related policies and providing definitions of open space and vacant land to coordinate the preservation, enhancement or development of land that does not currently support any or a large amount of development would be useful. It is also important to define the difference between Open Space and Vacant Land, since a piece of land that one person considers vacant may appear as open space to another.

c. Auto-Oriented Development – Policy 2.13 (Auto-Oriented Commercial Development) states that auto-oriented should be permitted on Major City Traffic Streets. It also states that auto-oriented development should be permitted on District Collector or Neighborhood Collector Streets where densities will not support transit-oriented development. In some cases, Major Traffic Streets are also Major Transit Priority Streets. Given this overlap, it may make sense to establish additional criteria for determining whether auto-oriented development should be permitted or encouraged in certain areas. Additionally, in light of concerns about global climate change, fuel costs and affordability, it is important to ask if the city still supports the development of auto-oriented development in any area of the community.

Policy 2.13 also includes policy direction for building design for neighborhood commercial uses on designated transit streets. It may be more effective to include the building design policies for transit- and pedestrian-oriented development in another policy, one that does not focus on auto-oriented commercial development.

Policy 2.16 (Strip Development) discourages the development of new strip commercial areas and encourages a clustered pattern of commercial development. This policy seems closely related to Policy 2.13. The same questions about the validity of Policy 2.13 should be applied to Policy 2.16.

d. Population Growth – Policy 2.1 (Population Growth) – Update to reflect population projections through 2050. This section should also be updated to reflect how and where our growing population will be accommodated.

e. River Planning and Industrial Lands Policies – Policy 2.7 (Willamette River Greenway Plan) addresses goals along the Willamette River south of the Broadway Bridge. In recent years, conditions along the Willamette River south of the Broadway Bridge have changed dramatically as the result of development. Additionally, with the potential development of a new bridge across the river, it may make sense to consider developing a more robust set of policies for the Willamette River south of the Broadway Bridge.

The city has been exploring the role of the Willamette River as a centerpiece of life in Portland through the River Renaissance and RiverPlan projects. The larger goals and policies developed through River Renaissance should be included in the Comprehensive Plan. Goals for the Willamette may have a significant impact on the shape of the city and in the development of new key civic and public places for Portlanders.

Goal 2 does not contain policies about development along the banks and adjacent to the Columbia River. Goal 2 should be updated to reflect the goals of RiverPlan, which will address, among other significant issues, the relationship between preservation of

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the city's industrial sanctuaries along the Columbia and the ecological role of the Columbia River in the Portland region.

- f. Residential Neighborhoods** – Policy 2.10 states that the city should allow for a range of housing types to accommodate increased population growth while improving and protecting the city's residential neighborhoods. This policy contains some potentially contradictory objectives. The community needs to thoughtfully consider what it means to protect residential neighborhoods and the role that neighborhoods need to play as Portland grows. This topic should also be addressed in significant detail in Goal 3: Neighborhoods.

Policy 2.21 states that the city should provide for the full utilization of larger single family houses with conditions that preserve the character of the neighborhood and prevent speculation. In some ways, this policy seems more like an implementation tool that can be used to accommodate increased population in neighborhoods while protecting their character. It is important to separate policy objectives from tools in the Comprehensive Plan. See Section III.A.5.

- g. Area Plans** – Goal 2 contains references to four area-specific plans in the city, (Terwilliger Parkway Corridor Plan, Central City Plan, Albina Community Plan, Outer Southeast Community Plan, Willamette River Greenway Plan). Each of these plans states that the subject areas should be preserved, invested in and enhanced. The purpose of including these plans in Goal 2 is not entirely clear; there are other plans for specific areas that are not included in Goal 2, but are included in Goal 3. Additionally, the role of these area plans, within the context of Goal 2, is unclear. The role of community plans and area plans needs to be better defined.

2. Neighborhoods – Goal 3

Preserve and reinforce the stability and diversity of the city's neighborhoods while allowing for increased density in order to attract and retain long-term residents and businesses and insure the city's residential quality and economic vitality.

The policies and objectives of this goal are concerned about maintaining or reinvigorating the physical condition of existing buildings and housing stock in the neighborhoods; preservation of historic structures; and nurturing social and economic stability, population diversity (by ethnicity, income, age), and citizen involvement.

The policies also defer to adopted neighborhood plans for additional guidance. To date, there are 39 adopted neighborhood plans, 12 areas plans, and 4 community plans (including "Central City"). In review of the all these plans, the majority of them nest within the 4 community plans (Central City, Albina, Outer Southeast, and Southwest). With regard to the built environment, the common thread in these plans is emphasis on protecting existing residential (read "single-dwelling") character or "preserving" distinct neighborhood character while allowing for mixed-use or multi-dwelling housing along existing or planned transit streets. This theme relates to another common thread: reducing sole reliance on the car by promoting and designing opportunities for increased transit use, bicycling, and walking. While some neighborhood plans specifically emphasize the preservation of suburban characteristics of the neighborhood (Centennial), many of the plans support and encourage improvement of the built environment.

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While many of these neighborhood plans are more than 10 years old, they still play a role in championing stability while guiding change within their respective boundaries. As part of the Comprehensive Plan update, the status of the existing plans will need to be explored. The broader comprehensive plan language could also be updated to reflect more recent thinking on how projected growth will impact the neighborhoods. Updated policy statements should include a discussion on how change can be designed to foster agreement about what that change should be—agreement on the meaning of compatibility—and how change can be managed so that while it might be different, it is not so jarring to residents.

Goal 3 Suggested Policy Revisions and Recommendations

As with many Comprehensive Plan goals, Goal 3 is relevant but would benefit from some clarifying language and reorganization. Specific revisions are provided below.

- a. Goal 3 does not clearly address the relationship between the Neighborhood, District and Community Plans, nor does it clearly address the reason for developing different types of plans. If these various plans are intended to guide neighborhood development and help neighborhoods advocate for themselves, it is important to understand their scope and potential impacts.
- b. The role of the neighborhood plans in documents not included as part of the Comprehensive Plan, but the role of the neighborhood plans are not clearly articulated in the Comprehensive Plan. It may be useful to have a clear definition in the Comprehensive Plan.
- c. Additionally, Portland Parks and Recreation would like to work with neighborhoods when they develop new neighborhood plans.
- d. Policy 3.7 (Visual Communication) is not particularly clear. This policy needs editing and should be placed in a different location. Currently, it is sandwiched between the Neighborhood Plan policy (3.6) and the Albina Community Plan Neighborhoods (3.8).

3. Housing - Goal 4

Enhance Portland's vitality as a community at the center of the region's housing market by providing housing of different types, tenures, density, sizes, costs and locations that accommodate the needs, preferences, and financial capabilities of current and future households.

Goal 4: The housing goal's policies and objectives are organized into four major policy topics:

- Housing Supply
- Safety and Quality
- Housing Opportunity
- Housing Affordability

This goal is being thoroughly analyzed by the Housing TWG. The Urban Form TWG recognizes that housing policies will greatly impact urban form, such as reconsideration of our 20% share of regional housing growth. But, for the purposes of this report, we've limited our analysis to those policies affecting the built environment.

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Overall, the housing policies emphasize diversity of housing options and affordability for all incomes and population groups. Policies that relate to the built environment highlight “sustainable development patterns,” neighborhood compatibility, well-designed housing options, and housing near transit and employment.

Goal 4 Suggested Policy Revisions and Recommendations

Generally, the housing policies and objectives affecting urban form appear sufficient. However, for overall readability and clarity, some policies and objectives can probably be pared down or consolidated. Additionally, some objectives can be better associated with the header policy. A few recommendations that particularly affect urban form:

- a. The “Opportunity” and “Affordability” policies could be grouped under one heading, “Opportunity and Affordability,” which would help in trimming redundant statements.
- b. Policy 4.10 (Housing Diversity) reiterates much that is already said in Policy 4.7, Balanced Communities. The update of the section should consider consolidating “Balanced Communities” and “Housing Diversity” into one policy, perhaps “Balanced Communities and Housing Diversity.”
- c. Policy 4.13 (Humble Housing) can be nested in Policy 4.7, Balanced Communities (and Housing Diversity).
- d. Policy 4.14 (Neighborhood Stability) “K. Enhance the quality of the design of new infill residential development.”... “Quality of the design” can mean many things to many people. The statement can be more specific to include the use of higher-quality durable materials, taking into account the surrounding context (block, neighborhood, district), and adhering to the general bulk and massing defined in the urban form plan.

4. Transportation – Goal 6

Develop a balanced, equitable, and efficient transportation system that provides a range of transportation choices; reinforces the livability of neighborhoods; supports a strong and diverse economy; reduces air, noise, and water pollution; and lessens reliance on the automobile while maintaining accessibility.

Forty-two policies (6.1 ... 6.42) and related objectives describe the elements and functions of a transportation system and associated actions that can carry-out the aims of this goal. The forty-two policies are grouped into ten major policy sections:

- 1) *Coordination and Involvement Policies (6.1 to 6.3);*
- 2) *Street Classification and Description Policies (6.4 to 6.11);*
- 3) *Transportation Function Policies (6.12 to 6.16);*
- 4) *Land Use and Transportation Policies (6.17 to 6.21);*
- 5) *Pedestrian and Bicycle Policies (6.22 to 6.23);*
- 6) *Public Transportation Policy (6.24);*
- 7) *Parking and Demand Management Policy (6.25 to 6.28);*
- 8) *Freight, Terminals, and Truck Policies (6.29 to 6.30);*
- 9) *Regional Transportation Policies (6.31 to 6.33);*

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10) *Transportation District Policies (6.34 to 6.42; 7 districts total: NE, far NE, SE, far SE, NW, SW, and Central City). [The Transportation District Policies also contain 6.42 Truck Accessibility, which was added in May 2006.]*

This goal and the Transportation System Plan are the most up-to-date of the Comprehensive Plan. Generally, the transportation policies adequately address the built environment within the ten broad policy sections, indirectly most of the time and directly on occasion. Given that these policies were updated in 2002, and some as recent as 2006, much of the language is still relevant.

The Transportation System Plan will be updated during the Portland Plan time frame and will include a much more detailed analysis of transportation goals and policies. For the purposes of the urban form, the Urban Form TWG suggests that the following additions to the Comprehensive Plan update.

Goal 6 Suggested Policy Revisions and Recommendations

- a. Explore the possibility of developing alternative standards that are responsive to differing neighborhood, topographical and environmental constraints. For example, our current policy is to require sidewalks on both sides of the street. Would it make economic and design sense to require sidewalks on one side of the street, or possibly a narrower sidewalk? [See Policy 11.10 Street Design and Right-of-Way Improvements]
- b. An updated policy about how each mode of transportation contributes to the public realm and spurs different forms and intensities of private development.
- c. A policy about “public space” as shaped by public infrastructure. For example, the city could consider supporting improvements at the confluence of major streets, like the intersection of SE Powell, SE Foster and SE 50th Avenue, to provide for public space or landmarks that serve as subtle gateways from one area of the city to another.
- d. Reconsidering our current level of service standards; one that takes into account other modes of transportation, not just automotive, to determine adequacy of transportation facilities. [Policy 6.18]
- e. Recognizing safety as a guiding transportation objective. Safety has been increasingly emphasized in the Office of Transportation’s operations and priority projects.
- f. Incorporating green streets and green infrastructure into transportation policies. Green street initiatives and policies that have been development recent programs are not evident in Goal 6 [This is also an issue with Goal 11, Public Facilities].
- g. Exploring policies about prioritizing one mode of transportation over another. Current design classifications are weighted the same. From a design/street construction perspective, should one mode have priority over others? Should it be different in different areas? From an operational perspective, should we require motor vehicle diversion for bike boulevards?
- h. Making bicycle objectives more robust to reflect current thinking.

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- i. Clarifying language about the extent of fulfilling sidewalk improvements in different parts of the city.
- j. An updated policy about streetcar development and the required surrounding development intensity needed to support its construction.

5. Environment – Goal 8

Maintain and improve the quality of Portland’s air, water and land resources and protect neighborhoods and business centers from detrimental noise pollution.

The Environment Goal contains 26 policies grouped into 6 major categories:

1) Air Quality, 2) Water Quality, 3) Land Resources, 4) Noise, 5) Aggregate Resources, and 6) RF Emissions. No direct language refers to urban form. However, objectives (8.11 A – H) recognize unique environmental areas and features that protect natural forms and by extension influence the city’s overall [urban] form.

Goal 8 Suggested Policy Revisions and Recommendations

Goal 8 should provide policy guidance regarding the importance of protecting, conserving and restoring the natural systems and landscape features, including trees and treeline ridges, buttes, stream corridors, wetlands, floodplains, soils and slopes. The link between these features and Portland’s urban form should be made explicit in the context of the City’s environmental policies. Goal 8 also needs to call for the built environment to be planned and designed as an integral part of Portland’s functioning watersheds. For example, along with designing the built environment to help manage stormwater, save energy, and provide habitat opportunities, the city should establish policies and guidelines to reduce the hazards to the migratory birds that traverse the city north and south each year on the Pacific Flyway.

According to the Environmental TWG, guidance is needed for promoting multi-disciplinary approaches and prioritizing goals, particularly with respect to the relationship among natural resource, economic and development goals. The Urban Form Plan TWG concurs with this statement.

6. Plan Review – Goal 10

Portland’s Comprehensive Plan will undergo periodic review to assure that it remains an up-to-date and workable framework for land use development. The Plan will be implemented in accordance with State law and the Goals, Policies and Comprehensive Plan Map contained in the adopted Comprehensive Plan.

Similar to Goal 2, the policy direction within Goal 10 is wide ranging. It includes information about how the Comprehensive Plan and its various components may be updated and amended, land use policy direction, direction to develop specific implementation tools (e.g., design review regulations and condition of approval enforcement regulations), and direction to create a parks system plan and a plan for development along the Columbia River.

It may be wise to focus the purpose of Goal 10 and concentrate on Plan Review and Administration, rather than include land use policy objectives, goals for specific geographic and direction to determine if it is appropriate to develop new and specific implementation tools in Goal 10. Land use policy objectives could be neatly folded into a

reorganized Goal 2.

Goal 10 Suggested Policy Revisions and Recommendations

Acknowledging that some of the policies within Goal 10 may be better served if located in other sections of the Comprehensive Plan, given that the Comprehensive Plan Map is the official long-range planning guide for development in the city, it is essential to address the existing Comprehensive Plan Map land use designations at this point.

- a. Number of Land Use Designations** – Policy 10.4 states that the Comprehensive Plan Map is the official long-range planning guide for uses and development in the city. The Comprehensive Plan uses twenty-one land use designations to tell the story of development in Portland. The land use designations identify desired uses for each area and call out the corresponding zoning code designation. Because there are so many land use designations, the existing Comprehensive Plan Map looks a lot like the zoning map. Most of these land use designations directly correspond to one specific zoning designation. Rather than increasing the clarity of the Comprehensive Plan Map, including so many land use designations makes the map more confusing.

Since many of the land use designations are similar, at the citywide scale, it may help to create a more generalized version of the Comprehensive Plan Map that reflects the general thrust of groups of related land use designations. Additionally, it would make more sense to develop a Comprehensive Plan Map that more clearly reflect how Portland plans on implementing the adopted regional growth strategy, the Metro 2040 Urban Growth Concept.

Creating a map that shows generalized uses will result in a map that, at first glance, will tell the user where they can expect to see many uses (mixed-use zones), single-dwelling residential areas, multi-dwelling residential areas and non-residential or working areas of the city. These larger groupings will limit the number of colors on the map and make it more intelligible to the average reader.

- b. Content of the Land Use Designations** – The text of many of the existing residential land use designations does not accurately describe the current state of development in many of areas of the city. For example, areas designated for multi-dwelling residential development are supposed to have good public services and no development constraints and, in some cases, also good transit access; however, for many of the areas in East Portland designated for multi-dwelling residential development, public services lags behind development, notable development constraints exist and transit services is not as frequent as it should be.

Similarly, some of the commercial land use designations do not address the fact that residential development is allowed by right at the street level in all commercial districts. While some of the commercial land use designations mention that residential development opportunities still exist, the language suggests that residential development is constrained in most commercial zones; it is not. Residential uses are permitted by right. Staff is not offering a critique of the uses permitted in commercial zones, staff is simply noting that the land use designations do not paint the clearest picture about what is permitted in many areas of the city.

In the process of updating the Comprehensive Plan Map, and in response to current development conditions, staff should review the applicability and usefulness of each of the land use designations. The community should reconsider goals for certain

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areas of the city and make sure both the regulations and policies push forward the same objectives and that those objectives are clearly shown on the Comprehensive Plan Map(s).

- c. **Dimensions of the Comprehensive Plan Map** – Recent conversations with residents have indicated that many concerns about new development have to do with the shape and mass of buildings, rather than the uses contained within. Given that mass and shape are of significant concern it makes sense to begin to include more three-dimensional images of what can be permitted and what is desired.
- d. **Plan Amendment Process** – Consider different tiers of Comprehensive Plan amendments (like the Type I, II, and III land use review types in the Zoning Code). Should there be a way to modify a street plan - local streets only - without an extensive Comprehensive Plan review process?

7. Public Facilities – Goal 11

The Public Facilities goal is comprised of nine separate goals (A through I). Goal 11 begins with a general discussion of public facilities and services and follows with more detailed discussion about each of the specific facilities and services. The following is a list of the nine goals and associated policies that make up the overall public facilities goal:

- 11A. General Goal & Policies
- 11B. Public Rights of Way Goal & Policies (transportation)
- 11C. Sanitary and Stormwater Facilities Goal & Policies
- 11D. Solid Waste Goal & Policies
- 11E. Water Service Goal & Policies
- 11F. Parks and Recreation
- 11G. *Public Safety*: Fire
- 11H. *Public Safety*: Police
- 11I. Schools

Goal 11A - The General Public Facilities Goal

Provide a timely, orderly and efficient arrangement of public facilities and services that support existing and planned land use patterns and densities.

This goal statement and its associated policies (but no objectives) serve as over arching guiding principles in the provision of the various urban public facilities and services.

Goals 11B through 11I each focus on the different facilities and services that altogether make up the set of public facilities (and services).

Goal 11A Suggested Policy Revisions and Recommendations

The arrangement of having a general goal statement for public facilities and services followed by eight more specific goals creates some confusion. Why have an overarching public facilities goal if the elements that make the set of facilities and services have their own separate goals? The elements themselves could, instead, become policies and objectives that need to be carried out in working to achieve the general public facilities and services goal.

While it makes sense to go from general to specific in discussing the public facilities

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goals, the creation of subsets of facilities and services (i.e., Public Safety) creates some logical organization issues. Introduction of the subset makes Goal 11I Schools seem to be a part of Public Safety, which it is not.

Given that Goal 11 includes "services, renaming the title of the chapter to "Public Facilities and Services" should be considered.

Alternatively, for additional consideration, the elements that are generally viewed as "services" (without a system of "hard infrastructure")—Police, Fire, Schools and perhaps also Parks and Recreation—that have their own goal statement in this section could be extracted and discussed in separate goal sections altogether. These additional goal sections could better focus on and address the issues and needs of Public Safety (Fire and Police); Schools; and Parks and Recreation. This rearrangement could streamline Goal 11 (while keeping its current title) and provide a logical framework for discussing the subset elements of public facilities and services that warrant their own goal sections.

Additionally, Goal 11B Public Rights-of-Way could also be extracted and moved into a different goal section; it could be consolidated into Goal 6: Transportation. It would further simplify Goal 11 Public Facilities.

With these changes made, Goal 11 then could focus collectively on sanitary, stormwater, water supply, and waste disposal systems. Aside from streets, these are the facilities and services that are generally understood by the general public to be "public facilities." A short explanation that the other "public facilities and services" that fit within other categories (Streets and Rights-of-Way into Transportation) or warrant their own goal section (Public Safety, Schools and Parks & Recreation) are no longer captured within this goal. Overall, the rearranging would streamline and sharpen the focus of Goal 11. Moreover, the proposed new goal sections would respectively be better focused to address their specific issues and needs.

Considering each specific sub-goal from an urban form perspective, Goal 11B Public Rights-Rights-of-Way Goal & Policies and its associated maps is the only element in this section that needs some revision.

Goal 11B - Public Rights-Rights-of-Way Goal

Improve the quality of Portland's transportation system by carrying out projects to implement the 2040 Growth Concept, preserving rights-of-way, implementing street plans, continuing high-quality maintenance and improvement programs, and allocating limited resources to identified needs of neighborhoods, commerce and industry.

As already mentioned, this sub-goal of Goal 11 could be incorporated into Goal 6 Transportation. This sub-goal could be reworded into several policies within the Transportation goal. These reframed policies along with the current set of policies associated with 11B might fit appropriately as a set before the more specific Transportation District Policies (starting with Policy 6.34). In addition to inserting Goal 11B into Goal 6, the following are a few suggested revisions and recommendations to the Goal 11B policies and objectives.

Goal 11B Suggested Policy Revisions and Recommendations

- a. Policy 11.10 Street Design and Right-of-Way Improvements (amended by Ordinance No. 180132, May 2006) should clarify or cite the transportation and land use goals and objectives the policy statement refers to. Are they the goals, policies and

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objectives stated in other chapters in the Comprehensive Plan or the City's Transportation System Plan? Or are they goals and objectives stated in other locally significant documents, like the Regional Transportation Plan.

- b. Goal 11B includes twenty-one maps, all of which follow after the main text of the policies and objectives of Policy 11.11 Street Plans. While the maps help to visually explain the objectives of the Street Plans policy, it is difficult to refer to the maps while reading the text. The maps need to be updated and made easier to connect with the associated text. The individual objectives could be placed directly on the updated map.
- c. Alternatively, Maps 11.11.1 through 11.11.8 and 11.11.17 through 11.11.19 A-C—the connectivity master street plans—could be consolidated into one larger citywide reference map with the specific areas that have master street plans outlined and emphasized on the map.
- d. Maps 11.11.9 through 11.11.16—the street connectivity status maps—could, as above, be consolidated into one larger citywide reference map in a separate document (atlas?). The map series can be excluded from the document. Four different maps to explain one objective of the policy is confusing and extraneous.
- e. Additionally, in updating the connectivity status maps, the "Other areas" designations needs to be more clearly defined. It appears that "Other areas" are the areas that do not meet street connectivity spacing standards. If that is the case, that is what the designation should state instead of "Other areas."

8. Urban Design – Goal 12

Enhance Portland as a livable city, attractive in its setting and dynamic in its urban character by preserving its history and building a substantial legacy of quality private developments and public improvements for future generations.

When the Comprehensive Plan was adopted in 1980, it only included 11 goals. The city adopted Goal 12, Urban Design, in 1993, along with the Albina Community Plan. The City's adopted goals about urban design and historic preservation are in Goal 12, Urban Design, and the Urban Design Chapter of the Central City Plan.

Note: This assessment is only of Goal 12; the assessment of urban design goals for the central city will be completed by the Central Portland Plan team, not the Urban Form Plan TWG.

Goal 12 includes policies related to Portland's character and sense of identity, respect for the variety in settlement patterns, historic preservation, enhancement of the pedestrian experience, promotion of the arts, preservation of neighborhoods, quality of design, and guidance regarding how community planning should take place. The goals and guidelines in Goal 12 draw on our past successful traditions of creating compact, pedestrian-friendly environments in our centers and corridors, while respecting and preserving the character of established neighborhoods.

Urban Form Plan TWG members discussed the relevance and usefulness of Goal 12 with Bureau of Planning urban design staff who focus on facilitating good civic quality

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throughout the city,¹⁵ design review staff from the Bureau of Development Services who are responsible for implementing the city's design goals on private property,¹⁶ and other Planning staff that work on infill design issues and those working on Historic Preservation. Whether Goal 12 provides the guidance needed to advance the city's design objectives depends on whether they are being used in a regulatory fashion or not.

With respect to site development review on private property, Goal 12 provides adequate guidance and needs only minor updates. However, with respect to citywide design goals and design in the public realm, staff indicated that Goal 12 no longer provides sufficient guidance. The urban design staff stated that while they acknowledge Goal 12 was appropriate for its time (1993); urban design today is generally expected to address the following:

- Broad understanding and approaches to desired city-scale organization.
- Clear approaches to community and neighborhood organization that match social expectations.
- Clear ideas on how public spaces and places can integrate and enhance livability.
- Place making strategies that embrace integrated public infrastructure, social agendas and good design principles.
- Consideration of the development potential of unique locations as future economic and activity catalysts or for the best and highest quality development.
- Strategic timing and phased development as cumulative improvements.
- Appropriate implementation tools in the form of public and private mechanisms to further the quality of the public realm. This includes community engagement tools such as urban design charrettes and design forums.

The above statements imply policy should address more than urban form and design quality. These aspects of urban design cut across traditional planning functions. As the Comprehensive Plan is updated, it will be necessary to define the relationship and limits of both urban design and urban form. The best way to express urban form policy and urban design policy will depend upon how the new Portland Plan is organized.

It will also be necessary to address the role of historic preservation. Historic preservation staff indicated that the existing policy and objectives under Goal 12 no longer provide sufficient guidance. Trends and issues have arisen in the past 15 years that highlight the need for changes to Policy 12.3 (Historic Preservation) and perhaps other preservation-related policies in the Comprehensive Plan. In general, the following areas should be addressed:

- Defining historic preservation's values, goals and public benefits and outlining its role as a key element in other policy areas/issues, e.g., urban development, neighborhood character, sustainability and economic development.

¹⁵ "Urban Design Portland." Available at:

<http://www.portlandonline.com/planning/index.cfm?c=43729>. Accessed on February 7, 2008

¹⁶ "Bureau of Development Services-Design Review." Available at:

<http://www.portlandonline.com/bds/index.cfm?c=37424&a=74223>. Accessed on February 7, 2008.

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- Clear policy statements that address conflicts and discrepancies that have arisen since 1993, e.g., between zoning entitlements and preservation policy, between state law and City policy/regulations, and between early preservation strategies (1970s-1980s) and current conditions.
- Providing tools for preservation efforts, e.g., local financial incentives, adequate historic resources inventories, policy leadership from the Historic Landmarks Commission, and coordination of historic preservation activities citywide.
- Strategies that embrace protecting and enhancing neighborhood character—while also allowing and guiding sensitive infill development and thoughtful change—and that address related issues such as neighborhoods “underserved” by protected historic resources, ways to evaluate and preserve the “recent past,” and public interest in forming new historic districts.

Goal 12 Suggested Policy Revisions and Recommendations

The suggestions that follow are specific issues that have been identified about Goal 12. This is not meant to imply that the goal should be kept as a separate and distinct goal. Given that, there are a few policy areas that should be explored through the Portland Plan:

- a. Create a more robust set of policies that balances our desire for compact urban environments in areas where we also desire to preserve and restore natural systems.
- b. Incorporate sustainability practices into our urban design objectives.
- c. Explore the influence that all modes of transportation have on urban design. Pedestrians are the only transportation mode mentioned in this goal.
- d. Re-examine the role the right-of-way and building massing along commercial and higher density residential streets play in creating and defining our public realm. Examine the spaces where private property abuts and influences the character of the right-of-way and vice-versa.
- e. Identify areas that could provide opportunities for giving spatial order to the city and areas where civic life can be celebrated. Examples of these places include major street intersections, like Burnside Street/Sandy/12th Ave and SE 50th Ave./SE Powell Blvd. Another example is the gateway designations that are prevalent in neighborhood plans.
- f. Incorporating the objective of providing a physical and visual connection between active spaces in buildings and the street is reflected in many purpose statements in the Zoning Code.
- g. *Policy 12.1 Portland’s Character*
 - Objective A: Expand the focus of new development on transit stations and along transit streets to include main streets and squares (the “heart” of each neighborhood). Consider place-making based on existing urban fabric/character.
 - Objective C: Enhance urban ecology with trail connections.
 - Objective D: Explore the role that street lighting can play in creating a sense of place.
 - Objective E: Update the design themes listed in the objective to include recent

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themes that are unique to Portland: environmental consciousness; design for climate all months of the year (shelters/ pergolas, canopies, etc.); creative city; artistic city.

- Objective G: Avoid prescriptive solutions like extending linear parks – underscore the need for strategic connections as part of a larger (ecologically conscious city).

h. Policy 12.2 Enhancing Variety

- Objective B: Consider the role of the historic fabric and natural features that make each area unique.
- Objective C: Strengthen the particular local, district and regional appeal of places

i. Policy 12.3 Historic Preservation

- Make explicit the educational and public value of historic districts
- Explain the role of materials, massing and scale in reinforcing the historic character of places
- Need objective statement about leadership role of Historic Landmarks Commission role in historic preservation policy-making.
- Need objective statement about coordination of historic preservation efforts between and among City bureaus, preservation organizations and citizen groups.
- Need clearer objective statement about regulatory (e.g. zoning and building code) and financial (e.g. grant and loan programs) incentives for historic preservation.
- Need objective statement about preservation “equity” and obligation to focus on geographic areas (e.g. Outer East Portland) “under-served” by historic landmarks, districts, research, protections, etc.
- Need objective statement calling for City to retain Certified Local Government status by maintaining historic design review, landmarks commission, inventory, etc.
- Need objective statement that identifies the responsibility City and other public owners have to protect historic resources that they own (as required by ORS 358.653).
- Clarify Objective E to reflect existence and purpose of new demolition review regulations, which are stronger than demolition delay implied by current language.
- Clarify/expand Objective F so that it communicates that preservation is better than demolition, but if demolition occurs, then salvage/reuse/recycle is a good strategy.
- Clarify/expand Objective C so that is about more than just “participation,” but also spells out purposes of development review of historic resource-related proposals

j. Policy 12.4 Provide for Pedestrians

- Include signage & wayfinding
- Design for pedestrians as well as transit users and bicyclists (include signage & wayfinding as key components)

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k. *Policy 12.5 Promote the Arts*

- Consider where iconic and temporary art can be used to enhance the quality of memorable places

l. *Policy 12.6 Preserve Neighborhoods*

- Consider additional policy related to fostering active and vibrant communities
- Focus increased density on commercial/transit areas - "heart" of each neighborhood

m. *Policy 12.7 Design Quality*

- Relate to an urban design framework diagram

n. *Policy 12.8 Community Planning*

- Relate to an urban design framework diagram
- Incorporate public and private amenities to reinforce a "complete community"