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MEMO

DATE: September 7, 2012

TO: Portland Planning and Sustainability Commission

FROM: Joe Zehnder, Chief Planner

CC: Susan Anderson, Director; Steve Iwata, Central City Planning Manager

SUBJECT: **Response to Comments from Mike Houck on Proposed Draft N/NE Quadrant Plan**

The Planning and Sustainability Commission will hold a public hearing on the Proposed Central City N/NE Quadrant Plan on September 11, 2012. We received advance comments from PSC member Mike Houck, which are reproduced below along with staff responses.

Mike Houck initial take on Central City 2035: N/NE Quadrant Plan

Overarching Issue:

Timing of Zoning and Environmental Analyses
I have a significant concern with timing with regard to **EN1** *Evaluate natural resource protection and management options for Sullivan's Gulch and the Willamette River bank as part of the Central City-wide natural resource analysis* (page 77) and **EN2** *Update the Willamette Greenway Plan for the Lloyd District as part of the River Plan/Central Reach process, building on concepts outlined in the N/NE Quadrant Plan and the North Portland Greenway Feasibility Study*, (page 79).

My concern is timing with regard to rezoning and natural resource/Willamette Greenway analysis. Rezoning should not occur prior to completion of these studies. In the past the city has created problems by first rezoning, then placing environmental overlays on land that owners have been given unrealistic expectations on, especially if the land has been upzoned for more intense uses. The classic example of this issue was the rezoning of the Columbia Corridor to industrial uses back in the mid-1980s. Much later the city's Goal 5 process established environmental overlays that were contested bitterly by land owners who had unrealistic

expectations for where they could develop. It is critical that rezoning be undertaken simultaneously environmental analyses and that the rezoning reflect realistic expectations for what land can and cannot be developed at higher densities/intensity.

This topic was also addressed in separate comments regarding: Pages 48, 77, 78 and 79.

Staff Response:
The N/NE Quadrant Plan is being recommended for adoption by resolution, as will be the case for subsequent quadrant plans. A complete Central City 2035 Plan will be adopted by ordinance at the end of this process, expected in 2015. The complete Central City Plan package will include formal adoption of implementing actions, such as changes to base zones, building heights, environmental and greenway overlay zones and design guidelines. Prior to bringing forward the complete Central City Plan and related implementation package, the City will evaluate any impacts from proposed zoning changes on natural resource areas.

To inform this phase of the planning process, staff has prepared a draft natural resource inventory for the N/NE Quadrant. The policies and actions in the plan recognize identified resources and opportunities for restoration and enhancement. In addition, the plan calls for evaluation of tools to protect identified resources in the next phase of the process (see Lloyd action EN1 on p.78). The intention is to better address natural resources by undertaking the evaluation for the Central City as a whole. Much of the resources in the Central City are associated with the Willamette River and it is optimal to do this planning at the reach scale.

It should also be noted that proposed zoning changes in the N/NE Quadrant are limited, particularly with respect to those affecting natural resource areas. Two areas where changes are proposed in areas with natural resources include:

1) Zone change from a mix of residential and office zoning (RH and CO) to Central Commercial (CX) at NE Multnomah and 21st in the Sullivan's Gulch area. The proposed change will primarily provide greater flexibility in land uses, however a modest increase in allowed intensity of development would also occur. The site currently has environmental zoning and BPS staff has discussed the next steps that will occur to evaluate natural resource with the property owner. (See discussion of action NB1, p.86 for more details). The importance of the natural resources in Sullivan's Gulch is also clearly stated in both plan policy and actions (see p.49-50).

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2) Increased maximum height allowance on the riverfront at the vacant "Thunderbird" site. The height increase is intended to facilitate the provision of open space on the site and the plan notes that it would be in the form of a bonus in exchange for open space. The plan also recognizes the potential for resource enhancement as part of redevelopment of the site. (See discussion of actions UD8, p.77 and EN2, p.77 for more details)

Tree Canopy: The city-wide goal is 33% tree canopy cover. The N/NE Quad tree canopy goal is 18%, and the Albina target is only 10%. The city's *Urban Forest Management Plan* has the following targets: right-of-way canopy -- 35%; developed parks -- 30%; and commercial/industrial -- 15%.

N/NE Quadrant Concept calls for greening the area the % tree canopy should be at least what's called for in the rest of the city. The 18% target for tree canopy is too low, particularly in light of proposed efforts to address urban heat island effect, carbon sequestration, energy reductions.

This topic was also addressed in a separate comment regarding:
Page 49: 2035 Performance Target: Tree Canopy.

Staff Response:
We acknowledge that the 2004 Urban Forestry Management Plan (UFMP) established citywide tree canopy targets, which are noted in the comments above. However, these targets are meant to be citywide averages. The UFMP recognizes that not all areas will meet the targets. Specifically regarding the 15 percent target for commercial/industrial/institutional areas it states:

> "There are some areas – such as downtown commercial areas – where it may not be possible to attain this level of coverage. Other areas may be able to achieve a much higher canopy cover."

The Central City is intended to be the most intensely developed part of the city. In particular, the Lloyd District has significant development potential and is expected to develop with high lot coverage similar to Downtown. In addition, the predominant zones in the Central City, including the Lloyd District and Lower Albina, have no minimum landscaping, tree preservation or tree density requirements. The resulting development pattern would make it very difficult to achieve significant tree canopy increases on private property. Instead, this plan focuses on increasing tree canopy within streets and other rights-of-way, such as Sullivan's Gulch.

With this in mind, the preliminary tree canopy targets are intended to be reasonably aggressive. Current tree canopy cover is 10 percent in the Lloyd District and 6 percent

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in Lower Albina. The plan proposes targets of 18 percent and 10 percent respectively. A significantly higher target was set for the Lloyd District in recognition that it has more opportunities to add trees in streets, new parks, Sullivan's Gulch and in setbacks and plazas on private property. Lower Albina is an urban industrial area, which has greater constraints due to the development pattern and space needs of industrial businesses. These targets represent a nearly 80 percent increase in canopy in both districts.

Feedback received from the project's Stakeholder Advisory Committee on this topic was mixed with some members feeling the targets were too high and others feeling the targets were too low. The Lloyd District target was increased from 15 to 18 percent in response to feedback on an earlier draft.

The plan includes district average targets, as opposed to setting separate targets for private property, rights-of-way etc., which staff feels is a more intuitive and holistic approach. However, it is possible to compare them to the UFMP targets. For example, if the 35 percent canopy target for rights-of-way were achieved in the Lloyd District and canopy on private property and parks remained roughly the same as they are today, the result would be an 18 percent average as proposed. If the UFMP targets were strictly applied to the Lloyd District, the result would be a 24 percent average coverage, which represents a 135 percent increase from what exists in the district today. This level of increase does not appear to be achievable based on the high intensity of development desired in this area. It may be possible to achieve higher average canopy coverage in other Central City districts, such as Downtown, which currently has an 18 percent average coverage, primarily due to existing coverage in streets and parks.

It should also be noted that the targets in the N/NE Quadrant Plan are consistent with those in the recently adopted Portland Plan, which reaffirmed the citywide target of 33% and states that Central City and industrial areas will have between 10 and 15% canopy.

Lastly, all of the performance targets in the N/NE Quadrant Plan are considered preliminary and will be revisited in the context of the full Central City, once the rest of the quadrant plans are complete. This will provide opportunities to revise the tree canopy targets based on additional work related to citywide canopy targets, as called for in the Portland Plan, and evaluating the Central City's role in contributing to those targets.

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Portland Parks and Recreation, which includes the Urban Forestry Division, has also commented on the preliminary canopy targets expressing a concern about the feasibility of meeting them. The plan recognizes that additional work is needed to identify planting locations and a strategy to get trees in the ground and notes that this work could result in fine-tuning of the tree canopy target for the Lloyd District (Lloyd action EN6, p. 50). There will also need to be additional conversations about tree canopy as the Central City planning proceeds.

Other Specific Comments:
Page 3: History: New parks and open spaces should seek to evoke the pre-settlement landscape in a manner similar to Tanner Springs Nature Park in the Pearl District. This is one way to bring a bit of nature into the heart of the quadrant.

Page 4: Same comment as above, but with regard to treatment of the Willamette River bank.

Page 23: Open Space. With regard to Sullivan's Gulch natural resource enhancement, such efforts should also reflect or at least evoke the pre-settlement landscape, including "sloughs and wetlands" that existed at the interface of the gulch and Willamette River.

Staff Response:
This plan does not include the level of detail described about the specific design of parks and natural resource restoration, however these comments could inform future implementation efforts. There are actions in the plan calling for future work to do more detailed planning work, including a parks implementation plan (Lloyd action UD5, p.46), update of the Willamette Greenway Plan (Lloyd action EN2, p.49), and a management strategy for the Sullivan's Gulch natural resource area (Lloyd action EN8, p. 50).

Page 24: I strongly support the Green Systems language.

Staff Response:
This was supported by the Stakeholder Advisory Committee as well.

Page 49: Why is Parks and Recreation not listed in EN1*?

Staff Response:
Good catch. We will add Portland Parks and Recreation (PPR) as one of the implementing agencies for this action (p.49).

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