

Dear Portland Planning & Sustainability Commission,

Our neighborhood greenways should evolve to become bicycle- and pedestrian- oriented mixed-use neighborhood centers, and as such, should be allowed to include limited amounts of neighborhood-serving retail uses in the future.

Comment on the Comprehensive Plan Map:

Currently, no change in zoning is proposed along the neighborhood greenways. Instead, neighborhood greenways should be rezoned, in all or at specified nodes, to Mixed Use – Neighborhood and Mixed Use – Dispersed.

The focus should be to liberalize the zoning along neighborhood greenways to allow limited commercial uses along these bike and pedestrian corridors. Since it seems to be difficult for the City to support human-centered bicycle oriented city-scape along many major commercial corridors, the neighborhood greenways must evolve to become more mixed-use corridors.

Many neighborhood greenway corridors are existing residential streets, so there may be some resistance to the insertion of commercial uses. These could be addressed through performance standards to address potential noise or light conflicts, while allowing a greater diversity of uses along the neighborhood greenways.

Given that these are neighborhood “greenways,” the insertion of commercial uses could be conditioned on owners adding green infrastructure improvements to the greenway, specifically improvements that would increase the shaded area provided by the tree canopy (street trees and landscaping) and add to the community space dedicated to pedestrians.

The recent wave of home demolitions in the City of Portland has left many residents scratching their heads and looking for solutions. One concern often expressed is that many of the demolitions are simply to replace a smaller, older, more affordable home with a new, larger, more expensive home. For adjacent neighbors, it is difficult to understand what benefit is being received by anybody but the developer: no additional housing units are being created, so pressure on the Urban Growth Boundary is not reduced. The price of the unit in question is actually sharply increased, so the shortage of affordable housing units is actually made worse. In short, it's hard to see how this trend actually helps the city or the region achieve any of our broader planning goals, aside from raising revenue.

Based on a series of recent discussions, and acknowledging that the wave of home demolitions will not be stopped, it is the consensus of the Concordia Neighborhood Association's Land Use & Transportation Committee that the following solution should be implemented as a part of the Comprehensive Plan update process to ensure that at least some of the demolitions will be followed by projects that do actually contribute towards meeting some of our broader community planning goals:

Within walking distance of Frequent Service transit routes (however the City chooses to define this -- 1/8, 1/4, 1/2 or 1-mile crow-fly or network buffer of frequent service transit routes or stops), there should be a new overlay zone created that allows for a residential property containing up to 5 separate residential housing units in a structure that otherwise conforms to the building envelope and setback provisions of its zoning designation (i.e. in an R5 zone, one main dwelling structure per each 5,000 sq ft lot, with required front, side and rear setbacks). The intended purpose of this overlay would be to allow

for new residential structures to be constructed containing a number of "flats," i.e. 2-4 story residential structures that look like houses where each floor is a separate housing unit (or a variation where each floor has two units, one on the right and one on the left). This type of structure is the workhorse backbone residential product of places like San Francisco's Mission District, certain areas of Boston, London, and other successful world cities; indeed, Portland has examples of this type of structure in inner SE and the NW Alphabet District that were built in the late 19th and early 20th century.

The end result would be that, rather than a demolition to replace a \$250,000 home with a \$700,000 home, the replacement unit could potentially contain three flats averaging \$250,000 each. One affordable unit could thus be replaced by three affordable units, which would help to achieve goals for increasing the supply of affordable housing, and also reduce pressure on the Urban Growth Boundary. The overall cost would be somewhat higher, due to the need to provide additional kitchens, bathrooms, laundry and common facilities, in addition to the additional impact fees that the City would likely require. However, the price per unit would be significantly lower for the finished product.

We would propose that, because this overlay zone would only exist within areas served by high quality transit service, that automobile parking requirements should remain the same as if the structure were a single-family home; but that off-street parking should be provided for bicycles at a rate of a minimum of one secure off-street bicycle parking space per bedroom.

It's possible that some neighborhoods would not want to see this type of unit constructed within their boundaries; as such, perhaps this overlay zone is something that could be rejected within its boundaries by a vote of the board of a neighborhood association. That would allow neighborhoods such as Concordia to allow this type of development in the appropriate areas near high quality transit, while neighborhoods like Laurelhurst and Eastmoreland could vote to reject it in favor of preserving their historic single-family character.

While we would love to find ways to slow down the wave of home demolitions, this proposal would allow us to live with the demolitions with the peace of mind that the replacement structures are at least helping us to achieve our broader community planning goals, bringing in more residents to help support neighborhood businesses, providing for more affordable housing, and reducing pressure on the Urban Growth Boundary.

We recommend that this proposal be studied and that language to implement it be developed and included as a part of this Comprehensive Plan Update process.

Edit 1: While the R5 zone is intended for areas near, in, and along centers and corridors with access to frequent transit, this language focuses too much on density rather than form. Especially beginning with this zone and continuing into the higher-density residential zones, Portland should transition to more of a form-based code, one which focuses on minimum site size, maximum lot coverage, setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability. The code should transition away from a strict focus on density, which can often be counter-productive towards achieving other livability-related goals, including affordable housing and achieving the critical mass of neighborhood population required to support the services of commercial centers within a 20-minute walk.

6. Single-Dwelling — 5,000

This designation is Portland’s most common pattern of single-dwelling development, particularly in the city’s inner neighborhoods. It is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very limited development constraints. Single-dwelling *structure* residential will be the primary use. The maximum density is generally 8.7 ~~units~~ *primary structures* per acre, *each structure may have up to two dwelling units per floor*. The corresponding zone is R5.

This edit should seek to clarify the role of private development in providing the off-street, secure, sheltered bicycle parking that will be required for Portland to attain its mode-split goals by 2035.

Edit 2: Policy 9.53: Bicycle parking is a critical issue, especially as the pervasive issue of bicycle theft refuses to go away. Adequate off-street, covered, secure bicycle parking should thus be required at all new developments, both residential and for employment-related uses. Off-street bicycle parking is much easier to provide than off-street automobile parking, so this requirement should be much less onerous than the off-street automobile parking requirements of the 20th century.

Bicycle parking. Promote the development of new bicycle parking facilities, including dedicated bike parking in the public right-of-way. Provide sufficient bicycle parking at High-Capacity Transit stations to enhance bicycle connection opportunities. *Require provision of adequate off-street bicycle parking for new developments.*

This is a minor edit, intended to amplify the effectiveness of this policy.

Edit 1: Policy 9.52: In order for the City to meet some of the goals mentioned elsewhere in this document, real estate that is currently dedicated to vehicle storage will need to find a higher and better use in the future, no matter where it is located – on street or off street. This policy should clarify that it applies to both situations.

Share space and resources. Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space, *both on and off street.*

The airport is currently a major source of regional air pollution. These emissions must be eliminated or mitigated as much as possible, as a matter of policy.

Edit 2: Policy 9.37: The air pollution plume from Portland International Airport currently extends deep into the residential neighborhoods of NE Portland, in a manner that is unacceptable for the long-term health of residents. The City should thus seek a long-term goal of zero emissions from the Portland Airport, and work with partners there to achieve that goal. Future technological advances, including hydrogen fueled aircraft, could allow this to become a reality within the life of the Comprehensive Plan.

Portland International Airport. Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy. *Seek ways to reduce airport air pollution emissions.*

We must seek to electrify the regional rail network, to expand capacity to allow passenger and freight rail to expand within the same corridors, and to reduce the negative impact of those rail facilities on sensitive areas such as our waterfront.

Edit 1: Policy 9.35: While growing and modernizing the regional freight rail network is certainly a laudable goal, the City should be more specific about the sought improvements: electrify the system, and create additional capacity to allow freight to peacefully co-operate with passenger rail expansion on the same corridors. Other goals may include seeking to move some freight rail yard operations away from the river, where they may no longer represent the best and highest use of those lands (as has already happened at the north end of the Pearl District.)

Freight rail network. Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network, *including electrification and double-tracking to accommodate passenger rail growth where feasible.*

We must reduce and seek to eliminate air pollution emissions from the traded sectors of our economy.

Edit 2: Policy 9.32: While it is important for Portland to maintain its role as a multimodal freight hub, the technologies currently involved are some of the dirtiest sources of air pollution in the entire region, and their pollution plume extends deep into adjacent residential neighborhoods. The City, at the very least as a matter of risk management, should therefore seek to enforce a zero emission goal on the multimodal freight hub portions of the economy. This could involve electrifying the entire regional freight rail network, transitioning trucks to hybrid biodiesel/electric vehicles, and other technological paths that could not only lead to reduced emissions but also reduced operating costs and additional jobs in the local green economy.

Multimodal system and hub. Maintain Portland's role as a multimodal hub for global and regional movement of goods. Enhance Portland's network of multimodal freight corridors. *Seek ways to achieve zero emissions from freight movement.*

We should seek to connect Portland to its hinterlands via an electric passenger rail system of the highest quality, akin to those found throughout Europe, Japan and other developed nations seeking to reduce emissions and their carbon footprint while providing attractive ways to travel without requiring the use of the automobile for longer-distance trips.

Edit 1: Policy 9.29: The City should seek stronger, carbon-neutral passenger transportation connections to more of its hinterlands. Electric interurban/intercity passenger rail service should be planned to connect Portland to Eugene (and points south), the Oregon Coast including Astoria to Tillamook (and possibly points south), the Columbia Gorge including Hood River and the Dalles (and possibly points east), as well as points to the north, including Vancouver (WA), Olympia, Seattle, and Vancouver, BC.

Intercity passenger service. Coordinate planning and project development to *create/expand electric rail* intercity passenger transportation services in the Willamette Valley, ~~and~~ from Portland to Seattle and Vancouver, BC, *and from Portland to nearby cities including Hood River, the Dalles, and destinations on the Oregon Coast including Astoria to Tillamook.*

Our goals for bicycle transportation must seek to attain the highest levels of performance. We should not sell ourselves short. Quite literally. Our goal should be to make bicycle riding more attractive than driving for all trips, *five miles or less* -- not just three.

Edit 1: Policy 9.21: The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately *five miles or less*. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn't seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the ROW to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.

Bicycle transportation. Create conditions that make bicycling more attractive than driving for most trips of approximately ~~three~~ *five* miles or less.

The City should be maximizing its production of sustainable energy.

Edit 1: New Policy, perhaps 8.105? The City should be actively seeking to produce sustainable energy on buildings, facilities, and lands that it owns or controls. The current power portfolio of the City's power sources is weighted currently very heavily to fossil fuels; one way to make this portfolio more renewable is for the City itself to begin generating more sustainable energy. Doing so could have direct financial, environmental, and economic benefits for the City.

Production. *Maximize opportunities to produce sustainable energy within the city, especially on city-owned facilities, through solar, wind, hydro, geothermal and other renewable energy production technologies.*

It's important to preserve links (and potential links) in our citywide bicycle and pedestrian network.

Edit 1: Policy 9.15: The existing language in this policy seems to support removing links from the transportation network. Rarely, aside from cul-de-sacs that don't actually front on properties with driveways, would it be possible to find links in the transportation network that couldn't possibly be used, even by bicyclists or pedestrians. This language should thus not refer to street "segments" but instead to street "areas." It is eminently practical to seek to shrink the transportation footprint by reducing the amount of street rights-of-way (ROW) that is paved and dedicated to vehicle movement. Portions of the ROW can easily be converted to use by non-auto modes, as greenspace, as bioswales, and/or as community space. This policy should support those sorts of activities, not the removal of potential links in the transportation network, especially those which may already by their nature be more suited to pedestrians and bicycles than other vehicles.

Repurposing street space. Encourage repurposing street segments *areas* that are not critical for transportation connectivity to other community purposes.

Part of an effective community policing strategy must be to ensure that the police themselves, through their facilities, are also good neighbors. Police (and other public) facilities thus must be supportive of planning goals for their locations, and must cede groundfloor street-facing space to sidewalk-oriented retail when they occupy real estate in centers and corridors.

Edit 1: Policy 8.86. Many police facilities in Portland are not necessarily a positive influence on their immediate surroundings, due to blank walls facing sidewalks, the creation of dead zones in retail strips, and the use of large amounts of land that is thus not available for infill housing, office, or retail purposes. The City should thus have a policy of “do no harm to surrounding neighborhoods” that seeks to better integrate its police facilities into their immediate urban environment.

Police facilities. Improve and maintain police facilities to allow police personnel to efficiently and effectively respond to public safety needs and serve designated land uses. *Ensure that police facilities are not themselves a blight on a neighborhood, by seeking to integrate facilities with other uses and functions, especially those that activate the pedestrian zone on adjacent sidewalks.*

We must ensure that the City and other water customers dependent on Bull Run are ensured of an adequate supply of the highest-quality drinking water, even during drought years where reduced snowpack and summertime droughts that extend into autumn combine with extreme high temperatures to maximize the load on water supply facilities. The City must thus seek to maximize its drinking water storage capacity, through construction of new capacity as well as preservation of existing historic reservoirs.

Edit 1: Policy 8.66. Many residents are concerned that, with the closure and proposed closure of many of the City’s open-air water reservoirs, that the door is being closed on water storage capacity that could be crucial in the future as climate change brings longer, drier summertime drought conditions to our region. The City should, as a matter of policy, ensure that it has adequate water storage capacity to allow adequate supply even during the most long-lasting, extreme drought conditions, without having to resort to groundwater pumping (which should only be a strategy of very last resort).

Storage. Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability, *even during extended drought periods.*

Graywater has huge potential to reduce the need for water consumption for landscape irrigation during summer months. It also can reduce the volume of wastewater requiring treatment during those time periods. It should thus be encouraged by the City at every opportunity, in partnership with other organizations that can help to implement a "graywater-safe" product labeling scheme and a public education program about how to responsibly use graywater systems.

Edit 1: Policy 8.49. Graywater, or the re-use of water from kitchen, laundry, sinks, showers, baths, and most other domestic wastewater sources except toilets, has a huge potential to reduce water consumption in Portland during the dry season. It should be specifically encouraged as City Policy, encoded in the Comprehensive Plan. The City should cooperate with other partners to develop a graywater program that educates property owners as to the responsible installation, maintenance and operation of graywater systems, including what substances and products can and cannot be used in conjunction with an active graywater system.

Pollution prevention. Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical and that reduce the amount of pollution entering the sanitary system. *Encourage the development of on-site graywater systems for landscape irrigation during the dry season (or for other re-use purposes if treated on-site).*

Right Of Way (ROW) vacations should not be taken lightly; these events should only happen as a matter of last resort, and even then, other solutions should be preferable.

Edit 2: Policy 8.43. Because the word “need” can be taken different ways by different people, it should be clarified: if a particular ROW does or could serve as a link in the local pedestrian/bicycle network, then pedestrian/bicycle facilities shall be required.

Right-of-way vacations. Adopt and maintain City code that identifies when street vacations are appropriate. That code should:

- Maintain existing rights-of-way unless there is no existing or future need for them.
 - Require pedestrian or bicycle facilities, if ~~needed~~ *the ROW serves or could serve as a connection in the neighborhood pedestrian and/or bicycle network.*
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Utility underground is not just a quality of life issue, a visual aesthetic issue, or a safety issue. It is an issue of resiliency. As residents of this city know too well, our above-ground utilities are far too vulnerable to extreme weather events. Ideally, the city would have a goal of complete undergrounding of all utilities by 2035, to maximize resilience to the stronger storms that are expected as global climate chaos intensifies.

Edit 1: Policy 8.42. This policy is all well and good, but it’s a bit vague and could have more teeth. For a variety of reasons, including resiliency, undergrounding would be a good city-wide policy, but it won’t happen without effort. Requiring undergrounding, and having a policy to accomplish it block-by-block whenever the street is opened, would make it feasible to actually accomplish this goal within our lifetimes.

Undergrounding. ~~Encourage~~ *Require* undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in Centers and along corridors where multi-story development is allowed. *Work with utilities to achieve undergrounding whenever the street is opened.*

The City must seek to attain the highest levels of environmental responsibility, especially for its own operations, if it seeks to be a world leader in municipal sustainability. This is an achievable goal, but concrete strategies must be specified.

Edit 1: Policy 8.29. This goal is very vague, and needs to have stronger language with specific goals. An achievable policy goal would be net-zero carbon emissions from City vehicles and properties, especially by the plan's target year of 2035. Setting such a goal would place Portland at the vanguard of cities willing to do something tangible about climate change; it would also come with a host of co-benefits for Portlanders, including better public health outcomes.

Resource efficiency. Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses. *Public facilities will have net zero carbon emissions from fleets, buildings, and other emissions sources.*

The habitat connections between Forest Park and the Willamette River are almost all completely missing. One by one, they must be restored; where creeks currently travel in pipes underground, they must be daylighted and allowed to connect to the river via natural environments that make them accessible to salmonids once again.

Edit 2: Policy 7.49. Forest Park's habitat can be enhanced not just by projects within its boundaries, but also through projects that better connect it to other habitat corridors. Daylighting streams from Forest Park to the Willamette can be an effective strategy to better integrate Forest Park with other nearby habitat areas. Balch Creek, Thurman Creek, Alder Creek, Yeon Creek, Rocking Chair/Munger/Saltzman Creek, Maple Creek, Doane Creek, Pull Out Creek, Hardesty Creek, Springville Creek, Hoge Creek, Linnton Creek, Be Free Creek, Bus Stop Creek, Newton Creek, Marina Way Creek, Harborton Creek, and Miller Creek all drain from Forest Park in to the Willamette River and Multnomah Channel, and would benefit from daylighting projects.

Forest Park. Enhance Forest Park as an anchor habitat and recreational resource. *Daylight creeks from Forest Park to the Willamette River and Multnomah Channel.*

Daylighting creeks where they currently flow in pipes underground must become a common strategy in the City's toolbox for re-connecting fragmented habitat of all types.

Edit 1: Policy 7.48. Daylighting can be an effective strategy to not just connect streams to rivers, but also to connect upland to lowland habitats along new (restored) habitat corridors.

Connected upland and river habitats. Enhance habitat quality and connectivity between the Willamette riverfront and upland natural resource areas. *Daylight creeks through urban areas; use these creeks as the centers of habitat corridors.*

Stream habitat connectivity within the City must be repaired by daylighting those creeks that are currently placed in pipes underground, preventing fish (especially salmon) from accessing them where they meet the river.

Edit 1: Policy 7.42. This policy is currently a bit vague as to what solutions should be on the table to “improve stream connectivity.” It should be much more specific: the strategy that needs to be pursued is to daylight those streams that have intact habitat in their headwaters, but which travel through culverts before joining the Willamette (or being lost in the underground stormwater system entirely). Daylighting must become the official policy of the City of Portland and the preferred strategy to deal with all such waterways over which the City has jurisdiction.

Stream connectivity. Improve stream connectivity between the Willamette River and its tributaries. *Work to daylight those streams with intact upland habitats that are culverted prior to joining the Willamette.*

We must seek to repair the damage done by previous generations, not just seek to prevent additional harm from being done by our or the following generations. This principle is especially applicable to the issue of habitat fragmentation.

Edit 1: Policy 7.18. It’s laudable that the City is advancing a habitat connectivity policy. However, given that we are now moving forward from more than a century and a half of urbanization, it seems that preventing more habitat fragmentation is less of an issue than actively seeking ways to repair existing fragmentation by creating new (rebuilding historic) wildlife corridors across the city.

Habitat connectivity. Ensure that plans and investments are consistent with and advance efforts to improve terrestrial and aquatic habitat connectivity for fish and wildlife by:

- Preventing habitat fragmentation; *working to repair existing fragmentation.*
 - Improving habitat quality.
 - Weaving habitat into sites as new development occurs.
 - Enhancing or creating habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas.
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Organic food must move from being a matter of market choice to a matter required by government. One step in that direction is for the City of Portland to support new businesses providing organic food to our walkable neighborhoods, as a matter of policy.

Edit 1: Policy 6.68b. Given all the new information that we are learning on a near-daily basis about the dangers of conventional, non-certified-organic agriculture, including the related risks of cancer and other diseases, the City must specifically seek not just any grocery stores, but grocery stores that specifically focus on providing certified organic food.

6.68.b. Encourage the development and retention of *certified organic* grocery stores and local markets as essential elements of centers.

Over and over again, single-family homes are being constructed instead of sidewalk-oriented neighborhood retail within our neighborhood commercial areas. This happens because it is allowed, and because residential housing developers are looking for every opportunity to construct the blueprints

they already own for single-family homes for upper-income households. The City must put a stop to this sort of development in order to protect the integrity of our neighborhood retail corridors.

Edit 1: Policy 6.59. Some language should be inserted here to clarify that, indeed, for neighborhood business districts to survive and thrive, they must be districts for business. Space must thus be allocated specifically for supportive uses, and new single-family (or other) development that does not acknowledge the need to provide this space, especially on the ground floor, must be prohibited.

Neighborhood business districts. Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3). *Eliminate “by right” single family development in commercial or mixed use zones; require all new development to provide ground-floor space for uses (such as retail) that support the retail-oriented pedestrian environment within neighborhood business districts.*

Air emissions from the traded sectors are a problem that is dangerous to the health of those who are least able to protect themselves, including the very young and the very old. The responsibility thus falls to the rest of us to look out for them, and to seek ways to reduce or eliminate things like air pollution from freight movement that can have a large negative impact on residents of adjacent neighborhoods.

Edit 1: Policy 6.23. While it is good for the economy for Portland to be a trade and freight hub, it is bad for the environment and for the health of the population. As such, the City needs to establish a goal to move towards zero emissions for the traded sectors and freight/goods movement. Setting this goal now will allow predictability for businesses in the future, so they can work with the City to achieve this goal over the course of multiple decades.

Trade and freight hub. Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub, *while transitioning towards a goal of zero emissions in this sector.*

Just a minor edit to correct a typo.

Edit 1: Third paragraph. The word “create” should be changed to “creative.”

New land development approaches are needed to improve local competitiveness in regional markets, including more brownfield redevelopment, low-cost office development and institutional zoning. Land use programs must address the increasingly blurred lines between commercial, industrial and *creative* services sectors.

This is a minor, pragmatic edit.

Edit 1: Policy 5.30. This policy seems, as written, to be seeking to protect mobile home parks from development, without discussing any valid policy reason to do so. Indeed, mobile home parks can be seen as “land banks”, areas that could be easily redeveloped where appropriate without necessitating

home demolitions, per se. Instead, this section should be re-focused to seek to mitigate impacts on park residents if and when parks do close.

Mobile home parks. Evaluate plans and investments for potential redevelopment pressures on existing mobile home parks and impacts on park residents. *Work to find affordable housing options for park residents when parks do close.*

There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic. People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood, neighbors would rather have the new larger structure that is built following a demolition contain multiple units of affordable housing, rather than one home that is only affordable to high-income households. Each structure could thus contain multiple flats (perhaps three), each affordable to a middle-income household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the Urban Growth Boundary (UGB), increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

Current zoning codes are overly restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units per acre. One reaction to this has been for developers to buy perfectly decent single family homes en masse, so that they can demolish them to build larger luxury homes that command a significantly higher price point. One solution to this issue may be to switch to more of a form-based code for the higher-density single family zones. Rather than focusing on the number of dwelling units, codes should instead focus on the form of development: the height of the structure, the treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units per acre is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building on the lot.

Therefore, we propose that the City create a new policy to allow flats to be built in the single-family zones R5 and R2.5. The new structures, to be built in single family detached zones (R5 and R2.5), would be required to meet all of the height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise be visually similar to single-family homes), but would contain multiple units stacked vertically (“flats”), in zones served by high-quality transit.

Edit 2: New policy, perhaps inserted after 5.36? This policy should specifically legalize “flats” in single-family neighborhoods (R5 and R2.5 zones), where multiple vertically separated housing units are housed within structures that otherwise appear to be single-family homes and meet all of the zoning regulations for single-family zones except those relating to number of units.

Encourage the development of flats in single-family neighborhoods, that is, vertically separated multiple housing units within buildings that otherwise resemble single-family homes and comply with single-family zone requirements related to height, setback, lot coverage, and minimum lot size.

It's possible that the City could accommodate much larger population growth with merely a small number of policy tweaks, including allowing greater development of "flats" within single-family neighborhoods, and relaxing restrictions on "units per acre" in favor of more form-based codes in areas served by frequent transit service. This edit seeks to at least bring daylight to the issue that the current language in the Comprehensive Plan does not address the increased uncertainty associated with population forecasting in the age of climate change. See the many statements and publications by the United States Joint Chiefs of Staff related to global destabilization related to climate change for more background on the potential extreme relevance of this issue.

Edit 1: First paragraph. Within the context of climate refugees and other potential phenomena that could dramatically affect the number of people seeking to move to our city over the coming decades, it should be clarified that these policies may not necessarily address the population growth pressures related to all future scenarios, but are instead tailored to address the needs associated with a specific particular population growth forecast.

About 122,000 new households are expected in Portland between 2010 and 2035, *according to the adopted forecast.*

This is a minor edit, but it addresses the issue of resiliency within the planning profession: that often, a forecast is accepted as a fact, even though forecasters themselves will tell you that it is merely a chosen midpoint from within a much wider range. We should instead be planning for that whole range, not just the midpoint.

Edit 1: First paragraph. The comprehensive plan's housing chapter is presumably structured to seek to provide for the creation of a certain number of new housing units by 2035. Within the context of climate refugees and other potential phenomena that could dramatically affect the number of people seeking to move to our city over the coming decades, it should be clarified that these policies may not necessarily address the population growth pressures related to all future scenarios, but are instead tailored to address the needs associated with a specific particular population growth forecast.

The purpose of this chapter is to provide policies that will help Portland meet its need for quality, affordable homes for a growing and socioeconomically-diverse population, and to help ensure equitable access to housing. The Comprehensive Plan Map allows for a more- than-adequate supply of housing to meet ~~the~~ *one scenario's estimate of* future needs. The challenge is to provide housing with a diverse range of unit types and prices in locations that help meet the needs of all, including low-income populations, communities of color, and people of all ages and abilities.

It is clear that leaving this choice up to the market is a failed approach. We don't let the market decide whether DDT, lead paint, leaded gasoline, or other unsafe products are safe to use or not. It is time to ban all pesticides, herbicides, fertilizers, and other products that would not be allowed under Oregon Tilth certification, from within city limits. This must become a matter of City policy, starting with this Comprehensive Plan update. This is a matter of human and ecological health.

Edit 3: Policy 4.69? Go organic. Our entire city should seek to be managed according to standards that could be certified as organic by Oregon Tilth. A new policy should be created to this effect that reads:

Within the City of Portland, all lands and buildings shall be managed under a standard that is equivalent to Oregon Tilth certification. This shall include banning within city limits and on all lands owned and/or managed by the city, all pesticides, herbicides, insecticides, fertilizers, etc. that are not approved for use by Oregon Tilth.

The City should specifically be encouraging organic agriculture, organic foods, and organic products wherever possible, for a variety of reasons related to human and ecological health.

Edit 2: Policy 4.65. Given the evidence linking conventional agriculture to cancer and other diseases, it is hardly logical to encourage stores selling conventional produce as a part of a “healthy food” strategy. The City should specifically seek grocery stores that sell certified organic food and produce.

Grocery stores in centers. Facilitate the development of grocery stores and neighborhood-based markets offering fresh *certified organic* produce in centers.

The Urban Heat Island Effect is a real problem in our city; recent reports suggest that, indeed, we may experience a larger differential between the urban heat island and the nighttime temperatures in surrounding rural areas than any other large metropolitan area in the country. This Comprehensive Plan needs to address this issue head-on, by specifically requiring and encouraging a massive expansion of the tree canopy.

Edit 1: Policy 4.63. This section on urban heat islands seems to read as if technological fixes are preferred to help reduce the urban heat island effect. The most cost-effective solutions may indeed be the simplest, however: plant more trees. At the very least, a nod in this direction could be added by inserting the word “landscaping” into this list.

Urban heat islands. Encourage development, building, *landscaping*, and infrastructure design that reduces urban heat island effects.

The Urban Heat Island Effect is a real problem in our city; recent reports suggest that, indeed, we may experience a larger differential between the urban heat island and the nighttime temperatures in surrounding rural areas than any other large metropolitan area in the country. This Comprehensive Plan needs to address this issue head-on, by specifically requiring and encouraging a massive expansion of the tree canopy.

Edit 1: Designing with nature. Add a new policy, perhaps here, to specifically encourage/require expansion of the tree canopy in order to reduce the urban heat island effect in Portland.

Art of all forms should be encouraged in the public realm.

Edit 1: Policy 4.46. In addition to requiring public art as a part of public and private development projects, art in the public realm should be encouraged through other means as well.

Public art and development. Create incentives for public art as part of public and private development projects. *Encourage art of all mediums in the public realm using a variety of strategies.*

Graywater is an age-old concept that is rapidly gaining traction as an appropriate and sustainable response to the problem of water scarcity in areas where people seek permaculture and greenery around buildings. While Australia is recognized as a world leader in this realm, Portland will find that it is also an effective strategy for our climate, especially as hotter, dryer summers extend further and further into the autumn months. Graywater from all non-toilet sources within a building can be re-used for landscape irrigation, as long as all of the products washed down the drain are graywater-safe. A parallel effort should be made to partner with a trusted, respected NGO (such as, perhaps, EcoTrust) to establish a credible "graywater-safe" labeling certification program for products such as detergents, soaps, and other products that routinely are washed down the drain.

Edit 2: Policy 4.52. Graywater does not appear to be specifically addressed anywhere in this draft of the Comp Plan, so this may be the most appropriate place to insert a reference to it. Given our increasingly long summertime droughts in Portland, graywater makes sense as a way to re-use water to reduce water consumption for landscape irrigation purposes. It can be used untreated in completely underground applications, or it can be treated and re-used for other purposes.

Water use efficiency. Encourage site and building designs that make efficient use of water and manage stormwater as a resource. *Encourage the re-use of graywater from showers, sinks, kitchens, and laundry for landscape irrigation, especially for permaculture.*

Air pollution from the airport is real, it causes measurably negative health impacts in adjacent residential neighborhoods, and yet it seems to be completely unaddressed in this Plan. This edit seeks to begin to correct that oversight.

Edit 1: Perhaps Policy 4.28h? There appears to be no mention of the air quality impacts of the airport, yet maps of the air pollution plume from the airport show that it extends deep into Northeast Portland. The City thus needs to have a policy to reduce, mitigate, and eventually eliminate the air quality impacts from the airport. Certainly, by 2035, this should be an achievable goal. A new policy in this section might be the best way to address this need.

This might seem minor, but it seems important to clarify that taxpayer-funded art is not the only art that's possible within the public realm, and that the City seeks to encourage all forms of art within the public realm.

Edit 2: Policy 4.25. Public art sounds like art that is funded by taxpayer dollars. This policy should be modified to make it clear that what is sought is not just art funded or required by the government, but art in the public realm of all types and mediums.

Public art/Art in the public realm. Encourage new development and public places to include design elements and public art that contribute to the distinct identities of centers and corridors, and that highlight the history and diverse cultures of neighborhoods. *Encourage art in the public realm of all types and mediums.*

This is a minor edit, but for the sake of completeness, living walls must be added to the list of ways to integrate natural and green infrastructure into the built environment.

Edit 1: Policy 4.21. Add living walls to the list of green infrastructure to seek in centers and corridors.

Natural features and green infrastructure in centers and corridors. Integrate natural and green infrastructure, such as street trees, green spaces, ecoroofs, *living walls*, gardens, and vegetated stormwater management systems, into centers and corridors.

One tried-and true method to buffer residential uses from busy streets, is to insert a commercial use as a buffer in the intervening space. This encourages a healthy streetside commercial pedestrian environment.

Edit 3: Policy 4.20. There have been too many instances in recent years of new development on our neighborhood main streets, such as Alberta and Belmont streets, that is purely residential. This creates “dead zones” on these streets. New development should seek to prevent the production of more such “dead zones” by requiring ground-floor uses that are compatible with the intent of a retail mixed-use pedestrian environment.

Residential uses on busy streets. Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic. *Prevent new single-use single-family houses on commercial retail streets. Require a ground floor use that contributes to a retail-oriented pedestrian environment, such as ground-floor retail space.*

We live in a climate that alternates between rain and sun, often. As pedestrians seek to navigate neighborhood center commercial spaces, they may find the environment a bit more welcoming when they are able to duck under the awning of a building to seek shelter from suddenly-changing elements. This should be a requirement of the building code: Awnings above sidewalks in commercial districts.

Edit 2: Policy 4.16. Specifically call out awnings as something that should be provided in pedestrian corridors. Too many buildings do not include awnings, probably because modern architecture often fails to recognize their functional value. The code must thus compensate for this architectural fad, and require buildings in centers and corridors to provide awnings.

Street environment. Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather. *Buildings should have awnings to provide shade and protection from the rain for pedestrians and other users of sidewalk space.*

As Portland seeks to implement its Centers and Corridors approach to planning, it will find that it must move closer and closer to a true Form Based Code to achieve its goals. Part of this strategy will include moving away from density as a strict regulating measure, and towards form-based requirements that relate to scale, character, and other, more varied regulatory descriptors.

Edit 1: Policy 4.13. Current zoning codes are too restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units. Rather than focusing on the number of dwelling units, codes should focus on the form of development, the height of the structure, treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building.

Scale and patterns. Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements. *Remove strict restrictions on dwelling units per structure or per acre in transit zones.*

As we seek to battle a wave of demolitions in our single-family neighborhoods, we are often up against developers who use the same blueprints over and over again, regardless of context. Therefore, a house with a front-loaded garage will be built even on a site that has an alley in the back, despite being located in a neighborhood that seeks to re-active neglected alley spaces. The City needs to change its policy to require the use of the alleys for vehicle access to properties in all instances, and to require a variance and neighborhood review in order to NOT use the alley.

Edit 1: Policy 4.11. This policy is great, except that it needs to be mandatory in order to be effective where alleys do exist. What the City needs, at this point, is a concerted effort to revitalize its alleys, especially in areas where they have long experienced neglect, to allow them to become viable locations to construct accessory dwelling units and serve other community needs.

Alleys. Encourage *Require* the continued use of alleys for parking access, *where they exist*, and expand their use as the location of accessory dwelling units and as multi-purpose community space.

Neighbors are fed up with the home demolitions epidemic. The promise of our regional grand bargain, of focusing development in centers and corridors while protecting single family neighborhoods, has been broken. Single family homes are being bulldozed all over the city. Neighbors are asking, what do we get from this? Where is the benefit to the neighborhood, to the city, to the region? When asked if, once that house has been bulldozed, they would rather see a single large home built for a high-income household, or a structure built containing two, three, or even four "flats" affordable to median-income households, most neighbors seem to prefer the latter. Now that the bargain has been demonstrably broken, they would prefer to see more affordable housing built using the format of "flats," as this allows for more folks to have access to affordable housing within existing established neighborhoods, thus reducing the pressure on the Urban Growth Boundary and providing more space where regular folks might be able to find housing.

Edit 2: Policy 4.12. Create a new policy to allow flats to be built in single-family neighborhoods. There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic. People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood, neighbors would rather have the new larger structure that is built following a demolition be full of perhaps three flats, each affordable to a middle-income household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the UGB, increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

Adaptable neighborhoods. Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages. Allow adaptive reuse of existing buildings and the creation of *detached* accessory dwelling units to serve the changing needs of a household over time. *Allow structures to be built in single family detached zones that meet height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise are visually similar to single-family homes), but that contain multiple units stacked vertically ("flats"), in zones served by high-quality transit.*

These edits to the map represent the addition of other logical urban habitat corridors within the City that appear to be missing from the current draft.

Edit 1: Figure 3-6. Urban Habitat Corridors. Modify the map to add the following two areas:

- 1) Sullivan's Gulch as a Habitat Corridor (Enhanced).
 - 2) Balch Creek: Daylighting project to the Willamette as a Habitat Corridor (Potential)
-

This is a minor edit, for the sake of completeness.

Edit 1: Policy 3.86. Bicycles should be mentioned in both places in this section where pedestrians are specifically addressed.

Eastern Neighborhoods active transportation. Enhance access to centers and other community destinations in Eastern Neighborhoods by ensuring that corridors have safe and accessible pedestrian *and bicycle* facilities and creating additional secondary connections that provide low-stress pedestrian and bicycle access.

Mature trees are being felled at a rate that is definitely putting the "stumps" back into "stumptown." Over a dozen mature century trees have been felled in the summer of 2014 in the Concordia neighborhood alone, nearly all of them by a single heavy-handed developer who has made a business model of demolishing homes, clearing the parcel, and building brand-new homes for upper-income households. This policy seeks to at least preserve old-growth trees within our neighborhoods.

Edit 2: Policy 3.79. Mature trees merit special consideration here as something that new development should seek to preserve.

Inner Neighborhoods infill. Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts' historic development patterns. *Ensure that development preserves and incorporates, rather than removes, mature trees.*

Part of preserving the wonderful system of alleys present in some of our neighborhoods, is ensuring that the alleys are used, and thus that property owners have an incentive to maintain and improve their alleys. This edit seeks to address that issue.

Edit 1: Policy 3.77. Alleys need special mention within these policies, as they have been neglected by City policy for too many years. New development must use alleys to provide auto access to properties where alleys exist, even if this means making modest improvements to the alleys.

Inner Neighborhoods street patterns. Preserve the area's urban fabric of compact blocks and its highly interconnected grid of streets, *including alleys where they exist. Where alleys do exist, do not allow new curb cuts on streets – require property auto access to off-street parking only from the alley, to protect the pedestrian environment on the sidewalk and preserve the neighborhood alley infrastructure.*

Currently, the City doesn't seem to be actively seeking ways to increase the amount of opportunity sites for residential growth adjacent to our rivers. This edit seeks to address that issue.

Edit 1: Policy 3.64. While this policy is laudable for seeking to re-orient communities adjacent to rivers, towards those rivers, it should also specify that additional residential capacity should be found adjacent to rivers to house the growing numbers of people who wish to live next to our waterways.

River neighborhoods. Enhance the strong river orientation of residential areas that are located along the Willamette and Columbia Rivers. *Increase capacity to accommodate growing demand to live adjacent to rivers.*

This edit relates to sustainable ways to address the shortage of industrial lands within the City.

Edit 1: Employment areas: Some language needs to be inserted to clarify that, while in the past (since World War 2), our industrial districts have been characterized by single-story buildings on large sites, in the future they will need to become more like industrial districts of the late 19th and early 20th century, with multiple-story buildings containing a mix of complementary uses.

Industrial Districts – Industrial districts are in the low, flat areas along Portland Harbor and the Columbia Corridor, Oregon’s freight infrastructure hub. The manufacturing and distribution sectors concentrate here. *Though in the past* they typically *have* needed one-story buildings, medium to large sites, and locations buffered from housing, *in the future these areas are expected to become more inclusive of multiple-story buildings containing a mix of complementary uses.* There is also an industrial district in the Central Eastside and smaller industrial areas scattered around the city, mostly adjacent to major transportation hubs.

City greenways need to be prioritized as spaces for primarily non-automobile modes. Autos should be welcome as guests in these spaces, but primarily for residents, guests, employees and other legitimate visitors to adjacent properties. Diverters should be employed as often as possible to enforce this policy, ideally at a rate of one diverter every two blocks where the grid is complete. This policy should replace the current policy, that does not seek diverters until traffic volumes are high enough that installation of diverters will necessarily cause problems with traffic on parallel routes. A policy that seeks to install diverters in all practical instances will ensure that neighborhood greenways truly become the stress-free, family-friendly environments that current propaganda makes them out to be.

Edit 1: City Greenways hierarchy. The city needs to enact a specific policy for neighborhood greenways that specifies that motor vehicles are guests only on these streets, and indeed that they are open to motorized vehicles for local access only. This needs to be implemented by installing traffic diverters every 2-5 blocks along neighborhood greenways (where the grid is intact) that would allow bicycles & pedestrians to continue, but force motorized vehicles to turn and find another route (where a reasonable parallel route exists).

4. Neighborhood greenways are an extensive network of streets with low volumes of *local access only* motor vehicle traffic that are prioritized for bicycles and pedestrians, working in conjunction with the rest of the City Greenways system to extend the system into all neighborhoods.

This edit is more of a suggestion, about maximizing rather than missing opportunities.

Edit 2: The zoo parking lot should be considered as a location for mixed-use development. As the city seeks to convert surface parking into paid, structured parking, it should consider a parking structure in

one corner of the lot next to the Zoo, to allow the rest of the lot to be converted to mixed-use 3-4 story buildings, containing housing and offices above ground-floor retail. One way to express this may be:

Some are locations for employment, or serve major regional destinations such as the Oregon Zoo, *which may in the future be called upon to begin acting more as mixed-use centers than single-use destinations.*

This edit is the second on this page that seems to involve some compromised language that no longer makes sense contextually, from an urban design standpoint.

Edit 2: With 5-10 story buildings, it's unacceptable to attempt to shunt any mode to a "parallel route." All modes must be accommodated to some degree within the ROW with this level of density. Pedestrians must be able to walk to the front doors of their buildings. Bicyclists must be able to ride to the front doors of ground-floor retail, safely. Cars and trucks must be able to drive down the streets, to read addresses and find destinations. Transit must be able to serve the corridor directly. There's simply no room to shunt any mode to a parallel route in this high-density scenario. Delete the words "or on nearby parallel routes."

Policy 3.40 **Mobility corridors.** Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way ~~or on nearby parallel routes.~~

This edit relates to needing to think more holistically about all of the uses that occur on "freight corridors," and how all of the employees, customers, and other users of those uses are expected to achieve mobility to and within those corridors in a future where automobiles represent a minority of all mode share.

Edit 1: Freight Corridors must still allow employees and customers to access businesses and other destinations along the corridor safely using all modes, including bicycles and pedestrians, not just trucks and automobiles. This is an equity issue, and one that will become absolutely relevant if the city has any hope of meeting its future mode split targets. One way to change the language to reflect this may be:

Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade. ~~While the forms of~~ These streets are ~~not expected to change significantly, they are~~ integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries. *In some cases, they may need to be upgraded to allow all modes to access destinations along the corridor, including employees and customers using bicycle and pedestrian modes.*

This edit seems to involve some compromised language that no longer makes sense contextually, from an urban design standpoint.

Edit 1: Be more assertive with the language in the first paragraph on this page. With 5-10 story buildings, there will always be associated pedestrian activity. Delete the words "in some cases."

Civic Corridors are the city's busiest, widest and most prominent streets. They provide major connections among centers, the rest of the City and the region. They support the movement of people and goods across the city, with high levels of traffic and, ~~in some cases,~~ pedestrian activity.

This edit seems to just be a typo.

Page GP3-11:

Edit 1: Make an edit to change the word "Town" to "Neighborhood":

Neighborhood Centers, Policy 3.31: **Housing.** Provide for a wide range of housing types in Neighborhood Centers, which are intended to generally be larger in scale than the surrounding residential areas, but smaller than Town Centers. There should be sufficient zoning within a half-mile walking distance of a ~~Town~~ **Neighborhood** Center to accommodate 3,500 households.

Thanks for your careful consideration of this matter.

Sincerely yours,

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