



City of Portland, Oregon
Bureau of Development Services
Land Use Services

FROM CONCEPT TO CONSTRUCTION

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Date: October 21, 2014
To: Planning and Sustainability Commission
From: Portland Design Commission
Subject: Responses to Briefing on the 2035 Comprehensive Plan Proposed

The Design Commission was recently briefed on the 2035 Comprehensive Plan Proposed Draft at our September 18, 2014 meeting by staff members from the Bureau of Planning and Sustainability. The Commission appreciates these opportunities to ask questions and offer advice on important policy documents such as the Comprehensive Plan. Since it is not possible for the entire Commission to attend a Planning and Sustainability Commission hearing about the Comprehensive Plan Draft prior to the next phase of plan development, we have outlined our suggested changes to the current document in this letter, including broad suggestions regarding content and specific suggestions regarding edits and amending potential omissions. We feel that it is important to address the following items at this time to ensure adequate protection of Portland's historic and cultural resources:

The following are our more broad comments about the general content and tone of the draft document:

1. Strengthen our connection to the Willamette and Columbia Rivers.

The Willamette River is a critical feature in the city and needs to be integrated throughout the Comprehensive Plan so that it is a benefit to the City on multiple levels. For example:

- What are we doing with Ross Island, Hardtack Island, East Island, Toe Island, Oaks Park, Sellwood Riverfront Park, and the greenway? How can we bring people to the river in ways that are both enlivening and environmentally sound?
- Our marinas should be incorporated into the center of the city and public activities should be pushed to, and into, the water's edge.
- As we integrate Milwaukie into the city via the Lightrail, how will we activate that entire river frontage along that route within Portland's boundaries?
- The majority of the city still believes that the Willamette is a polluted river only being used by factories. It isn't. It is getting cleaner and cleaner, as noted in this letter:
http://homespunwebsites.com/site/1228the/Willamette_River_Water_Quality_Letter_Dean_Marriott_BES.pdf
- Much of our discussion in the Comprehensive Plan focuses on the Willamette, but what about the Columbia? What are our hopes and dreams for this edge of our city? While the subject is something of an infrastructural third-rail today, what do we, as a city, really aspire to when it comes to the inevitable repair or replacement of the Interstate Bridge?

2. Embrace campuses and institutions of learning as vital elements of urban fabric.

Another major focus of our discussion of the Comprehensive Plan revolved around the integration of learning institutions into our future plans. Portland



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has a laudable reputation when it comes to planning. At one time, we also had an enviable public school system, but their status as stellar bedrocks of our neighborhoods has been in jeopardy for years.

While many of the issues facing our public schools rest squarely outside the Bureau of Planning and Sustainability's sphere of influence, we believe there are some areas where city government can demonstrate creative thinking about educational institutions and potentially forge alliances with the school district and public universities to truly knit them into our city. Many of us send our children to them, we choose them as our default disaster centers, and we collectively depend on them for a better future, yet they are all sitting around the city on somewhat lonely and disconnected parcels. How could we knit them more deeply into our fabric? These institutions, so vital to our community health, should be a cornerstone of our future plans.

3. The neighborhoods around us are changing rapidly as we plan. Are we keeping up?

The Design Commission is looking for specificity from the Bureau of Planning and Sustainability on how the Comprehensive Plan, which will not be adopted for awhile, is going to address development currently underway, some of it desirable and some of it not. Our concern is that the city is playing catch-up with significant changes in areas such as the Williams-Vancouver corridor and along SE Division Street. For instance, the Williams-Vancouver corridor is experiencing rapid development today and could be categorized even now as a Neighborhood Center and may even become as significant as a Regional Center, but is not given this name in the current document. There is also some confusion in the plan document between Neighborhood Centers and Civic Corridors. These labels and how they are applied on the maps may not reflect what is actually happening or what is desired in the future, and could be made more distinct.

4. Give special consideration for large parcel development opportunities.

The Design Commission suggests that unique and unified large sites such as university campuses, large office parks, hospitals, schools, and the central post office site be given special attention within the plan. For example, should the US Postal Service move its headquarters from the Pearl to the airport, the city will be presented with a unique opportunity and a host of challenges. These large, "once in a generation" opportunities can serve multiple community needs, but they deserve forethought. What happens to these sites in the future? What is the new paradigm for these types of institutions? How do they function? What are they doing for the City and the neighborhood? Can they offer creative solutions to common urban nuisances (burying / sharing of parking, living machines and other shared facilities, etc).

5. Acknowledge our role and impact in a bigger region

Connections to nearby cities could also be included in the Comprehensive Plan Policies and Goals. Perhaps a page of the Plan document is dedicated to building connections to Astoria, St. Helens, St. Johns, Lake Oswego, Oregon City, Scappoose, and Seaside for example. This could include trails, bike trails, retail corridors, or an exploration of re-establishing or



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reinterpreting the interurban streetcar lines that once connected Portland to the towns in our region.

6. Offer an honest assessment of what's possible when it comes to down-zoning under Oregon's current land use laws.

In our hearing, we asked a direct question about how realistic it would be for the Comprehensive Plan to indicate opportunities for down-zoning given the realities of Measure 49. While we appreciate the desire to offer hope to neighborhoods who want to "right-size the zoning in their districts, we wonder if it is truly possible to make zoning density changes without creating the specter of "takings" under our land use rules.

Overall, we are concerned that the Comprehensive Plan draft, in an attempt to please many stakeholders, has set up some tensions that are nearly impossible to reconcile in some cases. In other cases, the language and approach strikes us as a very safe rendition of "more of the same." We want to see Portland continue to innovate when it comes to planning a city for the future – and we don't think we see that in the Comprehensive Plan yet.

We recommend the following edits and suggestions to Chapters 3 and Chapter 4 of the Comprehensive Plan draft:

- **Policy 3.14.** Art is already required in infrastructure projects and we want to allow it in development.
- **Policy 4.8 GP 4-6.** Be very careful in the wording of the privacy and solar access policy. As written now, it is in direct contrast with most other city goals. Acknowledge that buildings cast shadows. This policy is in direct conflict with development goals.
- **Policy 4.8 GP 4-7.** Again, be very careful with this wording. We need more height in the city core overall to keep pressure off the Urban Growth Boundary. Wording is important around eco-districts as well. These districts make less and less sense because the building code is already making buildings extremely efficient and decreasing this need.
- **Policy 4.25.** We do not need to encourage art at public places as it is already required.
- **Policy 4.32 GP4-10.** We need a better vision for undergrounding utilities in districts. Utilities need to be integrated into the conversation. Overhead utility lines have a huge impact on the quality of life in neighborhoods
- **Policy 4.38.** Add language to the effect that demolition of historic resources is "discouraged" or "not the preferred course of action". The City should encourage retaining the resource until other alternatives to demolition can be explored.
- **I-21, I-31, I-37.** Another area of concern for the Design Commission is parking throughout the city. There needs to be a more creative solution to how we deal with parking. The Commission strongly feels that we do not need more parking. People are not moving to Portland because we have ample parking. One idea is to have shared parking areas or structures and multi-duty spaces that serve different needs during the day, evening, and on weekends.



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Finally, we note that The Park Blocks should be shown as green corridors/open spaces on the maps.

These conclude the Portland Design Commission comments on the latest draft of the 2035 Comprehensive Plan. Thank you for taking these into consideration as this document develops.

A handwritten signature in black ink, appearing to read "Guenevere Millius".

Guenevere Millius, Chair of Design Commission

October 21, 2014

Date