

To Whom it may concern: Please find the NWDA's set of comments below dealing with the comprehensive plan. Please excuse the fact that no attempt to coordinate writing styles. The Transportation committee's comments have been sent under separate cover. Thanks John Bradley, Chair of planning. NWDA. 503 313 7574

Chapter 2 We believe that neighborhood associations, both by tradition and merit, represent the backbone of community involvement, yet little is said concerning them. Chapter 2 should carefully outline the association's importance and duties into the future. Information design and notification are key components of community involvement. Currently, notification for meetings and land use actions by various city commissions are scattered and require an "in the know" level of expertise not available to the average citizen. A re-evaluation and modernization of the notification system should be undertaken with the goal of creating at least a centralized web page.

Chapter 3 This chapter calls out two policies which directly impact the N.W.D.A., the establishment of a town center within our district and a new zone type for Good Samaritan Hospital. While the acknowledgement of a town center in the northwest would seem logical and in keeping with new urbanism goals, without further details we cannot support this policy. The current language here suggests a potential height and density increase beyond the current infrastructure capacity and at odds with the policies in chapter 4 of "pattern areas" and "community identity". Our relationship to Good Sam has never been better. It is guided by both a master plan concept and a good neighbor agreement which outlines each party's duties and responsibilities and sets a growth boundary. None of the rules set forward in these current set of policies are onerous to either party, they insure good communications and are changeable as needs dictate. We see no reason to change them by initiating a one size fits all zoning, trying to incorporate the very different needs of the various campuses across Portland.

Chapter 7 As our bordering states enact tough regulations concerning clean diesel, Portland must follow through and enact our own clean diesel regulations to ensure that we do not become a dumping ground for polluting older equipment. One potential way to prevent this is to require that new construction project equipment, both city funded and private, meet the tier 4 federal standards. The city must also commit to regulating smaller point source air pollution sources not currently regulated by DEQ. While these sources may not have high impacts citywide their impacts are great on a micro scale.

There are specific geographies that have a deficit or shortfall that will need to be addressed to provide an adequate supply of development capacity to meet the forecasted employment growth. Specifically, additional policy changes, zoning capacity, public investments, and development incentives will be needed to address capacity shortfalls in the Central City Industrial, Harbor & Airport Districts, Harbor Access Lands, Dispersed Employment, and Institutions geographies. The Comprehensive Plan update will need to identify changes to policy or zoning, public investments, development incentives or other means to address these deficits and meet the forecast demand.

A large portion of the Northwest District Plan area is currently zoned EX and in that area the eastern portion of the neighborhood is designated in the Northwest District Plan as the **Eastern Edge**, “a diverse, mixed-use area with a fine-grain mixture of employment, residential, and community service uses. This area serves as a transition and connection between the residential core of the Northwest District and the more intensely developed Central City.” (see attached map) Zoning the Eastern Edge area EX was purposeful.

From Title 33.140.030 Characteristics of the Zones, EX, the Central Employment zone “_allows mixed - uses and is intended for areas in the center of the City that have predominantly industrial type development . **The intent of the zone is to allow industrial and commercial uses which need a central location. Residential uses are allowed, but are not intended to predominate or set development standards for other uses in the area.**

The Comp Plan is identifying all EX areas as Mixed Use Urban Center.

From the Comp Plan, **16. Mixed Use – Urban Center** “This designation is intended for areas that are close to the Central City and within Town Centers where urban public services are available or planned including access to high-capacity transit, very frequent bus service, or streetcar service. The designation allows a broad range of commercial and employment uses, public services, and a wide range of housing options. Areas within this designation are generally mixed-use and very urban in character. Development will be pedestrian oriented with a strong emphasis on design and street level activity, and will range from low- to mid-rise in scale. The range of zones and development scale associated with this designation are intended to allow for more intense development in core areas of centers and corridors and near transit stations, while providing transitions to adjacent residential areas.”

However, the Eastern Edge is holds many jobs, (see attached map) and the Northwest District Plan policies for this area are for it to remain the fine-grain mixture of employment, residential, and community service uses.

With the loss of EX zoning we request that the area of the Eastern Edge not be identified Mixed Use Urban Center but rather a Mixed Use Neighborhood which will place less stress on high intensity use which will effectively drive out the small jobs that are needed, in particularly near the Central City.

NWDA Comp Plan Testimony re:
Historic Alphabet District

As NWDA testified to during the 11/4/2014 BDS public hearing, the draft Comp Plan discusses historic preservation in broad strokes but the sections dealing with preservation lack teeth. In addition, many provisions in the draft Comp Plan seem to limit place limits on historic preservation – for instance, to properties already identified on the HRI, which can be removed at any time by their owners, or to only beautiful buildings. This approach fails to encourage preservation or at the minimum, investigation of preservation of potentially valuable historic resources.

Therefore, NWDA requests the following specific edits to the draft Comp Plan to address this city-wide concern:

Page I-37 (under “Inner Neighborhoods”)	New development should enhance the fine-grain, pedestrian-scaled built environment. In Inner Neighborhoods that are closest to the Central City, new development should take advantage of this proximity with increased densities, while at the same time working to enhance and preserve identified historic and cultural resources. Traffic and parking will need active management throughout the Inner Neighborhoods.
Page GP3-22	Policy 3.79 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.
Page GP 4-5	Goal 4.B: Historic and cultural resources Historic and cultural resources are integral parts of an urban environment that continues to evolve and are preserved when ever possible.
Page GP 4-11	Historic and cultural resources Portland has several hundred designated historic landmarks and historic and conservation districts. These special places help create a sense of place, contribute to neighborhood character, and recognize past history and events. More than half of

	Portland’s buildings are over 50 years old, creating a vast pool of potentially significant properties. These policies support the protection of all resources of statewide significance and encourage the identification and preservation of historic and culturally significant resources.
Page GP 4-11	Policy 4.36 Historic and cultural resource protection. Encourage the protection and restoration of high-quality historic buildings and places that contribute to the distinctive character and history of Portland’s evolving urban environment, where ver possible feasible .
Page GP 4-11	Policy 4.38 Demolition. Protect potentially significant historic structures more than 50 years old from demolition until opportunities can be provided for public comment, pursuit of alternatives to demolition, or actions that mitigate for the loss. Require 120-day demolition delay for buildings more than 50 years old.
Page GP 4-11	Policy 4.40 Historic Resources Inventory. Survey and update inventory of historic resources as part of future planning projects, with a focus on areas of anticipated growth and change. Provide notice and opportunity for public comment prior to removal of resource from historic resources inventory.
Page GP 4-11	Policy 4.41 Preservation equity. Expand historic preservation inventories, regulations, and programs to encourage historic preservation of all buildings more than 50 years old , in areas that are underrepresented by current historic preservation efforts.
Page GP 4-11	Policy 4.42 Cultural diversity. Work with Portland’s diverse communities to identify and preserve places of historic and cultural significance. Provide incentives for cultural preservation of communities similar to those for historic preservation.
Page G-7	Historic resource: A structure, place, or object that has a relationship to events or conditions of the human past. Historic resources may be significant for architectural, historical, and cultural reasons. Examples include historic landmarks, conservation landmarks, historic districts, conservation districts, and structures or objects that are identified as contributing to the historic significance of a district, including resources that are listed in the National Register of Historic Places. Structures, places, and objects that are more than 50 years old or included in historic inventories are potential historic resources.

In addition, as NWDA testified to before BDS on 11/04/2014, current zoning in the Historic Alphabet District (and in other historic and conservation districts city-wide) are incongruent with underlying base zoning, which conflicts with preservation goals, causes confusion among owners and developers, sets inflated property values, and creates costly, inefficient and difficult historic design reviews. NWDA therefore requests the following specific edits to current zoning and zoning under the Comp Plan update to reconcile historic overlays with underlying zoning “entitlements”:

FAR/Heights	<ul style="list-style-type: none"> • Reduce FAR from 4:1 to 2:1 in RH Zones in the Historic Alphabet District where such FAR does not currently exist. • Reduce Maximum Allowable Height in RH Zones in the Historic Alphabet District to no more than 45’. <p><i>Please see attached map.</i></p>
FAR Transfers	Prohibit FAR transfers WITHIN and TO projects within the Historic Alphabet District.

Historic and Plan District Overlay Designation	Clarify on City Maps Historic and Plan District overlays within the Northwest District Plan area. (<i>Today, the (d) designation appears inconsistently on city maps and no historic overlay designation appears at all.</i>)
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In order to further historic preservation efforts and provide more certainty to owners and developers, NWDA also advocates for similar treatment to other historic and conservation districts throughout the city.

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