



April 29, 2022

Barry Manning and Nicholas Starin  
City of Portland Bureau of Planning and Sustainability (BPS)  
1810 SW 5th Avenue, Suite 710  
Portland, OR 97201

Dear Barry and Nicholas:

Thank you for sharing the *MP2H-NW Plan Discussion Draft* and providing an opportunity for City bureau feedback. Although we provided previous comments prior to the release of the discussion draft, Portland Parks & Recreation (PP&R) has reconsidered our comments, and would like to offer the following climate change and greening, and open space comments on the proposed MP2H proposal:

### **Climate Change and Greening Comments**

- **Delivery of Public Benefits (Report p. 10)** - Creating a climate resilient neighborhood should be one of the desired outcomes of the plan, especially given the plan's emphasis on the climate benefits of the Portland Streetcar. In addition to climate change, this project should include an explicit goal to populate the study area with large form trees with adequate soil volume in open space to improve access to nature and reduce heat island impacts. This would be a valuable public benefit.
- **Urban Green Features (Report p. 71, Code section 33.590.255)** – We suggest strengthening this language to highlight the importance of climate resilience and the associated public health benefits. Trees should also be mentioned in this section, as they are the only urban greening option which provide all of the listed benefits of urban green features. For example, on page 71 of the project report and in proposed zoning code amendment 33.590.255.A: *Urban Green Features. Green elements are proposed to be integrated into the urban environment to promote climate resiliency, public health and a good quality of life within an urban environment. Trees and other landscaping mitigate the impacts of the urban heat island effect, improve air quality, help soften the effects of built and paved areas, cool the air temperature, intercept rainfall, and reduce stormwater runoff by providing unpaved permeable surfaces. A range of options are provided to address this area's urban development patterns and characteristics.*
- **Public Benefits Agreements (Report p. 72)** - This district is intended to provide a significant number of new affordable housing units. Residents of permanently affordable housing are more likely to rely on walking and transit and less likely to have cooling in their homes, and therefore there is a need for the benefits of urban

#### **Administration**

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cooling as much or more than residents of market-rate housing. There should be an emphasis on trees and urban greening in this code project so that the proposed affordable housing is not disproportionately impacted by urban heat island effects and is consistent with comprehensive plan policies that support climate resilience as a focus of city projects. Including urban greening as part of the public benefits agreements would be consistent with the City's goals for equity and climate resilience.

- **Large trees (Code section 33.590.255.C.2)** - Large trees are often not given sufficient growing space and do not thrive. Ensure that Title 11 standards for large tree planting spaces (minimum 150 square feet and minimum 10x10-foot dimension) apply so that large trees used in the development must meet this standard.
- **Bonus provisions (Report p. 71, Code section 33.590.300)** - Open spaces provided to meet Planned Development standards should include trees, and ideally large form trees; paved plazas are pedestrian amenities but if they don't include trees, they do not provide urban cooling or move the City closer to its climate resilience goals. The plan should set a target goal or requirement for minimum tree canopy within its overall plan area, and this would provide flexibility on where to plant, including on streets, on private areas, publicly-accessible open spaces, parking areas, rooftops, etc. The open space requirement should include large trees, or a minimum canopy cover for the required open space area. Urban Forestry recommends a minimum canopy coverage of 10% of the site area to be included within the 15% open space area.
- **Tree preservation** - Montgomery Park and the property immediately to the north (2850 NW Nicolai St) have notable tree canopy on-site that could be vulnerable to removal as part of the redevelopment. This appears to be the only significant existing canopy in the study area. Consider options for requiring preservation, particularly along the slopes.
- **Street trees and Portland Streetcar** - Streetcar infrastructure can lead to a reduction in available street tree planting locations. The plan could get ahead of this by making full street tree stocking (one tree for every 25 feet of frontage) a stated goal of the plan area. We suggest working to ensure that collaboration occurs between PBOT and PP&R when developing the streetscape plans for the plan area.
- **Urban greening and urban heat island impacts** – This area of the city is at high risk for urban heat island effects and related health impacts. It would be helpful for BPS to analyze the greening requirements and policy elements in Title 33 and Title 11 to assess their expected ability to mitigate those impacts. Based on that analysis, it may make sense to include additional greening elements in the proposed zoning code provisions and/or public benefits agreements if one is proposed to be negotiated between the City and property owners.
- **Resilience Policies** – The project area is located adjacent to the Central City and will experience many of the same issues around climate change (extreme

temperatures, rainfalls, etc.) that happen in the Central City today. Because of these similarities it seems like it would be helpful to adopt similar policies and associated plan provisions to those in Central City 2035. Policies like these could guide development throughout the MP2H plan area - beyond just the Vaughn-Nicolai area currently being considered. Goal 6.A and Policies 6.1-6.4, 6.8-6.10, and 6.12 are especially pertinent to issues related to resilience and neighborhood livability.

### **Open space comments**

PP&R appreciates the proposed requirement that at least fifteen percent (15%) of the total site area of a Planned Development in the Vaughn-Nicolai plan district must be developed as a publicly accessible plaza or park. PP&R believes that a new publicly-accessible plaza or park should be provided for two reasons: number of new households and proximity to developed parks.

- **Number of new households** – The land use changes proposed in *MP2H-NW Plan Discussion Draft* could result in roughly between 3,000 new housing units in the district, and many new affordable housing units in the district. Based on PP&R's level of service work, the average number of households served by a developed park citywide is approximately ~2,300 housing units.. Full capacity buildout of the Vaughn-Nicolai plan district would generate a number of households that would need a park based on the citywide average. Wallace Park is already serving nearly 5,000 existing households so adding additional households puts too much burden on Wallace Park.
- **Proximity to developed parks and natural areas** – PP&R's level of service goal is to provide a developed park within ½-mile walk of every Portland household. Although the Vaughn-Nicolai plan district is proximate to existing and proposed developed parks (Forest Park, Wallace Park, and the future Slabtown park), the distance from the planned new homes to the existing parks is very close to a ½-mile walk and could be outside the desired distance depending on where the housing units, streets, and access paths are eventually built, and thus would not meet park level of service goals for the new households.

Per the proposed code in the *MP2H-NW Plan Discussion Draft*, the publicly accessible plaza or park must be privately owned. PP&R respectfully requests that BPS modify the proposed code to provide flexibility regarding ownership, maintenance, and operation of the required publicly accessible plaza or park (note that a privately-built and operated publicly-accessible plaza or park would require a permanent easement or covenant to ensure public access in perpetuity). PP&R also acknowledges that there may be multiple methods of achieving publicly accessible open space in the plan district (e.g., Parks System Development Charges credits, flexibility to move FAR to create ground-level open space,

and/or development agreement) and requests to be part of those discussions in the future. However, at this time, we believe there is sufficient reason to include permanent publicly-accessible open space with any of the scenarios outlined in the proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Horner', with a stylized, flowing script.

Brett Horner

CC: Maya Agarwal  
Laura Lehman  
Brian Landoe