



CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Suite 613, Portland, Oregon 97204 ■ Mingus Mapps, Commissioner ■ Michael Jordan, Director

M E M O R A N D U M

April 22, 2022

TO: Barry Manning-BPS

COPY TO: Elisabeth Reese Cadigan-BES

FROM: Kate Hibsichman-BES, Marie Walkiewicz-BES,

RE: Montgomery Park to Hollywood Study – NW Discussion Draft

Thank you for the opportunity to review the Montgomery Park to Hollywood Study Northwest Plan Discussion Draft. We appreciate your attention to BES system considerations in developing a plan for the transition of this area to a new urban neighborhood. This memo summarizes our comments on the draft plan. Detailed comments are provided in the attached table.

BES staff reviewed the Discussion Draft to evaluate how BES systems will serve this area and to assess how the plan's provisions and the Stormwater Management Manual requirements would interact in the development process. In that process we considered current system conditions and future system demands, and the long-term impacts of climate change on the neighborhood.

We appreciate the plan's commitment to promoting active transportation and affordable housing. We also support the proposal to fund brownfield remediation on developable industrial sites to mitigate the impacts of changing the land uses from industrial sanctuary to high density mixed use (EXd – which allows employment, commercial and residential uses). Our attached comments relate to the resilience and livability of the neighborhood and fall into these themes:

Urban Green Features: BES supports the plan's requirement for Urban Green Features as part of development, especially provisions for large canopy trees and ecoroofs, which provide a wide range of public benefits: stormwater management, mitigation of urban heating, air quality benefits, habitat for birds and pollinators, and improved aesthetics and quality of life. In a neighborhood with a high proportion of rooftops, paving and other impervious surfaces, these green features are especially important for public health, neighborhood desirability, and resilience of public infrastructure systems.

Climate resilience: This planning effort, its proposed infrastructure investments and land use changes represent an opportunity to further evolve Portland's approach to creating more climate resilient neighborhoods. The plan's emphasis on linking housing and active transportation is a sound climate mitigation strategy, however, the urban greening elements are modest given the extent of building and paving expected in the neighborhood. Without more significant greening of the neighborhood, we are concerned that increases in extreme weather could impact area residents. A more robust approach to greening the district could reduce urban heating and the impact of stormwater runoff on streets and BES systems, while also providing an array of public benefits, as described above.

Urban character and urban nature: Given the proximity to the Central City and the urban scale of desired development, the Central City Plan could serve as a guide for the creation of this neighborhood, especially its policies and urban design concepts that integrate nature and greening into the urban neighborhoods.

Equity: Enhanced greening in the area will be especially important to residents of affordable housing who may lack the ability to take refuge in other, cooler parts of the city when summer temperatures are high. They will also have a greater need for green respites close to home. Trees, landscaping, and green stormwater management facilities will make the urban neighborhood more livable for all its residents, and special consideration is merited for how this neighborhood will function for low-income and residents who have mobility limitations.

Assessment: In reviewing the plan, we struggled to understand the anticipated outcomes of the plan's greening provisions for the amount of building and pavement, landscaping, tree canopy coverage, and stormwater management, as well as equity considerations. We suggest an assessment be done of the anticipated results of the plan's provisions and their implications for achieving goals for public health, environmental justice, infrastructure resilience, habitat, and mitigation of extreme rain and heat events.

Thank you for the opportunity to review and comment on the Northwest Plan Discussion Draft. We appreciate your consideration of BES's interests in providing service to this new community. We hope you find our comments helpful. Please let us know if you have any questions about our comments. We look forward to continuing to work together as this project progresses.