

MP2H Discussion Draft Comments

Volume 1: Summary and Report

document page:	comment:
5 - The Opportunity	Caption under first photo says, "low carbon neighborhoods." This is a little misleading because incomes are higher in the district, which tend to correlate with higher per capita greenhouse gas emissions. Plus there are air quality issues in the district in part from surrounding highways. "Compact, transit-oriented neighborhoods" might be a better phrase.
8-9 - Addressing Industrial Land Supply	Is there a concern that this rezoning of industrial land to allow non-industrial uses could further create pressure to rezone other industrial lands in the area as well?
10 - Delivery of Public Benefits	Can the creation of a climate resilient neighborhood be incorporated? It could perhaps be worked into the existing public amenities category, or that category could be reframed around climate resilience (especially given the physical characteristics of the area and the plan's commitment to affordable housing).
17 - Area History	Add, "forced removal and resettlement of many tribes..." Also the underground piping of Balch Creek was essential to draining, filling and development of Guild's Lake.
22 - Demographics & Equity Indicators	The demographics indicate a lot of people live alone, likely because housing stock is dominated by studios and 1-bedrooms. Policies favoring development of 2- and 3-bedroom affordable units (i.e. The Ramona in the Pearl) could make area more viable for families and increase equitable benefits.
22 - Equity Index Map	Do the darker colors on this map (indicating greater risk of displacement) reflect the higher concentration of rental units? Based on the info summarized in this section, it looks like the area overall is more affluent, more white and more educated than the Portland median, but that it also has a much higher concentration of rentals. Within this neighborhood context, do we think rentals are an indicator of displacement risk or is it an indicator of a different lifestyle that doesn't prioritize ownership? It seems like the analysis in this area needs to be nuanced to acknowledge that the neighborhood does include public (and nonprofit?) affordable housing, but that that overall housing costs are high and the demographic overall is quite privileged.
23 - Employment	It might be helpful to include (in this and similar plans) information on entrepreneurship and/or small businesses - numbers, types of businesses, ownership info, types of jobs, etc. This could help get at neighborhood vulnerabilities from a business/jobs perspective as well as a residential perspective. It also might be helpful to provide more context about the education levels, wages, racial demographics for people employed in the area. Even if you don't have data at that level, it could be helpful to give a sense of the characteristics of employees in those jobs citywide so folks understand the economic tradeoffs to be considered in the planning effort.
24-25 - 2035 Comp Plan	Comp Plan Policies 2.3 and 2.4, which address environmental justice, provide a guidepost by which to evaluate the plan elements and though they don't directly mention climate change or urban heat island impact, these issues are a critical part of environmental justice, so they should be explicit considerations in developing the elements of this plan.
27 - Central City Plan	Thank you for acknowledging the proximity to the Central City Plan District. It seems like the CCPD provisions would be reasonable models for some of the regulations here, especially where the scale of development is similar in the Planned Development provisions.
29 - Urban Character	Mentions that American Can Company buildings are Historic Landmarks. Montgomery Park building is as well, and a few other buildings are on City HRI list. It looks like there might be a few other buildings that should be on the HRI but aren't. Not sure if there are any zoning tools that could help encourage their preservation and reuse?
59 - Transportation Network and Framework	Does current vision for updated transportation network include enough flexibility for private development of green space? Or does it create too many small blocks to make green space development feasible? Human-scaled connectivity is very important, but there might be a couple of places where street connectivity should be deprioritized to accommodate development of sorely needed trees, swales, grassy areas, play structures that make a place livable.
62-pedestrian and bike	Is this a chance to tie together urban canopy and stormwater mitigation, as well as long term heat island mitigation, air quality, etc? Protecting/expanding the canopy along the greenways, especially as corridors between Forest Park and NW Neighborhoods.
63 - Sanitary Sewer and SW Management Systems	update to: "To reduce this projected risk, green and grey infrastructure may be needed to reduce the amount of stormwater currently entering the pipes."
63 - Sanitary Sewer and SW Management Systems	Consider strengthening the ecoroof language. Ecoroofs are already allowed and a strong tool for getting stormwater out of the combined system in areas with limited potential for infiltration facilities such as green streets.

64-ecoroofs	SWMM would require on site management either way. Ecoroofs are especially good for zone changes leading to more constraints in the ROW or on private property, but this feels like a good opportunity to emphasize a diverse set of green infrastructure tools that retain stormwater and heat island mitigation and air quality improvements
64 - Viability of Industrial Land	BES may be able to provide programmatic support for an offset program that promotes brownfield cleanups, but we wouldn't have a role if the program also includes access improvements. How does BPS envision this program being administered?
69 - Future Zoning Map	There are a handful of owner-occupied SFR lots on NW Roosevelt and NW 23rd. Proposed Zoning changes change them from IG1k to EXd. These are mostly small lots with homes that appear to be in good shape. The existing buildings are likely to persist for the time being, so the question is: Will the proposed zoning change help encourage the highest and best use of the existing lots, which is likely adapting/adding to existing buildings to maximize the number of residential or live/work units on each lot? Or will it pose a barrier? I don't think the new density allowances under RIP apply to EX base zone. Is there an easy pathway for densifying existing SFR lots under EX?
71-urban green features	this could be another opportunity to expand the context of green infrastructure in this plan. Within the boundary this makes sense, but the proximity of the study area to the Willamette, Forest Park etc. AND the surrounding industrial district with so little green space really emphasizes the need for real integration
71 - Urban Green Features	These provisions are similar to those found in the WPTC, yet the broader landscapes and context for this industrial area, which is highly impervious, is quite different than is found in SW Portland. The risks of UHI impacts and associated health issues are much greater in MP2H. To offset those impacts and to create a more livable environment, the plan should include additional greening in the area.
71 - Urban Green Features	Revise this statement to emphasize the benefits of urban greening for climate resiliency and public health, mitigation of UHI impacts, air quality, and quality of life. <i>Urban Green Features. Green elements are proposed to be integrated into the urban environment to <u>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 affect, improve air quality, provide habitat for birds and pollinators, help soften the effects of built and paved areas,</u> cool the air temperature, intercept rainfall, and reduce stormwater runoff by providing unpaved permeable surface. A range of options are provided to address this area's urban development patterns and characteristics.</i>
71 - Design overlay	What is the proposed character statement for the area? How will that influence the development review process?
72 - Public benefits agreements	Could greening also be part of this? Given the City's goals for equity, resilience and climate change, it seems like it could/should be.
73 - Action E2	Same comment as above - who will administer this program?
74 - Action E-12	it's up to BPS if you want to consider an ecoroof requirement to provide the range of public benefits they provide, consistent with the Central City Plan District. BPS would be the lead implementor and BES would be listed.
72-public amenities (open areas, park/plaza)	intersection of stormwater infiltration, public space, greenway connectivity, equity?
Volume 2: Zoning Code Amendments	
document page:	comment:
39 - 33.590.230 Floor Area and Height Bonus Options	Why is there a bonus for meeting the mandatory requirements for inclusionary housing or are we misunderstanding the language?
48/49 - 33.590.255 Urban Green Features	Revise this statement to emphasize the benefits of urban greening for climate resiliency and public health, mitigation of UHI impacts, air quality, and quality of life. <i>Urban Green Features. Green elements are proposed to be integrated into the urban environment to <u>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 affect, improve air quality, provide habitat for birds and pollinators, help soften the effects of built and paved areas,</u> cool the air temperature, intercept rainfall, and reduce stormwater runoff by providing unpaved permeable surface. A range of options are provided to address this area's urban development patterns and characteristics.</i>
48/49 - 33.590.255 Urban Green Features	C. Urban green features standard, 1. Landscaped area: subsections a. and c. seem to contradict each other. Section a. says "Up to one-third of the landscaped area may be improved for active or passive recreational use" and section c. says "Up to 25% of the required landscaped area may be improved for pedestrian use...if the area is surfaced with pervious pavement..."
48/49 - 33.590.255 Urban Green Features	With the setbacks and transportation needs of this district, will it be possible to achieve significant tree canopy along the streets? Some amount of building setbacks are essential for getting meaningfully sized trees along existing streets. Many existing buildings go right up to the sidewalk, then the sidewalk strips are too small for planting, and trees that do get planted are at high risk from truck and car traffic (plus heat and drought).
50 - 33.590.260 Required Outdoor Areas	How does the allowances for indoor community or recreational spaces relate to the "Plaza or Park" requirement? Is there the potential for it reducing the amount of outdoor space (and greening) provided by developers? Seems like indoor community or recreational spaces could be used instead of providing outdoor space.

60/61 - 33.590.300 Planned Development Review	How would/could the open space requirement interact with other provisions for urban green features and required outdoor areas? Are there ways this provision can further support stormwater management and/or other resilience outcomes?
61 - 33.590.300 Planned Development	From the purpose statement, <i>"Overall, a Planned Development is intended to promote: High quality design that is integrated into the broader urban fabric, and complements existing character within the site and adjacent to the site;..."</i> How does that fit with the transition from industrial to mixed use? Could this be used as an argument to favor an "urban" character with less landscaping? In an area that is proposed to transform, maybe there should be a different desired outcome that prioritizes the benefits for future residents and businesses over consistency with the past. I would suggest that the PD purpose statement be updated to include an acknowledgement of the need to create a community that promotes public health, equity and resilience, consistent with the Comp Plan and City values.
67 - Additional requirements for planned development	"Plaza or park. At least 15 percent of the total Planned Development site area must be developed as a publicly accessible plaza or park. " Would the PD meet this requirement through the Urban Green Features requirements? It seems like the lift in this is that the open area is publicly accessible, but it seems the PD should get additional public benefits.
Other/general questions or comments :	
	comment:
Urban greening and urban heat island impacts	This area is identified by PSU as being at high risk for UHI and related health impacts. It would be helpful for BPS to summarize the various greening requirements and other greening elements (zoning, design standards/guidelines, Title 11, etc.) to assess their expected ability to mitigate those impacts. Based on that analysis, it may make sense to include additional greening elements in the plan district provisions, PD bonuses and/or public benefits agreements to be negotiated between the City and property owners.
Urban greening and outdoor space	Have you confirmed that the proposed plan and zoning code changes will result in the green spaces you desire? Recommend walking the new code through a couple of development scenarios with BPS and BDS. Also recommend looking at any districts where very similar code changes have been made (parts of the Pearl or Slabtown?) to look at actual outcomes.
Resilience policies	Given the location of this site and issues around climate change (extreme temperatures, rainfalls, etc.) 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. These policies are especially pertinent to issues related to resilience and neighborhood livability: GOAL 6.A The Central City is a living laboratory that demonstrates how the design and function of a dense urban center can: a) equitably benefit human health, the natural environment and the local economy; and b) provide resilience to climate change impacts such as urban heat island, and to natural hazards, including flooding and earthquakes. POLICY 6.1 Natural hazard resilience. POLICY 6.3 Multiple functions. POLICY 6.8 Upland habitat connections. POLICY 6.9 Strategic tree canopy enhancement. POLICY 6.10 Effective tree planting. POLICY 6.12 City investment in street trees.
Urban Green Features	Has this been assessed to confirm that it is above and beyond what is already required with existing landscape standards? Seems that option 1C will be taking space away that could be used for landscaping, leaving us with less green space than we need here. Has analysis been done to evaluate how much greening this option will provide and whether the required space is large enough to support the growth of large canopy trees? People can use pervious paving on their site to meet part of their stormwater management requirements according to the SWMM. The large trees option is only meaningful if there is enforcement to make sure trees are maintained, protected and grow to maturity to reach their potential to provide substantial community benefits. Eco-roofs are a meaningful ask in this project area.