



CITY OF PORTLAND ENVIRONMENTAL SERVICES



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M E M O R A N D U M

May 12, 2021

TO: Barry Manning-BPS

COPY TO: Jane Bacchieri-BES, Kristen Acock-BES

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

RE: Montgomery Park to Hollywood Study – NW In-House Review Draft

Thank you for the opportunity to review the in-house review draft of the Montgomery Park to Hollywood Study west side project. Now that a streetcar track alignment has been chosen and new zoning has been proposed, BES is able to provide more feedback on your proposal. BES staff reviewed the draft with a focus on the following factors: sewer system risk, storm system risk, resiliency, maintenance, stormwater management, and land use. This memo provides a synopsis of our comments. Please review the attached, MP2H_InHouseReview_210510_BES document for detailed comments.

The following is a summary of what BES currently knows about the capacity and constraints of the combined sanitary/stormwater system and other stormwater facilities in the study area. Over the next few months, BES will perform computer modeling analysis of the sewer systems on anticipated system conditions under the upzoning proposed in the MP2H study. The information we currently have indicates that much of the area is at risk for backup of the combined sanitary/storm system into basements under the 10- and 25-year storms under existing conditions. Additionally, regional climate models show potential increases in intense storm events that could exacerbate existing problems. While we don't yet have a model of future conditions, we expect that addressing system issues would require significant investment and level of effort by BES. The exact nature of the types and costs of needed system improvement would have to be determined through system planning; however, such an effort isn't anticipated in the near future and it could be many years before those improvements are made. We look forward to sharing more detailed information with you when we have the results of the modeling and discussing how that information can inform the MP2H study.

Sewer System Risk

BES previously provided BPS with maps showing various components of current sewer system risk and existing CIP sewer improvement projects BES has planned within the MP2H project area. The proposed increased zoning density falls in areas where BES has identified as having capacity deficiencies and basement sewer backup risk. Streetcar tracks are being proposed over pipes that are in poor condition (Hansen grading of 4, with a grading of 5 being the worst), and over pipes with capacity deficiencies. BES will need to determine how to address the deficiency of those pipes during track design and construction. We will need to perform system analysis to assess the impact of proposed zoning on the sewer system and planned CIP project in the area. If currently planned CIP projects won't meet the needs of the proposed zoning changes, BES may need to pause or reassess our work. BES anticipated that the modeling work, which is the first step of this analysis, will take at least two months to complete.

Storm System Risk

BES previously provided BPS with maps showing various components of our current stormwater system risk. Parts of the proposed streetcar track alignment and areas where increased zoning density is proposed are in areas with medium-high landslide susceptibility. The southern portion of the 23rd Ave corridor streetcar track is located in an area with the potential for fairly high landslide risk due to unmanaged or ineffectively managed stormwater flows. Special consideration should be given to stormwater management strategies in this area to avoid exacerbating susceptible landslide conditions. Part of the track is located in an area with the potential for fairly high localized nuisance flooding risk. Special consideration should be given to stormwater management strategies in this area to minimize the likelihood of nuisance flooding.

Resiliency

BES previously provided BPS with maps showing various resiliency considerations. The 23rd Ave streetcar track alignment does not cross the critical, seismically vulnerable BES "backbone" assets that the 18th/19th Ave alignment would have, but there are seismically vulnerable assets adjacent to 23rd Ave we may need to evaluate. BES pipes with moderate to high fragility underlying emergency transit routes and serving critical infrastructure (such as hospitals) should be prioritized for reinforcement if resources are available. Given the history of fill in the area, soil conditions and proximity to the river, BES suggests geotechnical analysis be done to assess the potential risks in the area due to landslide or earthquake.

The track segment along NW Wilson and a portion of NW York Street has a high existing risk of regular localized flooding, an access barrier for streetcar users. Flooding may periodically interrupt service, which could impede pedestrian access and safety and transit function. The northern part of the project area has higher existing urban heat island risk due to extensive impervious area. To mitigate urban heat island impacts, investments in green infrastructure and tree planting should be prioritized, particularly when densifying land uses.

Maintenance

BES previously provided BPS with a list of various maintenance considerations along with a draft memo regarding identifying assets that would potentially need to be moved, replaced, or rehabilitated due to proximity to light rail tracks. BES assets that

intersect a 12' buffer originating from the edge of the track guideway are considered in conflict and will need to be relocated, replaced or reconstructed as necessary. We will need proposed street cross sections to evaluate the impact on individual pipe segments. The following pipe segments are of particular concern: the 24" sewer main in the block of NW 23rd Avenue between NW Raleigh and Savier streets, the relatively new 12" sewer main in the west side of NW 23rd between NW Thurman and Vaughn, and the three blocks of NW 23rd Avenue between NW Vaughn and NW York that have 24", 30", and 36" sewer mains on the west side of the road. BES has received a high concentration of flooding complaints at the intersection of NW 23rd & Thurman.

Stormwater Management

Generally, infiltration facilities, such as green street facilities and underground injection controls/sumps, are challenging in this part of the city due to low soil infiltration rates and site contamination. Lined facilities may be needed where infiltration isn't feasible. The Central City provisions for ecoroofs are appropriate for this scale of development. BES will need proposed street cross sections to provide more feedback on how stormwater treatment options could fit into the ROW and on private property.

Land Use

Guiding policies

The intention of the study would be clearer if the goals outlined in the Urban Design were also included in this document. Without them, it is difficult to evaluate proposals, preferred scenarios, and implementation strategies. While the study is understandably focused on the link between land use and streetcar investments, it provides less clarity about how the proposals would support the goals of environmental health, equity and resilience.

Neighborhood Greening

Development of this area should include ample parks, access to the river and Forest Park, abundant trees and greenery, and opportunities to enjoy nature. These elements are some of the most popular and energizing spaces in the River District/Pearl District, which serve as a counterpoint to urban living. Tanner Springs Park is a well-loved example of urban wilderness that provides a respite for people and habitat for native and migratory birds.

Through thoughtful planning and design, these green elements can help achieve multiple and complementary outcomes, like mitigating stormwater flows, cooling the air and promoting public health. These benefits can be achieved through master plans, development agreements, design guidelines and character statements, tree and landscaping requirements for parks and plazas, and zoning provisions for bird-safe window glazing.

The study should specifically address how the urban landscape will minimize the impacts of rising summer temperatures due to climate change. This is critical for reducing energy use and for protecting the health of community members. The vitality of the area and people's ability to use active transportation during summer months will be impacted by outdoor temperatures and air quality. To that end, the study should include zoning and investments that mitigate the urban heat island effect. In addition to

the greening elements described above, we recommend that all properties zoned for urban densities include ecoroof requirements, as called for in the Central City Plan District.

Industrial land supply

The study proposes converting a considerable amount of industrial land, including industrial sanctuary, to urban density mixed use development. The 2016 Economic Opportunities Analysis identified a tight land supply for industrial lands through 2036, and the EOA update currently underway is expected to find a similarly constrained supply of industrial lands.

Reducing the supply of industrial lands in an area that is already highly developed raises concerns about the potential implications for the City's ability to meet future industrial land needs, especially as the current EOA considers the potential to expand protections for riparian buffers, floodplains and wetlands in industrial areas.

The MP2H study intersects with issues like brownfield redevelopment, industrial sanctuaries, public access to the river, and environmental protections. It is one of several plans and initiatives that moves Portland toward a tipping point in redefining the long-term vision for the Willamette River, economic diversity, racial justice, environmental justice, and climate resilience. As the MP2H study points out, there is a critical relationship between the MP2H study area and the Economic Opportunities Analysis, currently underway. The MP2H study and similar efforts should inform and be informed by a larger framework or vision that reflects existing and anticipated challenges and opportunities, so that public and private investments are aligned to achieve what Portlanders want for their future.

If there is agreement that the study area should be rezoned to urban mixed use to meet critical public needs, we think that establishing a program to fund brownfield cleanups represents a promising opportunity to address the difficult issue of bringing contaminated sites back into active industrial use. We offer the following questions and considerations regarding developing and implementing such a program:

- The current EOA assumes that the City will invest in brownfield cleanup to help meet long-term industrial lands goals, yet securing funding for that work has been challenging. In order for the MP2H fund to provide a lift in terms of our long-term industrial lands goals, it would need to add capacity beyond what is currently assumed in the EOA.
- How will the brownfield fees be calculated? The study cites an average figure of \$1 million/acre for cleaning up industrial brownfield sites. It's important to know that the actual costs of cleanup are site specific and can vary considerably. It's unclear if the fund could assure that fees paid for industrial land conversion would result in mitigation on the same acreage of brownfield lands.
- It is unclear how the program could result in brownfield cleanup at the scale the MP2H study seeks to achieve. Are these inactive industrial sites not already being counted towards available industrial acreage? While costs are significant issue for the development, there can be a variety of other constraints that hamper cleanup and ultimate reuse of industrial lands. Would the program also address those issues? How can we be confident that a sufficient number of property owners would be interested in participating? How would we address

potential participation of current property owners who are directly responsible for contamination?

- Establishing and administering the fund would have staffing implications and would have administrative costs that would also need to be funded. An Industrial Mitigation Fund could have benefits beyond those outlined in the MP2H project. It could serve as a mechanism for soliciting grant funding, including anticipated federal relief funding, and could be utilized elsewhere in the City, if needed.

Before the MP2H project Discussion Draft is released, we would welcome the opportunity to meet with BPS staff working on the MP2H project and the EOA analysis to discuss and hone the basic elements of the concept before the idea is vetted publicly.

Public benefits of upzoning

The study recognizes that public investments in streetcar and proposed rezonings would add considerable value to privately-owned land. We agree that these public investments should be done in a way that supports broad public goals and offset the impacts of redevelopment, especially brownfield investment to offset impacts to industrial land supply, and affordable housing and parks for people living and working in the area. The proposal estimates that about 10% of additional housing expected through redevelopment would be affordable. Given the City's existing zoning inclusionary zoning requirements, this target seems too modest, especially given the limited supply of affordable housing in the surrounding neighborhood and the city overall.