

# Exhibit A: Findings of Fact Report As Amended

## December 4, 2024

Legislative amendments to the Comprehensive Plan goals, policies and map must be found to be consistent with the goals and policies of the Comprehensive Plan, Metro’s Urban Growth Management Functional Plan, the Statewide Planning Goals, and any relevant area plans adopted by City Council. (33.835.040 and 33.810.050).

The Comprehensive Plan requires that amendments to its elements, supporting documents, and implementation tools comply with the plan itself. “Comply” means that the amendments must be evaluated against the comprehensive plan’s applicable goals and policies and on balance be equally or more supportive of the Comprehensive Plan as a whole, than the existing language or designation. (Policy 1.10)

Text amendments to the zoning code must be found to be consistent with the Comprehensive Plan, Urban Growth Management Functional Plan, and the Statewide Planning Goals. In addition, the amendments must be consistent with the intent or purpose statement for the base zone, overlay zone, and plan district where the amendment is proposed, and any plan associated with the regulations. (33.835.040)

Legislative zoning map amendments must be found to comply with the Comprehensive Plan Map with a zone change to a corresponding zone of the Comprehensive Plan Map. The change also must demonstrate that there are adequate public services capable of supporting the uses allowed by the zone. Sites located in school districts with adopted school facility plans that have been acknowledged by the City of Portland must demonstrate that there is adequate enrollment capacity to accommodate any projected increase in student population resulting from development. The David Douglas School District is the only district in Portland with an adopted and acknowledged school facility plan, so this criterion does not apply to Montgomery Park Area Plan. (33.855.050)

- 1. Finding:** The City Council has identified and addressed all relevant and applicable goals and policies and zoning code purpose statements relevant and applicable to zoning code text amendments in these additional findings of fact.
- 2. Finding:** As discussed in more detail below, the City Council has considered the public testimony on this matter and has weighed all applicable goals and policies and on balance has found the Montgomery Park Area Plan (MPAP) amendments are consistent with the goals and policies of the Comprehensive Plan, Metro Urban Growth Management Functional Plan, Statewide Planning Goals and other relevant city plans and on balance, are equally or more supportive of the comprehensive plan as a whole than the existing language and designations.

## Part I. Statewide Planning Goals

State planning statutes require cities to adopt and amend comprehensive plans and land use regulations in compliance with the Statewide Planning Goals.

**The Statewide Planning Goals that apply to Portland are:**

- Goal 1 Citizen Involvement
- Goal 2 Land Use Planning
- Goal 5 Natural Resources, Scenic and Historic Areas, and Open Spaces
- Goal 6 Air, Water and Land Resource Quality
- Goal 7 Areas Subject to Natural Hazards
- Goal 8 Recreational Needs
- Goal 9 Economic Development
- Goal 10 Housing
- Goal 11 Public Facilities and Services
- Goal 12 Transportation
- Goal 13 Energy Conservation
- Goal 14 Urbanization
- Goal 15 Willamette River Greenway

There are approximately 560 acres of land both within Portland’s municipal boundaries and beyond the regional urban service boundary that can be classified as rural land. In 1991, as part of Ordinance 164517, the City Council took an exception to Goal 3 and 4. the agriculture and forestry goals. Because of the acknowledged exception, the following goals do not apply:

- Goal 3 Agricultural Lands
- Goal 4 Forest Lands

Other Statewide Planning Goals apply only within Oregon’s coastal zone. Since Portland is not within Oregon’s coastal zone, the following goals do not apply to this decision:

- Goal 16 Estuarine Resources
- Goal 17 Coastal Shorelands
- Goal 18 Beaches and Dunes
- Goal 19 Ocean Resources

**Goal 1. Citizen Involvement.** To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process.

**3. Finding:** Portland adopted a Community Involvement Program on June 15, 2016. The Community Involvement Program serves as a framework to carry out policies from Chapter 2 — Community Involvement, of the 2035 Comprehensive Plan, and applies to legislative land use and transportation projects initiated by the City. Among the commitments that the City is asked to make in the Comprehensive Plan are the following:

- To provide a wide range of opportunities for involvement in planning and investment decisions.
- To achieve greater equity in land use actions through setting priorities and making decisions with meaningful involvement of under-served and under-represented communities.

- To meaningfully involve, in decision making, those who potentially will be adversely affected by the results of those decisions.
- To provide this meaningful involvement throughout the phases of planning and investment projects - issue identification and project design through implementation, monitoring, evaluation, and enforcement.
- To provide well-designed, relevant, responsive and culturally-responsive public involvement.
- To build community capacity for meaningful participation and leadership in planning and investment decisions.

The City has an acknowledged Goal 1 program. Community involvement efforts for the MPAP project have been conducted in accordance with that program. Therefore, the project is in compliance with Goal 1. More specific findings related to the city's community involvement efforts are found in response to the policies in Chapter 2 of the Comprehensive Plan and are incorporated by reference here. Therefore, the MPAP complies with Statewide Planning Goal 1.

**Goal 2. Land Use Planning.** To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

**4. Finding:** Goal 2, as it applies to the MPAP amendments, requires the City to follow its established procedures for legislative amendments to the Comprehensive Plan policies, the Comprehensive Plan map, the Zoning Code, and the Zoning Map. The amendments comply with this goal because, as demonstrated by these findings, the amendments were developed consistent with the Statewide Planning Goals, the Metro Urban Growth Management Functional Plan, 2035 Comprehensive Plan and Portland Zoning Code, as detailed in this ordinance.

Other government agencies received notice from the 35-day DLCD notice and the City's legislative notice. The City did not receive any requests from other government agencies to modify the MPAP amendments.

The City Council's decision is based on the findings in this document, and the findings are based on the evidence presented to the Planning Commission, Design Commission, and City Council that are incorporated in the record that provides the adequate factual basis for this decision.

The Council legislative record specifically incorporates all materials linked on the project website ([www.portland.gov/bps/planning/mp2h](http://www.portland.gov/bps/planning/mp2h)), the reports, memos and presentations provided to the Planning and Sustainability Commission and City Council, the written and verbal testimony submitted to the Planning Commission, Design Commission, and City Council, and notices sent to the public, and the Montgomery Park Area Plan electronic box available at <https://efiles.portlandoregon.gov/record/14215597> that contains reports, documents, and information related to the project. On the Bureau of Planning and Sustainability's website, the following link [www.portland.gov/bps/planning/mp2h](http://www.portland.gov/bps/planning/mp2h) provides access to a portion of the legislative record. This link was available to the public and City Council during the public hearing process. The Planning Commission, Design Commission, and Council hearings were in a hybrid format, allowing the public to testify in person or using a telephone, mobile device, or computer. All project documents were produced and distributed electronically but physical copies were available upon request. The City Council's decision is based on the findings in this document, and the findings are based on the evidence presented to the Planning Commission, Design

Commission, and City Council that are incorporated in the record that provides the adequate factual basis for this decision.

Based on these findings, the MPAP complies with Statewide Planning Goal 2.

**Goal 5. Open Space, Scenic and Historic Areas, and Natural Resources.** To protect natural resources and conserve scenic and historic areas and open spaces.

**5. Finding:** Goal 5 addresses open spaces, scenic resources, historic resources, and natural resources. Each category is addressed below:

**Open Spaces.** The City generally directs and protects its open spaces through designation of Open Space zones and related code provisions (City Code Chapter 33.100). The MPAP Zoning Map amendments do not affect the location or extent of Open Space zoning within the City. The MPAP amendments add specific provisions to the Zoning Code to encourage the creation of additional open space with development in the Plan area, but do not affect regulations that apply to the City's Open Space zoned areas.

The City has citywide level of service (LOS) metrics in place for access to open space and recreation for residents. The City's Parks 2020 Vision documents the City's open spaces and a long-term plan to provide a wide variety of high-quality park and recreation services and opportunities for all residents. The 2020 Vision identifies a goal that 100% of Portlanders are within half a mile of a developed park or natural area. In addition to distance, the LOS evaluation also considers population density.

The Plan area has not previously been identified as parks deficient per LOS analysis because it has until now had industrial and employment land use designations that prohibit residential uses. Nonetheless, the majority of the plan area is within a half mile walking distance of a developed park (Wallace Park) and within a half mile of a natural area park (Lower Macleay Park and trailhead), which is within the City's stated level of service goals for distance from residential uses. However, given the existing high residential density surrounding these existing park facilities and the proposed MPAP zoning amendments that could add more than 2,000 housing units in the long term, Portland Parks and Recreation recognizes that an additional developed park is needed in the plan area to serve the expected households over time. Portland Parks and Recreation will seek opportunities to achieve a new park for the area, including through public-private partnerships.

Therefore, the MPAP amendments are consistent with the open space elements of Goal 5.

**Scenic Resources.** The City has designated scenic resources in an adopted inventory and protects them through an overlay zone (City Code Chapter 33.480) which address landscaping, setbacks, screening, building facades and tree removal. The MPAP area does not have any existing or proposed designated scenic resources and the MPAP amendments do not change this program. Therefore, the MPAP amendments are consistent with the scenic elements of Goal 5.

**Historic Resources.** There are two designated historic resources in the MPAP area, the Montgomery Park building and the American Can Complex. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City's Historic Resources overlay zone. The MPAP amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code

Chapter 33.445). Therefore, the MPAP amendments are consistent with the historic elements of Goal 5.

**Natural Resources.** The City protects natural resources by applying environmental zoning to significant natural resources that it identifies through a natural resources inventory. There are no natural resources identified through the natural resources inventory in the MPAP area. Existing natural resource protections are not amended with the MPAP amendments. Therefore, the MPAP amendments are consistent with the natural resource elements of Goal 5.

**Generally.** As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 4 (Design and Development, including Historic, Scenic, and Cultural Resources) and Chapter 7 (Environment and Watershed Health) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 5.

**Goal 6. Air, Water, and Land Resource Quality.** To maintain and improve the quality of the air, water, and land resources of the state.

**6. Finding:** Goal 6 requires the maintenance and improvement of the quality of air, water, and land resources. The State has not yet adopted administrative rules for complying with Statewide Planning Goal 6. The City is in compliance with federal and state environmental standards and statutes, including the federal Clean Water Act and Clean Air Act. Existing City regulations including Title 10 (Erosion Control), the Stormwater Management Manual and for the Environmental overlay zones will remain in effect and are applicable to future development. These other regulations are generally the mechanism used to assure compliance with this goal. As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 7 (Environment and Watershed Health) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 6.

**Goal 7, Areas Subject to Natural Disasters and Hazards.** To protect people and property from natural hazards.

**7. Finding:** The State has not yet adopted specific requirements for complying with Statewide Planning Goal 7. The Buildable Land Inventory (BLI), which was adopted (Ordinance 187831) and acknowledged by LCDC on April 25, 2017, included a development constraint analysis that identified parts of Portland that are subject to natural hazards. The City of Portland used several sources of information in its Comprehensive Plan to identify potential hazards:

- Special flood hazard area (Land area covered by the floodwaters of the base flood, as shown on the Federal Emergency Management Agency (FEMA) maps in effect on November 26, 2010);
- Floodway (The active flowing channel during a flood, as designated on the flood maps adopted under authority of Title 24 of the Portland City Code);
- 1996 Flood Inundation area (A record peak flow in February of 1996 caused the Willamette River and its major tributaries to flood. This map was created to delineate the inundated areas near the mainstem and major tributaries of the Willamette River);
- Potential Rapidly Moving Landslide Hazard Zones (as shown in the DOGAMI IMS-22 publication); and

- Deep landslide—High Susceptibility or Landslide Deposit or Scarp as shown in the DOGAMI IMS-57 publication.

The MPAP considered this information for both map designation and infrastructure planning purposes.

The MPAP amendments will not expose people to additional hazard because the code changes do not include amendments to any programs or regulations that implement floodplain or landslide hazard policies.

The MPAP amendments are also consistent with this goal because City programs that are deemed in compliance with Metro Title 3 requirements for flood management, and erosion and sediment control (i.e., City Title 10 Erosion Control, and the balanced cut and fill requirements of City Title 24), as well as the environmental overlay zones are unchanged and ensure any new development will be done in a way to protect people and property from hazards.

As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 7 (Environment and Watershed Health) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 7.

**Goal 8. Recreational Needs.** To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

- 8. Finding:** Goal 8 imposes a general obligation on the City to plan for meeting its residents' recreational needs: "(1) in coordination with private enterprise; (2) in appropriate proportions; and (3) in such quantity, quality and locations as is consistent with the availability of the resources to meet such requirements."

Goal 8 provides that "Recreation Needs -- refers to existing and future demand by citizens and visitors for recreations areas, facilities and opportunities." Goal 8 also provides that "Recreation Areas, Facilities and Opportunities -- provide for human development and enrichment, and include but are not limited to: open space and scenic landscapes; recreational lands; history, archaeology and natural science resources; scenic roads and travelers; sports and cultural events; camping, picnicking and recreational lodging; tourist facilities and accommodations; trails; waterway use facilities; hunting; angling; winter sports; mineral resources; active and passive games and activities."

The City of Portland has a robust and diverse system of parks, recreation areas and open spaces. The City's Parks 2020 Vision documents the City's long-term plan to provide a wide variety of high-quality park and recreation services and opportunities for all residents. The MPAP amendments support and do not impact that existing vision. The Parks 2020 Vision identifies a goal that 100% of Portlanders are within half a mile of a park or natural area. In addition, Portland Parks and Recreation's citywide level of service (LOS) guidance and metrics also consider population density. The Plan area has not previously been reviewed for LOS because it has had industrial and employment land use designations that prohibit residential uses until now. Nonetheless, the majority of the plan area is within a half mile walking distance of a developed park (Wallace Park) and within a half mile of a natural area park (Lower Macleay Park and trailhead), which is within the City's stated level of service goals for distance from residential uses. However, given the existing high residential density surrounding these existing park facilities and the proposed MPAP zoning amendments that could add more than 2,000 housing units in the long term, Portland

Parks and Recreation recognizes that an additional developed park is needed in the plan area to serve the expected households over time. Portland Parks and Recreation will seek opportunities to achieve a new park for the area, including through public-private partnerships. Testimony was received regarding increases in housing capacity and need for a community center with a pool and public park space to serve existing and future population in and around the plan area. The public park space is addressed above. Specific to community center needs, Portland Parks and Recreation LOS guidance, as discussed in the April 2022 report Level of Service Guidance: Full-service Community Centers, is that households should be within 3 miles of a full-service community center. The plan area is within the 3-mile service area of the Matt Dishman Community Center. Existing Portland Parks and Recreation plans call for building an additional full-service community center at a City-owned property near SE 12<sup>th</sup> Ave and SE Stark St, to serve central eastside and westside residents. While the plan area would be just outside the 3-mile distance of that future center, a large part of the surrounding Northwest Town Center would be within the level of service distance and that center will be an additional resource to meet community recreational needs.

In addition to its proximity to existing parks facilities, the MPAP area is also close to other recreational opportunities such as the Friendly House Community Center, a variety of sports and cultural venues, the Willamette River Greenway, and major city bikeways that serve to connect to the broader city bike network. The MPAP amendments also do not affect any land designated as open space.

The MPAP includes elements that encourage the development of shared outdoor areas as well as a large public open space, to serve some of the recreation needs of residents and employees within the plan area. These elements are implemented through zoning code requirements and incentives.

As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 8 (Public Facilities and Services) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 8.

**Goal 9. Economic Development.** To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

**9. Finding:** Goal 9 requires cities to consider economic activities vital to the health, welfare, and prosperity of Oregon's citizens. Comprehensive plans for urban areas are required to include, among other things: an analysis of economic patterns, potentialities, strengths, and deficiencies; policies concerning economic development; and land use maps that provide for at least an adequate supply of sites for a variety of industrial and commercial uses.

The 2035 Comprehensive Plan demonstrates compliance with Goal 9. Land needs for a variety of industrial and commercial uses are identified in the Economic Opportunities Analysis (EOA), which was adopted (Ordinance 187831) and acknowledged by LCDC on April 25, 2017.

The City's acknowledged EOA analyzed and demonstrated adequate growth capacity for a diverse range of employment uses. The MPAP project makes changes to the supply of land planned for industrial and employment uses, but maintains a citywide surplus of industrial land capacity. The MPAP changes the land use designation on 30 acres of industrial land to Central Employment. This represents less than 0.2 percent of the city's total industrial/employment land base of 13,175 acres, and 3 percent of the 1,067 acres of buildable land in the Harbor & Airport Districts.

As explained in the BPS memos dated September 20, 2024, and November 25, 2024, the adopted EOA found a surplus of 54 acres of land in Harbor and Airport Districts, which has subsequently been reduced through other land use actions to 6 acres. The EOA also identified a surplus of 66 acres of industrial land in the Columbia East District, a district that can accommodate similar land uses as the Harbor and Airport Districts. No land use actions have affected the supply of land in the Columbia East district since adoption of the EOA. Therefore, the EOA shows a citywide surplus of 62 acres with the MPAP land use change. Further, the MPAP amendments support economic development with the inclusion of requirements for nonresidential floor area in the Central Employment (EX) zone in the new York Plan District (PCC 33.597), and the application of the General Employment (EG1) zone in a transitional buffer area along the southside of NW Nicolai Street. In addition, the MPAP amendments are coupled with a Public Benefits Agreement that further supports economic development by including a target for creation of 400 new middle-wage jobs, and other elements that support economic development and job growth.

As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 6 (Economic Development) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 9.

**Goal 10. Housing.** To provide for the housing needs of citizens of the state.

**10. Finding:** Goal 10 specifies that each city must plan for and accommodate needed housing types. As used in ORS 197.307 “needed housing” means all housing on land zoned for residential use or mixed residential and commercial use that is determined to meet the need shown for housing within an urban growth boundary at price ranges and rent levels that are affordable to households within the county with a variety of incomes, including but not limited to households with low incomes, very low incomes and extremely low incomes. Needed housing includes attached and detached single-family housing and multiple family housing for both owner and renter occupancy; government assisted housing, mobile home or manufactured dwelling parks; manufactured homes on individual lots; and housing for farmworkers.

Goal 10 requires each city to inventory its buildable residential lands, forecast future needs, and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.

Goal 10 and its implementing administrative rules contain the following specific requirements:

1. Identify future housing needs by amount, type, tenure and affordability;
2. Maintain a residential Buildable Lands Inventory (BLI) with sufficient land to meet identified needs;
3. Adopt land use maps, public facility plans and policies to accommodate needed housing (housing capacity, as well as type, tenure and affordability);
4. Meet minimum density and housing mix requirements (including the Metropolitan Housing Rule);
5. Adopt clear and objective standards for needed housing.

The adopted 2035 Comprehensive Plan conducted citywide analyses to demonstrate compliance with Goal 10, including a buildable lands inventory and housing needs analysis that analyzed the state of housing supply, housing affordability issues and the City's ability to meet projected housing demand. The City adopted an updated 2045 Housing Needs Analysis (HNA) and 2023 Residential Buildable Lands Inventory (BLI) in December 2023 (Ordinance 191547). The HNA

provides information on the future housing need in Portland to 2045 to inform future policy decisions that can influence future housing development, and the BLI identifies the supply of land available to provide this needed housing. The HNA establishes for Portland that 97,471 additional households are expected by 2045; after factoring in vacancy rates and second home replacements, Portland's needed housing is 106,571 additional units by 2045. The BLI estimates that Portland has the capacity for 236,977 additional housing units, which is sufficient capacity to meet the requirements under Statewide Planning Goal 10: Housing and ORS197.296.

Goal 10 mandates that local jurisdictions ensure adequate capacity, and provides a "floor" for such measure, but does not restrict or prevent jurisdictions from increasing housing capacity above a set "ceiling". In other words, just because the City has shown that it meets the number of requisite units to accommodate the forecast growth, Goal 10 does not prevent the City from increasing the capacity, and especially when such increases support production in other areas of the goal (type, tenure and affordability).

The MPAP area is adjacent to and proposed to be incorporated into an expanded Northwest District Town Center, a City-designated town center. The 2035 Comprehensive Plan describes centers as places that include amongst other elements, concentrations of housing and a variety of housing types. The MPAP creates the opportunity to support housing needs and choices in the town center. The Plan's amended Comprehensive Plan Map designations create capacity for a projected minimum additional 2,000+ housing units.

The following elements of the MPAP support Goal 10's mandate of increasing housing choices, tools and programs for all household types and incomes:

- Comprehensive Plan map amendments that change 29.8 acres and Zoning map amendments that rezone 29.8 acres of land area from exclusively industrial and employment to a central employment (EX) designation that allows a broad mix of uses. This introduces housing as an allowed use in the area and therein increases future residential unit capacity.
- Creation of new plan district regulations in the zoning code, including incentives and minimum densities, serve to encourage development of more housing as well as affordable housing through the Inclusionary Housing Program. Plan district provisions also encourage projects that have a higher proportion of affordable units than required by the Inclusionary Housing Program provisions. These incentives support a broader range of housing options and affordability levels in the plan area.

A public benefits agreement with the property owners of the former ESCO Steel site further supports inclusion of affordable housing at the 60% area median income level, increasing the diversity of housing affordability levels in the area.

As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 5 (Housing) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 10.

**Goal 11. Public Facilities and Services.** To plan and develop a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

**11. Finding:** Statewide Planning Goal 11, Public Facilities, requires cities to adopt and update public facilities plans. Public facilities plans ensure that urban development is guided and supported by types and levels of water, sewer and transportation facilities appropriate for the needs and

requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement.

The adopted 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017. The CSP includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects, consistent with the requirements of Statewide Planning Goal 11.

Findings addressing water, sanitary sewage disposal, stormwater management, and school district capacity are found in findings in response to Comprehensive Plan Chapter 8 policies. Findings addressing transportation systems are in response to Chapter 9 policies. The findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies with Statewide Planning Goal 11.

**Goal 12. Transportation.** To provide and encourage a safe, convenient and economic transportation system.

**12. Finding:** This goal requires Portland to adopt a Transportation System Plan (TSP) that supports safe, convenient, and economical movement of people and goods, and supports a pattern of travel that will avoid air pollution, traffic, and livability problems. Parts, but not all, of the City's TSP have to be adopted as part of the Comprehensive Plan.

All cities are required to provide safe and convenient motor vehicle, pedestrian, and bicycle travel on a well-connected network of streets. Larger cities are required to provide for transit service and to promote more efficient performance of existing transportation facilities through transportation system management and demand management measures.

Goal 12 rules require coordination with the state and regional transportation plans (such as the Oregon Highway Plan and the Regional Transportation Plan), and with other transportation providers.

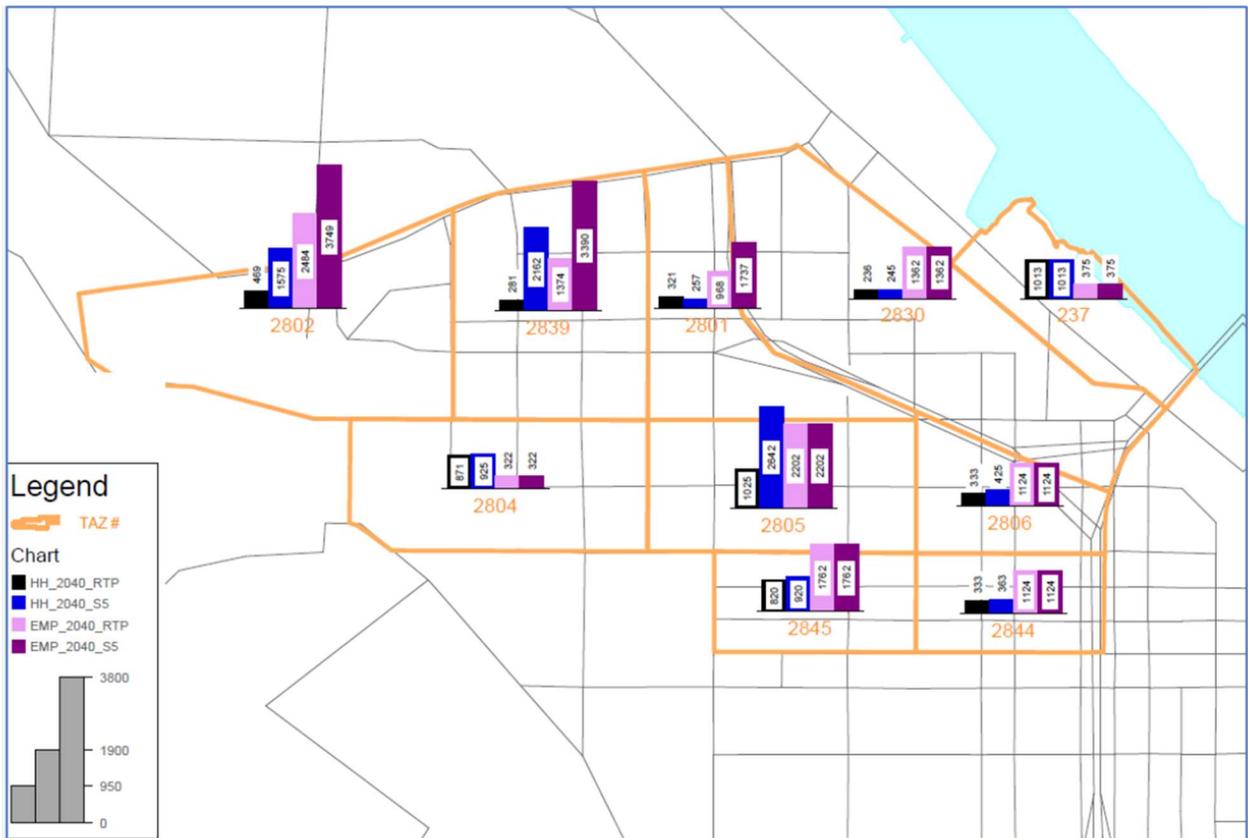
Under Oregon Administrative Rule (OAR) 660-012-0060, if an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would have significant effect on an existing or planned transportation facility, then the local government must put in place certain remedies provided in the rule.

"Significant effect" as defined in the rule indicates degrading the performance of a facility such that it will not meet state, regional, or local performance standards. State, regional, and local transportation plans establish identical mobility targets based on volume to capacity, or "V/C," ratios. These standards generally specify a V/C ratio of .99 for two-hour peak operating conditions through a 20-year horizon. Ratios of 1.1 are allowed for one peak hour on some routes, including within Town Centers. Where roads don't already meet the standards, the land use amendments should not make the problem worse. While there are several initiatives underway to consider changes to these performance measures to put more emphasis on multimodal outcomes, those changes have not yet been adopted.

When there is a significant effect, remedies may include incorporating mitigating measures into the plan, adding new facilities to the TSP that address it, and/or changing the performance standards. A jurisdiction may also balance the impact on one mode with improvements that will benefit another mode (for example, bike, pedestrian, or transit improvements may mitigate detrimental traffic impacts).

To understand the traffic impacts of the MPAP zoning changes, BPS first estimated the increase in residential units and jobs by 2040 associated with the zoning changes. This analysis yielded an estimated overall maximum increase in the MPAP area used for traffic analysis of 4,825 new housing units and 4,050 new jobs by 2040, with these estimates allocated by Transportation Analysis Zone (TAZ) based on the locations of the zone changes. The growth analysis was based upon the Buildable Lands Inventory (BLI) model, which estimates the development capacity of land, and an allocation of forecasted citywide housing and employment growth through 2040 to the area using recent (five-year) trends. The adjusted growth data was then provided to the Portland Bureau of Transportation (PBOT).

The MPAP study area utilized for the traffic analysis makes up 10 TAZs in the City’s 2040 Regional Transportation Plan – City Comprehensive Plan (RTP-Comp) travel demand model, as indicated in the location and allocation plot below. Of the 10 MPAP study area TAZs, four TAZs (2802, 2839, 2801, and 2805) make up 94% and 100% of the total estimated increases in new housing and new jobs over the base model, respectively.



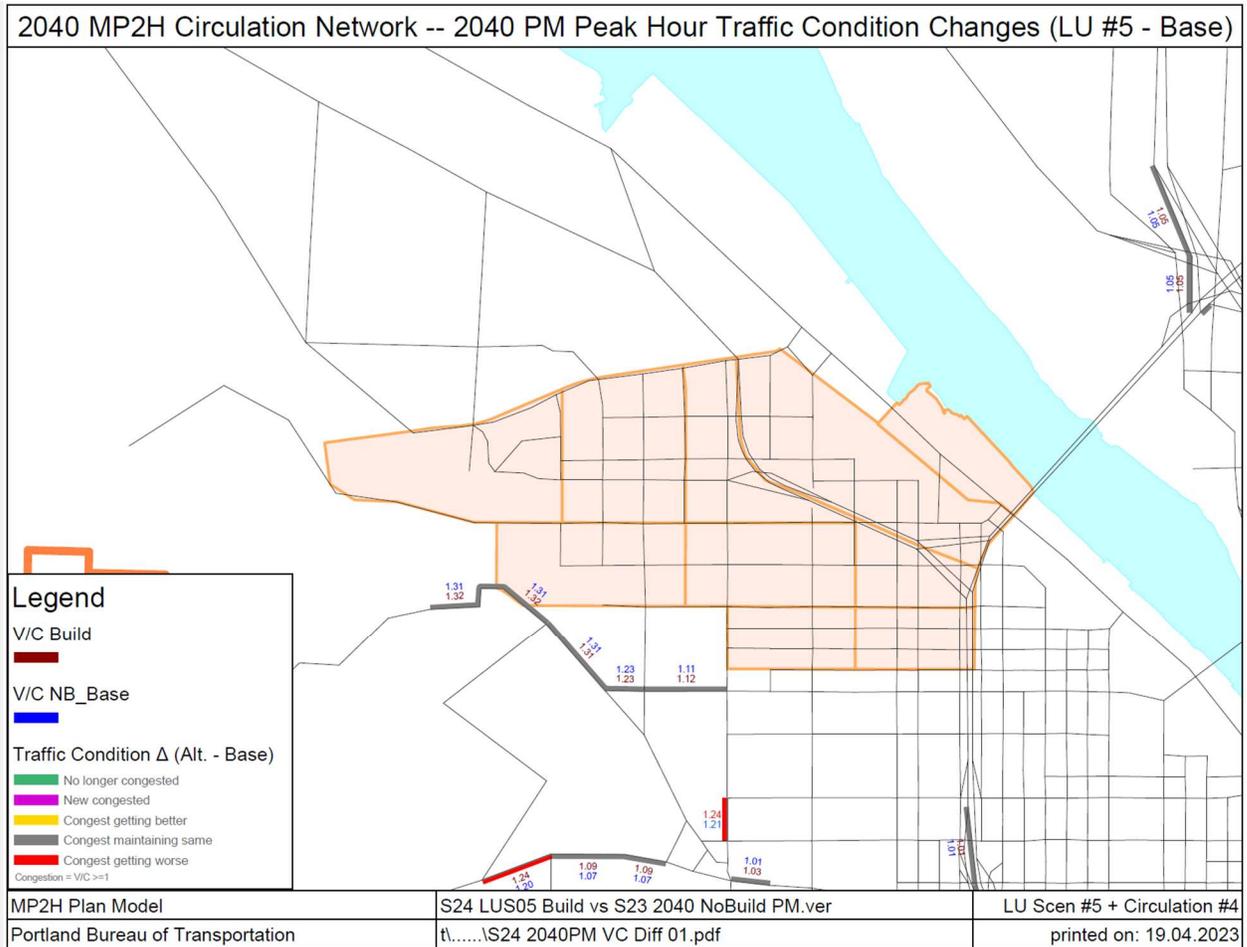
Using the adjusted growth allocation data provided by BPS, PBOT then used the 2040 RTP-Comp PM Peak Hour travel demand model as the base model for the future traffic projection analysis. RTP-Comp model data was used to determine which road segments the additional households and employees in the MPAP study area would likely use. Mode split was also estimated using PM Peak Hour added auto demands resulting from the adjusted growth allocation data. A 10% discount was applied to auto trips to reflect mode shift resulting from the additional land use measures in the MPAP (creation of a denser more mixed-use land pattern), as well as active transportation improvements and high-capacity streetcar expansion to the area through implementation of the

financially-constrained adopted TSP project Montgomery Park Streetcar Extension (ID 60035). The model network was adjusted to better reflect proposed transportation circulation improvements in the MPAP area over the RTP-Comp, including extensions of area streets, a prohibition of southbound left turn movement at the intersection of NW Vaughn Street and NW 23<sup>rd</sup> Avenue toward US-30, and turn prohibitions at the intersection of NW Vaughn Street and NW 24<sup>th</sup> Avenue. The analysis assumed that new added traffic would maintain the same travel patterns as the base model for both Trip Generation and Origin and Destination (OD) distribution. More detailed information is available in a presentation on the record.

Within the MPAP study area, PBOT staff calculated the increase in PM Peak Hour traffic demands, which resulted in a total of 1,702 additional PM Peak Hour vehicle trips over the base model. These additional trips represent a 36% increase in auto demand over the base.

To identify potentially congested road segments, PBOT staff then reviewed the traffic pattern from the 2040 base model and assessed the potential additional traffic from the adjusted growth allocation traffic pattern, which concluded that no more than 100 vehicles would be added to any streets surrounding the MPAP area with an average increase of 35 vehicles per hour (representing an average 5% increase over the base model demand per segment). PM Peak Hour V/C ratios were also calculated.

In the plot below, results have been expressed in terms of V/C ratios indicating where congestion will exceed a V/C ratio of 1.0. Both the base model and the MPAP results are shown for comparison, showing any segments that are congested and remaining the same compared to the base; or congested and getting worse compared to the base.



No street segments within the MPAP study area TAZs are expected to experience worse congestion than the 2040 base assumption. However, there are two street segments in the broader network that exceed a V/C ratio of 1.0 and are expected to experience worse congestion than the base: NW 23<sup>rd</sup> Avenue and W Burnside Road. The congested roadways are PBOT facilities. While NW 23<sup>rd</sup> Avenue is in a Town Center, its expected V/C ratio exceeds the allowable PM Peak Hour V/C ratio of 1.1.

Pursuant to OAR 660-0120060 (2) (e), PBOT has planned remedies to address the congestion impact identified in the analysis:

- The MPAP recommends several additional bike, pedestrian, and local automobile circulation projects, beyond what is already included in the City TSP, to mitigate detrimental traffic impacts, including additional facilities through street grid connections in the MPAP, improved active transportation routes in and around the area, and the expansion of a Pedestrian District and required supportive sidewalk corridor widths to the area. These recommendations are described in Volume 3 of the plan. Associated TSP amendment recommendations are also described in Volume 3.
- PBOT has proposed and been implementing several transit priority treatments for bus lines that run on the corridors on which the congested segments are located. These corridors are part of the primary transit network prioritized for transit priority treatments, called

“Enhanced Transit Corridors” or “Rose Lanes”, adopted as a modal plan in the City TSP. These improvements will help mitigate detrimental traffic by making transit more reliable and attractive for people to meet their daily needs without a personal automobile.

- Estimated mode share data for the traffic analysis, even with the 10% reduction for mode shift, assumes a conservative mode shift for the MPAP area. The expansion of high-capacity transit to the area indicates preliminary modeled expected ridership in 2040 of 3,000 average weekday riders along the proposed streetcar extension. The proposed streetcar extension to Montgomery Park is already included in the financially constrained TSP Project List (60035), as well as the financially constrained RTP Project List (11319)
- The TSP contains several projects on the financially constrained project list to improve multimodal conditions on W Burnside Road, to support active transportation and to mitigate expected congestion along the corridor. Some of these projects have already been funded and implemented, with others expected to be constructed by 2040.
- Beyond the TSP project list, PBOT also has proposed several short-term active transportation improvement projects to facilitate safer, more accessible, and more comfortable pedestrian and bicycle connections throughout Northwest Portland in the recent City Council adopted “Northwest in Motion” plan. These projects are intended to fill gaps in the pedestrian and bicycle network to support mode shift toward walking, rolling, biking, and accessing transit. Several projects have been implemented, with the rest funding contingent within a 10-year timeframe. Continued prioritization of funding allocation for these improvements will be sought.
- The zoning code for the MPAP includes development standards that further cultivate and support a pedestrian oriented and dense mixed-use employment district where people can meet their daily needs without a personal automobile. These include active use and ground floor window requirements along NW Wilson Street near the proposed streetcar extension, restrictions on commercial and surface parking, limits on driveway locations, and supplemental standards near the streetcar transit route. Specific code language is found in Volume 2 of the plan.
- The combined above result in system-wide benefits that PBOT approves as sufficient to balance the significant effects identified in the above analysis.

Two freeway interchanges are located in the MPAP area. Offramp congestion can be safety issue if vehicle queues extend beyond the offramps into freeway through lanes. Because of this concern and the proximity of the proposed zone changes to ODOT offramps, PBOT completed a supplemental planning-level safety analysis to estimate the potential maximum queue length at the ramps in the MPAP study area during the 2040 PM Peak Hour. Based on that analysis, PBOT estimated that the maximum offramp queue lengths with expected demand would be shorter than their ramp lengths and do not present an offramp safety issue.

For the above reasons, the MPAP is consistent with OAR 660-012-0060.

As noted below in the findings for the 2035 Comprehensive Plan, the MPAP amendments are consistent with the goals and policies of Chapter 9 (Transportation) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the MPAP complies Statewide Planning Goal 12.

**Goal 13. Energy Conservation.** To conserve energy.

**13. Finding:** The State has not adopted specific rules for complying with Statewide Planning Goal 13. Goal 13 generally requires that land use plans contribute to energy conservation. The MPAP amendments do not adopt or amend a local energy policy or implementing provisions.

The MPAP amendments support energy conservation with the following actions:

- Expands mixed-use employment zoning at the edge of an existing town center and near transit corridors, allowing for more housing and jobs in locations close to services and where people can walk, bike, or take transit to destinations, allowing for less driving and reduced energy consumption.
- Amendments expanding mixed-use employment zoning will allow for more compact housing in the plan area that is energy- and resource-efficient. The plan will require a minimum housing density of 87 units/acre when housing is developed. This density, combined with floor area and height allowances, will result in a compact, dense form of multi-family housing. According to a study published by Oregon DEQ, A Life Cycle Approach to Prioritizing Methods of Preventing Waste from the Residential Construction Sector in the State of Oregon, of 30 different material reduction and reuse practices evaluated, reducing home size and multi-family living achieved the largest greenhouse gas reductions along with significant reductions in other impact categories, including energy use. Reducing home size by 50 percent results in a projected 36 percent reduction in lifecycle greenhouse gas emissions. Reducing home size is a significant leverage point for environmental impact reduction and may be equivalent to achieving minimum levels of "green" certification.
- Plans for an extension of streetcar service to the area and recommends transportation projects to support multimodal options for walking, biking, and transit. This supports alternatives to driving and allows for a reduction in energy use associated with travel by car.
- Therefore, the MPAP complies with Statewide Planning Goal 13.

**Goal 14. Urbanization.** To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

**14. Finding:** Metro exercises Goal 14 obligations on behalf of Portland and other cities within the Metropolitan region. Metro has adopted an Urban Growth Management Functional Plan and compliance with this plan by constituent cities assures compliance with Goal 14, which is discussed in Part II of this document and those findings are incorporated by reference.

As discussed above under Goal 9 and Goal 10, the MPAP amendments will increase the residential and job development capacity in the plan area, located inside the urban growth boundary, further enabling the City to accommodate its forecasted growth. Therefore, the MPAP complies with Statewide Planning Goal 14.

**Goal 15. Willamette River Greenway.** To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

**15. Finding:** Statewide Planning Goal 15 requires cities to adopt local greenway plans, along with criteria for new development, new uses, and the increase of uses along the river. The City

implements Statewide Planning Goal 15 through application of the Greenway and River overlay zones.

The MPAP amendments do not affect the Greenway or River overlay zones regulations. Therefore, MPAP complies with Statewide Planning Goal 15.

## Part II. Metro Urban Growth Management Functional Plan

Under ORS 268.380 and its Charter, Metro has the authority to adopt regional plans and require city and county comprehensive plans to comply with the regional plan. Metro adopted its Urban Growth Management Functional Plan under this authority.

In Metro’s June 2011 update to its 2010 compliance report Metro found, “The City of Portland is in compliance with all Urban Growth Management Functional Plan requirements in effect on December 15, 2010, except for Title 13, Nature in Neighborhoods. On January 16, 2013 the City received a letter from Metro stating that Portland had achieved compliance with Title 13.

**Title 1. Housing Capacity**

**Title 2. Regional Parking Policy.** (Repealed Ord. 10-1241B, Sec. 6, 1997)

**Title 3. Water Quality and Flood Management.**

**Title 4. Industrial and Other Employment Areas.**

**Title 5. Neighboring Cities** (Repealed Ord. 10-1238A, Sec. 4, 1997)

**Title 6. Centers, Corridors, Station Communities and Main Streets.**

**Title 7. Housing Choice.**

**Title 8. Compliance Procedures.**

**Title 9. Performance Measures.** (repealed Ord. 10-1244B, Sec. 8, 2010)

**Title 10. Functional Plan Definitions.**

**Title 11. Planning for New Urban Areas.**

**Title 12. Protection of Residential Neighborhoods.**

**Title 13. Nature in Neighborhoods.**

**Title 14. Urban Growth Management Plan.**

**Title 1. Housing Capacity.** The Regional Framework Plan calls for a compact urban form and a “fair-share” approach to meeting regional housing needs. It is the purpose of Title 1 to accomplish these policies by requiring each city and county to maintain or increase its housing capacity, especially in centers, corridors, main streets, and station communities, except as provided in section 3.07.120.

**16. Finding:** As discussed above under in Part 1, Goal 10, the plan amendments include map changes from Industrial and Employment zones to the Central Employment zone. These changes increase the City’s housing capacity by allowing residential uses in an area where these uses were previously prohibited. Further, the MPAP is proposed to be a high-density neighborhood incorporated into the existing Northwest Town Center, meeting the Title 1 policy goal of increasing housing capacity within centers, corridors, main streets, and station communities. The MPAP is also adjacent to a public transit, commercial districts, and recreation opportunities; furthering the goal of compact urban form. Therefore, the MPAP complies with the applicable requirements of Metro Title 1.

**Title 2. Regional Parking Policy.** (Repealed Ord. 10-1241B, Sec. 6, 1997)

**Title 3. Water Quality and Flood Management.** To protect the beneficial water uses and functions and values of resources within the Water Quality and Flood Management Areas by limiting or mitigating the impact on these areas from development activities and protecting life and property from dangers associated with flooding.

**17. Finding:** Title 3 calls for the protection of the beneficial water uses and functional values of resources within Metro-defined Water Quality and Flood Management Areas by limiting or

mitigating the impact of development in these areas. Title 3 establishes performance standards for 1) flood management; 2) erosion and sediment control; and 3) water quality. The City implements zoning regulations (Title 33.430, 33.440, 33.465, 33.475, 33.510, 33.515, 33.537, 33.563, 33.631, 33.640), as well as erosion control and balanced cut-and-fill standards (Title 10 and Title 24). Metro has found the City to be in substantial compliance with Title 3. This ordinance does not affect any of these overlays or regulations. Therefore, MPAP complies with the applicable requirements of Metro Title 3.

**Title 4. Industrial and Other Employment Areas.** The Regional Framework Plan calls for a strong regional economy. To improve the economy, Title 4 seeks to provide and protect a supply of sites for employment by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs), Industrial and Employment Areas. Title 4 also seeks to provide the benefits of "clustering" to those industries that operate more productively and efficiently in proximity to one another than in dispersed locations. Title 4 further seeks to protect the capacity and efficiency of the region's transportation system for the movement of goods and services and to encourage the location of other types of employment in Centers, Corridors, Main Streets and Station Communities. The Metro Council will evaluate the effectiveness of Title 4 in achieving these purposes as part of its periodic analysis of the capacity of the urban growth boundary.

**18. Finding:** The purpose of Title 4 is to maintain a regional supply of existing industrial and employment land by limiting competing uses for this land. Metro has not adopted a Statewide Planning Goal 9 economic opportunities analysis for the region, so Title 4 is not based on an assessment of the land needed for various employment types, nor do the Title 4 maps necessarily depict lands most suitable to accommodate future job growth. Rather, Title 4 seeks to protect the manufacturing, warehousing, and distribution of goods within three types of mapped areas by limiting competing uses. These three areas are Regionally Significant Industrial Areas (RSIAs), Industrial Areas, and Employment Areas.

The proposed MPAP map amendments change the zoning designations on 42 acres with a Title 4 designation, including the removal of approximately 30 acres of industrial land from the Regionally Significant Industrial Areas map in Title 4. The changes from industrial and employment designations and zones to the Central Employment and Mixed-Employment designations and corresponding zones creates conflicts with the limitations on some commercial uses as described in Title 4. The Metro Council is currently considering amending the Title 4 map to remove this area; the issue is tentatively scheduled for a vote to amend the Title 4 map in early 2025. Should the Metro Council adopt the Title 4 Map amendment, the Title 4 Map will no longer apply to the MPAP area. The effective date of the City Ordinance is scheduled to ensure the plan does not go into effect until the Metro Title 4 Map is amended.

Therefore, conditional upon a Title 4 Map amendment, the MPAP complies with the applicable requirements of Metro Title 4.

**Title 5. Neighboring Cities** (Repealed Ord. 10-1238A, Sec. 4, 1997)

**Title 6. Centers, Corridors, Station Communities and Main Streets.** The Regional Framework Plan identifies Centers, Corridors, Main Streets and Station Communities throughout the region and recognizes them as the principal centers of urban life in the region. Title 6 calls for actions and investments by cities and counties, complemented by regional investments, to enhance this role. A regional investment is an investment in a new high-capacity transit line or designated a regional investment in a grant or funding program administered by Metro or subject to Metro's approval.

**19. Finding:** Title 6 establishes eligibility criteria for certain regional investments, and the use of more flexible trip generation assumptions when evaluating transportation impacts. Title 6 also contains aspirational activity level targets for different Metro 2040 place types. This title is incentive-based, so these findings simply serve to document intent. There are no specific mandatory compliance standards in Title 6 that apply to this ordinance.

Metro has designated the areas that may qualify for these regional incentives, including transit stations, the Central City, Gateway regional center, along with Hollywood, Hillsdale, Raleigh Hills, West Portland, Lents, and St. Johns town centers. The MPAP amendments help achieve the intent of the Metro 2040 Growth Concept by:

- Incorporating the MPAP plan area into the existing Northwest District Town Center.
- The MPAP is accompanied by a proposed expansion of the Portland Streetcar into the plan area, serving existing and new future residents and employees with high-capacity transit.
- Plan district provision include requirements for non-residential floor area and affordable commercial space in addition to incentives for additional inclusionary housing.
- In addition to the regulatory provisions described above, the MPAP project is accompanied by a public benefits agreement with property owners of the former ESCO Steel site within the plan area to support affordable housing in the area by providing incentives working in tandem with the zoning code.

Therefore, the MPAP complies with the applicable requirements of Metro Title 6.

**Title 7. Housing Choice.** The Regional Framework Plan calls for establishment of voluntary affordable housing production goals to be adopted by local governments and assistance from local governments on reports on progress towards increasing the supply of affordable housing. It is the intent of Title 7 to implement these policies of the Regional Framework Plan.

**20. Finding:** Title 7 addresses housing choice. Metro adopted voluntary affordable housing goals for each city and county in the region for the years 2001 to 2006, but never updated them. Therefore, Title 7 does not apply. Nevertheless, the recently adopted *2035 Comprehensive Plan* includes city-wide affordable housing production goals that greatly exceed those adopted by the outdated Title 7 (Ordinance 178832). In addition to the City’s inclusionary housing requirements in the zoning code (within Chapter 33.245), the MPAP creates new plan district regulations (33.597), including incentives for higher proportions of affordable housing than normally required, and minimum densities, supporting a broader range of housing choices in the plan area.

Therefore, the MPAP complies with the applicable requirements of Metro Title 7.

**Title 8. Compliance Procedures.** Title 8 addresses compliance procedures and establishes a process for ensuring city or county compliance with requirements of the Urban Growth Management Functional Plan and for evaluating and informing the region about the effectiveness of those requirements. An amendment to a city or county comprehensive plan or land use regulation shall be deemed to comply with the functional plan upon the expiration of the appropriate appeal period specified in ORS 197.830 or 197.650 or, if an appeal is made, upon the final decision on appeal. Once the amendment is deemed to comply, the functional plan requirement shall no longer apply to land use decisions made in conformance with the amendment. A city or county proposing an amendment to a comprehensive plan or land use regulation shall submit the proposed amendment to Metro at least 35 days prior to the first evidentiary hearing on the amendment.

**21. Finding:** Required notice was provided to Metro more than 35 days before the first evidentiary hearing on April 15, 2024. Title 8 also requires the City to provide findings of compliance with the *Urban Growth Management Functional Plan*. These findings meet this requirement. Therefore, the MPAP complies with Metro Title 8.

**Title 9. Performance Measures.** (repealed Ord. 10-1244B, Sec. 8, 2010)

**Title 10. Functional Plan Definitions.** Title 10 contains definitions.

**22. Finding:** When 2035 Comprehensive Plan uses a term found in Title 10 either the term has the same meaning found in Title 10, or the difference is explained. The MPAP amendments do not change any definitions in the 2035 Comprehensive Plan that are also found in Title 10. Therefore, the MPAP complies with Metro Title 10.

**Title 11. Planning for New Urban Areas.** The purpose of Title 11 to guide long range planning for urban reserves and areas added to the UGB. It also provides interim protection for areas added to the UGB until city or county amendments to land use regulations to allow urbanization to become applicable to the areas.

**23. Finding:** The amendments do not add areas to the UGB. Therefore, Metro Title 11 is not applicable.

**Title 12. Protection of Residential Neighborhoods.** Existing neighborhoods are essential to the success of the 2040 Growth Concept. The intent of Title 12 of the Urban Growth Management Functional Plan is to protect the region's residential neighborhoods. The purpose of Title 12 is to help implement the policy of the Regional Framework Plan to protect existing residential neighborhoods from air and water pollution, noise, and crime and to provide adequate levels of public services.

In order to protect these areas, Metro shall not require any city or county to authorize an increase in the residential density of a single-family neighborhood in an area mapped solely as Neighborhood. In addition, specific limits on access to commercial services are applied to commercial uses within designated neighborhood centers in order to reduce air pollution and traffic congestion. This Title also calls on Cities to establish a level of service standard for parks and greenspaces that calls for a park facility within a specified distance of all residences.

**24. Finding:** Title 12 largely restricts Metro's authority to plan and regulate density in single-family neighborhoods. The MPAP amendments were originated by the City's legislative process, respond to locally identified needs, and are not at the direction of Metro. The MPAP amendments include an expansion of the NW Town Center to include the MPAP. The proposed map amendments from industrial and employment zones to central and mixed employment will add a range of permitted commercial uses to the NW District, meeting the intent of 3.07.1230. No existing residential neighborhoods are directly included in the plan area or any of the proposed amendments. The City has already established a goal in its Parks 2020 Vision of providing a basic, developed Neighborhood Park facility within a half mile of every Portland resident, and a Community Park within a mile of every resident. Therefore, the MPAP complies with Metro Title 12.

**Title 13. Nature in Neighborhoods.** The purposes of this program are to (1) conserve, protect, and restore a continuous ecologically viable streamside corridor system, from the streams' headwaters to their confluence with other streams and rivers, and with their floodplains in a manner that is integrated with upland wildlife habitat and with the surrounding urban landscape; and (2) to control and prevent water pollution for the protection of the public health and safety, and to maintain and improve water quality throughout the region.

**25. Finding:** Title 13 is expressly intended to provide a minimum baseline level of protection for identified Habitat Conservation Areas. Local jurisdictions may achieve substantial compliance with Title 13 using regulatory and/or non-regulatory tools. The City of Portland implements Title 13 through its adopted Natural Resources Inventory (NRI) and environmental overlay zone protection measures, which Metro has found to be in substantial compliance with Title 13. The MPAP does not include any amendments impacting Title 13.

Therefore, the MPAP complies with the applicable requirements of Metro Title 13.

**Title 14. Urban Growth Management Plan.** Title 14 addresses the regional urban growth boundary.

**26. Finding:** The MPAP project does not amend the current regional urban growth boundary. This Title does not apply.

### **Summary, Urban Growth Management Functional Plan Findings**

**27. Finding:** The Metro Title 10 definition of comply or compliance means “substantial” rather than absolute compliance. "Substantial compliance" means city comprehensive plans and implementing ordinances, on the whole, conform with the purposes of the performance standards in the functional plan and any failure to meet individual performance standard requirements is technical or minor in nature.

For the facts and reasons stated above the MPAP substantially complies with all applicable Urban Growth Management Functional Plan requirements.

## Part III. Portland’s Comprehensive Plan

Portland’s 2035 Comprehensive Plan was adopted as part of Task Four of Periodic Review. Task Four was adopted by Ordinance No. 187832 on June 15, 2016. The 2035 Comprehensive Plan was amended as part of Task Five of Periodic Review, which was adopted by Ordinance No. 188177 on December 21, 2016. Both ordinances were made effective on May 24, 2018 by Ordinance No. 188695, and both Tasks Four and Five were approved by LCDC Order 18 – WKTSK – 001897 on August 8, 2018.

**28. Finding:** The City Council has identified the following guiding principles, goals and policies to be applicable to the MPAP project.

### Guiding Principles

The 2035 Comprehensive Plan adopted five “guiding principles” in addition to the goals and policies typically included in a comprehensive plan. These principles were adopted to reinforce that implementation of the plan needs to be balanced, integrated and multi-disciplinary, and the influence of each principle helps to shape the overall policy framework of the plan. While the policies in the Comprehensive Plan effectively ensure that the guiding principles are met, the findings below further demonstrate that in addition to meeting those specific policies on balance, the amendments in MPAP are consistent with these guiding principles as described below.

**Economic Prosperity.** Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

**29. Finding:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of supporting a robust and resilient low-carbon economy, employment growth with living-wage jobs that fosters household prosperity.

The MPAP amendments support a low-carbon economy by supporting compact urban development in an expansion of the Northwest District Town Center that is close to services and transit, therein helping people have access to housing, employment, and transportation choices that can reduce cost of living as well as carbon emissions. The MPAP fosters employment growth by requiring and incentivizing non-residential uses and expanding opportunities for transit-oriented employment.

Equitably distributed household prosperity means that the economic benefits of a prosperous city are broadly accessible to satisfy essential needs, advance wellbeing, and achieve full potential. Council finds that household prosperity is equitably distributed across a range of income levels and all neighborhoods have access to amenities and services.

The MPAP amendments foster employment growth through application of Central Employment Comprehensive Plan designation and zoning, along with zoning code requirements for nonresidential floor area, and bonuses and incentives for affordable commercial space and key employment uses. These amendments will promote a range of employment opportunities in the area and contribute to equitably distributed household prosperity. The regulatory measures are supplemented by a Public Benefits Agreement that specifies middle-wage job creation (400 middle-wage jobs, which are low barrier-to entry), and specifies funding for job training and other resources if on-site targets are not met.

The MPAP amendments contribute to equitably distributed household prosperity by including incentives and zoning map changes for the creation of more housing choices as well as affordable

housing in a “high opportunity area” – as identified by the Portland Housing Bureau’s opportunity area mapping analysis - close to high quality amenities and job centers. Planning and preparing for future investments through MPAP will increase access to economic, educational, and housing opportunities and result in households of a range of income levels having increased access to jobs, amenities, and services.

Therefore, the MPAP complies with the economic prosperity guiding principle. See also findings for relevant policies in Chapters 5 and 6.

**Human Health.** Avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives.

**30. Finding:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of minimizing health impacts and increasing opportunities for Portlanders to lead healthy, active lives. Council finds this principle is met in part through the Comprehensive Plan “complete neighborhoods” strategy.

The Montgomery Park Area Plan (MPAP) proposes the creation of a new, transit-oriented mixed-use neighborhood as an extension of the NW District Town Center. The area is currently a partly underutilized industrial area, and the plan envisions a transition to a vibrant mixed use employment district that will support both job growth and housing development. The plan is in an opportunity rich area close to an array of amenities and services that support human health such as parks and open spaces, frequent transit service, schools, libraries, hospitals, grocery stores, and array of other everyday services.

The MPAP includes vision statements, policies, actions, and implementation tools that directly support reductions in negative health impacts and support opportunities for Portlanders to lead healthy active lives, such as:

- New housing and employment opportunities that contribute to Portlanders access to housing and employment stability and access to opportunity.
- Expansion of mixed-use employment zoning at the edge of an existing town center and industrial employment area, near transit corridors, allowing more people access to a location close to services and where they can more easily walk, bike, or take transit to daily destinations.
- Extension of streetcar service to the area and recommended transportation projects to support multimodal options for walking, biking, and transit use.
- Requirements that will add more trees, vegetation and open space throughout the plan area will support climate resilience, heat island reductions, and air quality, as well as general overall human health.

Therefore, the MPAP complies with the human health guiding principle.

**Environmental Health.** Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland’s air, water and land.

**31. Finding:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of including space for the health of natural resources and the ecosystem in the design and development of the city. This space can be in parks, streams, natural areas, along streets as well as on sites with development.

The best performance occurs when the supply and design of these different types of spaces create, or “weave”, intentional or ad-hoc pathways for wildlife through the city.

The Montgomery Park Area Plan (MPAP) proposes the creation of a new, transit-oriented mixed-use employment neighborhood in the area west of Highway 30 between NW Vaughn and south of NW Nicolai. The area is currently a partially underutilized industrial area, and the plan envisions a transition to a vibrant mixed-use employment district that will support both job growth and housing development. The MPAP includes vision statements, policies, actions, and implementation tools that directly address the desire to weave parks, open areas, trees, and other green features into the new neighborhood, including the following:

- As the Montgomery Park plan area transitions from an industrial area to a new mixed-use neighborhood, the boundary of the industrial district will be relocated from NW Vaughn to NW Nicolai. The MPAP urban design framework envisions NW Vaughn being redeveloped with more trees and landscaping to reinforce the area's connection to Forest Park – a new ‘green curtain’ to replace the former ‘steel curtain’.
- In addition to the improvements envisioned along NW Vaughn, the MPAP urban design framework also shows how future street and transportation improvements, primarily along the proposed streetcar extension, will create new connections within the plan area. Trees and additional landscaping will be a part of these improvements, significantly increasing the amount of tree canopy and vegetation in the district above what exists today.
- The new transit-oriented mixed-use district is expected to support thousands of workers and residents in the future. While Northwest Portland currently includes neighborhood parks (Couch Park, Wallace Park) as well as Forest Park which serves the broader region, a new greenspace to serve those living and working in the district is necessary. The plan offers regulatory and financial incentives to the private sector to aid in creating publicly accessible open spaces to serve the need in this district.
- The MPAP includes zoning code regulations that will ensure green elements are integrated into the urban environment to help soften the effects of built and paved areas, cool the air temperature, intercept rainfall and reduce stormwater runoff. A range of options are provided to address this area's urban development patterns and characteristics.

Therefore, the MPAP complies with the environmental health guiding principle.

**Equity.** Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and under-represented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history.

**32. Finding:** This guiding principle states that actions taken to implement the Comprehensive Plan should equitably benefit and be shaped by underserved and underrepresented communities, including communities of color. This includes heightened consideration of avoiding repetition of systematic harms city policy has caused these communities in the past.

Consideration of equitable outcomes and process were foundational elements of the MPAP. The plan includes equitable public benefits that promote reduced disparities, increased affordable

housing, increased employment and socio-economic opportunities, and increased access to a service and amenity rich, connected, and complete neighborhood.

The MPAP area is currently a partially underutilized industrial area, with a number of commercial and industrial uses and a limited number of residences in the form of eight single dwelling homes. The potential for involuntary displacement risk, both commercial and residential, was determined to be very low based on community engagement feedback and the characteristics of the area.

The community engagement elements of the plan included early work with community-based organizations with relationships or connections to underrepresented communities in, or connected to, the plan area. Each of the organizations conducted outreach to the communities they generally serve, including under-served or under-represented groups, including BIPOC community members, to understand the aspirations, concerns, and priorities of their communities. This feedback helped shape the plan and the type of public benefits that might be sought to foster equitable development. The process also included engagement of the York Street Work Group. This group raised the idea and value of commemorating York, the enslaved member of the Corps of Discovery Expedition, and also offered feedback on equitable public and community benefits in the form of comments and creation of the York Urban Village Concept, which embedded equity-oriented objectives.

As a result, the MPAP includes a variety of implementation tools intended to promote equity and support opportunities for under-served communities. These include requirements for affordable housing beyond the minimum inclusionary housing provisions; requirements for non-residential floor area minimums to provide space for employment; opportunities for affordable commercial spaces; required on-site outdoor areas for housing; and the opportunity for a significant public open space. A related public benefits agreement also supports these outcomes by establishing a middle wage jobs target for part of the plan area.

Therefore, the MPAP complies with the equity guiding principle.

**Resilience.** Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and built environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts.

**33. Finding:** The 2035 Comprehensive Plan describes resilience as “reducing the vulnerability of our neighborhoods, businesses, and built and natural infrastructure to withstand challenges – environmental, economic and social – that may result from major hazardous events.”

The 2035 Comprehensive Plan’s description of the resilience guiding principle identifies floods, extreme heat events, and economic and energy shocks as among the challenges that need to be addressed; and identifies resilient neighborhoods with local services and multi-modal streets, a low-carbon economy, and resilient natural systems as among the approaches that contribute to resilience. The MPAP sets the foundation for the creation of a resilient neighborhood with housing, jobs, local services, and transit. The plan supports resilience through encouraging and requiring new trees and vegetation as discussed in the human and environmental health guiding principles above and additionally in the following ways:

- The Plan supports neighborhood resilience by expanding the designated Northwest District town center with expanded central employment zoning that allows a broad mix of uses, which over time will allow more residents the opportunity to live within walking distance of commercial services without having to be dependent on cars to access services.

- The Plan’s recommendations for transportation projects that prioritize pedestrian, bicycle and transit access, including new streets, an extension of the streetcar line and upgraded streets over time, will facilitate the ability of residents to access services and community destinations by walking, biking, or transit, supporting a low-carbon economy and community.
- The Plan’s expansion of mixed use employment zoning will allow for redevelopment that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the area’s urban forest and helping to minimize urban heat islands in the area.
- Amendments that require inclusion of affordable commercial spaces larger new development. This supports more diversity of business and economic opportunities at a range of affordability levels. Diverse affordability levels in turn support pathways to opportunity, innovation, and long term social and economic resilience locally and regionally.

Therefore, the MPAP complies with the resilience guiding principle.

## Chapter 1: The Plan

**Goal 1.A: Multiple goals.** Portland’s Comprehensive Plan provides a framework to guide land use, development, and public facility investments. It is based on a set of Guiding Principles that call for integrated approaches, actions, and outcomes that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient.

**34. Finding:** As noted above, the MPAP amendments are consistent with the guiding principles of the Comprehensive Plan. As part of an integrated approach to meet multiple goals, the City Council has considered, weighed and balanced applicable policies, as described on page HTU-5 of the Comprehensive Plan, to determine that this ordinance on the whole complies with the Comprehensive Plan. As described below, the City Council’s decision to adopt the MPAP amendments has considered the multiple goals of the Comprehensive Plan, including the guiding principles, to determine that the adoption of this ordinance will ensure that Portland is prosperous, healthy, equitable, and resilient. Therefore, the MPAP complies with this goal.

**Goal 1.B: Regional partnership.** Portland’s Comprehensive Plan acknowledges Portland’s role within the region, and it is coordinated with the policies of governmental partners.

**35. Finding:** The findings show how the amendments are consistent with Metro’s Urban Growth Management Functional Plan and the Statewide Planning Goals, including Goal 2 which requires coordination. Metro, TriMet, and other state agencies received notice of the proposed amendments from the 35-day DLCDD notice and the City’s legislative notice. Therefore, the MPAP complies with this goal.

**Goal 1.C: A well-functioning plan.** Portland’s Comprehensive Plan is effective, its elements are aligned, and it is updated periodically to be current and to address mandates, community needs, and identified problems.

**36. Finding:** The City Council defines “effective” as being successful in producing a desired or intended result. The desired or intended result is embodied in the Guiding Principles and goals and policies of the Comprehensive Plan. These findings demonstrate how the MPAP amendments are consistent with the Comprehensive Plan, including advancing multiple goals. These changes represent updating regulatory implementation tools that respond to community needs and identified problems, especially in regard to increasing opportunity for housing, and affordable housing, while maintaining opportunity for employment through deployment of Employment

zones, and regulatory (zoning code) tools that will require nonresidential space in the plan area. Therefore, the MPAP complies with this goal.

**Goal 1.D: Implementation tools.** Portland’s Comprehensive Plan is executed through a variety of implementation tools, both regulatory and non-regulatory. Implementation tools comply with the Comprehensive Plan and are carried out in a coordinated and efficient manner. They protect the public’s current and future interests and balance the need for providing certainty for future development with the need for flexibility and the opportunity to promote innovation.

**37. Finding:** The MPAP is implemented by both regulatory and nonregulatory tools. The MPAP includes zoning map and code amendments that will implement the plan, It also includes a separate nonregulatory public benefits agreement, an innovative tool that has not been previously used in conjunction with a land use plan, that outlines performance targets and measures that cannot be achieved through zoning. The combination of tools protect the public interest by providing certainty about future development, but also include options that allow flexibility to adapt to changing circumstances. The City Council defines “flexibility” as a capability to adapt to new, different, or changing requirements and “innovation” as the introduction of something new. This approach is consistent with the goal and on balance, is equally or more supportive of the comprehensive plan as a whole than the existing implementation tools. Therefore, the MPAP complies with this goal.

**Goal 1.E: Administration.** Portland’s Comprehensive Plan is administered efficiently and effectively and in ways that forward the intent of the Plan. It is administered in accordance with regional plans and state and federal law.

**38. Finding:** As noted above, the findings show how the amendments are consistent with the guiding principles of the 2035 Comprehensive Plan. The findings additionally show how the amendments are consistent with the Urban Growth Management Functional Plan, and the Statewide Planning Goals. Metro, TriMet, and other state agencies received notice of the proposed MPAP amendments from the 35-day DLCDC notice and the City’s legislative notice. Therefore, the MPAP complies with this goal.

## The Comprehensive Plan

**Policy 1.1. Comprehensive Plan elements.** Maintain a Comprehensive Plan that includes these elements:

- **Vision and Guiding Principles.** The Vision is a statement of where the City aspires to be in 2035. The Guiding Principles call for decisions that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient.
- **Goals and policies.** The goals and policies of the Comprehensive Plan, including the Urban Design Framework, provide the long-range planning direction for the development and redevelopment of the city.
- **Comprehensive Plan Map.** The Comprehensive Plan Map is the official long-range planning guide for spatially defining the desired land uses and development in Portland. The Comprehensive Plan Map is a series of maps, which together show the boundaries of municipal incorporation, the Urban Service Boundary, land use designations, and the recognized boundaries of the Central City, Gateway regional center, town centers, and neighborhood

centers.

- **List of Significant Projects.** The List of Significant Projects identifies the public facility projects needed to serve designated land uses through 2035 including expected new housing and jobs. It is based on the framework provided by a supporting Public Facilities Plan (PFP). The Citywide Systems Plan (CSP) is the City’s public facilities plan. The Transportation System Plan (TSP) includes the transportation-related list of significant projects. The list element of the TSP is also an element of the Comprehensive Plan.
- **Transportation policies, street classifications, and street plans.** The policies, street classifications, and street plan maps contained in the Transportation System Plan (TSP) are an element of the Comprehensive Plan. Other parts of the TSP function as a supporting document, as described in Policy 1.2.

**39. Finding:** The MPAP does not change the structure of these plan elements. Therefore, the MPAP complies with Policy 1.1.

### Supporting Documents

**Policy 1.2 Comprehensive Plan supporting documents.** Maintain and periodically update the following Comprehensive Plan supporting documents.

**1. Inventories and analyses.** The following inventories and analyses are supporting documents to the Comprehensive Plan:

- Economic Opportunities Analysis (EOA)
- Buildable Lands Inventory (BLI)
- Natural Resource Inventory (NRI)
- Housing Needs Analysis (HNA)
- Willamette River Greenway Inventory (WRGI)
- Scenic Resources Inventory (SRI)

**2. Public Facilities Plan.** The Public Facilities Plan (PFP) is a coordinated plan for the provision of urban public facilities and services within Portland’s Urban Services Boundary. The Citywide Systems Plan (CSP) is the City’s public facilities plan.

**3. Transportation System Plan (TSP).** The TSP is the detailed long-range plan to guide transportation system functions and investments. The TSP ensures that new development and allowed land uses are consistent with the identified function and capacity of, and adopted performance measures for, affected transportation facilities. The TSP includes a financial plan to identify revenue sources for planned transportation facilities included on the List of Significant Projects. The TSP is the transportation element of the Public Facilities Plan. Certain components of the TSP are elements of the Comprehensive Plan. *See Policy 1.1.*

**4. School Facility Plans.** School facility plans that were developed in consultation with the City, adopted by school districts serving the City, and that meet the requirements of ORS 195 are considered supporting documents to the Comprehensive Plan

**40. Finding:** The MPAP includes recommended updates to the Transportation System Plan as described in Volume 3 of the plan and discussed in this document in the findings for Policy 9, but does not include updates to any other facilities plans, including school facilities plans. Therefore, the MPAP complies with Policy 1.2.

## Implementation tools

**Policy 1.3. Implementation tools subject to the Comprehensive Plan.** Maintain Comprehensive Plan implementation tools that are derived from, and comply with, the Comprehensive Plan. *Implementation tools include those identified in policies 1.4 through 1.9.*

**41. Finding:** The MPAP amendments maintain and amend the Comprehensive Plan implementation tools as described below in Policies 1.4 through 1.9. Compliance with the comprehensive policies and guiding principles for relevant amendments are demonstrated elsewhere in these findings. Therefore, the MPAP complies with Policy 1.3.

**Policy 1.4. Zoning Code.** Maintain a Zoning Code that establishes the regulations that apply to various zones, districts, uses, and development types.

**42. Finding:** Title 33 is the adopted and effective zoning code tool for the city. The MPAP updates the zoning code to implement the plan by creating a new plan district (33.597, York Plan District) and amending other elements of Title 33 in a manner consistent with the Comprehensive Plan and MPAP. Compliance with the comprehensive policies and guiding principles are demonstrated elsewhere in these findings. Therefore, the MPAP complies with Policy 1.4.

**Policy 1.5 Zoning Map.** Maintain a Zoning Map that identifies the boundaries of various zones, districts, and other special features.

**43. Finding.** The MPAP includes zoning map amendments that implement and are consistent with the goals and vision of the area plan and are consistent with application of corresponding zones as called for in the Comprehensive Plan. The MPAP proposed zoning map amendments identifies the boundaries of the proposed and existing zoning districts along with relevant special features such as overlay zones. The area is also mapped in the zoning code as the York Plan District (33.597). Compliance with the comprehensive policies and guiding principles are demonstrated elsewhere in these findings. Therefore, the MPAP complies with Policy 1.5.

**Policy 1.6 Service coordination agreements.** Maintain coordination agreements with local governments of adjoining jurisdictions concerning mutual recognition of urban service boundaries; special service districts concerning public facilities and services within Portland's Urban Services Boundary; and public school districts concerning educational facilities within Portland's Urban Services Boundary.

**44. Finding:** The city maintains several intergovernmental agreements concerning mutual recognition of urban service boundaries; special service districts concerning public facilities and services within Portland's Urban Services Boundary; and with public school districts This policy is not applicable to the MPAP because there are no changes being made to these coordination agreements.

**Policy 1.7 Annexations.** Provide a process incorporating urban and urbanizable land within the City's Urban Services Boundary through annexation. See policies 8.11-8.19 for service extension requirements for annexations.

**45. Finding:** The city has a process for incorporating urban and urbanizable land. The MPAP amendments do not include any annexations nor change current processes for incorporation of land. Therefore, this policy is not applicable.

**Policy 1.8 Urban renewal plans.** Coordinate Comprehensive Plan implementation with urban renewal plans and implementation activities. A decision to adopt a new urban renewal district, adopt or amend

goals and objectives that will guide investment priorities within a district, or amend the boundaries of an existing district, must comply with the Comprehensive Plan.

**46. Finding:** The MPAP does not include changes to existing, or any new urban renewal plans. Therefore, this policy is not applicable.

**Policy 1.9 Development agreements.** Consider development agreements entered into by the City of Portland and pursuant to Oregon Revised Statute 94 a Comprehensive Plan implementation tool.

**47. Finding:** The MPAP includes amendments to the Portland zoning map and zoning code to implement the vision and goals for the plan area. The plan does not include development agreements as defined by Oregon Revised Statute 94 (ORS 94) for implementation.

A public benefits agreement between the city and the property owner of the former ESCO Steel site supplements the regulatory tools included in the plan. The MPAP public benefits agreement does not meet the definition of a development agreement per ORS 94 as it does not specify the permitted uses of the property, set forth the future discretionary approvals required, nor the required timeframe for commencement of construction, phasing, or completion. Therefore, this policy is not applicable to the MPAP.

## Administration

**Policy 1.10. Compliance with the Comprehensive Plan.** Ensure that amendments to the Comprehensive Plan’s elements, supporting documents, and implementation tools comply with the Comprehensive Plan. “Comply” means that amendments must be evaluated against the Comprehensive Plan’s applicable goals and policies and on balance be equally or more supportive of the Comprehensive Plan than the existing language or designation.

**1.10.a** Legislative amendments to the Comprehensive Plan’s elements and implementation tools must also comply with the Guiding Principles.

**1.10.b** Legislative amendments to the Comprehensive Plan’s elements should be based on the factual basis established in the supporting documents as updated and amended over time.

**1.10.c** Amendments to the Zoning Map are in compliance with the Comprehensive Plan if they are consistent with the Comprehensive Plan Map.

**48. Finding.** The City Council finds that this is a fundamental policy of the Comprehensive Plan that guides the manner in which the City Council considers amendments to the Plan itself or any implementing regulations, such as the Zoning Code.

The City Council interprets the policy to require the Council to consider whether, after considering all relevant facts, an amendment is equally or more supportive of the Comprehensive Plan than the existing code and designations. The City Council finds that an amendment is equally supportive when it is on its face directly supported by goals and policies in the Plan. The City Council finds that an amendment is more supportive of the Comprehensive Plan when the amendment will further advance goals and policies, particularly those that are aspirational in nature. The City Council finds that the policy requires consideration as to whether amendments are equally or more supportive of the Plan as a whole. The City Council finds that amendments do not need to be equally or more supportive with individual goals and policies, but rather amendments must be equally or more supportive of the entire Comprehensive Plan. Therefore,

the City Council finds that there may be instances where specific goals and policies are not supported by the amendments but still the amendment is equally or more supportive of the entire Comprehensive Plan when considered cumulatively. The City Council finds that there is no precise mathematical equation for determining when the Plan as a whole is supported but rather such consideration requires City Council discretion in evaluating the competing interests and objectives of the plan.

Council notes that the Comprehensive Plan introduction explains that “[t]he Comprehensive Plan contains a broad range of policies for Council to consider. Each policy describes a desirable outcome. But it is unlikely that all policies are relevant to a particular decision and that a particular decision could be expected to advance all of the policies in the plan equally well . . . [E]ven the strongest policies do not automatically trump other policies. Every decision is different, with different facts. The particular policies that matter will change from one decision to another. There is no set formula—no particular number of ‘heavier’ policies equals a larger set of ‘lighter’ policies. In cases where there are competing directions embodied by different policies, City Council may choose the direction they believe best embodies the plan as a whole.” 2035 Comprehensive Plan, page HTU-5.

The MPAP amendments are a legislative amendment to the Comprehensive Plan Map, Zoning Map, and Zoning Code. These findings identify how the amendments comply with the Comprehensive Plan. That is, the amendments are evaluated against the Comprehensive Plan’s Guiding Principles, goals, and policies, as detailed throughout this set of findings. As described in the finding for Policy 1.2, the factual basis of the supporting documents is not changed by this ordinance.

The City Council has considered all applicable goals and policies to achieve an optimum outcome. Goals and policies are considered as factors which must be weighed, balanced and met on the whole, not as criteria that must be individually met. The overall purposes of the MPAP amendments are to support the city’s Comprehensive Plan goals and policies to provide housing, affordable housing, and employment, in a transit-oriented development that responds to climate challenges and improves resiliency, and advances equity and equitable development goals.

The Council finds that the project particularly advances the following interjurisdictional guidance, goals and policies, and has weighed these policies heavily. The City Council finds that the MPAP amendments are more supportive of the Comprehensive Plan than the existing regulations with regard to the goals and policies as discussed below.

- Providing Housing opportunities: As described in policies
- Advancing affordable housing opportunity:
- Minimizing displacement risk:
- Creating employment opportunity:
- Addressing climate and resiliency:

Thus, the Council finds the MPAP is, on balance, equally or more supportive of the comprehensive plan than the existing code and designations and complies with Policy 1.10.

**Policy 1.11. Consistency with Metro Urban Growth Management Functional Plan and Urban Growth Boundary.** Ensure that the Comprehensive Plan remains consistent with the Metro Urban Growth Management Functional Plan and supports a tight urban growth boundary for the Portland

Metropolitan area.

**49. Finding:** As noted earlier in these findings, the MPAP amendments are consistent with and designed to further the applicable elements of the Metro Urban Growth Management Functional Plan. See findings in Part II, Metro Urban Growth Management Functional Plan, which demonstrate consistency. It is anticipated that the Metro Urban Growth Management Functional Plan Title 4 Map will be amended to remove the MPAP area from the Title 4 map. The effective date of the MPAP amendments is set to occur after any amendment of the Metro Urban Growth Management Functional Plan Title 4 Map. Therefore, subject to amendment of the Title 4 Map, the MPAP complies with this policy.

**Policy 1.12. Consistency with Statewide Planning Goals.** Ensure that the Comprehensive Plan, supporting documents, and implementation tools remain consistent with the Oregon Statewide Planning Goals.

**50. Finding:** As noted earlier in these findings, the MPAP amendments are consistent with and designed to further the applicable elements of the Statewide Planning Goals. See findings in Part I, Statewide Planning Goals, which demonstrate consistency. Therefore, the MPAP complies with this policy.

**Policy 1.13. Consistency with state and federal regulations.** Ensure that the Comprehensive Plan remains consistent with all applicable state and federal regulations, and that implementation measures for the Comprehensive Plan are well coordinated with other City activities that respond to state and federal regulations.

**51. Finding:** The MPAP amendments were developed to be consistent with applicable state and federal regulations, including the fair housing act, and do not amend any Zoning Code sections that are required by state or federal regulations, including FEMA flood regulations and state building code requirements. Therefore, the MPAP complies with this policy.

**Policy 1.14. Public facility adequacy.** Consider impacts on the existing and future availability and capacity of urban public facilities and services when amending Comprehensive Plan elements and implementation tools. Urban public facilities and services include those provided by the City, neighboring jurisdictions, and partners within Portland’s urban services boundaries, as established by Policies 8.2 and 8.6.

**52. Finding:** As demonstrated in the findings for Statewide Planning Goal 11 and Chapter 8 (Public Facilities and Services) of the Comprehensive Plan, City Council considered the impacts on the existing and future availability and capacity of urban public facilities and services, consistent with the intent of this policy. Therefore, the MPAP complies this policy.

**Policy 1.15 Intergovernmental coordination.** Strive to administer the Comprehensive Plan elements and implementation tools in a manner that:

- a. Supports the efforts and fiscal health of the City, county and regional governments, and partner agencies such as school districts and transit agencies.
- b. Supports the cultural practices and fiscal health of tribal nations.

**53. Finding:** As demonstrated in the findings for Statewide Planning Goal 2, the City filed the required 35-day notice with Oregon Department of Land Conservation and Development to notify other government agencies of the proposed MPAP amendments. In addition, the City sent a separate legislative notice to Multnomah County, adjacent cities, Metro, TriMet, Portland Public Schools and other parties. A communication was also sent to tribal leaders regarding the MPAP proposal

in August 2024. The Klickitat Nation responded in October 2024 but then failed to respond to further communications. No government agencies or tribal nations have raised issues or concerns with the MPAP amendments. Therefore, the MPAP complies with this policy.

**Policy 1.16. Planning Commission review.** Ensure the Planning Commission (PC) reviews and makes recommendations to the City Council on all proposed legislative amendments to Comprehensive Plan elements, supporting documents, and implementation tools. The PC advises City Council on the City’s long-range goals, policies, and programs for land use, planning, and sustainability. The membership and powers and duties of the PC are described in the Zoning Code.

**54. Finding:** The PC reviewed the MPAP amendments over the course of four meetings:

- May 21, 2024 – Planning Commission and Design Commission joint public hearing
- June 11, 2024 – PC work session
- June 25, 2024 – PC work session
- July 9, 2024 – PC work session and recommendation

The PC fulfilled its responsibilities as outlined in this policy. Therefore, the MPAP complies with this policy.

**Policy 1.17. Community Involvement Committee.** Establish a Community Involvement Committee to oversee the Community Involvement Program as recognized by Oregon Statewide Planning Goal 1 – Community Involvement and policies 2.15-2.18 of this Comprehensive Plan.

**55. Finding:** The Citizen Involvement Committee was appointed in June 2018 and reviews and advises the way City staff engage with the public in land use and transportation planning. In 2019 and 2020 BPS staff briefed the Portland Bureau of Planning and Sustainability Citizen Involvement Committee (CIC) about the Montgomery Park to Hollywood Transit and Land Use Development Strategy (aka, MP2H study, or MP2H) which led to the MPAP. The CIC provided feedback to staff on key issues, objectives and concerns which informed the community engagement efforts of the MP2H study.

The project’s community involvement program is detailed more in the findings for Chapter 2, Community Involvement.

The CIC fulfilled its responsibilities as outlined in this policy. Therefore, the MPAP complies with this policy.

**Policy 1.18. Quasi-judicial amendments to the Comprehensive Plan Map.** Applicants for quasi-judicial amendments to the Comprehensive Plan Map must show that the requested change adheres to Policies 1.10 through 1.15 and:

- Is compatible with the land use pattern established by the Comprehensive Plan Map.
- Is not in conflict with applicable adopted area-specific plans as described in Policy 1.19, or the applicable hearings body determines that the identified conflict represents a circumstance where the area specific plan is in conflict with the Comprehensive Plan and the proposed amendment is consistent with the Comprehensive Plan.

The Hearings Officer must review and make recommendations to the City Council on all quasi-judicial amendments to the Comprehensive Plan Map using procedures outlined in the Zoning Code.

**56. Finding:** This policy concerns quasi-judicial amendments to the Comprehensive Plan Map and is not applicable to the MPAP.

**Policy 1.19. Area-specific plans.** Use area-specific plans to provide additional detail or refinements

applicable at a smaller geographic scale, such as for centers and corridors, within the policy framework provided by the overall Comprehensive Plan.

**1.19.a** Area-specific plans that are adopted after May 24, 2018, should clearly identify which components amend Comprehensive Plan elements, supporting documents, or implementation tools. Such amendments should be appropriate to the scope of the Comprehensive Plan; be intended to guide land use decisions; and provide geographically-specific detail. Such amendments could include policies specific to the plan area, land use designation changes, zoning map changes, zoning code changes, and public facility projects necessary to serve designated land uses.

**1.19.b** Area-specific plan components intended as context, general guidance, or directives for future community-driven efforts should not amend the Comprehensive Plan elements or implementation tools but be adopted by resolution as intent. These components include vision statements, historical context, existing conditions, action plans, design preferences, and other background information.

**1.19.c** Community, area, neighborhood, and other area-specific plans that were adopted by ordinance prior to January 1, 2018 are still in effect. However, the elements of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that are inconsistent with this Plan.

**57. Finding:** The MPAP is an area-specific plan that is an outcome of the related precursor Montgomery Park to Hollywood Transit and Land Use Development Strategy (MP2H), which provided much of the background information, data and analysis, as well as public involvement conducted for the MPAP. The MPAP affects a geography in Northwest Portland between NW Vaughn and NW Nicolai streets between Highway 30 and NW Wardway. The MPAP clearly identifies specific changes to Comprehensive Plan land use designations in the area, the expansion of the NW Town Center designation to include the area, as well as zoning map changes, zoning code changes and public facilities such as transportation system improvements intended and needed to serve the area. The MPAP also includes a vision, existing conditions information, action table and other elements intended to provide additional context and guidance for the land use amendments that are adopted by ordinance.

The MPAP also includes amendments to the Guild’s Lake Industrial Sanctuary Plan (GLIS; 2001) and Northwest District Plan (NW Plan; 2003), both of which are area plans that were adopted prior to January 1, 2018. The MPAP amendments remove portions of the MPAP area from these existing plans where there is geographic overlap or a conflict, and also amends the text of these plans where conditions have changed as a result of the MPAP, and thus brings these existing older plans closer into conformance with the current 2035 Comprehensive Plan as amended and updated by the MPAP in 2024. Therefore, the MPAP complies with this policy.

## Chapter 2: Community Involvement

**Goal 2.A: Community involvement as a partnership.** The City of Portland works together as a genuine partner with all Portland communities and interests. The City promotes, builds, and maintains relationships, and communicates with individuals, communities, neighborhoods, businesses, organizations, institutions, and other governments to ensure meaningful community involvement in planning and investment decisions.

**Goal 2.B: Social justice and equity.** The City of Portland seeks social justice by expanding choice and opportunity for all community members, recognizing a special responsibility to identify and engage, as genuine partners, under-served and under-represented communities in planning, investment, implementation, and enforcement processes, particularly those with potential to be adversely affected by the results of decisions. The City actively works to improve its planning and investment-related decisions to achieve equitable distribution of burdens and benefits and address past injustices.

**Goal 2.C: Value community wisdom and participation.** Portland values and encourages community and civic participation. The City seeks and considers community wisdom and diverse cultural perspectives, and integrates them with technical analysis, to strengthen land use decisions.

**Goal 2.D: Transparency and accountability.** City planning and investment decision-making processes are clear, open, and documented. Through these processes a diverse range of community interests are heard and balanced. The City makes it clear to the community who is responsible for making decisions and how community input is considered. Accountability includes monitoring and reporting outcomes.

**Goal 2.E: Meaningful participation.** Community members have meaningful opportunities to participate in and influence all stages of planning and decision making. Public processes engage the full diversity of affected community members, including under-served and under-represented individuals and communities. The City will seek and facilitate the involvement of those potentially affected by planning and decision making.

**Goal 2.F: Accessible and effective participation.** City planning and investment decision-making processes are designed to be culturally accessible and effective. The City draws from acknowledged best practices and uses a wide variety of tools, including those developed and recommended by under-served and under-represented communities, to promote inclusive, collaborative, culturally-specific, and robust community involvement.

**Goal 2.G: Strong civic infrastructure.** Civic institutions, organizations, and processes encourage active and meaningful community involvement and strengthen the capacity of individuals and communities to participate in planning processes and civic life.

**58. Finding:** The City Council interprets the Chapter 2 goals and policies as calling for a broad range of meaningful community engagement approaches that complement the legally required public notices and meetings. The MPAP was preceded by and is an outcome of the Montgomery Park to Hollywood Transit and Land Use Development Strategy (also known as the MP2H study) which was initiated in 2019. The community outreach, engagement and involvement conducted during the MP2H process was the foundational community engagement for the MPAP, however additional engagement occurred after the MPAP nomenclature change. Both the MP2H process and the current MPAP work provided numerous opportunities for meaningful community involvement consistent with Goals 2.A through 2.G, including:

**Community Involvement Committee and Engagement Plan.** The MP2H staff met with the Portland CIC in 2019 to discuss the project and share information. The timing of this meeting roughly coincided with the development and publication of the [Montgomery Park to Hollywood Transit and Land Use Development Study \(MP2H\) Community Engagement Plan](#). That Engagement Plan describes the goals and steps in the public engagement process for the study, and acknowledged the additional emphasis placed on engagement focused on equity and reaching under-served communities and those potentially impacted by public decisions.

The process outlined in the plan was generally followed, with highlights described below. The outbreak of the COVID-19 pandemic in March 2020, and related orders to reduce in-person contact, changed the anticipated approach, and much of the outreach originally anticipated as in-person meetings were adapted to virtual and online events. Given this, the timing and format of public events varied during the process.

**Project Activities Leading to the Discussion Draft.** The MPAP included the following community engagement efforts conducted prior to development of the MP2H NW Plan Discussion Draft, which was the first complete draft of the plan available for public review, and served as precursor to the proposed Montgomery Park Area Plan.

- **Neighborhood and Other Group Meetings:** Project staff attended the meetings of neighborhood and business associations in the study area in mid to late-2019, as well as other times during the project, to inform them of the project and collect initial feedback. This included meetings with: Northwest District Association and subcommittees; Northwest Industrial Neighborhood Association; Northwest (formerly Nob Hill) Business Association; AIA Portland Urban Design Committee.
- **Kickoff Open House:** A public in-person open house to share information about the project and collect initial public feedback was held in March 2020. About 25 people attended. Open House attendees were invited to share thoughts and feedback about development scenarios such as those in the Northwest area. More information and a summary of feedback is available in the [MP2H Open House Summary](#).
- **Community-Based Organization (CBO) Outreach:** As part of the Federal Transit Administration grant for the MP2H Study, funds were made available for [community-based organizations \(CBO\)](#) in order to provide for and conduct outreach to under-served communities in the study areas. A public request for proposal (RFP) solicitation process was initiated, and four organizations were selected to participate in the effort: Friendly House, Inc.; Northwest Industrial Business Association; Hollywood Senior Center/Urban League of Portland; Micro Enterprise Solutions of Oregon. Each of the organizations conducted outreach to the communities they generally serve, including under-recognized groups, many of which included a high percentage of BIPOC community members. The four CBOs conducted outreach to understand the aspirations, concerns, and priorities of their communities. This feedback served to help shape the proposals and the type of public benefits that might be sought to foster equitable development. Each CBO developed a report by late 2020 to share the information they had gathered; these reports are available here: <https://www.portland.gov/bps/mp2h/community-based-organization-outreach>
- **Northwest Project Working Group:** In 2020 a [Project Working Group](#) (PWG) was recruited for the Northwest Portland study area. The working group was composed of people representing a variety of viewpoints, such as local neighborhood groups, local business groups,

transportation advocates, and property owners. The group also included representatives of the community-based organizations (CBO) that participated in the outreach grants aimed at underserved communities. With the exception of the representatives of the community-based organizations that were funded by grants, and some members that had represented property owners, Project Working Group Members generally served as volunteers and were not compensated for their participation. The PWG met seven times between May 2020 and November 2021. The group acted as a “sounding board” and provided guidance to the project team (city staff and consultants) on analysis, concepts and other information, and served as a conduit for information between community organizations and the team. The PWG reviewed and informed draft materials and products but did not vote on proposals or make formal recommendations. City staff integrated feedback from the PWG into project materials and the development of proposals and products as appropriate.

**Discussion Draft and Response to Discussion Draft Comments.** The [MP2H-NW Plan Discussion Draft](#) was published in December 2021. This draft plan included the first formal and complete plan proposal presented to the community for feedback of the Northwest study area. The plan included Volume 1 (the plan), Volume 2 (proposed zoning code amendments), and appendices including the Draft Montgomery Park Transportation Plan and other supporting documents. As part of the MP2H-NW Plan Discussion Draft, notice of the draft proposal was mailed to over 3,000 nearby property owners and tenants. Staff conducted two virtual open house information sessions on the Discussion Draft and received dozens of comments on the discussion draft which are captured in the [MP2H Northwest Plan Public Comments on the December 2021 Discussion Draft](#). These comments, among others, helped inform the proposed draft plan.

**Project Activities between the Discussion Draft and Proposed Draft.** The MPAP included the following community engagement efforts conducted after publication of the MP2H NW-Plan Discussion Draft:

- York Street Work Group:** The City of Portland engaged the Portland Harbor Community Coalition (PHCC) to elevate the voices and perspectives of members of the York Street Work Group. The York Street Work Group membership includes Black Portlanders and allies with interest in exploring opportunities to share information about the legacy of York, an enslaved member of the Corps of Discovery Expedition (also known as the Lewis and Clark Expedition), and for whom NW York Street in the study area is named. The group also explored equitable development and community benefit opportunities in the Northwest study area. The MPAP area was home to many Black Portland households during World War II and shortly thereafter, and many lived in Guild’s Lake Court housing, constructed north of NW Nicolai Street for World War II production efforts. These households were ultimately displaced to accommodate industrial development in the broader Northwest study area. The York Street Work Group produced the “York Urban Village Concept,” a vision for a “justice- and climate-centered transit and land use development strategy and cultural heritage district along York Street.” The concept outlined approaches for commemorating York, and included key themes for public and community benefits within the concept plan. In some cases, these themes overlap with other feedback from CBOs and other planning goals.
- Design Character Statement:** After release of the MP2H NW Plan Discussion Draft, staff developed a design character statement – a design guidelines tool that applies to development pursuing discretionary design review. To develop the Design Character Statement, the project team conducted additional outreach, a survey and workshops in 2023-

2024. A community [Design Character Statement workshop](#) was held in June 2023, with roughly 30 people in attendance. Workshop feedback is summarized in the following document: [MP2H-NW Design Character Statement Workshop Summary](#). A February 2024 Character Statement focus group to hear further about Black, Indigenous, and Communities of Color perspectives was also held, and feedback from the focus group was incorporated into the proposal.

- **Additional Engagement:** The project team also met with property owners in the area to discuss potential for realizing the public benefits to which the plan, and a broad array of community members, aspire. In addition, project staff met occasionally with the Northwest District Association Planning Committee and the Northwest Industrial Business Association, to share information and hear feedback on land use and transportation topics. The Portland Bureau of Transportation (PBOT) also conducted additional streetcar-specific outreach to community members in the latter part of 2023. A summary of this outreach and feedback is included in Volume 3: Transportation Plan.

**Proposed Draft and Planning Commission (PC) Hearing.** The City published the Montgomery Park Area Plan Proposed Draft on April 15, 2024, and a joint public hearing of the Planning Commission (PC) and Design Commission (DC) was scheduled for May 21, 2024. DLCD Notice was filed on April 15, 2024. Measure 56 notice was mailed to affected property owners on April 15, 2024. The project Legislative Notice was mailed on April 15, 2024. Information about the proposed plan and public hearing was emailed to project interested parties on April 16, 2024.

The PC and DC held a joint public hearing on May 21, 2024 and took oral testimony from 21 people. In addition, 40 pieces of written testimony were submitted via the city’s Map App public testimony management tool.

**Recommended Draft and City Council Hearing.** The City published the Montgomery Park Area Plan Recommended Draft on October 15, 2024. The project website was updated to reflect information recapping the PSC and DC recommendations and any related changes and how to comment during the City Council phase, as well as refreshed plan information and links to relevant documents. The project Map App website was also updated and continued to include the search by address and testimony functions.

The public was provided opportunities to comment and suggest amendments in front of the City Council. City Council held a hearing on November 13, 2024 on the MPAP and took verbal testimony from 25 people. Council also considered amendments at the November 13 hearing. Written testimony was accepted through December 3, 2024, at 5 pm. Council met again on the MPAP on December 4, 2024. City Council amended the name of the plan district from Vaughn-Nicolai to the York Plan District and a number of zoning code provisions to fix technical issues and improve clarity for implementation of the plan. These findings reflect the as amended plan district name.

Council also amended the recommended Comprehensive Plan Map designations and zoning for two properties in response to changes in participation with an associated public benefits agreement and made related zoning code changes to better support plan objectives in light of those changes.

Therefore, the MPAP complies with goals 2.A through 2.G.

## Partners in decision making

**Policy 2.1. Partnerships and coordination.** Maintain partnerships and coordinate land use engagement with:

**2.1.a** Individual community members.

**2.1.b** Communities of color, low-income populations, Limited English Proficient (LEP) communities, Native American communities, and other under-served and under-represented communities.

**2.1.c** District coalitions, neighborhood associations, and business district associations as local experts and communication channels for place-based projects.

**2.1.d** Businesses, unions, employees, and related organizations that reflect Portland’s diversity as the center of regional economic and cultural activity.

**2.1.e** Community-based, faith-based, artistic and cultural, and interest-based non-profits, organizations, and groups.

**2.1.f.** People experiencing disabilities.

**2.1.g.** Institutions, governments, and tribal nations

**59. Finding:** This policy directs the City to maintain partnerships and coordinate community engagement on a programmatic level and is not specific to a particular legislative project. Therefore, this policy is not applicable. Nevertheless, these partnerships were engaged throughout this process as noted above. The project included emphasis on engagement of underserved communities, including communities of color, low-income populations, and other under-served and under-represented communities, through outreach conducted by community-based organizations (Friendly House, Inc.; Northwest Industrial Business Association/Columbia Corridor Association; Hollywood Senior Center/Urban League of Portland; Micro Enterprise Solutions of Oregon; Portland Harbor Community Coalition/York Street Work Group) as well as project staff. In addition, engagement included work with recognized neighborhood associations (Northwest District Association), business associations (Northwest Industrial Business Association; Columbia Corridor Association; Northwest Business Association), and other groups or organizations (Friendly House; Portland Harbor Community Coalition/York Group). Outreach was also conducted to the city’s Tribal Liaison, including in summer/fall of 2023 and again in summer 2024. Therefore, the MPAP complies with this policy.

**Policy 2.2. Broaden partnerships.** Work with district coalitions, neighborhood associations, and business district associations to increase participation and to help them reflect the diversity of the people and institutions they serve. Facilitate greater communication and collaboration among district coalitions, neighborhood associations, business district associations, culturally-specific organizations, and community-based organizations.

**60. Finding:** This policy directs the City to work with coalitions and associations to increase participation and improve communication on a programmatic level and is not specific to a particular legislative project. Therefore, this policy is not applicable. However, as noted in findings above and evidenced by the range of comments and testimony received, the City was engaged with a breadth of partners to increase participation from these organizations and better reflect the diversity of the people served by them. Therefore, the MPAP complies with this policy.

## Environmental justice

**Policy 2.3. Extend benefits.** Ensure plans and investments promote environmental justice by extending the community benefits associated with environmental assets, land use, and public investments to communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision. Maximize economic, cultural, political, and environmental benefits through ongoing partnerships.

**Policy 2.4. Eliminate burdens.** Ensure plans and investments eliminate associated disproportionate burdens (e.g. adverse environmental, economic, or community impacts) for communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision.

**2.4.a.** Minimize or mitigate disproportionate burdens in cases where they cannot be eliminated.

**2.4.b.** Use plans and investments to address disproportionate burdens of previous decisions.

**61. Finding:** The 2035 Comprehensive Plan defines “ensure” to mean “to make sure that something will happen or be available”. Council interprets these policies to mean that plans and investments each contribute to the extension of community benefits, and elimination of disproportionate burdens, over the duration of the planning period.

The MPAP included a focus on equitable development and strives to ensure that the results of public policy changes and public investments extend benefits that will benefit underserved groups, including communities of color and low income communities. The MPAP also strives to reduce or minimize burdens for these groups. The MPAP does so by providing opportunity for ongoing employment in the plan area, while creating opportunity for housing, and affordable housing beyond city requirements, and opportunity for affordable commercial space and a public open space. The plan minimizes the burden of direct displacement, as there are seven dwelling units in the area, the majority of which are owner-occupied and will be conforming land uses.

For the reasons above, the MPAP complies with policies 2.3 and 2.4.

## Invest in education and training

**Policy 2.5. Community capacity building.** Enhance the ability of community members, particularly those in under-served and/or under-represented groups, to develop the relationships, knowledge, and skills to effectively participate in plan and investment processes.

**Policy 2.6. Land use literacy.** Provide training and educational opportunities to build the public’s understanding of land use, transportation, housing, and related topics, and increase capacity for meaningful participation in planning and investment processes.

**Policy 2.7. Agency capacity building.** Increase City staff’s capacity, tools, and skills to design and implement processes that engage a broad diversity of affected and interested communities, including under-served and under-represented communities, in meaningful and appropriate ways.

**62. Finding:** Policies 2.5 through 2.7 address broad approaches to educating community members and City staff about planning processes and are generally not applicable to this project given the project scope. However, the MPAP did support these policies by working directly with CBOs on engagement of underserved communities. As part of this, the MPAP funded four CBO and staff supported CBO staff to understand project elements, needs and outreach goals to assist them in building community capacity to participate in the MPAP process (Policy 2.5). Staff also educated CBO staff and community members on land use issues which in turn assisted in soliciting informed

feedback (Policy 2.6). Staff also assisted CBOs at a technical level by providing data, developing processes and surveys, and helping to prepare documents (Policy 2.7).

For the reasons above, the MPAP complies with these policies.

### Community assessment

**Policy 2.8. Channels of communication.** Maintain channels of communication among City Council, the Planning Commission (PC), project advisory committees, City staff, and community members.

**63. Finding:** The City Council interprets this policy to create the opportunity for the community and advisory committees to have opportunities to communicate their issues and concerns to the PC and City Council outside of the formal legislative process. The plan offered multiple opportunities for community members to communicate with City staff during the project including input from a Project Working Group, topic specific and other community groups, and the public at-large – see findings for Goal 2 and related Chapter 2 policies; this communication helped shape the direction of the project as it evolved. In addition, the MPAP amendments are a legislative process with formal opportunities for community members as well as advisory groups and commissions to testify to communicate directly with Planning Commission and City Council. Therefore, the MPAP complies with this policy.

**Policy 2.9. Community analysis.** Collect and evaluate data, including community-validated population data and information, to understand the needs, priorities, and trends and historical context affecting different communities in Portland.

**Policy 2.10. Community participation in data collection.** Provide meaningful opportunities for individuals and communities to be involved in inventories, mapping, data analysis, and the development of alternatives.

**Policy 2.11, Open data.** Ensure planning and investment decisions are a collaboration among stakeholders, including those listed in Policy 2.1. Where appropriate, encourage publication, accessibility, and wide-spread sharing of data collected and generated by the City.

**64. Finding:** Policies 2.9 through 2.11 concern how the City collects and makes available data that supports land use decisions. The MP2H/MPAP staff worked with several community organizations as noted in Findings for Policy 2.1. Many of these organizations partnered with the city in the collection and interpretation of data, design of surveys, and sharing of information. These efforts helped inform plan elements, such as the types of public benefits sought. In addition, the plan scenarios and proposals were published on the city web site. In addition, proposed land use changes were represented on the online “Map App” database where public comments and testimony were taken. This online comment database was viewable to the public, as well as the PSC and staff, through a web browser. Therefore, the amendments are consistent with these policies.

### Transparency and accountability

**Policy 2.12. Roles and responsibilities.** Establish clear roles, rights, and responsibilities for participants and decision makers in planning and investment processes. Address roles of City bureaus, elected officials, and participants, including government agencies and tribal nations in addition to community and neighborhood leadership, business, organizations, and individuals.

**Policy 2.13. Project scope.** Establish clear expectations about land use project sponsorship, purpose, design, and how decision makers will use the process results.

**Policy 2.14. Community influence.** At each stage of the process, identify which elements of a planning and investment process can be influenced or changed through community involvement. Clarify the extent to which those elements can be influenced or changed.

**Policy 2.15. Documentation and feedback.** Provide clear documentation for the rationale supporting decisions in planning and investment processes. Communicate to participants about the issues raised in the community involvement process, how public input affected outcomes, and the rationale used to make decisions.

**65. Finding:** As described in the findings above, the legislative process was clearly outlined in notices, documents and on the project website, including how to testify to influence the Proposed Draft at the PC and the Recommended Draft at City Council. The Recommended Draft was published with information about how to testify.

Throughout the MP2H and MPAP process, BPS staff contacted, met with, and coordinated with stakeholders to inform them how to engage in the plan development and decision-making process, how the process was structured, and additional opportunities to participate when such opportunities existed. While staff coordinated with many engaged communities, staff worked most directly with the York Work Group, Northwest Industrial Business Association and Northwest District Association to inform them about the process and opportunities to influence the direction of the proposed plan. Information about the plan was also shared with the Office of Government relations Tribal Liaison, and in August 2024 a communication to tribal leaders regarding the MPAP proposal. Detailed information about the public outreach process is included in the Plan Volume 1 and Volume 5. Findings on this outreach are also included in this document.

During the review phases of the project, BPS staff presented at various community meetings to inform people of the proposed plan and amendments. All meetings and events were open to the public and included opportunities for public comment. Therefore, the MPAP complies with these policies.

## **Community involvement program**

**Policy 2.16. Community Involvement Program.** Maintain a Community Involvement Program that supports community involvement as an integral and meaningful part of the planning and investment decision-making process.

**Policy 2.17. Community engagement manual.** Create, maintain, and actively implement a community engagement manual that details how to conduct community involvement for planning and investment projects and decisions.

**Policy 2.18. Best practices engagement methods.** Utilize community engagement methods, tools, and technologies that are recognized as best practices.

**Policy 2.19. Community Involvement Committee.** The Community Involvement Committee (CIC), an independent advisory body, will evaluate and provide feedback to City staff on community involvement processes for individual planning and associated investment projects, before, during, and at the conclusion of these processes.

**Policy 2.20. Review bodies.** Maintain review bodies, such as the Planning Commission (PC), Design Commission, Historic Landmarks Commission, and Adjustment Committee, to provide an opportunity for community involvement and provide leadership and expertise for specialized topic areas.

**Policy 2.21. Program evaluation.** Periodically evaluate the effectiveness of the Community Involvement Program and recommend and advocate for program and policy improvements. The Community Involvement Committee (CIC) will advise City staff regarding this evaluation.

**Policy 2.22. Shared engagement methods.** Coordinate and share methods, tools, and technologies that lead to successful engagement practices with both government and community partners and solicit engagement methods from the community.

**Policy 2.23. Adequate funding and human resources.** Provide a level of funding and human resources allocated to the Community Involvement Program sufficient to make community involvement an integral part of the planning, policy, investment and development process.

**66. Finding:** Policies 2.16 through 2.23 concern the City’s Community Involvement Program and are not applicable because the MPAP does not change this program.

### Process design and evaluation

**Policy 2.24. Representation.** Facilitate participation of a cross-section of the full diversity of affected Portlanders during planning and investment processes. This diversity includes individuals, stakeholders, and communities represented by race, color, national origin, English proficiency, gender, age, disability, religion, sexual orientation, gender identity, and source of income.

**67. Finding:** The MP2H/MPAP planning process sought participation and representation from a wide array of affected Portlanders. This was facilitated in part through the work of CBOs that conducted outreach to underserved communities, as well as other outreach to community members directly and through channels including existing neighborhood, business and non-profit organizations. See finding for Chapter 2 Goals for details. Therefore, the MPAP complies with this policy.

**Policy 2.25. Early involvement.** Improve opportunities for interested and affected community members to participate early in planning and investment processes, including identifying and prioritizing issues, needs, and opportunities; participating in process design; and recommending and prioritizing projects and/or other types of implementation.

**68. Finding:** The MP2H planning process that provided foundational community engagement elements for the MPAP sought early participation from community members as detailed in the finding for Chapter 2 Goals. This included initial meetings with neighborhood and other community organizations, as well as an open house in March 2020. Therefore, the MPAP complies with this policy.

**Policy 2.26. Verifying data.** Use data, including community-validated population data, to guide planning and investment processes and priority setting and to shape community involvement and decision-making efforts.

**Policy 2.27. Demographics.** Identify the demographics of potentially affected communities when initiating a planning or investment project.

**Policy 2.28. Historical understanding.** To better understand concerns and conditions when initiating a project, research the history, culture, past plans, and other needs of the affected community, particularly under-represented and under-served groups, and persons with limited English proficiency (LEP). Review preliminary findings with members of the community who have institutional and historical knowledge.

**69. Finding:** The MP2H planning process which provided foundational community engagement

elements for the MPAP used data from a variety of sources to provide background on the communities affected and a historical perspective on the area. Demographic and other community information is documented in the MP2H Existing Conditions report, MP2H Community Engagement Plan, and Volume 1 of the MPAP plan document. Therefore, the MPAP complies with this policy.

**Policy 2.29. Project-specific needs.** Customize community involvement processes to meet the needs of those potentially affected by the planning or investment project. Use community involvement techniques that fit the scope, character, and potential impact of the planning or investment decision under consideration.

**Policy 2.30. Culturally-appropriate processes.** Consult with communities to design culturally-appropriate processes to meet the needs of those affected by a planning or investment project. Evaluate, use, and document creative and culturally-appropriate methods, tools, technologies, and spaces to inform and engage people from under-served and under-represented groups about planning or investment projects.

**Policy 2.31. Innovative engagement methods.** Develop and document innovative methods, tools, and technologies for community involvement processes for plan and investment projects.

**70. Finding:** Policies 2.29 to 2.31 address project specific, culturally appropriate and innovative involvement needs and processes. The MP2H planning process that provided foundational community engagement elements for the MPAP used a customized, culturally appropriate innovative approach to engagement by soliciting the participation of community based organizations to conduct outreach to the affected local communities, focusing on underserved communities represented by these organizations. This outreach included direct engagement of low-income residents, people of color, employees of industrial firms and other individuals that might not typically be involved in local neighborhood association or other community group activities. Therefore, the MPAP complies with these policies.

**Policy 2.32. Inclusive participation beyond Portland residents.** Design public processes for planning and investment projects to engage affected and interested people who may not live in Portland such as property owners, employees, employers, and students, among others, as practicable.

**71. Finding:** Public involvement for MP2H planning process that provided foundational community engagement elements for the MPAP included participation from a wide array of stakeholders and community members including employees of industrial firms and property owners who may not be Portland residents. The project also included a web page that is accessible to a wide range of people beyond Portland residents, was updated periodically, and included online surveys and other opportunity to engage. Therefore, the MPAP complies with this policy.

**Policy 2.33. Inclusive participation in Central City planning.** Design public processes for the Central City that recognize its unique role as the region's center. Engage a wide range of stakeholders from the Central City and throughout the region including employees, employers, social service providers, students, and visitors, as well as regional tourism, institutional, recreation, transportation, and local/regional government representatives, as appropriate.

**72. Finding:** The MP2H and MPAP projects are not located within Portland's Central City, therefore this policy does not directly apply. However, public meeting notifications were extended broadly to a variety of stakeholders including those from Central City interests. Much of the project engagement was conducted virtually which broadened accessibility for many Central City community members. Therefore, the MPAP complies with this policy.

**Policy 2.34. Accessibility.** Ensure that community involvement processes for planning and investment projects are broadly accessible in terms of location, time, and language, and that they support the engagement of individuals with a variety of abilities and limitations on participation.

**73. Finding:** The MP2H and MPAP public meeting notifications were extended broadly to a variety of stakeholders. Much of the project engagement was conducted virtually which broadened accessibility for many community members. In addition, open houses, such as the Discussion Draft open house, were offered live in different timeframes to accommodate community. In addition, online surveys and questionnaires were developed with broad timeframes, allowing participation by a broad group over time. Notices for shared communications were available with translation guidance for different languages, in compliance with the City’s accessibility statement requirements. Therefore, the MPAP complies with this policy.

**Policy 2.35. Participation monitoring.** Evaluate and document participant demographics throughout planning and investment processes to assess whether participation reflects the demographics of affected communities. Adapt involvement practices and activities accordingly to increase effectiveness at reaching targeted audiences.

**Policy 2.36. Adaptability.** Adapt community involvement processes for planning and investment projects as appropriate to flexibly respond to changes in the scope and priority of the issues, needs, and other factors that may affect the process.

**74. Finding:** Policy 2.35 and 2.36 call for monitoring and adapting participation processes to create effective processes. The MP2H planning process that provided foundational community engagement elements for the MPAP adapted processes as it evolved. The initial MPAP process Community Engagement Plan found that the westside area was not highly diverse, and that there was a small percentage of non-English speakers in the area. The process initially included engagement with the local Neighborhood Association, primarily through its Planning Committee, and business association, including the Northwest Industrial Business Association (NIBA). The plan’s participation process also included work through community based organizations (CBOs), including Friendly House and NIBA, to more effectively reach communities that were potentially affected but may not participate in traditional channels. The project adapted as the process evolved to focus on other groups that had interest but were not part of other organizations. Examples of this include engagement of the York Street Work Group, which provided feedback on commemoration of York and public benefits, and a design Character Statement focus group specifically aimed at gathering perspectives of BIPOC and underserved community members.

The MPAP complies with policies 2.35 and 2.36.

**Policy 2.37. Process evaluation.** Evaluate each community involvement process for planning or investment projects from both the City staff and participants’ perspectives, and consider feedback and lessons learned to enhance future involvement efforts.

**75. Finding:** The MP2H and MPAP team received feedback from community members and staff at the conclusion of project events/meetings, and adapted practices to better engage the community on relevant project issues. Therefore, the MPAP complies with this policy.

## Information design and development

**Policy 2.38. Accommodation.** Ensure accommodations to let individuals with disabilities participate in administrative, quasi-judicial, and legislative land use decisions, consistent with federal regulations.

**Policy 2.39. Notification.** Notify affected and interested community members and recognized organizations about administrative, quasi-judicial, and legislative land use decisions with enough lead time to enable effective participation. Consider notification to both property owners and renters.

**Policy 2.40. Tools for effective participation.** Provide clear and easy access to information about administrative, quasi-judicial, and legislative land use decisions in multiple formats and through technological advancements and other ways.

**Policy 2.41. Limited English Proficiency (LEP).** Ensure that limited English proficient (LEP) individuals are provided meaningful access to information about administrative, quasi-judicial, and legislative land use decisions, consistent with federal regulations.

**76. Finding:** Consistent with Policies 2.38 through 2.41, and BPS community involvement practices, meetings, open house events, and all public meetings, described in more detail in the findings above, were noticed, and information was provided online. Information about accommodation and translation was provided on all notices. The City also sent a legislative notice on April 15, 2024 of the May 21, 2024 PC hearings to interested parties, including neighborhood associations, business associations, and other affected jurisdictions, that have requested notice of proposed land use changes. The City sent a legislative notice in October 2024 to interested parties, and others that participated in the PC hearings to inform them of the opportunity to testify at the November 13, 2024 City Council public hearing. Therefore, the MPAP complies with policies 2.38 through 2.41.

## Chapter 3: Urban Form

**GOAL 3.A: A city designed for people.** Portland’s built environment is designed to serve the needs and aspirations of all Portlanders, promoting prosperity, health, equity, and resiliency. New development, redevelopment, and public investments reduce disparities and encourage social interaction to create a healthy connected city.

**77. Finding:** This goal calls for a built environment that supports the ability of Portlanders to meet their needs, including but not limited to needs for housing, employment, commercial and community services, education, and access to recreation and open space. The MPAP elements that support this goal include, but are not limited to, the following: setting affordable housing requirements beyond the minimum inclusionary housing provisions; inclusion of non-residential areas for employment; a middle-wage jobs target; opportunities for affordable commercial spaces; required on-site outdoor areas for housing; standards for urban green features including tree planting and landscaping; and the opportunity for a new public park/open space.

The proposed Comprehensive Plan map changes from Industrial Sanctuary (IS) to Mixed Employment (ME) and Central Employment (EX) designations allow a variety of employment, commercial, service and housing uses at high development intensity. The sites, zoned EX and EG1 respectively, allow an array of employment uses, with housing also allowed in the EX zone on the Montgomery Park property. The MPAP floor area ratio (FAR) standards reinforced by bonuses support the desired affordable housing outcomes of the Montgomery Park Public Benefits Agreement, which include development of a minimum of 200 affordable housing units at 60% Median Family Income (MFI) in a near term timeframe and at least 2,000 additional housing units. The Plan’s approach to affordable housing will allow more people to live near transit investments and, in turn, conveniently access the resources and services within the NW Town Center and the York Plan District. These types of land use designations also contribute significantly to advancing equity goals by providing living-wage, low barrier to entry jobs that often benefit communities of color and other under-represented groups. Plan amendments requiring affordable commercial spaces will foster opportunities for small businesses, including Black, Indigenous, and People of Color- (BIPOC) and immigrant-owned businesses, supporting economic prosperity for all communities within the Plan area.

With the creation of the York Plan District and the Bureau of Transportation’s (PBOT) recommended transportation project investments and policy updates, the MPAP encourages the growth and development of the Montgomery Park area into a diverse, equitable, transit-oriented landscape with an active public realm. The MPAP Volume 3 identifies multimodal transportation projects to improve street connectivity within the project area and surrounding land, which will provide people with accessible and comfortable mobility options to housing, and employment, as well as nature, recreation, and other destinations and amenities. The MPAP also recommends the extension of a Pedestrian District to the area, ensuring sidewalk corridor widths supportive of social interaction and community uses. A district with accessible multimodal options paired with dense mixed-use development will contribute to active transportation use, improved health outcomes, and reduced carbon emissions, combining to support a healthy environment. Overall, the plan’s provisions promote health and social interactions through new development standards, right-of-way standards and street connectivity improvements, design guidelines, requirements, allowances, and bonuses, centered around a planned investment in high-capacity sustainable mass transit (TSP Project 60035). Therefore, the MPAP complies with this goal.

**GOAL 3.B: A climate and hazard resilient urban form.** Portland’s compact urban form, sustainable building development practices, green infrastructure, and active transportation system reduce carbon emissions, reduce natural hazard risks and impacts, and improve resilience to the effects of climate change.

**78. Finding:** The MPAP’s recommended implementation of TSP Project 60035 to extend Portland Streetcar to Montgomery Park will connect the Montgomery Park area to the broader streetcar system and regional transit network. The streetcar not only offers many of the same benefits of light rail at a much lower cost and is a more cost-effective route toward transit-oriented compact urban form, but also provides climate-related benefits as a low-carbon transportation option. Additionally, the MPAP recommends a suite of active transportation system projects to improve connectivity for people walking, biking, and accessing transit in and around the area. The MPAP’s land use allowances and bonuses, density requirements, and “green features” regulatory requirements (33.597), in combination with the guidelines and principles in the Citywide Design Guidelines and the MPAP Character Statement, will allow intensive, sustainable mixed-use development, especially adjacent and near the streetcar alignment. Over time, the presence of the streetcar, the compact urban environment, and the improvement of multimodal transportation connections will reduce carbon emissions and foster a pleasant and diverse pedestrian- and transit-oriented neighborhood area. Therefore, the MPAP complies with this goal.

**GOAL 3.C: Focused growth.** Household and employment growth is focused in the Central City and other centers, corridors, and transit station areas, creating compact urban development in areas with a high level of service and amenities, while allowing the relative stability of lower-density single-family residential areas.

**GOAL 3.D: A system of centers and corridors.** Portland’s interconnected system of centers and corridors provides diverse housing options and employment opportunities, robust multimodal transportation connections, access to local services and amenities, and supports low-carbon complete, healthy, and equitable communities.

**79. Finding:** Goals 3.C and 3.D call for focusing growth within an interconnected system of centers, corridors, and transit station areas. Although the MPAP project area west of Highway 30 between NW Vaughn and NW Nicolai streets does not include or involve any changes to corridors, the proposed amendments support job growth and housing development with the creation of a new York Plan District and its inclusion within the boundaries of the Northwest Town Center. The Plan’s proposed application of the Mixed Employment (ME) designation, the high-density Central Employment (EX) designation, and the Design ‘d’ Overlay zone will allow a more diverse mix of employment and other active nonresidential uses within the Plan area besides the industrial and employment uses that have been primarily based in this district. The plan also recommends the application of a Neighborhood Main Street on NW Wilson Street along the Streetcar alignment in the plan area.

The Plan’s regulatory measures, including floor area and height allowances and bonuses, promote compact urban development that provides equitable public benefits including affordable housing and middle-wage employment opportunities, especially within 200 feet of a streetcar alignment. Based upon the plan area’s location and proximity to essential services, amenities, and transit, the provisions of the plan district aim to foster a dense, walkable neighborhood close to the Central City with an active pedestrian environment near streetcar transit and support the growth of the neighborhoods immediately surrounding the Central City.

The MPAP amendments support the area’s multimodal transportation system and access to local services and amenities by including a range of bikeway and pedestrian crossing and corridor improvements to complement the high-quality investment in the planned extension of the Portland Streetcar. Improved street connectivity will provide robust multimodal transportation connections in the area. The streetcar offers the community a reliable, accessible transit option that supports low-carbon complete, healthy, and equitable communities with high-density mixed income housing. Therefore, the MPAP complies with goals 3.C and 3.D.

**GOAL 3.E: Connected public realm and open spaces.** A network of parks, streets, City Greenways, and other public spaces supports community interaction; connects neighborhoods, districts, and destinations; and improves air, water, land quality, and environmental health.

**80. Finding:** The MPAP amendments foster a well-connected public realm and open spaces by encouraging investment in pedestrian thoroughways with safe crossings, bikeway and Neighborhood Greenways, green infrastructure, and active ground floor use requirements, which enhance the pedestrian experience and neighborhood environment. In conjunction, the proposed land use changes will create opportunities for a future public park as well as opportunities for small businesses and makerspaces to occupy affordable commercial spaces, all of which support recreation and community interaction. Plan standards require “green features” (landscape, large trees, or ecoroofs) and allow floor area ratio (FAR) to be transferred from a site, or a portion of a site, that is set aside for a publicly accessible park or open space, in conjunction with the offsets in Required Outdoor Area requirements to create public open spaces. In addition, the Public Benefits Agreement call for creation of a Park/Open Space of 40,000 square feet.

Additionally, the MPAP’s proposals and recommendations for improving and extending the area’s streets, crossings, bikeways, and neighborhood greenways in addition to the main Portland Streetcar extension project will help create multimodal connections on varying scales for a better-connected public realm and complement future land uses and developments. Neighborhood greenways are defined in the Comprehensive Plan as an extensive network of streets with low volumes of motor vehicle traffic that prioritize non-vehicular modes of travel like walking, using mobility devices, and biking. These proposed street improvements and extensions support the goal to ensure safe and accessible routes for walking, biking, and accessing public transit, especially considering the location of nearby dense destinations in the Northwest District south of NW Vaughn Street. These standards are among other tools and actions that the Plan proposes that will contribute to improving air, water, land quality, and environmental health. Therefore, the MPAP complies with this goal.

**GOAL 3.F: Employment districts.** Portland supports job growth in a variety of employment districts to maintain a diverse economy.

**81. Finding:** The Montgomery Park area has historically been the site for employment uses and industrial facilities and services including office, manufacturing, warehousing and freight-moving land uses. The MPAP amendments propose rezoning 33.5 acres to the Comprehensive Plan Mixed Employment (ME) and Central Employment (EX) designation so intense residential development can occur in addition to employment uses. In accordance with the City’s equity-based policy goals in the 2035 Comprehensive Plan and the Portland Plan, the MPAP includes multiple implementation tools

such as the non-residential uses and development requirement (33.597.135) to retain and create new opportunities for employment oriented uses. A Public Benefits Agreement supplements the plan’s regulatory measures through the target of creating at least 400 middle-wage, low barrier to entry jobs, which often benefit Black, Indigenous, and People of Color (BIPOC) and other under-represented communities. A proportionate per-job payment to fund workforce development and training programs applies if the job targets are not met within 12 years from the date that the proposed public benefits agreement goes into effect. Therefore, the MPAP complies with this goal.

**GOAL 3.G: Nature in the city.** A system of habitat corridors weaves nature into the city, enhances habitat connectivity, and preserves natural resources and the ecosystem services they provide.

**82. Finding:** The MPAP includes standards for urban green features, required outdoor areas, and setbacks and landscaping, which strengthen the preservation of the existing supply of large, mature trees and the addition of nature in at least one of a few forms including landscaping, spaces for large trees and ecoroofs. The plan references the strong support from the community for the development of a new public park or green space to provide recreational space. In the effort to enhance habitat connectivity and the district’s connection to Forest Park and the Willamette River, the amendments promote the addition of more street trees and landscaping along NW Vaughn Street. The enhancement of nature in the city will improve the area’s environmental conditions like tree canopy and temperature cooling and, in turn, contribute to a high-quality pedestrian environment. Therefore, the MPAP complies with this goal.

### Citywide design and development

**Policy 3.1 Urban Design Framework.** Use the Urban Design Framework (UDF) as a guide to create inclusive and enduring places, while providing flexibility for implementation at the local scale to meet the needs of local communities.

**83. Finding:** The Urban Design Framework (UDF) provides guidance on Portland’s evolving built and natural form, including the centers and corridors where growth is focused. The MPAP Plan is consistent with this policy in a number of ways, including at a fundamental level using the UDF as a guide to reinforce the role of the NW Town Center as a designated town center, where growth and services are concentrated. The MPAP’s actions also support the goal that the town center remains an inclusive and enduring place that is both accessible and welcoming to people from a range of income levels and cultural communities, and that can provide a variety of services to support complete neighborhoods.

The UDF, as indicated in Comprehensive Plan Figure 3-1, provides a diagrammatic guide to the locations of centers, corridors, city greenways, urban habitat corridors, and pattern areas. The MPAP polices, goals and actions are consistent with this policy and the UDF as they work to implement the UDF’s designations, including the Inner Neighborhood Pattern Area, an employment area, parks, open spaces, and trails. These UDF concepts guide plan development, including implementation approaches and actions. This includes the Plan’s proposal to expand the boundary of the existing NW Town Center area. Increasing the size of the center allows for greater concentrations of housing, specifically mixed-use and multi-dwelling housing, which is consistent with intent of town centers as places where growth is focused and will provide opportunities for additional housing, and an extension of the Portland Streetcar, that can help support commercial services and amenities in this center.

Application of the Design ‘d’ Overlay within this town center will meet this policy since the framework of the overlay is guided by the UDF and shapes its processes and tools intended to

guide growth in Portland’s centers and corridors. This includes references to the UDFs breakdown of Portland into four distinct layers: pattern areas, centers, corridors and transit stations. Further, Guideline 01 of the Citywide Design Guidelines uses the UDF as a measure of determining the character, local identity, and aspiration of a place where a development is being proposed. The Citywide Design Guidelines and MP Character Statement will provide guidance on how development should respond to local context on a majority of sites within the York Plan District. In addition, the objective design standards promote site and building designs to align with the Citywide Design Guidelines and the UDF. Lastly, many of the guidelines and standards encourage development to both provide welcoming public spaces and measures to ensure the development is enduring and resilient.

Therefore, the MPAP complies with this policy.

**Policy 3.2. Growth and stability.** Direct most growth and change to centers, corridors, and transit station areas, allowing the continuation of the scale and characteristics of Portland’s residential neighborhoods.

**84. Finding:** This policy reflects the Comprehensive Plan preferred growth scenario which calls for roughly 30% of the housing growth in the Central City, centers and corridors accommodating about 50% of new housing units, while the single-family residential areas accounting for the remaining 20% of growth. The MPAP Plan is consistent with this policy as it directs growth within a new Vaughn Nicolai Plan District and expanded NW Town Center. The Plan supports this through Comprehensive Plan Map and Zoning Map amendments that expand Central Employment (EX) zoning within the town center, which is estimated to increase housing opportunity by roughly 2,000+ units and provides opportunities for additional jobs, supported by land use changes that allow a broad mix of uses and a public benefits agreement with the property owners of the former ESCO Steel site requiring the creation of 400+ new middle-wage jobs. The Plan’s larger scale growth is focused primarily around the district core area, Subarea’s B, C and D, and within Subdistricts E and F which provide a transition to surrounding residential and industrial areas to the south and east. Additionally, the majority of the new Central Employment zoning will be within the southern portion of the new Plan District, which provides more opportunities for housing while also maintaining a buffer from the industrial sanctuary north of NW Nicolai with an employment zoned buffer in Subdistrict A. These changes will support the growth of a more robust mixed-use center featuring commercial, employment and residential, with access to services and amenities, including an extension of the Portland Streetcar, keeping within the scale and characteristics of Portland’s NW residential neighborhoods that currently exist within the NW Town Center. Therefore, the MPAP complies with this policy.

**Policy 3.3. Equitable development.** Guide development, growth, and public facility investment to reduce disparities, ensure equitable access to opportunities, and produce positive outcomes for all Portlanders.

**3.3.a.** Anticipate, avoid, reduce, and mitigate negative public facility and development impacts, especially where those impacts inequitably burden communities of color, under-served and under-represented communities, and other vulnerable populations.

**3.3.b.** Make needed investments in areas that are deficient in public facilities to reduce disparities and increase equity. Accompany these investments with proactive measures to avoid displacement and increase affordable housing.

**3.3.c.** Encourage use of community benefit agreements to ensure equitable outcomes from

development projects that benefit from public facility investments, increased development allowances, or public financial assistance. Consider community benefit agreements as a tool to mitigate displacement and housing affordability impacts.

**3.3d.** Incorporate requirements into the Zoning Code to provide public and community benefits as a condition of development projects to receive increased development allowances.

**3.3e.** When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.

**3.3f.** Coordinate housing, economic development, and public facility plans and investments to create an integrated community development approach to restore communities impacted by past decisions.

**85. Finding:** The Montgomery Park Area Plan’s land use changes include amendments to Portland’s Comprehensive Plan map, zoning map, zoning code, and design guidance for future development. The Plan area is in NW Portland, recognized as a high-opportunity area through Portland Housing Bureau opportunity area analysis.

Modeling and analysis of MP2H development scenarios, and subsequent related work, showed that the mix of the Plan’s proposed land use and zoning changes will help to create value that can be captured to support several public benefits including affordable housing and middle-wage jobs, which tend to provide the most benefit to communities of color, low-income populations, and other under-served or under-represented groups.

The MPAP employs a combination of regulatory and non-regulatory tools to achieve equitable development. The MPAP includes new zoning regulations in a new plan district (33.597) that provide bonuses and incentives for equitable development features such as: affordable housing, and affordable housing beyond required inclusionary housing; employment, via a nonresidential use requirement; green features such as landscaping, trees or ecoroof; and required affordable commercial spaces, among other features. Many of the regulatory elements, such as affordable housing bonuses, required affordable commercial space, on-site outdoor areas, and “green features” promote public/community benefits that support sustainable, resilient development and offset increased development allowances.

Regulatory approaches are supplemented by a Public Benefits Agreement with the property owners of the former ESCO Steel site to achieve plan objectives and equitable development outcomes. The Public Benefits Agreement (PBA), which serves some of the functions of a community benefits agreement, aims to address and provide the following to promote a dynamic, mixed-use neighborhood with equitable access to housing and economic opportunity: provision of affordable housing, creation of middle-wage jobs, wealth building via opportunities for affordable commercial space, creation of a public open space or park, commemoration of York and cultural placemaking, transportation funding.

The MPAP project team reached out to various organizations and community members on multiple occasions to hear and implement feedback on the Plan and equitable development approaches. The community outreach is discussed in Policy 2 findings.

The 2020 MP2H Existing Conditions Report showed that there are a small number of residents within the area, which is due to residential zoning limitations, and prior displacement instigated by the significant industrial development of properties in the plan area. Overall, there were no

vulnerable populations identified to be living in the plan area. Of the seven houses in the plan area, the majority are owner occupied. The MP2H Equitable Development Report noted that direct displacement risk is low, and that the effect of transit investment and zoning changes are not expected to influence existing housing costs significantly, so the potential for indirect displacement is low.

In the recent past, the area in Northwest Portland to the east and west of Highway 30 has mainly been an employment and industrial-focused area. The 2019 Preliminary Racial Equity Analysis evaluating the potential streetcar extension in Northwest Portland found that Black, Indigenous and People of Color (BIPOC) and other underrepresented communities typically benefit from industrial jobs, due in part to lower barriers to entry. To help offset the loss of prime industrial land and impact to middle wage jobs in the area, the Plan preserves the land to the east of Highway 30 for industrial operations and focuses land use changes to the west, allowing a mix of uses such as employment, commercial and residential development. The Plan requires nonresidential uses in new development, and allows the transfer of the nonresidential use requirement to facilitate larger scale employment uses. Nonresidential spaces include affordable commercial spaces that small businesses, artists, and entrepreneurs can occupy, adding an equitable mix of businesses to the district. In addition, the public benefits agreement allows development of affordable for-sale commercial space as an offset for a portion of the middle-wage job requirement; this supports equitable development by encouraging affordable ownership opportunity.

The MPAP regulations are intended to address housing affordability. The MPAP regulatory bonuses allow additional building floor area when a higher percentage of affordable units than would otherwise be required is developed. In addition, a public benefits agreement, which applies to the two largest large sites, requires a minimum of 200 affordable housing units at 60% Median Family Income (MFI) prior to or concurrent with any market-rate units and within 7 years of the effective date of the PBA or each housing project must include 15% of its dwelling units at 60% of Area Median Income (AMI). This provides affordable housing units sooner, or in greater quantity, than required through existing regulations.

Major investments in deficient public facility areas are outlined in the list of Significant Projects in the CSP. Volumes 1 and 2 of the MPAP mainly affect Zoning Code regulations. Volume 3 of the MPAP works in tandem with these regulatory changes to identify and recommend improvements to public facilities within and near the boundaries of the new York Plan District. As more than 1/3 of Portland's affordable housing units are near the streetcar, continued expansion of streetcar service advances the City and region's growth, climate, and transportation goals. The recommended extension of the Portland Streetcar's North-South Line aims to provide clean, green transportation service that will connect this high-opportunity area to the broader streetcar system and city. The MPAP points to potential updates to the area's existing public facilities to complement the proposed streetcar extension, supporting the ability for more people to live close to or within walking distance of high-quality transit or the NW Town Center's services and amenities. This requires investments in new and improved facilities such as new streets and sidewalks, improvements to pedestrian crossings and bikeways, and upgrades to sanitary and stormwater facilities. For planned projects, facilities will be coordinated, and BES and PWB have been consulted toward the development of the plan to ensure that future development will not lead to negative impacts to public utilities facilities.

The related Public Benefits Agreement also informs and provides guidance on creating a new park/open space for the district. Given the forecasted growth of the new York Plan District as a transit-oriented, mixed-use neighborhood, a new park or open space is needed to provide climate-related benefits and a space for social gathering and recreational activities, all of which help to cultivate a thriving, healthy community. The MPAP Public Benefits Agreement calls for development of a new Park/public open space and specifies the guidelines and requirements for key park features, park location and size, allowed number of park events/functions, among others.

Therefore, the MPAP complies with Policy 3.3, including Policies 3.3a through 3.3f.

**3.3.g.** Encourage developers to engage directly with a broad range of impacted communities to identify potential impacts to private development projects, develop mitigation measures, and provide community benefits to address adverse impacts.

**86. Finding:** The verb “encourage”, which is defined in the 2035 Comprehensive Plan, means to promote or foster using some combination of voluntary approaches, regulations, or incentives. The Neighborhood Contact requirements encourage dialogue between developers and impacted communities, which can include discussion of impacts, mitigation and community benefits. No changes are proposed to these requirements within the MPAP, therefore its amendments are consistent with this policy. In addition, the MPAP employs the Design overlay zone, which provides an opportunity for community dialogue in some development review situations. In addition, the MPAP includes a public benefits agreement which is an agreement between developers and the city regarding features that will benefit the community. The community has had an opportunity to inform the content of the public benefits agreement through the planning and legislative process. Further engagement of community is supported by the public benefits agreement, particularly around the commemoration of York.

Therefore, the MPAP complies with Policy 3.3.g.

**Policy 3.4. All ages and abilities.** Strive for a built environment that provides a safe, healthful, and attractive environment for people of all ages and abilities.

**87. Finding:** The City Council interprets this policy to be focused on creating a supportive built environment for people of all ages and abilities, including children, the elderly, and people with disabilities. Plan improvements to bicycle and pedestrian facilities and transit services will increase opportunities for affordable and physically-accessible connections to jobs, attractions and parks and natural areas. Improvements to the street network, including the creation of a Local Improvement District (LID) with safety improvements for all modes, will create a safer environment for people of all ages and abilities.

Accessibility for all ages and abilities is also supported by the MPAP Plan’s expanded Central Employment mixed-use zone, which provides for physically-accessible units and offer more housing options for people with disabilities or mobility limitations. The expanded zoning facilitates physically-accessible housing close to the town center’s services and transit, including an extension of the Portland Streetcar. An accessible built environment is further by the EX zoning, which is expected to result in multi-level buildings that include elevators and accessible or adaptable units.

This policy is also supported by the Plan’s application of the Design ‘d’ Overlay within the Town Center. New development on these sites would be required to meet the Citywide Design Guidelines, particularly Guideline 07, which focuses on guiding development to support the comfort, safety and dignity of residents, workers and visitors in the town center area will provide

pedestrian facilities and through thoughtful site and building design. This includes ensuring that pedestrian circulation is universally designed for all ages and abilities should link the public realm, building entries, parking, and open areas throughout. Additional guidance with the MP Character Statement includes more direction, requesting that the creation of public spaces feature age and family friendly amenities as specified by the community. Therefore, the MPAP complies with this policy.

**Policy 3.5. Energy and resource efficiency.** Support energy-efficient, resource-efficient, and sustainable development and transportation patterns through land use and transportation planning.

**Policy 3.6. Land efficiency.** Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land while protecting environmental quality.

**Policy 3.7. Integrate nature.** Integrate nature and use green infrastructure throughout Portland.

**Policy 3.8. Leadership and innovation in design.** Encourage high-performance design and development that demonstrates Portland’s leadership in the design of the built environment, commitment to a more equitable city, and ability to experiment and generate innovative design solutions.

**88. Finding:** Consistent with the objectives of Policies 3.5 – 3.8, the MPAP Plan promotes sustainable development and transportation, protecting and enhancing environmental quality and incorporating green infrastructure while supporting resource-efficient land and transportation development patterns. The Plan includes land use and zoning designations (Central Employment, EX) that will allow a broad array of land uses at transit-oriented urban densities with floor area ratios up to 5:1 in most areas. This dense area will be served by an extension of streetcar transit and other supportive transportation investments. The result will be creation of a compact district that makes efficient use of land, energy and other resources. This land use and transportation approach will allow a broad array of uses and will support the ability for more people to live within walking distance of the Town Center’s services and amenities. Further, the Plan contains new zoning requirements, which require the inclusion of green, climate resilient elements in the urban environment, encouraging new development to include features that respond to and enhance the area’s natural features. Additionally, the zoning regulations require a landscaped setback area between the General Employment-zone (EG1) and the Central Employment (EX) zone which allows housing, to help minimize noise and visual impacts, and also integrate natural elements such as trees and other green elements. This standard, in addition to the requirement to provide building design features (i.e. insulation and windows) to help reduce the noise impacts of nearby industrial and employment uses, as well as requirements for urban green features such as on-site landscaping and eco-roofs, promote the redevelopment and intensification of scarce urban land within the town center, while also integrating nature to protect health and environmental quality. All development in the Plan area will continue to be required to meet the City’s stringent stormwater management requirements, which ensures the incorporation of well-functioning, effective green infrastructure. Therefore, the MPAP complies with policies 3.5 – 3.8.

**Policy 3.9. Growth and development.** Evaluate the potential impacts of planning and investment decisions, significant new infrastructure, and significant new development on the physical characteristics of neighborhoods and their residents, particularly under-served and under-represented communities, with attention to displacement and affordability impacts. Identify and implement strategies to mitigate the anticipated impacts.

**89. Finding:** The City of Portland is planning for growth and development, especially in centers such as the NW Town Center. The MPAP Plan includes amendments that allow for additional growth in this town center, with a proposed expansion to incorporate the new Vaughn Nicolai Plan District supported by actions for future infrastructure investments that build upon existing public facilities and services. These plans and investments will have a positive impact on the residents within the Center, particularly those within the immediate plan area. The plan will allow for more mixed-use development, which along with the requirements and incentives for non-residential uses will help create a true mix of uses within the area that previously included heavy industrial uses. The plan also includes an EG1-zoned area adjacent to NW Nicolai Street that will not allow residential uses and serves as a “employment buffer” or transition between heavy industrial areas to the north, and the new and existing mixed use areas to the south. Conflicts between heavy industry and residences be lessened by the buffer (Subdistrict A), and also by redirecting freight traffic to NW Nicolai Street.

Further actions and policies within the MPAP plan also investigated impacts of the plan on the physical characteristics of this area and its residents, particularly under-served and under-represented communities. A preliminary racial equity analysis found that Black, Indigenous and People of Color (BIPOC) and other under-represented communities typically benefit from industrial jobs, due in part to lower barriers to entry. The findings of this preliminary equity analysis emphasized the importance of retaining viable industrial land. The MPAP considered this issue and trade-offs in both the geography and final elements of the plan. The MP2H Northwest study area included and considered the future of industrially zoned land both east and west of Highway 30. The proposed plan focuses land use changes west of Highway 30 and preserves the more active, viable industrial lands east of Highway 30 to balance the need for industrial land with the other policy goals advanced by MPAP.

Overall, the MPAP includes requirements for affordable housing beyond the minimum inclusionary housing provisions; inclusion of non-residential areas for employment; a middle wage jobs target; opportunities for affordable commercial spaces; required on-site outdoor areas for housing; and the opportunity for a significant public open space. These requirements and other future improvements to access open spaces, recreation, parks, bicycle and pedestrian facilities and transit services, will make this area more accessible to under-represented and under-served communities within and outside of the MPAP project area. Therefore, the MPAP complies with this policy.

**Policy 3.10. Rural, urbanizable, and urban land.** Preserve the rural character of rural land outside the Regional Urban Growth Boundary. Limit urban development of urbanizable land beyond the City Limits until it is annexed, and full urban services are extended.

**90. Finding:** The MPAP project does not affect rural land outside the Regional UGB. Therefore, this policy is not applicable.

**Policy 3.11. Significant places.** Enhance and celebrate significant places throughout Portland with symbolic features or iconic structures that reinforce local identity, histories, and cultures and contribute to way-finding throughout the city. Consider these especially at:

- High-visibility intersections
- Attractions
- Schools, libraries, parks, and other civic places
- Bridges

- Rivers
- Viewpoints and view corridor locations
- Historically or culturally significant places
- Connections to volcanic buttes and other geologic and natural landscape features
- Neighborhood boundaries and transitions

**91. Finding:** The MPAP includes elements that enhance and celebrate the significant places of the town center with symbolic features that reinforce the local identity with industrial history and contribute to wayfinding throughout the City.

The plan recognizes the importance of the area’s historic landmark, Montgomery Park, with proposed regulations within the York Plan District to help ensure that views to Montgomery Park will be maintained throughout the district. Areas around Montgomery Park, as well as land to the south and east of this historic landmark, and the American Can, will also be subject to design review, which encourages and requires designs which reference or complement the area’s existing historic context and repurpose structures, materials and features where possible.

The MPAP also includes plan actions (Action CE1) and language within the Public Benefits Agreement that direct the City to work with community members and groups, property owners, and city and regional agencies to identify meaningful ways, through public art and placemaking, to honor York of the Corps of Discovery Expedition, as well as people and stories of Portland’s African-American history. Guidance within the Citywide Design Guidelines, particularly Guideline 01 and 02, encourages culturally and environmentally responsive designs. Further, the MP Character Statement includes additional guidance for new development along NW York Street to incorporate a commemoration of York.

The MP Character Statement provides additional recognition of significant places within the town center with specific guidance for future development on how community regards its special cultural and natural features, including views to Mt. Hood, the Fremont Bridge and Montgomery Park. Other special features that are incorporated within the Character Statement’s diagrammatic map, including the Big Community Tree and ESCO Statue, indicate existing character that the community values. However, while the plan encourages acknowledgement of this history and these elements, it does not require their preservation. Therefore, the MPAP complies with this policy.

## Centers

**Policy 3.12. Role of centers.** Enhance centers as anchors of complete neighborhoods that include concentrations of commercial and public services, housing, employment, gathering places, and green spaces.

**92. Finding:** The MPAP area is proposed to be an extension of the existing NW town center and will complement the existing center’s wide array of uses and services. The MPAP supports this policy by applying land use and zoning designations (Central Employment, EX) that allow a broad array of land uses and will support development of new employment, commercial uses, and housing, and provide opportunity for public services. The plan also calls for expansion of public transit services (Streetcar) and other transportation infrastructure investments to serve the area. The plan area is proximate to existing parks (Wallace Park, Forest Park) that serve this center. In addition, a related public benefits agreement supports the creation of a new public open space/park within

the plan area that will serve both the new area as well as portions of the existing town center. Therefore, the MPAP complies with this policy.

**Policy 3.13. Variety of centers.** Plan for a range of centers across the city to enhance local, equitable access to services, and expand housing opportunities.

**Policy 3.14. Housing in centers.** Provide housing capacity for enough population to support a broad range of commercial services, focusing higher-density housing within a half-mile of the center core.

**Policy 3.15. Investments in centers.** Encourage public and private investment in infrastructure, economic development, and community services in centers to ensure that all centers will support the populations they serve.

**Policy 3.16. Government services.** Encourage the placement of services in centers, including schools and colleges, health services, community centers, daycare, parks and plazas, library services, and justice services.

**Policy 3.17. Arts and culture.** Ensure that land use plans and infrastructure investments allow for and incorporate arts, culture, and performance arts as central components of centers.

**Policy 3.18. Accessibility.** Design centers to be compact, safe, attractive, and accessible places, where the street environment makes access by transit, walking, biking, and mobility devices such as wheelchairs, safe and attractive for people of all ages and abilities.

**Policy 3.19. Center connections.** Connect centers to each other and to other key local and regional destinations, such as schools, parks, and employment areas, by frequent and convenient transit, bicycle sharing, bicycle routes, pedestrian trails and sidewalks, and electric vehicle charging stations.

**Policy 3.20. Green infrastructure in centers.** Integrate nature and green infrastructure into centers and enhance public views and connections to the surrounding natural features.

**93. Finding:** Policies 3.12 through 3.20 provide guidance on the desired characteristics and functions of centers. The MPAP encourages the use of public and private investments through its varied goals and actions. These investments build on community services already present in the area that support its function as a town center, including a library, parks, and schools. The Plan's actions call for future investments in both the physical and social infrastructure of the town center.

The new York Plan District will become part of the Northwest Town Center, extending the characteristics of that existing town center to the north and west. The extension of the town center will feature a new commercial spine along NW Wilson Street which will become the Neighborhood Main Street of the district leading to the Montgomery Park building which has the potential to serve as a major employment anchor in the neighborhood. The area will be served by a planned streetcar extension which will link the area to the Central City. High density housing is allowed through the provisions of the plan, with an expectation that more than 2000 new residential units, including more than 200 affordable units, would be located within this town center extension. Through the application of EX zoning, many additional uses would be allowed including community services, medical services, religious services, daycare, schools and colleges, as well as retail, office, and housing in these areas. Additionally, Action E1 calls for supporting employment and job creation and the Plan does this through regulations that require nonresidential space in development, and is further supplemented by a public benefits agreement with middle-wage jobs targets.

The MPAP recommends multimodal transportation projects to improve access and mobility through the recommended expansion of the NW Town Center. Street designs for final projects are recommended to be supportive of walking, biking, and the use of mobility devices through wide sidewalk corridors, improved crossings, dedicated bikeway facilities, and parallel low-volume routes to ensure comfort and access for users of all ages and abilities. Details of recommended projects are available in Volume 3 of the MPAP, and further details are described in the findings for Chapter 9: Transportation; they are incorporated by reference.

The MPAP provisions incentivize the provision of a public park and other publicly accessible open space through regulatory tools such as FAR transfers and offsets in on-site open area requirements, as well as through the application of the Design Overlay Zone which encourages publicly accessible open space through both the design guidelines and the design standards. The public park is further supported by a public benefits agreement. Transportation investment is proposed along the NW Vaughn corridor and the proposed Streetcar extension, which would also require an investment in art.

Art is encouraged through the Citywide Design Guidelines, specifically Guidelines 01 and 05, which encourage the use of art as a way to create an interesting focal point within a development, while simultaneously connecting it to the local community's identity, history and cultural values. The Design Standards also encourage such artwork to be incorporated into development; such artwork may or may not become part of the public art portfolio. The EX zoning allows for schools and colleges to be located within this area, which could include art schools. Lastly, the zoning will not preclude the development of a major event entertainment space which could be approved through Conditional Use Review. A related public benefits agreement has provisions that support art through private development as well.

The MPAP calls for the extension of NW Roosevelt Street, NW York Street, and NW 25<sup>th</sup> Avenue which increase connectivity through the area for pedestrians, bike, and wheeled transportation. All new streets would be developed using Complete Streets policies and in compliance with the Americans with Disabilities Act of 1990, ensuring accessibility for all. The extension of this center is proposed to be connected to the rest of the center, and with the broader city through the extension of permanent, high-capacity streetcar transit. Additional improvements include corridor and crossing improvements of NW Vaughn Street, improving connectivity to the MPAP area from the Northwest District to the south. Additionally, the MPAP calls for completing a section of the Willamette Greenway Trail along NW Nicolai Street, thereby connecting people by bicycle between NW Front Avenue and the Willamette Greenway and the NW industrial area north and east of Highway 30.

Finally, the MPAP includes regulations that require green features, including landscaping, large trees, ecoroofs, and landscape buffering to support air quality, cooling, and stormwater management. Design Standards C15 and QR8 as well as the Character Statement, in combination with Citywide Guidelines 01, 02, and 03, also encourage reinforcement of views and access to Forest Park, the NW 24th Greenway, the Willamette River, and Mt. Hood beyond (C15, QR8).

Therefore, the MPAP complies with Policies 3.12 – 3.20.

## Central City

**Policy 3.21. Role of the Central City.** Encourage continued growth and investment in the Central City, and recognize its unique role as the region’s premier center for jobs, services, and civic and cultural institutions that support the entire city and region.

**Policy 3.22. Model Urban Center.** Promote the Central City as a living laboratory that demonstrates how the design and function of a dense urban center can concurrently provide equitable benefits to human health, the natural environment, and the local economy.

**Policy 3.23. Central City employment.** Encourage the growth of the Central City’s regional share of employment and continue its growth as the region’s unique center for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

**Policy 3.24. Central City housing.** Encourage the growth of the Central City as Portland’s and the region’s largest center with the highest concentrations of housing and with a diversity of housing options and services.

**Policy 3.25. Transportation hub.** Enhance the Central City as the region’s multimodal transportation hub and optimize regional access as well as the movement of people and goods among key destinations.

**Policy 3.26. Public places.** Promote public places and the Willamette River waterfront in the Central City as places of business and social activity and gathering for the people of its districts and the broader region.

**94. Finding:** Policies 3.21 through 3.26 provide direction on the desired characteristics and functions of the Central City. The Montgomery Park Area Plan proposes land use and transportation changes to support a transit-oriented, mixed-use district within the Northwest District neighborhood area west of Highway 30. This geographic area is not within the Central City. Therefore, these policies are not applicable.

## Gateway Regional Center

**Policy 3.27 Role of Gateway.** Encourage growth and investment in Gateway to enhance its role as East Portland’s center of employment, commercial, and public services.

**Policy 3.28 Housing.** Encourage housing in Gateway, to create East Portland’s largest concentration of high-density housing.

**Policy 3.29 Transportation.** Enhance Gateway’s role as a regional high-capacity transit hub that serves as an anchor for East Portland’s multimodal transportation system.

**Policy 3.30 Public places.** Enhance the public realm and public places in Gateway to provide a vibrant and attractive setting for business and social activity that serves East Portland residents and the region.

**95. Finding:** Policies 3.27 through 3.30 provide direction on the desired characteristics and functions of the Gateway Regional Center. The Montgomery Park Area Plan proposes land use and transportation changes to support a transit-oriented, mixed-use district within the Northwest District neighborhood area west of Highway 30. The project’s geographic area is not in or near the Gateway Regional Center. Therefore, these policies are not applicable.

## Town Centers

**Policy 3.31 Role of Town Centers.** Enhance Town Centers as successful places that serve the needs of surrounding neighborhoods as well as a wider area, and contain higher concentrations of employment, institutions, commercial and community services, and a wide range of housing options.

**Policy 3.32 Housing.** Provide for a wide range of housing types in Town Centers, which are intended to generally be larger in scale than the surrounding residential areas. There should be sufficient zoning capacity within a half-mile walking distance of a Town Center to accommodate 7,000 households.

**Policy 3.33 Transportation.** Improve Town Centers as multimodal transportation hubs that optimize access from the broad area of the city they serve and are linked to the region’s high-capacity transit system.

**Policy 3.34 Public places.** Provide parks or public squares within or near Town Centers to support their roles as places of focused business and social activity.

**96. Finding:** Policies 3.31 through 3.34 provide direction on the desired characteristics and functions of the town centers. The Montgomery Park area is considered a “High Opportunity” area that will feature streetcar access, the historic Montgomery Park office building and the historic American Can Company Complex. The MPAP creates the new York Plan District between NW Nicolai and NW Vaughn streets west of Highway 30, which will be incorporated into the boundaries of the existing Northwest Town Center. The regulations in the York Plan District are intended to influence the area’s transition into a transit-oriented, employment and mixed-use area, promote development that complements the planned extension of the Portland Streetcar, and increase the access of residents within the NW District Town Center and the new plan district to middle-wage jobs, affordable housing and affordable commercial space. The proposed changes in land use designations and zoning to Central Employment (EX) designation and Mixed Employment (EG1) allows a mix of employment uses (office, creative services, manufacturing, distribution, traded sector, and other light-industrial) as well as commercial and residential uses.

The MPAP includes allowances for housing, and requirements for affordable housing beyond the minimum inclusionary housing provisions and minimum density to ensure dense, urban-scale development, which supports a safer and more convenient neighborhood area for walking, biking, and riding public transit. The minimum density for housing is targeted at approximately 87 units per acre, similar to the density standards applied in RX zones. Additionally, the proposed district will increase the NW District Town Center’s capacity for housing by an additional 2,000 or more households/residential units.

In support of improving the MPAP and the NW District Town Center as multimodal transportation hubs, the plan includes the extension of the North-South line through Northwest Portland to serve the Montgomery Park and former ESCO steel sites and connect the MPAP to the larger streetcar system. Plan recommendations include the addition of a multimodal transit hub at the streetcar extension’s new terminus near Montgomery Park.

The MPAP zoning amendments include a Required Outdoor Areas standard that applies the same minimum square feet per unit requirement as the Commercial/Mixed Use zones. These standards allow opportunities for residents to access outdoor areas in the form of open spaces or indoor community or recreational facilities. Other forms or combinations of outdoor areas (e.g., public

plazas, private outdoor spaces, open space) are allowed if they are designed to accommodate recreational activities and gathering. Beyond this, the MPAP zoning allows reductions/offsets of the on-site outdoor area requirement if a public open space is created. This is supported further by a Public Benefits Agreement that calls for creation of a 40,000 square foot public park/open space to serve the new area and nearby existing neighborhood, through offsets to the requirement and other public and private sector actions. Therefore, the MPAP complies with Policies 3.31 through 3.34.

## Neighborhood Centers

**Policy 3.35 Role of Neighborhood Centers.** Enhance Neighborhood Centers as successful places that serve the needs of surrounding neighborhoods. In Neighborhood Centers, provide for higher concentrations of development, employment, commercial and community services, and a wider range of housing options than the surrounding neighborhoods.

**Policy 3.36 Housing.** Provide for a wide range of housing types in Neighborhood Centers, which are intended to generally be larger in scale than the surrounding residential areas, but smaller than Town Centers. There should be sufficient zoning capacity within a half-mile walking distance of a Neighborhood Center to accommodate 3,500 households.

**Policy 3.37 Transportation.** Design Neighborhood Centers as multimodal transportation hubs that are served by frequent-service transit and optimize pedestrian and bicycle access from adjacent neighborhoods.

**Policy 3.38 Public places.** Provide small parks or plazas within or near Neighborhood Centers to support their roles as places of local activity and gathering.

**97. Finding:** Policies 3.35 through 3.38 provide direction on the desired characteristics and functions of neighborhood centers. The MPAP considers nearer term transit investment and land use changes to and around the Montgomery Park area that is part of the Northwest Town Center, which is not a Neighborhood Center. Therefore, these policies are not applicable.

## Inner Ring Districts

**Policy 3.39 Growth.** Expand the range of housing and employment opportunities in the Inner Ring Districts. Emphasize growth that replaces gaps in the historic urban fabric, such as redevelopment of surface parking lots and 20th century auto-oriented development.

**98. Finding:** Inner Ring Districts are described in the Comprehensive Plan as areas that are served by a highly interconnected system of streets and sidewalks, which allows most residents to live near multiple mixed-use corridors, frequent-service transit and neighborhood services, jobs, and amenities. The MPAP will expand housing and employment opportunities by applying Central Employment designations in the plan area which will facilitate a mix of uses including dense housing and employment opportunities. The new plan district further supports this policy by applying minimum densities and minimum nonresidential floor area requirements. The MPAP complies with this policy.

**Policy 3.40 Corridors.** Guide growth in corridors to transition to mid-rise scale close to the Central City, especially along Civic Corridors.

**99. Finding:** The MPAP project area in Northwest Portland west of Highway 30 between NW Vaughn and NW Nicolai streets does not include or involve any changes to corridors. Therefore, Policy 3.40 is not applicable.

**Policy 3.41 Distinct identities.** Maintain and enhance the distinct identities of the Inner Ring Districts and their corridors. Use and expand existing historic preservation and design review tools to accommodate growth in ways that identify and preserve historic resources and enhance the distinctive characteristics of the Inner Ring Districts, especially in areas experiencing significant development.

**100. Finding:** The MPAP project area includes historic landmarks, the Montgomery Park building and American Can building. These are protected resources and regulated through historic design review. Other parts of the MPAP area are subject to the Design overlay zone and Character Statement created specifically for the MPAP area. These tools will help support and build on the district's distinctive characteristics. Therefore, the MPAP complies with this policy.

**Policy 3.42 Diverse residential areas.** Provide a diversity of housing opportunities in the Inner Ring Districts' residential areas. Encourage approaches that preserve or are compatible with existing historic properties in these areas. Acknowledge that these areas are historic assets and should retain their established characteristics and development patterns, even as Inner Ring centers and corridors grow. Apply base zones in a manner that takes historic character and adopted design guidelines into account.

**101. Finding:** The proposed MPAP amendments will change the land use designations in the plan area to include Central Employment which will support development of dense housing opportunities in an inner ring district. There are currently eight existing houses in the area, and the proposed zoning designations will make these conforming uses, which may facilitate reinvestment. The plan's zoning and regulations will complement the existing historic resources in the district (Montgomery Park, American Can) which are non-residential structures and are currently zoned EX and EG1. In particular, sites within the Design overlay zone are subject to the design standards or the Character Statement, both of which require new development to complement existing industrial and historic context. For example, the Character Statement encourages new development to complement the Montgomery Park and American Can buildings, either through new forms which reference industrial materials and characteristics or by repurposing existing industrial buildings materials and features. Therefore, the MPAP complies with this policy.

**Policy 3.43 Active transportation.** Enhance the role of the Inner Ring Districts' extensive transit, bicycle, and pedestrian networks in conjunction with land uses that optimize the ability for more people to utilize this network. Improve the safety of pedestrian and bike connections to the Central City. Strengthen transit connections between the Inner Ring Districts and to the Central City.

**102. Finding:** The MPAP 's proposed Central Employment (EX) and Mixed Employment (ME) zoning designations along with development standards aim to transition the area into a transit-oriented, mixed-use urban area in which high-density employment, residential, and commercial development are allowed. The plan creates opportunities for the rehabilitation of underutilized opportunity sites that have significant redevelopment potential, including the historic Montgomery Park office building and the historic American Can Company Complex both of which contribute to the character of the neighborhood, as well as the former ESCO Steel site.

The MPAP Transportation Plan calls for improvements to multiple modes, including active transportation (bike, pedestrian, transit) that will work with the land use plan and create a dense, transit and pedestrian oriented district that is connected to the Central City, Northwest Portland,

as well as neighboring industrial areas. To facilitate this, the street network is expected to be completed, and large sites will need to meet City connectivity requirements when redeveloped.

The Bureau of Transportation categorizes project recommendations based on different scales of connection, which are internal, neighborhood, and city and regional connections. As part of the overarching streetcar extension project, the MPAP promotes the enhancement of the transportation network on all three scales of connection within the project area by extending and connecting multimodal local streets to improve the area street grid for all users, recommending pedestrian and bicycle infrastructure improvements including dedicated facilities, improved crossings, and traffic calming elements, and connecting users to the streetcar system and to the broader regional transit system.

MPAP recommendations enhance the Northwest District's transit, bicycle, and pedestrian networks in conjunction with land use amendments that are supportive of denser development. The MPAP recommends improved multimodal street connectivity in the area to help extend the district's consistent pattern of 200'-deep rectilinear blocks, including the recommendation of a Master Street Plan to ensure further street connectivity. The plan recommends improved bicycle, pedestrian, and transit connections to the Central City through specific project recommendations and Modal and Design Street Classification updates supportive of those changes. A Pedestrian District is also recommended for the area, which will require pedestrian-supportive sidewalks and furnishing zones wide enough for large street trees. Specific recommendations are detailed in Volume 3 of the MPAP.

The recommended project cross sections in the MPAP aim to reduce modal conflicts so that people of all ages and abilities can safely and conveniently commute within, to, and from the area, including options for avoiding conflicts with US-30 on- and off-ramps and other high-stress streets. Therefore, the MPAP complies with Policy 3.43.

## Corridors

**Policy 3.44. Growth and mobility.** Coordinate transportation and land use strategies along corridors to accommodate growth and mobility needs for people of all ages and abilities.

**Policy 3.45. Connections.** Improve corridors as multimodal connections providing transit, pedestrian, bicycle, and motor vehicle access and that serve the freight needs of centers and neighborhood business districts.

**Policy 3.46. Design.** Encourage street design that balances the important transportation functions of corridors with their roles as the setting for commercial activity and residential living.

**Policy 3.47. Green infrastructure in corridors.** Enhance corridors with distinctive green infrastructure, including landscaped stormwater facilities, extensive tree plantings, and other landscaping that both provide environmental function and contribute to a quality pedestrian environment.

**103. Finding:** Policies 3.44 through 3.47 provide direction on the desired characteristics and functions of corridors as well as street design and future land use changes. Although there are two sections of designated civic and neighborhood corridors that intersect with NW Vaughn Street at NW 25th and NW 23rd Avenues, the MPAP project area in Northwest Portland west of Highway 30 between NW Vaughn and NW Nicolai streets does not include or involve any changes to a corridor. Therefore, Policies 3.44 through 3.47 are not applicable.

## Civic Corridors

**Policy 3.48. Integrated land use and mobility.** Enhance Civic Corridors as distinctive places that are models of ecological urban design, with transit-supportive densities of housing and employment, prominent street trees and other green features, and high-quality transit service and pedestrian and bicycle facilities.

**Policy 3.49. Design great places.** Improve public streets and sidewalks along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe, healthy, and attractive pedestrian environment, and contribute to quality living environments for residents.

**Policy 3.50. Mobility corridors.** Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way or on nearby parallel routes.

**Policy 3.51. Freight.** Maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets.

**104. Finding:** Policies 3.48 through 3.51 provide direction on the desired characteristics and functions of civic corridors as well as street design and future land use changes. The Bureau of Transportation defines civic corridors as the city’s widest and most prominent streets that “balance the need to provide safe mobility for all modes while moving large volumes of people and goods.” These policies are implemented by the Bureau of Transportation through the Transportation System Plan and street design guidelines, as well as by higher-density mixed-use and multi-dwelling zoning along the corridors mapped on the UDF. The MPAP does not include or impact any civic corridors. Therefore, these policies do not apply.

## Neighborhood Corridors

**Policy 3.52. Neighborhood Corridors.** Enhance Neighborhood Corridors as important places that support vibrant neighborhood business districts with quality multi-family housing, while providing transportation connections that link neighborhoods.

**105. Finding:** Policy 3.52 provides direction on the desired characteristics and functions of corridors as well as street design and future land use changes. This policy is primarily implemented by the Bureau of Transportation through the Transportation System Plan and by higher-density mixed-use and multi-dwelling zoning along the corridors mapped on the UDF. Although there are two sections of designated civic and neighborhood corridors that run perpendicular to NW Vaughn Street at NW 25th and NW 23rd Avenues, the MPAP project area in Northwest Portland west of Highway 30 between NW Vaughn and NW Nicolai streets does not include or involve any changes to a neighborhood corridor. Therefore, this policy is not applicable.

## Transit Station Areas

**Policy 3.53. Transit-oriented development.** Encourage transit-oriented development and transit-supportive concentrations of housing and jobs, and multimodal connections at and adjacent to high-capacity transit stations.

**Policy 3.54. Community connections.** Integrate transit stations into surrounding communities and enhance pedestrian and bicycle facilities (including bike sharing) to provide safe and accessible connections to key destinations beyond the station area.

**Policy 3.55. Transit station area safety.** Design transit areas to improve pedestrian, bicycle, and personal safety.

**Policy 3.56. Center stations.** Encourage transit stations in centers to provide high density concentrations of housing and commercial uses that maximize the ability of residents to live close to both high-quality transit and commercial services.

**Policy 3.57. Employment stations.** Encourage concentrations of jobs and employment-focused land uses in and around stations in employment-zoned areas.

**Policy 3.58. Transit neighborhood stations.** Encourage concentrations of mixed-income residential development and supportive commercial services close to transit neighborhood stations. Transit neighborhood stations serve mixed-use areas that are not in major centers.

**Policy 3.59. Destination stations.** Enhance connections between major destinations and transit facilities and strengthen the role of these station areas as places of focused activity.

**106. Finding:** Policies 3.53 through 3.59 provide direction on the desired characteristics and functions of transit station areas. The MPAP includes project and policy recommendations in and near Montgomery Park area such as the streetcar extension of the Portland Streetcar North/South (NS) Line as the first phase of redevelopment and new street connections to support mobility in the district, which encourage transit-oriented development and transit-supportive concentrations of housing, jobs, and multimodal connections. Additional actions, such as improvements to pedestrian crossings and the addition of new bikeways, will provide safe and accessible connections to the Central City and destinations across the Willamette River. The MPAP land use and transportation amendments and actions aim to ensure continued transit-related improvements in response to forecasted growth in the area, which partially fulfills Policies 3.53 through 3.55. However, the MPAP project area does not have a Transit Station Area designation. Therefore, Policies 3.53 through 3.59 are not applicable.

## City Greenways

**Policy 3.60. Connections.** Create a network of distinctive and attractive City Greenways that link centers, parks, schools, rivers, natural areas, and other key community destinations.

**Policy 3.61. Integrated system.** Create an integrated City Greenways system that includes regional trails through natural areas and along Portland’s rivers, connected to neighborhood greenways, and heritage parkways.

**Policy 3.62. Multiple benefits.** Design City Greenways that provide multiple benefits that contribute to Portland’s pedestrian, bicycle, green infrastructure, and parks and open space systems.

**Policy 3.63. Design.** Use design options such as distinctive street design, motor vehicle diversion, landscaping, tree plantings, scenic views, and other appropriate design options, to create City Greenways that extend the experience of open spaces and nature into neighborhoods, while improving stormwater management and calming traffic.

**107. Finding:** Within the network of City Greenways, the span of NW Nicolai Street included in the MPAP project area is part of the Pacific Greenway regional trail. The Comprehensive Plan defines trails as routes that “provide public access for recreation or transportation purposes.” The MPAP Volume 3 recommends extensions of the NW 24th Avenue Neighborhood Greenway and NW 27th Avenue Neighborhood Greenway to a planned multi-use path along NW Nicolai Street in an effort to improve the area’s connection to the broader City Greenways system. The MPAP recommends a multi-use path along the north side of NW Nicolai Street between NW 24th Avenue and NW 29th Avenue and additional future bikeways throughout and near the Montgomery Park area to

support connections to the Willamette River waterfront and, in turn, the Willamette Greenway trail. There is potential for long-term improvements that could link the project area to other key community, city and regional destinations like Forest Park.

The Urban Design Framework breaks down the plan area into five distinctive subareas. Subarea A is defined as the northern edge of the plan area, along NW Nicolai Street from NW Wardway to Highway 30. The southwestern edge of Subarea A has a developing tree canopy. To encourage tree canopy expansion in this transitioning industrial zone through landscaping and plantings of a variety trees, the MPAP offers multiple options for developers to integrate urban green features and design outdoor areas with the intent of achieving Comprehensive Plan policy to promote healthy and active living, ensuring access to outdoor space, and providing multiple environmental and public benefits. A few of these benefits are the provision of functional and attractive stormwater facilities, habitats for birds and other wildlife, shade and cooling, and visual and physical separation between the zones/subareas. In tandem, the MPATP recommends the implementation of tools including pedestrian and bicycle refuge and median diverters to build safe and accessible multimodal connections that extend the experience of nature and open space into the neighborhood, bridging the Montgomery Park area and the rest of the Northwest District. Therefore, the MPAP complies with Policies 3.60 through 3.63.

### Urban habitat corridors

**Policy 3.64. Urban habitat corridors.** Establish a system of connected, well-functioning, and diverse habitat corridors that link habitats in Portland and the region, facilitate safe fish and wildlife access and movement through and between habitat areas, enhance the quality and connectivity of existing habitat corridors, and establish new habitat corridors in developed areas.

**108. Finding:** Habitat corridors are natural and built areas that provide safe, healthy places for marine and wildlife species. Portland’s habitat corridors are mapped on Figure 3-6 of the Comprehensive Plan. The City has an adopted Natural Resources Inventory (NRI) that provides a basis for establishing future habitat corridors and enhancing connectivity. The City’s environmental overlay zone regulations are the implementing regulatory tools to preserve natural resources and their ecosystem services, particularly in relationship habitat areas. The MPAP area does not include any existing habitat corridors and amend either the NRI or the existing environmental zone regulations. Therefore, Policy 3.64 is not applicable.

**Policy 3.65. Habitat connection tools.** Improve habitat corridors using a mix of tools including natural resource protection, property acquisition, natural resource restoration, tree planting and landscaping with native plants, and ecological design integrated with new development.

**Policy 3.66. Connect habitat corridors.** Ensure that planned connections between habitat corridors, greenways, and trails are located and designed to support the functions of each element, and create positive interrelationships between the elements, while also protecting habitat functions, fish, and wildlife.

**109. Finding:** The MPAP zoning code amendments (33.597) include Residential-Employment Buffer Standards and Urban Green Features. The buffer provides setback and landscaping specification which will mitigate conflicts, improve tree canopy, and achieve climate-related benefits of green areas. The green features standards contain provisions applicable to development in the EX zone for integrating green elements such as landscaping, large trees or ecoroofs. These will mitigate

effects of built and paved areas, and potentially create opportunities for urban habitats for fish, birds, and other wildlife.

Two significant natural resources sit adjacent to the Montgomery Park area. The Willamette River is to the east while Forest Park is to the west of the project area. The MPAP development regulations and the character statement allow and encourage tree plantings, landscaping, and the incorporation of green spaces along NW Vaughn Street to accentuate the area's connection to Forest Park, which has over eighty miles of trails and is home to hundreds of native wildlife and plant species. The character statement also highlights the opportunity for NW Wilson to be developed in a way that references the Willamette River.

The MPAP amendments, including the MPAP Character Statement, provide direction and offer options to protect, ensure, and support the area's connection to natural resources, trails, and parks. Therefore, the MPAP complies with Policies 3.65 and 3.66.

## Employment areas

**Policy 3.67. Employment area geographies.** Consider the land development and transportation needs of Portland's employment geographies when creating and amending land use plans and making infrastructure investments.

**110. Finding:** Comprehensive Plan Figure 3-7 identifies four employment area geographies – Central City, industrial/employment, commercial and institutional. The MPAP project area is included within the industrial/employment area north of NW Vaughn Street, but a portion of the area west of Highway 30 is designated as ME Mixed Employment in the Comprehensive Plan. This designation indicates that the Comprehensive Plan envisioned transitioning this area away from an Industrial Sanctuary and toward a mixed-use, employment focused future.

The MPAP refines and implements this transition by applying Central Employment (EX) Comprehensive Plan and zoning designation to the area west of Highway 30. The EX zoning area allows a wide range of dense employment uses, as well as commercial and residential uses, and is supported by a range of planned transportation improvements including: transit, bike, pedestrian and roadways. The plan also maintains EG1 employment zoning along NW Nicolai Street, which is a freight route.

These changes reinforce the area between NW Vaughn Street and NW Nicolai Street, west of Highway 30 as an area of transition between the heavy industrial uses in Guilds Lake and the dense residential uses in the Northwest District. The provisions in the York Plan District require and incentivize a broad mix of higher density uses. The MPAP will serve to advance a greater number of Comprehensive Plan goals and policies in the area, while leaving capacity in the industrial land supply (see the findings response to Statewide Goal 9).

Therefore, the MPAP complies with this policy.

**Policy 3.68. Regional Truck Corridors.** Enhance designated streets to accommodate forecast freight growth and support intensified industrial use in nearby freight districts. *See Figure 3-7 — Employment Areas.* Designated regional truckways and priority truck streets (Transportation System Plan classifications are shown to illustrate this network).

**111. Finding:** To facilitate the MPAP area's transition into a district with a mix of employment, housing, and commercial, the Montgomery Park Area Transportation Plan calls for the elimination of the freight district and the change of all area streets to local service truck streets in the area west of

Highway 30 and NW 23rd Avenue, which will support the local goods and service delivery that is expected based on the proposed land use and zoning changes. To protect Portland's limited supply of industrial land, the plan also preserves the freight district of active industrial lands and corresponding streets to the east of Highway 30. The MPAP also recommends the classification of NW Nicolai Street to an Industrial Road, supporting industrial and employment land uses adjacent to NW Nicolai Street and to further prioritize the street as a freight route and access point to industrial land uses and US-30. Therefore, the MPAP complies with Policy 3.68.

## Rivers Pattern Area

**Policy 3.69. Historic and multi-cultural significance.** Recognize, restore, and protect the historic and multi-cultural significance of the Willamette and Columbia Rivers, including current activities such as subsistence fishing of legally-permitted fish species.

**Policy 3.70. River transportation.** Recognize and enhance the roles of the Willamette and Columbia rivers as part of Portland's historic, current, and future transportation infrastructure, including for freight, commerce, commuting, and other public and private transportation functions.

**Policy 3.71. Recreation.** Improve conditions along and within the Willamette and Columbia rivers to accommodate a diverse mix of recreational users and activities. Designate and invest in strategically-located sites along the length of Portland's riverfronts for passive or active recreation activities that are compatible with nearby land uses, historically and culturally important sites, significant habitat areas, restoration sites, and native fish and wildlife usage.

**Policy 3.72 Industry and port facilities.** Enhance the regionally significant economic infrastructure that includes Oregon's largest seaport and largest airport, unique multimodal freight, rail, and harbor access; the region's critical energy hub; and proximity to anchor manufacturing and distribution facilities.

**Policy 3.73. Habitat.** Enhance the roles of the Willamette and Columbia rivers and their confluence as an ecological hub that provides locally and regionally significant habitat for fish and wildlife and habitat restoration opportunities.

**Policy 3.74. Commercial activities.** Enhance the roles of the Willamette and Columbia rivers in supporting local and regional business and commerce, including commercial fishing, tourism, recreation, and leisure.

**Policy 3.75. River neighborhoods.** Enhance the strong river orientation of residential areas that are located along the Willamette and Columbia Rivers.

**Policy 3.76. River access.** Enhance and complete Portland's system of river access points and riverside trails, including the Willamette Greenway Trail, and strengthen active transportation connections between neighborhoods and the rivers.

**Policy 3.77. River management and coordination.** Coordinate with federal, state, regional, special districts, and other agencies to address issues of mutual interest and concern, including economic development, recreation, water transportation, flood and floodplain management and protection, regulatory compliance, permitting, emergency management, endangered species recovery, climate change preparation, Portland Harbor Superfund, brownfield cleanup, and habitat restoration.

**Policy 3.78 Columbia River.** Enhance the role of the Columbia River for river dependent industry, fish and wildlife habitat, subsistence and commercial fisheries, floating- and land-based neighborhoods, recreational uses, and water transportation.

**Policy 3.79 Willamette River North Reach.** Enhance the role of the Willamette River North Reach for river dependent industry, fish and wildlife habitat, and as an amenity for riverfront neighborhoods and recreational users.

**Policy 3.80. Willamette River Central Reach.** Enhance the role of the Willamette River Central Reach as the Central City and region’s primary riverfront destination for recreation, history and culture, emergency response, water transportation, and as habitat for fish and wildlife.

**Policy 3.81 Willamette River South Reach.** Enhance the role of the Willamette River South Reach as fish and wildlife habitat, a place to recreate, and as an amenity for riverfront neighborhoods and others.

**Policy 3.82. Willamette River Greenway.** Maintain multi-objective plans and regulations to guide development, infrastructure investments, and natural resource protection and enhancement within and along the Willamette Greenway.

**112. Finding:** Policies 3.69 through 3.82 provide direction on the desired characteristics and functions of the Rivers Pattern Area, which includes areas along the Willamette and Columbia Rivers. The MPAP project area currently falls within the Rivers Patter Area. However, based on the plan’s proposed Comprehensive Plan designation changes to expand the Central Employment mixed-used zone, the MPAP is proposing to remove the Rivers Pattern Area designation and replace it with the Inner Neighborhood Pattern Area. The plan’s standards support a mixed-use district that no longer prioritizes heavy industrial facilities and services, but instead has an employment-focused development pattern that includes office and commercial retail uses, which more effectively supports the characteristics and functions of the Inner Neighborhoods Pattern Area. Therefore, Policies 3.69 through 3.82 are not applicable.

### Central City Pattern Area

**Policy 3.83. Central City districts.** Enhance the distinct identities of the Central City’s districts.

**Policy 3.84. Central City river orientation.** Enhance and strengthen access and orientation to the Willamette River in the Central City and increase river-focused activities.

**Policy 3.85. Central City pedestrian system.** Maintain and expand the Central City’s highly interconnected pedestrian system.

**Policy 3.86. Central City bicycle system.** Expand and improve the Central City’s bicycle system.

**113. Finding:** Polices 3.83 through 3.86 provide direction on the desired characteristics and functions of the Central City Pattern Area. The Montgomery Park Area Plan proposes land use and transportation changes to support a transit-oriented, mixed-use district within the Northwest District neighborhood area west of Highway 30. This geographic area is not included in the Central City Pattern Area. Therefore, these policies are not applicable.

### Inner Neighborhoods Pattern Area

**Policy 3.87 Inner Neighborhoods main streets.** Maintain and enhance the Streetcar Era pattern of street-oriented buildings along Civic and Neighborhood corridors.

**Policy 3.88 Inner Neighborhoods street patterns.** Preserve the area’s urban fabric of compact blocks and its highly interconnected grid of streets.

**Policy 3.89 Inner Neighborhoods infill.** Fill gaps in the urban fabric through infill development on vacant and underutilized sites and in the reuse of historic buildings on adopted inventories.

**Policy 3.90 Inner Neighborhoods active transportation.** Use the extensive street, sidewalk, and bikeway system and multiple connections to the Central City as a key part of Portland’s active transportation system

**Policy 3.91 Inner Neighborhoods residential areas.** Continue the patterns of small, connected blocks, regular lot patterns, and streets lined by planting strips and street trees in Inner Neighborhood residential areas.

**114. Finding:** Policies 3.87 through 3.91 provide direction on the desired characteristics and functions of the Inner Neighborhoods Pattern Area. The Inner Neighborhoods were developed and shaped during the Streetcar Era of the late 19th and early 20th centuries. The Inner Neighborhoods are characterized by a regular pattern of neighborhood business districts located along former streetcar streets interspersed with residential areas. These policies express the overall design approach in Inner Neighborhoods. They address block patterns, infill development, building orientation and design, and active transportation.

The Comprehensive Plan pattern areas are used to inform how urban development should respond to and enhance existing conditions. The MPAP project area currently falls within the Rivers Pattern Area (Policies 3.69 through 3.82) as indicated in Comprehensive Plan Figure 3-8. However, the Montgomery Park Area Plan, including the proposed Mixed Employment (ME) and the Central Employment (EX) designations and zoning, prompt the district’s shift away from industrial employment towards an urban, transit-oriented mixed use future development pattern. Additionally, the project area’s distance from the Willamette River, the area’s proximity to Forest Park and the other NW Portland neighborhoods, and the Plan’s proposal to improve internal, neighborhood, and city/regional connections suggest that the plan area would best be characterized and informed by the Inner Neighborhoods Pattern Area.

Located near the Central City and the Northwest District, the Plan area is a high opportunity area close to community assets, resources, and amenities. Certain properties in the Plan area have significant redevelopment potential including the former ESCO Steel site. The MPAP recognizes the potential for infill development on vacant and underutilized sites such as the rehabilitation of the two other large property sites in the area, the historic Montgomery Park office building and the historic American Can Company Complex. Their respective EX and EG1 zoning would allow substantial additional employment, office, and commercial uses.

The Montgomery Park Area Transportation Plan proposes extension of the Portland Streetcar’s North-South line to connect the Montgomery Park area to the broader streetcar system and city/regional transit network. The Plan area’s existing street network is disconnected with missing sidewalks, and the Plan includes recommendations for new and improved streets with pedestrian and bicycle connections, signalized intersections, and multimodal facilities to support a more connected, walkable, and rollable street grid throughout the district. Recommended and planned street connections intended to improve multimodal transit circulation will fill gaps in the street grid, while retaining some opportunity for larger lot sizes and ensuring flexibility for development programming. Although there are no Civic and Neighborhood Corridors that run through the MPAP project area, the Plan proposes required active ground floor regulations to develop an active public realm and street frontage along sections of the streetcar alignment and main street, on NW Wilson Street between NW 24th and NW 27th avenues (the new streetcar main street).

The MPAP’s use regulations along with the requirements for on-site landscaping, urban green features, and residential outdoor areas will help to enhance the character of the Plan area and

achieve the desired outcomes of a pedestrian and transit-oriented neighborhood along the streetcar alignment. They also support residential character in some areas. The MPAP encourages development in certain areas to reflect residential characteristics such as reducing building height and massing, and enhanced street landscaping along NW Vaughn Street to complement and ease the transition between the Plan area and the lower scale of the neighborhood to the south.

Therefore, the MPAP complies with Policies 3.87 through 3.91.

### **Eastern Neighborhoods Pattern Area**

**Policy 3.92 Eastern Neighborhoods street, block, and lot pattern.** Guide the evolving street and block system in the Eastern Neighborhoods in ways that build on positive aspects of the area’s large blocks, such as opportunities to continue mid-block open space patterns and create new connections through blocks that make it easier to access community destinations.

- A. **North-South Transit.** Support development of, access to, and service enhancement for North-South transit.
- B. **Alleyways.** Promote and guide the implementation of alley improvements that result in alleys that are safe, well maintained, and an asset for the community.

**Policy 3.93 Eastern Neighborhoods site development.** Require that land be aggregated into larger sites before land divisions and other redevelopment occurs. Require site plans which advance design and street connectivity goals.

**Policy 3.94 Eastern Neighborhoods trees and natural features.** Encourage development and right-of-way design that preserves and incorporates Douglas fir trees and groves, and that protects the area’s streams, forests, wetlands, steep slopes, and buttes.

**Policy 3.95 Eastern Neighborhoods buttes.** Enhance public views of the area’s skyline of buttes and stands of tall Douglas fir trees.

**Policy 3.96 Eastern Neighborhoods corridor landscaping.** Encourage landscaped building setbacks along residential corridors on major streets.

**Policy 3.97 Eastern Neighborhoods active transportation.** Enhance access to centers, employment areas, and other community destinations in Eastern Neighborhoods by ensuring that corridors have safe and accessible pedestrian and bicycle facilities and creating additional secondary connections that provide low-stress pedestrian and bicycle access.

**115. Finding:** Policies 3.92 through 3.97 provide direction on the desired characteristics and functions of the Eastern Neighborhoods Pattern Area, which the Comprehensive Plan defines as eastern portions of the city, mostly located east of 82nd Avenue and largely annexed to Portland in the 1980s and 1990s. The Montgomery Park Area Plan proposes land use and transportation changes to support a transit-oriented, mixed-use district within the Northwest District neighborhood area west of Highway 30. This geographic area is not included in the Eastern Neighborhoods Pattern Area. Therefore, these policies are not applicable.

### **Western Neighborhoods Pattern Area**

**Policy 3.98 Western Neighborhoods village character.** Enhance the village character of the Western Neighborhoods’ small commercial districts and increase opportunities for more people to live within walking distance of these neighborhood anchors.

- A. **Prioritize new sidewalk connections.** Prioritize adding sidewalks where there are none over

expanding/ widening existing connections.

- B. **North-South transit.** Support development of, access to, and service enhancement for North-South transit.

**Policy 3.99 Western Neighborhoods active transportation.** Provide safe and accessible pedestrian and bicycle connections, as well as off-street trail connections, to and from residential neighborhoods.

**Policy 3.100 Western Neighborhoods development.** Encourage new development and infrastructure to be designed to minimize impacts on the area’s streams, ravines, and forested slopes.

**Policy 3.101 Western Neighborhoods habitat corridors.** Preserve, enhance, and connect the area’s network of habitat areas and corridors, streams, parks, and tree canopy.

**Policy 3.102 Western Neighborhoods trails.** Develop pedestrian-oriented connections and enhance the Western Neighborhoods’ distinctive system of trails to increase safety, expand mobility, access to nature, and active living opportunities in the area.

- A. **TDM strategies.** Explore and emphasize Transportation Demand Management strategies and tools, that function in spite of unique topographic conditions of the West Hills, to provide effective options for commuters while reducing carbon emissions, improving neighborhood livability and cycling safety, and protecting important natural resources.
- B. **Forest Park natural resources.** Protect the ecological quality and function of natural Forest Park’s natural resources in the design and development of transportation projects in or near the park and avoid, minimize, then mitigate adverse impacts to wildlife, habitat, and riparian corridors.
- C. **Focus for active transportation.** Primarily focus sidewalk and bicycle route improvements in (and in close proximity to) the designated Centers and Corridors of the Comp Plan.
- D. **Filling gaps in connections.** Fill gaps in important access connections, including exploring traditional ROW acquisition and partnerships with other City bureaus.
- E. **Accessible routes.** Improve accessibility/create parallel routes in some cases (for motor vehicles, bicycles and pedestrians, and/or both). Explore what existing facilities and connections most merit upgrades or secondary accessible routes.

**116. Finding:** Policies 3.98 through 3.102 provide direction on the desired characteristics and functions of the Western Neighborhoods Pattern Area. The Montgomery Park Area Plan proposes land use and transportation changes to support a transit-oriented, mixed-use district within the Northwest District neighborhood area west of Highway 30. This geographic area is not included in the Western Neighborhoods Pattern Area. Therefore, these policies are not applicable.

## Chapter 4: Design and Development

**Goal 4.A: Context-sensitive design and development.** New development is designed to respond to and enhance the distinctive physical, historic, and cultural qualities of its location, while accommodating growth and change.

**117. Finding:** The Design and Development chapter focuses on the specifics of the built environment. City Council interprets this goal as calling for the design of new development to consider and respond to the context where the development is taking place. City Council interprets the term distinctive physical, historic, and cultural qualities of its location to mean characteristics of the existing and historic built environment of a district or place including, but not limited to, block pattern, arrangement and design of streets and pedestrian realm, street wall, street-level activity, building use, construction type, architectural style, exterior materials, design details, massing, and height. In addition, a neighborhood’s historical narrative, such as influences from major infrastructure or institutional investments or changing socio-economic compositions, also help define the distinct attributes of different neighborhoods. City Council interprets response to context to not be about replicating what exists, but for development and the regulations that shape this development to be informed by context.

The MPAP supports this policy through its vision, Land Use Concept, Montgomery Park Character Statement, and Urban Design Framework which help inform the proposed regulations for new development, ensuring they are tailored to the distinctive physical, historic, and cultural qualities of the district. While the Land Use Concept outlines the proposal for a new transit-oriented, mixed-use district, the plan’s Urban Design Framework outlines how this new district will be shaped and impacted by the plan area’s varied urban forms and building typologies and supported by the creation of five distinctive Subareas. The Plan responds to these distinct Subareas with context specific policies, actions and regulations, as seen in the creation of the York Plan District (Volume 2, Section 2) which furthers the impact of these geographic distinctions by breaking the areas up into four subdistricts with distinct regulatory approaches.

In addition to the plan district provisions, there is also a proposal to expand the Design ‘d’ Overlay with the application of the Central Employment (EX) zone. These sites will be subject to meeting either the Citywide Design Guidelines (discretionary) or the Design Standards (objective).

Both the Citywide Design Guidelines and Design Standards are designed to guide growth of development and change within the City’s centers and along its corridors. They support these concentrated areas of the city by fostering development that incorporates three design-related core values, or “tenets”: build on context, contribute to the public realm and promote quality and resilience. Citywide Design Guidelines 01-03 require development to respond to context on multiple scales (district, adjacent and site). Development must build on the character and local identity of a place, build positive relationships with adjacent surroundings, and meaningfully integrate and enhance onsite features to contribute to a location’s uniqueness, including topography, historic and natural resources. They specifically address how new development within the district should respond to the areas’ unique attributes (historic landmarks, industrial fabric, terminating vistas, etc.) within the urban fabric. Additionally, Guideline 09 ensures new development is designed with resilience and environmental stewardship in mind which will help enhance the distinctive physical qualities of this area.

Further, the Montgomery Park Character Statement also supports Citywide Design Guideline 01 and provides specific guidance for future development by identifying which distinctive, historic

and cultural places, spaces and resources the community values. Responses to community engagement during the MPAP process conveyed that the area’s industrial heritage, historic landmarks, and rich cultural history are amongst its most valued assets. The character statement provides examples of how new development can accommodate change while finding ways to enhance these assets (i.e. referencing industrial materials and characteristics and repurposing existing industrial buildings) and while adding elements that improve their accessibility and inclusivity (i.e. Programming open spaces with elements such as playgrounds, performance spaces, historic markers and/or passive recreation areas.).

Therefore, the MPAP complies with this goal.

**Goal 4.B: Historic and cultural resources.** Historic and cultural resources are integral parts of an urban environment that continue to evolve and are preserved.

**118. Finding:** City Council interprets this goal as recognizing that Portland’s built environment will and should continue to change over time, but that it is important that historic and cultural resources be preserved as part of this changing environment. City Council interprets “historic and cultural resources” to refer to “historic resources” as defined in the Comprehensive Plan, which indicates that these are designated historic resources that 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.”

Historic resources are located throughout the City, including in the MPAP area. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City’s Historic Resources overlay zone. The MPAP amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445).

New development in these areas, as well as land to the south and east of Montgomery Park and the American Can Complex landmarks will also be subject to design standards or design guidelines. Both the standards and guidelines encourage and require designs which reference or complement the area’s existing historic context and repurpose structures, materials and features where possible.

Therefore, the MPAP complies with this goal.

**Goal 4.C: Human and environmental health.** Neighborhoods and development are efficiently designed and built to enhance human and environmental health: they protect safety and livability; support local access to healthy food; limit negative impacts on water, hydrology, and air quality; reduce carbon emissions; encourage active and sustainable design; protect wildlife; address urban heat islands; and integrate nature and the built environment.

**119. Finding:** City Council interprets this goal as calling for the protection and enhancement of human and environmental health as objectives that should guide City actions related to the built environment. City Council interprets development that is “efficiently designed” as designed to be resource- and cost-efficient.

Consistent with Goal 4.C, the MPAP promotes human and environmental health through a broad range of provisions, including expanded requirements for outdoor spaces; requirements for large sites to include common areas to provide residents with access to recreation, socialization and

opportunities to grow food; allowances that promote green infrastructure such as ecoroofs and stormwater planters as part of development; and FAR transfer allowances in exchange for publicly-accessible open space and by allowing more housing options close to services and transit.

Further, the plan will enhance human health by ensuring a safe walkable, bikeable, and transit-supportive urban form that provides access to parks, natural areas, and nearby goods and services. These, in combination will in turn enhance environmental health by helping to reduce heat island effect and carbon emissions, improve stormwater management and air quality and minimize impacts to wildlife. MPAP amendments will require development in the plan district's EX areas to incorporate urban green features, including native landscaping to reflect the area's natural heritage, space for large trees to build upon the center's existing tree canopy, or eco-roofs to help manage stormwater, all of which can help improve the urban heat island effect.

Therefore, the MPAP complies with this goal.

**Goal 4.D: Urban resilience.** Buildings, streets, and open spaces are designed to ensure long-term resilience and to adjust to changing demographics, climate, and economy, and withstand and recover from natural disasters.

**120. Finding:** City Council interprets this goal as calling for the protection and enhancement of human and environmental health as objectives that should guide City actions related to the built environment. City Council interprets development that is "efficiently designed" as designed to be resource- and cost-efficient.

The MPAP amendments support this goal with robust requirements for affordable commercial space and other non-residential uses to be more responsive to changing demographics and to reinforce and strengthen the area's status as an employment hub. Actions also include provisions to build climate resilience by placing limitations on surface parking lots, requiring open spaces in conjunction with new development in EX zoned areas and providing options for green features like eco-roofs, which will all help reduce urban heat islands in the context of rising temperatures. Resilience and reduced carbon emissions are also supported through expanding housing capacity in the plan area, including over 200 affordable housing units, allowing more people to live within walking distance of services, including an extension of the Portland Streetcar, and helping to direct growth away from habitat and natural hazard areas. Transportation project recommendations, when implemented, will add streetcar service, a multimodal street network, updated stormwater management, and new street trees, all of which will support a resilient and low carbon neighborhood.

Action E-I 1, also supports early involvement with property owners of large sites to plan for the phasing of sanitary and stormwater infrastructure system updates in the plan area.

Therefore, the MPAP complies with this goal.

## Context

**Policy 4.1. Pattern areas.** Encourage building and site designs that respect the unique built, natural, historic, and cultural characteristics of Portland's five pattern areas described in Chapter 3: Urban Form.

**Policy 4.2. Community identity.** Encourage the development of character-giving design features that are responsive to place and the cultures of communities.

**Policy 4.3. Site and context.** Encourage development that responds to and enhances the positive qualities of site and context — the neighborhood, the block, the public realm, and natural features.

**121. Finding:** Policies 4.1 through 4.3 provide direction on how the context of where development occurs should be considered in City implementation approaches – including how building and site design respect pattern areas and respond to the physical character-giving aspect of place and context. These policies are implemented by site and building development standards in the zoning code, and in some situations through design review guidelines.

The MPAP amendments remove the plan area from the Rivers Pattern Area and instead assign it to the Inner Neighborhoods Pattern Area designation. Although the plan area’s proximity to manufacturing and distribution facilities speak to the qualities of the River Pattern area, the uses in the plan area have evolved from heavy industrial businesses (such as ESCO Steel) to more of a commercial and employment hub, which is reinforced by the area’s existing General Employment and Central Employment Zoning. These changes combined with the area’s farther distance from the River, proximity to the neighborhoods of Northwest District and Pearl District local park and commercial amenities, the plans to reconnect the street grid and expand the Central Employment zone in the area, make it more characteristic of the Inner Pattern Area.

As proposed, the plan is consistent with and primarily implements the Inner Neighborhoods Pattern Area for the York Plan District. The provisions which propose to expand the Design ‘d’ Overlay with the expansion of the Central Employment (EX) Zone, and apply the Citywide Design Guidelines, and a MP Character Statement will address issues of pattern areas, site, context, and community identity in the following ways:

Guideline 01 requires new development to build on the local identity of Portland’s pattern areas and neighborhoods to avoid the potential for sameness or unresponsiveness in new buildings throughout the city. For the MPAP Plan area, this means that new development must identify how it responds to the character of the Inner Neighborhoods Pattern Area, which is detailed within the guideline.

Guidelines 02 and 03 require that new development enhance the positive qualities of adjacent sites and meaningfully integrate and enhance onsite features to contribute to a location’s uniqueness. For development in the York Plan District, this could mean enhancing the qualities of adjacent sites, blocks, and natural features, including NW Wilson and the Montgomery Park building. It also means complementing and referencing existing historic industrial context, ensuring well established street frontages and pedestrian connections, and properly orienting buildings along transit streets to allow access for all who live, work and visit the district.

The MPAP’s Montgomery Park (MP) Character Statement augments Guideline 01 by explicitly describing the qualities that define the community’s character and culture. The statement includes a section entitled Community Character which identifies the local landmarks, natural resources and future aspirations, valued by those who live, work and have historically contributed to the MPAP Plan area, with an emphasis on highlighting the area’s Black, Indigenous and Chinese communities. For most of the MPAP community, its identity stems from not only its physical attributes (historic landmarks, scenic views and existing mature trees) but its social attributes as well, particularly the designation of NW York Street in honor of York. Guidance for new development also seeks to encourage culturally and environmentally responsive designs, which provide access to the district’s resources, reflect its rich industrial character and incorporate spaces that allow for a true mix of uses, reflecting a history of ingenuity and innovation. Although the plan encourages the acknowledgement of existing features which help tell the story of this community’s history of innovation, such as the ESCO Statue on Character Statement’s diagrammatic map, it does not require their preservation. However, these design guidance

elements are reinforced by code standards that require open space in the EX zoned areas, including incentives to provide publicly accessible open areas.

Therefore, the MPAP complies with policies 4.1 through 4.3.

**Policy 4.4. Natural features and green infrastructure.** Integrate natural and green infrastructure such as trees, green spaces, ecoroofs, gardens, green walls, and vegetated stormwater management systems, into the urban environment. Encourage stormwater facilities that are designed to be a functional and attractive element of public spaces, especially in centers and corridors.

**122. Finding:** This policy calls for including natural elements, such as trees, and green infrastructure, such as ecoroofs and vegetated stormwater facilities, as part of the urban environment – both as part of development projects and within public spaces, such as streets.

The MPAP amendments support this policy through provisions that promote the inclusion of green infrastructure, such as ecoroof and stormwater planters, as part of developments, urban green feature requirements in the EX zone, requirements for open spaces and vegetated green buffer requirements adjacent to Subdistrict A. Limitations on the number of surface parking spaces as well as a change to parking ratios, are intended to reduce the amount of vehicle parking allowed for certain types of land uses in this new transit-oriented district and will provide more opportunities for site area to be used for landscaping, trees, and other green features.

Additionally, the Plan’s proposed relocation of the Industrial District boundary and regional freight route to NW Nicolai Street allows NW Vaughn Street to be developed with more street trees and landscaping to reinforce the connection to Forest Park. As part of this proposed change, the plan’s Urban Design Framework has highlighted an opportunity to create a “Green Curtain” concept on NW Vaughn. This concept is reinforced by guidance within the MP Character Statement that encourages new development to preserve trees around the Montgomery Park building and widen sidewalks through building setbacks to support the planting of trees. Further guidance within the Citywide Design Guidelines, specifically Guideline 01, encourages designs which reintroduce nature into the city and incorporate vegetation and stormwater features that enhance the distinctive beauty of Portland’s neighborhoods. The MP Character Statement reinforces this with guidance to incorporate functional, attractive stormwater facilities that celebrate the Balch Creek Watershed.

Therefore, the MPAP complies with this policy.

**Policy 4.5. Pedestrian-oriented design.** Enhance the pedestrian experience throughout Portland through public and private development that creates accessible, safe, and attractive places for all those who walk and/or use wheelchairs or other mobility devices.

**123. Finding:** The MPAP amendments provide for new and enhanced accessible, safe and attractive places for pedestrians through public and private development. New street connections and improved pedestrian crossings in the MPAP area will support safe, comfortable, and accessible walking and rolling in the area. Zoning code provisions will reinforce NW Wilson as the district’s main street, by requiring the inclusion of ground floor windows and active uses and set limitations on surface parking areas. These standards will improve the relationship between buildings, the public realm and contribute to creating pedestrian-friendly street environments while reducing conflicts between pedestrians on sidewalks and vehicles using driveways. Allowances for greater housing density will also allow for more people to live within walking distance of services and transit, reinforcing the creation of a new pedestrian-oriented mixed-use neighborhood.

MPAP amendments also include application of the Design 'd' overlay to Central Employment zoned areas. Areas with the 'd' overlay are subject to either Design Standards or the Citywide Design Guidelines. Under the action to apply the new Citywide Design Guidelines in the MPAP area, new public and private development must design accessible, safe and attractive pedestrian connections onsite. Specifically, Guideline 07 requires that all development include pathways that are universally designed for all ages and abilities and the pathways should link the public realm, building entries, parking, and open areas. Additionally, these pathways should be safe, visible and well-lit and building entries and windows should orient towards them. Additional detail within the MP Character Statement identifies where onsite pathways should be placed to contribute to a well-established urban fabric and public realm.

Therefore, the MPAP complies with this policy.

**Policy 4.6. Street orientation.** Promote building and site designs that enhance the pedestrian experience with windows, entrances, pathways, and other features that provide connections to the street environment.

**Policy 4.7. Development and public spaces.** Guide development to help create high-quality public places and street environments while considering the role of adjacent development in framing, shaping, and activating the public space of streets and urban parks.

**124. Finding:** The MPAP amendments these policies by proposing development standards that activate the public realm, including provisions that limit vehicle area on its new transit streets (NW Wilson and NW Roosevelt streets) and open space requirements that include options and incentives for public open space. These standards, in addition to the landscaping provisions for required open spaces and district wide requirements for urban green features, provide more opportunities for high-quality public places and street environments. This policy is also supported by zoning code amendments that require new development along the proposed main street (NW Wilson Street) to activate the street environment through minimum ground-floor windows and active ground-floor use requirements.

As outlined in the response to Goal 4a, the Citywide Design Guidelines operate under a framework of core values, one being the creation of a strong public realm. Guidelines 04 through 06 specifically address issues within public realm by requiring development at the sidewalk level of buildings to be designed to enrich public life with active ground floors that are visible, attractive, inviting, and interesting at the human-scale. This includes providing large storefront windows, multiple entries, outdoor seating, and connections to adjacent right-of-way. Guidance also requires the inclusion of publicly accessible spaces which offer protection from the street, support safety and are well-integrated into the site, with adjacent building programming that enhances the pedestrian experience. These elements of the plan are consistent with Policies 4.6 and 4.7 above.

Therefore, the MPAP complies with policies 4.6 and 4.7.

**Policy 4.8. Alleys.** Encourage the continued use of alleys for parking access, while preserving pedestrian access. Expand the number of alley-facing accessory dwelling units.

**125. Finding:** Policy 4.8 encourages the use of alleys for parking and accessory dwelling unit access, while also preserving pedestrian access. The plan area is not home to an existing network of alleys that would work towards expanding parking access. Instead, parking and improvement of pedestrian access in the district has been addressed through measures discussed above in Policies 4.5, 4.6 and 4.7, as well as thru the plans Action T4 which encourages the creation of a parking

management district in the plan area. Similarly, no requirements for alley-facing accessory dwelling units have been included as these housing types are not expected with the proposed high density multi dwelling Central Employment or General Employment 1 zoning where housing is not allowed. Therefore, this policy does not apply.

**Policy 4.9. Transitional urbanism.** Encourage temporary activities and structures in places that are transitioning to urban areas to promote job creation, entrepreneurship, active streets, and human interaction.

**126. Finding:** The Council interprets this policy as relating to temporary commercial activities and public gathering places, rather than residential uses that are the focus of the single-dwelling zones.

Policy 4.9 provides direction on encouraging temporary activities and structures in places that are transitioning to urban areas. While the MPAP supports the district’s transition to a more intensely urban built environment, the area’s Central Employment (EX) Zone allows for transitional use of existing surface parking lots for outdoor markets, events, and other temporary activities.

Therefore, the MPAP complies with this policy.

## Health and safety

**Policy 4.10. Design for active living.** Encourage development and building and site design that promotes a healthy level of physical activity in daily life.

**127. Finding:** Policy 4.10 provides direction regarding the promotion of health and safety in development. The MPAP amendments and actions help implement this policy through a range of provisions. Amendments promote site design supportive of physical activity by expanding requirements for outdoor spaces in the EX Zone to provide opportunities for recreation. The plan’s proposal for an extension of the Portland Streetcar will provide access to mass transit and allow for improvements to create a more comfortable public realm, encouraging more pedestrian activity. The plan also includes improved connections in the pedestrian and bicycle district, supporting active transportation and activity as a part of daily life. Additional plan provisions support this policy with incentives to provide a public park or open space, also detailed in Action PB2 and the Public Benefits Agreement, to improve access to active transportation, recreation and health functions, such as parks and open spaces. Finally, sites in the York plan district where the Design overlay zone is applied will need to meet design standards or the Citywide Design Guidelines. Design standards requiring pedestrian connections to a major trail (QR3) or windows facing a pedestrian walkway (QR4), are intended to improve the public realm experience and promote more physical activity. Additionally, Citywide Design Guideline 07, which requires that development support people’s movement and activity throughout the site, including points of entry and open spaces for active and passive recreation. This is further supported by guidance within the MP Character Statement which encourages the programming of open spaces to include playgrounds and passive recreation areas. Therefore, the MPAP complies with this policy.

**Policy 4.11. Access to light and air.** Provide for public access to light and air by managing and shaping the height and mass of buildings while accommodating urban-scale development.

**Policy 4.12. Privacy and solar access.** Encourage building and site designs that consider privacy and solar access for residents and neighbors while accommodating urban-scale development.

**128. Finding:** Consistent with Policies 4.11 and 4.12, the MPAP includes elements which preserve access to light and air, while also encouraging opportunities for privacy and solar access within urban-scale development. New development on sites with the Design overlay will be required to meet Citywide Design Guideline 02 to create positive relationships with adjacent sites. This includes scaling and shifting building mass to respond to varied context. Buildings are encouraged to utilize shifts in massing to not only preserve access to light and air, but also create opportunities for private spaces within the development. The MP Character Statement provides further guidance for new development along NW Wilson Street by encouraging larger, setback frontages with hardscaped areas and room for trees, to preserve access to light and air along the corridor. In addition, Guideline 07 encourages thoughtfully shaping the massing of buildings to optimize solar access in open areas. Therefore, the MPAP complies with policies 4.11 and 4.12.

**Policy 4.13. Crime-preventive design.** Encourage building, site, and public infrastructure design approaches that help prevent crime.

**129. Finding:** Consistent with Policy 4.13, the MPAP includes amendments to encourage crime preventative design. Sites in the MPAP with the Design Overlay Zone will need to meet design standards or the Citywide Design Guidelines. Design standards requiring windows facing a pedestrian walkway (QR4) or placement of windows along an outdoor common area (QR6), are intended to improve the pedestrian experience and promote safety. Additionally, Citywide Design Guideline 07 focuses on guiding development to support the comfort, safety and dignity of residents, workers and visitors through thoughtful site and building design. Development is encouraged to consider crime prevention measures, including designing sites to avoid visual barriers such as high fences or tall hedges. Therefore, the MPAP complies with this policy.

**Policy 4.14. Fire prevention and safety.** Encourage building and site design that improves fire prevention, safety, and reduces seismic risks.

**130. Finding:** Policy 4.14 encourages building and site design safety. The MPAP does not alter existing codes that regulate building and site design to address fire safety and reduce seismic risk. This policy does not apply.

## Residential areas

**Policy 4.15. Residential area continuity and adaptability.** Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages, and the changing needs of households over time. Allow adaptive reuse of existing buildings, the creation of accessory dwelling units, and other arrangements that bring housing diversity that is compatible with the general scale and patterns of residential areas.

**Policy 4.16. Scale and patterns.** Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow for a range of architectural styles and expression.

**Policy 4.17. Demolitions.** Encourage alternatives to the demolition of sound housing, such as rehabilitation and adaptive reuse, especially affordable housing, and when new development would provide no additional housing opportunities beyond replacement.

**Policy 4.18. Compact single-family options.** Encourage development and preservation of small resource-efficient and affordable single-family homes in all areas of the city.

**Policy 4.19. Resource efficient and healthy residential design and development.** Support resource efficient and healthy residential design and development.

**131. Finding:** City Council interprets the residential areas policies (policies 4.15 through 4.19) as applying to the lower-density residential zones located outside centers, including the single-dwelling zones. The MPAP amendments do not impact any low-density residential zones. Therefore, these policies do not apply.

### **Design and development of centers and corridors**

**Policy 4.20. Walkable scale.** Focus services and higher-density housing in the core of centers to support a critical mass of demand for commercial services and more walkable access for customers.

**Policy 4.21. Street environment.** Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.

**Policy 4.22. Relationship between building height and street size.** Encourage development in centers and corridors that is responsive to street space width, thus allowing taller buildings on wider streets.

**132. Finding:** The MPAP is consistent with policies 4.20 through 4.22. The MPAP amendments aim to update and intensify development in and around the plan area, particularly Subdistricts, B/C, D, E and F. The amendments support these policies by allowing for greater housing density within the EX Zone when affordable housing and other community benefits are provided, and the amendments provide requirements for a step down for development along NW Vaughn, to reflect the context of the Northwest District neighborhood to the south. The MPAP calls for a mixed-use, transit-oriented district with two transit streets on NW Wilson and NW Roosevelt that prioritize commercial and employment uses on the ground floor, thus allowing for the area's tallest buildings (5-7 stories) on its widest streets. These policies are also supported by the MPAP's proposal to assign main street status to NW Wilson to create a new, walkable, business-focused main street with commercial area standards that encourage pedestrian-oriented development, with buildings up to the sidewalk frontage, pedestrian-scaled internal circulation streets, and fewer surface parking lots.

In addition, the application of the new Citywide Design Guidelines to this area, and along its corridors, will encourage development, through Guideline 05, to improve the street environment by providing intermittent breaks in urban form as an expansion of the public realm. These breaks should create places for people to share space together, such as providing seating or points of interest for stopping, viewing, and gathering. Further guidance within the MP Character Statement encourages development along NW Wilson Street to create space for people with larger set-back frontages, and incorporate pedestrian amenities along multi-modal streets like NW Roosevelt, NW York, and NW Vaughn. Therefore, the MPAP complies with policies 4.20 through 4.22.

**Policy 4.23. Design for pedestrian and bicycle access.** Provide accessible sidewalks, high-quality bicycle access, and frequent street connections and crossings in centers and corridors.

**133. Finding:** Consistent with Policy 4.23, the MPAP amendments support accessible sidewalks, bicycle access, and frequent crossings, as well as re-establishment of the local street grid, supportive of inner neighborhoods more typical 200-foot block pattern and street connections. The plan's transportation recommendations will create safer conditions for both pedestrians and bicycles by including elements such as dedicated bicycle facilities on streetcar streets, wide sidewalk corridors

built to Americans with Disabilities Act of 1990 standards, and parallel low-stress routes to provide pedestrian and bicycle access and mobility options. Application of the Citywide Design Guidelines with a MP Character Statement will also address pedestrian and bicycle access from new developments throughout the district.

The transportation recommendations also support broader pedestrian and bicycle crossing improvements of NW Vaughn Street, and across US-30, including enhanced crossings and redirecting freight travel to NW Nicolai Street to support multimodal safety, comfort, and access between the plan area and the Northwest District across NW Vaughn Street. In addition, MPAP amendments require ground floor active uses to support pedestrian activity along NW Wilson, the district's proposed main street. The MP Character Statement, as part of the Citywide Design Guidelines, provides additional guidance and support for creating a pedestrian and bicycle friendly district by encouraging development to place large openings at the ground floor offering views into flexible spaces with active uses, incorporating seating and weather protection at key intersections, and locating utilitarian uses towards and along NW 24th, 25th and 26th avenues. Therefore, the MPAP complies with this policy.

**Policy 4.24. Drive-through facilities.** Prohibit drive through facilities in the Central City, and limit new development of new ones in the Inner Ring Districts and centers to support a pedestrian-oriented environment.

**134. Finding:** Policy 4.24 prohibits drive through facilities in the Central City and limits development of new ones in Inner Ring Districts and centers. The MPAP proposes to expand the EX Zone within the plan area, which prohibits new drive-through facilities in order to prioritize a pedestrian- and transit-oriented urban environment. Therefore, the MPAP complies with this policy.

**Policy 4.25. Residential uses on busy streets.** Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic.

**135. Finding:** The MPAP amendments are consistent with Policy 4.25 because new development along these corridors will be required to meet either Design Standards or the Citywide Design Guidelines. The Design Standards include options for setting back 50 percent of ground floor unit main entrances and incorporating landscaping, tree, change of grade or private open space (PR10). Additionally, the Citywide Design Guidelines provide guidance on designing a pedestrian oriented public realm on busy streets. For example, Guideline 04 requires that all ground floor residential development contribute to the vibrant streetscape with graceful transitions from private to public space using stoops, porches, or buffered setbacks with layers of landscaping and semi-private spaces. Guideline 06 also requires that sites optimize spaces dedicated to people, mitigating the physical and visual impacts from cars and spaces dedicated to them.

Further, the plan's urban green features regulations also support options for ground floor vegetated open space which can also support design approaches to buffer residences on high traffic streets. Therefore, the MPAP complies with this policy.

**Policy 4.26. Active gathering places.** Locate public squares, plazas, and other gathering places in centers and corridors to provide places for community activity and social connections. Encourage location of businesses, services, and arts adjacent to these spaces that relate to and promote the use of the space.

**136. Finding:** The MPAP supports this policy because they encourage incorporating public space/park and open space within the Plan, including incentives to consolidate required outdoor areas in the

EX Zoned areas. The requirements for urban green features also address the area’s more urban development patterns and characteristics, particularly in Subarea D. One option, the publicly accessible open area, is further supported by a Public Benefits Agreement with the property owners of the former ESCO Steel site in the plan area.

In addition, the application of the Design Standards and Citywide Design Guidelines within this center, and along its corridors, encourage development to provide public open spaces and to locate them to encourage community activity and social connections. Guideline 05 encourages development to provide room for a diversity of publicly accessible spaces to invite community-building and social interaction; they should be well integrated within the site with active adjacent building programming and openings. Design Standards support this guidance with requirements for development to provide physical and visual connection to both public and private open spaces on site. Further guidance within the MP Character Statement encourages development along NW Wilson to create space for people with larger set-back frontages, incorporate multi-functional plaza spaces and more intimate courtyard spaces within the district, particularly Subareas F and D. Therefore, the MPAP complies with this policy.

**Policy 4.27. Protect defining features.** Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources.

**Policy 4.28. Historic buildings in centers and corridors.** Protect and encourage the restoration and improvement of historic resources in centers and corridors.

**137. Finding:** City Council interprets the term “protect” here to mean defend or guard against loss, injury, or destruction, and “enhance” means to add to, complement, or improve.

Policy 4.27 provides direction on protecting and enhancing defining places in centers and corridors. The MPAP amendments are consistent with this policy because they include guidance in the MP Character Statement on integrating landmarks and viewpoints. They also include an action, CE 1, which encourages implementors to work with work with community members, groups including the York Work Group, property owners, and city and regional agencies to identify meaningful ways, through public art and placemaking, to honor York of the Corps of Discovery Expedition, as well as people and stories of Portland’s African-American history. This action provides guidance on enhancing and preserving the area’s cultural history and lived experiences of communities who have contributed to this place.

Regarding Policy 4.28, historic resources are located throughout the City, including in the MPAP area. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City’s Historic Resources overlay zone. The MPAP amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445).

However, these sites will be included within the expansion of the Design Overlay Zone, where sites will be required to meet the Citywide Design Guidelines or Design Standards, encouraging the preservation of character defining places and features, and requiring new development to be designed complement them as well. Guidelines 01 through 03, address how development should respond to existing context within centers and corridors on multiple scales. Guideline 02 requires that new development adjacent to designated historic landmarks or historic districts should be designed thoughtfully and deferentially towards its neighbors. This could include, but is not limited to, design strategies such as stepping down toward the landmark height or allowing a wide

berth through setbacks or a pocket plaza if the landmark is a standalone building, such as a church or theater. Additionally, the MP Character Statement requires that new development reference or complement the area's existing historic context and repurpose structures, materials and features where possible. For example, the plan encourages the acknowledgement of defining features that are incorporated within the Character Statement's diagrammatic map, including the Big Community Tree and ESCO Statue, however it does not require their preservation.

Therefore, the MPAP complies with policies 4.27 and 4.28.

**Policy 4.29. Public art.** Encourage new development and public places to include design elements and public art that contribute to the distinct identities of centers and corridors, and that highlight the history and diverse cultures of neighborhoods.

**138. Finding:** Policy 4.29 encourages new development and public places to include design elements and public art. The MPAP includes provisions which call for the inclusion of public art that is by, or reflective of the community's industrial and cultural history. This includes the commemoration of York along NW York Street, and that any such commemoration be done in partnership with the City Arts Program and community organizations who carry forward the lived experiences of communities of color with roots in the area (Action CE 1).

The plan also addresses this, in part, through the application of the Citywide Design Guidelines within the district. For example, Guideline 05 will require development within these areas to incorporate room for a diversity of publicly accessible spaces for sitting, resting, eating, socializing, or just experiencing city life. This includes the incorporation of public art or water features which can play a role within open spaces by providing a visual focal point to inspire conversation and contemplation or to reflect the identity of Portland, its communities, and its history. The MP Character Statement adds further context by specifying areas where art should be heavily considered and communicating some ideas that were expressed by community during the development of this statement. Therefore, the MPAP is consistent with this policy.

Therefore, the MPAP complies with this policy.

## Transitions

**Policy 4.30. Scale transitions.** Create transitions in building scale in locations where higher-density and higher-intensity development is adjacent to smaller-scale single-dwelling zoning. Ensure that new high-density and large-scale infill development adjacent to single dwelling zones incorporates design elements that soften transitions in scale and limit light and privacy impacts on adjacent residents.

**Policy 4.31. Land use transitions.** Improve the interface between non-residential uses and residential uses in areas where commercial or employment uses are adjacent to residentially-zoned land.

**Policy 4.32. Industrial edge.** Protect non-industrially zoned parcels from the adverse impacts of facilities and uses on industrially zoned parcels using a variety of tools, including but not limited to vegetation, physical separation, land acquisition, and insulation to establish buffers between industrial sanctuaries and adjacent residential or mixed-use areas to protect both the viability of long-term industrial operations and the livability of adjacent areas.

**139. Finding:** Policies 4.30 through 4.32 provide direction regarding transitions between different types and intensities of land uses. The MPAP includes provisions which address these policies in a number of ways. Primarily, as there are no smaller scaled zones surrounding the plan area, careful

thought has been given to land use and scale transitions within the district. For example, the plan's zoning map amendments, as also echoed in the urban design framework and land use concept, propose an employment buffer area, Subarea A, zoned General Employment where there will be more traditional employment uses and light industrial uses, to provide a buffer between the Central Employment zone, where residential uses are allowed and anticipated, to provide a transition to the heavy industrial use areas to the north of NW Nicolai Street, outside of the plan area. Additional code provisions within the plan district's Residential-Employment Buffer section also require a setback with landscaping, focusing on providing tree canopy, to help achieve a visual and physical separation between the Central Employment and General Employment zones to acknowledge and mitigate potential impacts of diverse uses. These provisions also serve to support climate-related benefits of vegetated areas.

To help create transitions in building scale, the plan also includes regulations that lower the height limits within the first 20 feet for sites along NW Vaughn Street with the intention of improving compatibility with height limits allowed on the south side of NW Vaughn Street. This is further supported by the plan's application of the Design Standards and the Citywide Design Guidelines which will provide additional guidance to mitigate the adverse impacts of larger development on adjacent sites. Guideline 02, which addresses context at a neighborhood level, encourages development on larger sites to build positive relationships with neighboring properties by utilizing smaller contextual responses. These could include the use of site edge treatments such as buffering and landscaping, and/or architectural features, such as placement of openings and building details, to help protect the livability of adjacent areas.

Overall, the MPAP complies with policies 4.31-4.32. Since the proposed plan area is not adjacent to any single dwelling zones, policy 4.30 does not apply.

### **Off-site impacts**

**Policy 4.33. Off-site impacts.** Limit and mitigate public health impacts, such as odor, noise, glare, light pollution, air pollutants, and vibration that public facilities, land uses, or development may have on adjacent residential or institutional uses, and on significant fish and wildlife habitat areas. Pay attention to limiting and mitigating impacts to under-served and under-represented communities.

**Policy 4.34. Auto-oriented facilities, uses, and exterior displays.** Minimize the adverse impacts of highways, auto-oriented uses, vehicle areas, drive-through areas, signage, and exterior display and storage areas on adjacent residential uses.

**Policy 4.35. Noise impacts.** Encourage building and landscape design and land use patterns that limit and/or mitigate negative noise impacts to building users and residents, particularly in areas near freeways, regional truckways, major city traffic streets, and other sources of noise.

**Policy 4.36. Air quality impacts.** Encourage building and landscape design and land use patterns that limit and/or mitigate negative air quality impacts to building users and residents, particularly in areas near freeways, regional truckways, high traffic streets, and other sources of air pollution.

**Policy 4.37. Diesel emissions.** Encourage best practices to reduce diesel emissions and related impacts when considering land use and public facilities that will increase truck or train traffic.

**Policy 4.38. Light pollution.** Encourage lighting design and practices that reduce the negative impacts of light pollution, including sky glow, glare, energy waste, impacts to public health and safety, disruption of ecosystems, and hazards to wildlife.

**Policy 4.39. Airport noise.** Partner with the Port of Portland to require compatible land use designations and development within the noise-affected area of Portland International Airport, while providing disclosure of the level of aircraft noise and mitigating the potential impact of noise within the affected area.

**Policy 4.40. Telecommunication facility impacts.** Mitigate the visual impact of telecommunications and broadcast facilities near residentially zoned areas through physical design solutions.

**140. Finding:** Policies 4.33 through 4.40 generally address impacts that can negatively affect adjacent residential uses and areas. The City Council interprets these policies to apply to non-residential uses, such as those allowed in commercial and employment zones, that can have negative public health impacts on adjacent residential uses. They are implemented through a variety of design and impact-related performance standards in the zoning code. Current base zone development standards address potential off-site impacts through existing setback requirements, tree density standards, limitations on commercial uses and signage. Offsite impacts are additionally addressed in Chapter 33.262.

The MPAP includes code provisions that will apply within the new York Plan District, detailed in the Off-Site Impacts section. These standards include a requirement that prior to the issuance of a building permit the property owner must sign and record a copy of the City's Industrial Impacts Disclosure Statement. This statement is intended to provide information to new residents and businesses that they are moving to an area that is in transition from, and proximate to, heavy industrial and other employment uses. Additional regulations in this section require that development provide building design features- such as insulation and windows - that can reduce the noise impacts of nearby industrial and employment uses.

Therefore, the MPAP complies with policies 4.33 through 4.40.

## Scenic resources

**Policy 4.41. Scenic resources.** Enhance and celebrate Portland's scenic resources to reinforce local identity, histories, and cultures and contribute toward way-finding throughout the city. Consider views of mountains, hills, buttes, rivers, streams, wetlands, parks, bridges, the Central City skyline, buildings, roads, art, landmarks, or other elements valued for their aesthetic appearance or symbolism.

**Policy 4.42. Scenic resource protection.** Protect and manage designated significant scenic resources by maintaining scenic resource inventories, protection plans, regulations, and other tools.

**Policy 4.43. Vegetation management.** Maintain regulations and other tools for managing vegetation in a manner that preserves or enhances designated significant scenic resources.

**Policy 4.44. Building placement, height, and massing.** Maintain regulations and other tools related to building placement, height, and massing to preserve designated significant scenic resources.

**Policy 4.45. Future development.** Encourage new public and private development to create new public viewpoints providing views of Portland's rivers, bridges, surrounding mountains, hills and buttes, the Central City skyline, and other landmark features.

**141. Finding:** The City has designated scenic resources in an adopted inventory and protects them through an overlay zone (Chapter 33.480) which addresses landscaping, setbacks, screening, building facades and tree removal. The MPAP does not have any existing or proposed designated scenic resources and does not change this program, therefore, policies 4.42, 4.43, and 4.44 which

are related to designated scenic resources do not apply. However, the MPAP includes several provisions to recognize the scenic qualities of the area, including highlighting views to Mt. Hood, the Fremont Bridge, Forest Park and the historic Montgomery Park building which terminates the vista along NW Wilson Street, the area's main street. Specifically, the MP Character Statement, which will be used in the design review process for new development, provides guidance to establish a "Green Curtain" along NW Vaughn to guide travelers on Vaughn toward nearby Forest Park and to orient views toward Mt. Hood and the Fremont Bridge. Therefore, the MPAP complies with policies 4.41 and 4.45.

### **Historic and cultural resources**

**Policy 4.46. Historic and cultural resource protection.** Protect and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

**Policy 4.47. State and federal historic resource support.** Advocate for state and federal policies, programs, and legislation that would enable stronger historic resource designations, protections, and rehabilitation programs.

**Policy 4.48. Continuity with established patterns.** Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources.

**Policy 4.49. Resolution of conflicts.** Adopt and periodically update design guidelines for unique historic districts. Refine base zoning in historic districts to consider the character of the historic resources in the district.

**Policy 4.50. Demolition.** Protect historic resources from demolition. Provide opportunities for public comment, and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

**Policy 4.51. City-owned historic resources.** Maintain City-owned historic resources with necessary upkeep and repair.

**Policy 4.52. Historic Resources Inventory.** Maintain and periodically update Portland's Historic Resources Inventory to inform historic and cultural resource preservation strategies.

**Policy 4.53. Preservation equity.** Expand historic preservation inventories, regulations, and programs to encourage historic preservation in areas and in communities that have not benefited from past historic preservation efforts, especially in areas with high concentrations of under-served and/or under-represented people.

**Policy 4.54. Cultural diversity.** Work with Portland's diverse communities to identify and preserve places of historic and cultural significance.

**Policy 4.55. Cultural and social significance.** Encourage awareness and appreciation of cultural diversity and the social significance of historic places and their roles in enhancing community identity and sense of place.

**Policy 4.56. Community structures.** Encourage the adaptive reuse of historic community structures, such as former schools, meeting halls, and places of worship, for arts, cultural, and community uses that continue their role as anchors for community and culture.

**Policy 4.57. Economic viability.** Provide options for financial and regulatory incentives to allow for the productive, reasonable, and adaptive reuse of historic resources.

**Policy 4.58. Archaeological resources.** Protect and preserve archaeological resources, especially those sites and objects associated with Native American cultures. Work in partnership with tribal nations, Native American communities, and the state to protect against disturbance to Native American archaeological resources.

**142. Finding:** Historic resources are located throughout the city, including the MPAP area. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are protected by the City’s Historic Resources overlay zone. The MPAP amendments do not identify or remove any existing historic resources and do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445) or state laws governing archaeological resources. The MPAP specifically responds to policies 4.46 and 4.48 by protecting existing historic resources within the plan area and encouraging infill that complements the historic industrial character of the area. Additionally new development near the historic resources in the plan area will be subject to design review, where the existing tools of design guidelines and design standards will ensure that the design of adjacent development is complementary to the historic resources. Therefore, the MPAP complies with policies 4.46 through 4.58.

### **Public art**

**Policy 4.59. Public art and development.** Create incentives for public art as part of public and private development projects.

**143. Finding:** Policy 4.59 provides direction on public art with private development projects. The MPAP includes the application of the Design Overlay Zone within the proposed EX-zone areas. This requires that proposed development gain design approval through either an objective review path using the Design Standards or a subjective review path using the Citywide Design Guidelines. The Design Standards include an optional standard (PR21) for development to incorporate City-approved public art in the design. Alternatively, development proposals approved through design review will be subject to the Citywide Design Guidelines. The language of Guidelines 02 and 05, encourage private development projects to meet guideline requirements by incorporating public art within site and building design. Guideline 02 encourages development to incorporate public art to integrate characteristics identified by the site history and the lived experience of local communities. Guideline 05 also encourages designing spaces that can integrate opportunities for art, particularly in public outdoor areas and plazas. The MP Character Statement, written to supplement these guidelines with district-specific guidance encourages developers to work with Black, Chinese, and Indigenous artists to incorporate design elements such as color, pattern, or artwork to reflect the history of the area. Lastly, the MPAP lists as an action that the City will work with property owners and community members to “identify meaningful ways, through public art and placemaking, to honor York of the Corps of Discovery Expedition, as well as people and stories of Portland’s African-American history” (Action CE1). Therefore, the MPAP complies with this policy.

### **Resource-efficient design and development**

**Policy 4.60. Rehabilitation and adaptive reuse.** Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.

**Policy 4.61. Compact housing.** Promote the development of compact, space- and energy-efficient housing types that minimize use of resources such as smaller detached homes or accessory dwellings and attached homes.

**Policy 4.62. Seismic and energy retrofits.** Promote seismic and energy-efficiency retrofits of historic buildings and other existing structures to reduce carbon emissions, save money, and improve public safety.

**Policy 4.63. Life cycle efficiency.** Encourage use of technologies, techniques, and materials in building design, construction, and removal that result in the least environmental impact over the life cycle of the structure.

**Policy 4.64. Deconstruction.** Encourage salvage and reuse of building elements when demolition is necessary or appropriate.

**Policy 4.65. Materials and practices.** Encourage use of natural, resource-efficient, recycled, recycled content, and non-toxic building materials and energy-efficient building practices.

**Policy 4.66. Water use efficiency.** Encourage site and building designs that use water efficiently and manage stormwater as a resource.

**Policy 4.67. Optimizing benefits.** Provide mechanisms to evaluate and optimize the range of benefits from solar and renewable resources, tree canopy, ecoroofs, and building design.

**Policy 4.68. Energy efficiency.** Encourage and promote energy efficiency significantly beyond the Statewide Building Code and the use of solar and other renewable resources in individual buildings and at a district scale.

**144. Finding:** Policies 4.60, 4.63, 4.65, 4.66, and 4.67 encourage the adaptive reuse of buildings and the use of natural, resource-efficient and/or recycled materials and the employment of energy-efficient building practices. The MPAP amendments support these policies because they require that new development on sites within the design overlay in the MPAP area that go through design review must meet the City Design Guidelines. City Design Guideline 09, encourages adaptive reuse of existing buildings and designing buildings with flexible floor plates and taller ground floors will ensure that they last beyond today's users and needs. Development is also encouraged to utilize reclaimed and recycled materials to help conserve valuable resources and integrate historic character. This guideline also provides guidance on how to implement energy-efficient building practices such as eco-roofs, rooftop solar panels and solar shades on windows. The amendments also encourage new development subject to the Design Standards, through the objective review path, to use energy-efficient systems and materials through optional standards QR11, QR18, QR19, QR21, QR22, and QR23. Rehabilitation and adaptive reuse of existing buildings is also encouraged through optional standards C4 and C5.

The MPAP amendments are consistent with policy 4.61 which promote compact housing and encourage use of energy efficient materials. The MPAP's expansion of EX zoning increases the area where housing can be developed. Minimum density requirements in the proposed code of 1 unit per 500 square feet of site area will result in a housing density similar to that required in the RX zone, thus ensuring that if housing is built it will be compact and space- and energy-efficient through the development of multi-dwelling structures. According to studies conducted by the

State DEQ, “Reducing home size is among the best tier of options for reducing waste generation in the Oregon housing sector, while simultaneously achieving a large environmental benefit across many categories of impact...Reduction in home size is a significant leverage point for impact reduction [including non-renewable energy use] and may be a more effective measure than achieving minimum levels of ‘green certification’” [<https://www.oregon.gov/deq/FilterDocs/ADU-ResBldgLCA-Report.pdf>] Attached housing is also more energy efficient than detached forms of housing. According to the EPA, “fairly substantial differences are seen in detached versus attached homes [approximately 17.5% improved efficiency], but the most striking difference is the variation in energy use between single-family detached homes and multifamily homes [50% improved efficiency], due to the inherent efficiencies from more compact size and shared walls among units.” [[www.epa.gov/sites/production/files/2014-03/documents/location\\_efficiency\\_btu.pdf](http://www.epa.gov/sites/production/files/2014-03/documents/location_efficiency_btu.pdf)]

The MPAP does not include any changes to building requirements related to materials, deconstruction, seismic retrofitting, energy efficiency, water use efficiency or any other issues identified in policies 4.62, 4.64 4.66 and -4.68. These policies do not apply.

Therefore, the MPAP complies with policies 4.60, 4.61, 4.65, and 4.67.

**Policy 4.69. Reduce carbon emissions.** Encourage a development pattern that minimizes carbon emissions from building and transportation energy use.

**145. Finding:** The MPAP zoning map and code amendments create opportunities for a compact, energy efficient, and high-density development pattern. in an These include introduction of the Central Employment zone which allows a wide range of uses, including multi dwelling housing and things like minimum density requirements. The amendments support development near areas with access to services and transit, creating opportunities for walking, biking and taking transit and reduced carbon emissions. The plan also includes many recommendations and actions that support expanding multi-modal transportation options in the area to reduce the reliance on automobiles, including the extension of Portland Streetcar to serve the area. The MPAP also includes regulations that require green features, including landscaping, large trees and ecoroofs, to support air quality, cooling, and stormwater management. Therefore, the MPAP complies with Policy 4.69.

**Policy 4.70. District energy systems.** Encourage and remove barriers to the development and expansion of low-carbon heating and cooling systems that serve multiple buildings or a broader district.

**Policy 4.71. Ecodistricts.** Encourage ecodistricts, where multiple partners work together to achieve sustainability and resource efficiency goals at a district scale.

**Policy 4.72. Energy-producing development.** Encourage and promote development that uses renewable resources, such as solar, wind, and water to generate power on-site and to contribute to the energy grid.

**146. Finding:** The MPAP includes action item E-I 4 directing BPS to work with property owners to “identify opportunities for district and community energy systems in the study area”. Action item E-I1 also directs BES, PWB, and PBOT to work with property owners of larger sites to conduct early and phased planning for sanitary and stormwater infrastructure systems in the Plan area and coordinate plans and investments for infrastructure in the area with transportation projects, to leverage investments and ensure coordinated provision of infrastructure on the sites, also within that same timeframe. Additionally, the application of the Design Overlay Zone within the EX-zoned areas will encourage the employment of solar systems through Design Guideline 09 and Design Standards QR22. Therefore, the MPAP complies with these policies.

## Designing with nature

**Policy 4.73. Design with nature.** Encourage design and site development practices that enhance, and avoid the degradation of, watershed health and ecosystem services and that incorporate trees and vegetation.

**Policy 4.74. Flexible development options.** Encouraging flexibility in the division of land, the siting and design of buildings, and other improvements to reduce the impact of development on environmentally sensitive areas and to retain healthy native and beneficial vegetation and trees.

**Policy 4.75. Low-impact development and best practices.** Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure.

**Policy 4.76. Impervious surfaces.** Limit use of and strive to reduce impervious surfaces and associated impacts on hydrologic function, air and water quality, habitat connectivity, tree canopy, and urban heat island effects.

**Policy 4.77. Hazards to wildlife.** Encourage building, lighting, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.

**Policy 4.78. Access to nature.** Promote equitable, safe, and well-designed physical and visual access to nature for all Portlanders, while also maintaining the functions and values of significant natural resources, fish, and wildlife. Provide access to major natural features, including:

- Water bodies such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.
- Major topographic features such as the West Hills, Mt. Tabor, and the East Buttes.
- Natural areas such as Forest Park and Oaks Bottom.

**147. Finding:** Policies 4.73 through 4.77 provide direction regarding the interface between development and natural features and functions. The MPAP amendments support these policies by requiring development over 10,000 square feet include urban green features such as additional landscaping, space large trees, or ecoroofs. The amendments also require that publicly accessible outdoor areas include landscaping, trees, and lights that do not shine upward, thus providing habitat and protection for birds and bats. Through the application of the Design Overlay Zone in the EX-zoned areas, new development will also be encouraged to integrate existing and large canopy trees, native landscaping, bird-safe glazing, sensitive light design, punched windows, and shade screens via Citywide Guideline 09, in combination with the MPAP Character Statement, or through optional Design Standards C10, C12, PR7, QR11, QR12, and QR21. Design Standard PR17 also limits the amount of pervious pavement that can be used in surface parking areas with ten or more spaces. Regarding Policy 4.78, access to nature, Design Standards C15 and QR8 and the Character Statement, in combination with Citywide Guidelines 01, 02, and 03, also encourage reinforcement of views and access to Forest Park, the NW 24th Greenway, the Willamette River, and Mt. Hood beyond (C15, QR8). Therefore, the MPAP complies with these policies.

## Hazard-resilient design

**Policy 4.79. Natural hazards and climate change risks and impacts.** Limit development in or near areas prone to natural hazards, using the most current hazard and climate change-related information and maps.

**Policy 4.80. Geological hazards.** Evaluate slope and soil characteristics, including liquefaction potential, landslide hazards, and other geologic hazards.

**Policy 4.81. Disaster-resilient development.** Encourage development and site-management approaches that reduce the risks and impacts of natural disasters or other major disturbances and that improve the ability of people, wildlife, natural systems, and property to withstand and recover from such events.

**Policy 4.83. Urban heat islands.** Encourage development, building, landscaping, and infrastructure design that reduce urban heat island effects.

**Policy 4.82. Portland Harbor Facilities.** Reduce natural hazard risks to critical public and private energy and transportation facilities in the Portland Harbor.

**Policy 4.84. Planning and disaster recovery.** Facilitate effective disaster recovery by providing recommended updates to land use designations and development codes, in preparation for natural disasters.

**148. Finding:** Policies 4.79 through 4.84 provide direction regarding the interface of development with natural hazards. The policies address climate, geology, disaster recovery, and reducing risks at harbor-related facilities. Landslide hazards in the MPAP area are limited and primarily concentrated along the steep slopes along the western boundary between subareas A and B. The area lies within an area mapped to anticipate “very strong” intensity in a 9.0 Cascadia Subduction Zone earthquake. Areas of greater intensity and increased landslide hazard are located outside the plan area, to the east and north along the river and also west along the West Hills. The area is located outside of any flood and wildfire hazard zones. Further, City programs that are deemed in compliance with Metro Title 3 requirements for flood management, and erosion and sediment control (i.e., City Title 10 Erosion Control, and the balanced cut and fill requirements of City Title 24), as well as the environmental overlay zones are unchanged by these amendments and will ensure any new development will be done in a way to protect people and property from hazards. Likewise, Title 24 regulates development’s response to seismic hazards and those regulations are unchanged by these amendments.

Regarding Policy 4.83, the verb “encourage”, which is defined in the 2035 Comprehensive Plan, means to promote or foster using some combination of voluntary approaches, regulations, or incentives. Urban heat island effects are areas of the city that are significantly warmer than surrounding areas due to development. The City Council interprets this policy to mean that the City should consider policies, programs and regulations that promote strategies to increase the tree canopy and vegetation; green roofs, cool roofs, and alternatives to asphalt for paved surfaces. Other provisions include new limitations on the size of surface parking lots, helping to limit urban heat islands by reducing paved surfaces and allowing more site area for green spaces and by provisions that expand outdoor space and common area requirements, providing more space for trees and other green elements that help reduce urban heat impacts.

As it exists, the Montgomery Park area creates conditions that exacerbate the heat island effect, impacting those who work and live near and in the area. To address this, the plan is designed to encourage and support opportunities for green, climate-resilient and responsive development. Provisions which allow for new development and infrastructure in the MPAP area will improve these existing conditions and limit impacts for urban heat island risks with the creation of the new York Plan District, allowing for denser development required to meet certain standards for urban green features, open spaces and infrastructure. New regulations will require development in the

York Plan District to incorporate urban green features, such as landscaping, space for large trees, and ecoroofs to help improve the urban heat island effect.

The application of the Design Overlay zone also supports these policies within its guidelines and standards. This includes Guideline 09 which states, ‘design for resilience’, including creating buildings that are adaptable over time, conserve resources, use systems to reduce the urban heat island, and methods to reduce runoff which adds to flooding. There are several design standards which encourage resilience, including preserving natural features and landscaping, the shading of parking and increasing building resilience through ecoroofs and solar installations.

Regarding Policy 4.84, the MPAP does not impact the underlying zoning that determines where public facilities can locate, therefore Policy 4.84 does not apply.

Therefore, the MPAP complies with policies 4.79 through 4.83.

## Healthy food

**Policy 4.85. Grocery stores and markets in centers.** Facilitate the retention and development of grocery stores, neighborhood-based markets, and farmer’s markets offering fresh produce in centers.

**Policy 4.86. Neighborhood food access.** Encourage small, neighborhood-based retail food opportunities, such as corner markets, food co-ops, food buying clubs, and community-supported agriculture pickup/drop-off sites, to fill in service gaps in food access across the city.

**149. Finding:** Currently, there is at least one grocery stores within a 20-minute walk for the MPAP area. The MPAP amendments support the development of grocery stores and markets, including small, neighborhood-based retail food opportunities through the expansion of the EX zoning which allows a range of uses including stores or markets. The proposed regulations in the York Plan District limit the size of retail but provide exceptions for grocery stores to support and prioritize access to food in the district. Other provisions include plan district regulations that encourage new development to support small businesses and affordable commercial opportunities, which will provide more affordable commercial opportunities for small corner markets, food co-ops, etc. (Action E3). Therefore, the MPAP complies with policies 4.85 and 4.86.

**Policy 4.87. Growing food.** Increase opportunities to grow food for personal consumption, donation, sales, and educational purposes.

**Policy 4.88. Access to community gardens.** Ensure that community gardens are allowed in areas close to or accessible via transit to people living in areas zoned for mixed-use or multi-dwelling development, where residents have few opportunities to grow food in yards.

**150. Finding:** The MPAP amendments support opportunities for development to improve the health of the community in the district, including increasing access to growing food and community gardens. Plan district standards related to urban green features and required outdoor areas can support opportunities for growing food. Through application of the Design Overlay Zone on the EX-zoned portion of the York Plan District, new developments in these areas will either gain approval via the Design Standards or the Citywide Design Guidelines. Both the Standards (QR5) and the Guidelines (07), in combination with the MP Character Statement, encourage the development of community gardens and landscaping that incorporates native flora and first foods. Therefore, the MPAP complies with policies 4.87 and 4.88.

## Chapter 5: Housing

**Goal 5.A: Housing diversity.** Portlanders have access to high-quality affordable housing that accommodates their needs, preferences, and financial capabilities in terms of different types, tenures, density, sizes, costs, and locations.

**151. Finding:** The City adopted an updated 2045 Housing Needs Analysis (HNA) and 2023 Residential Buildable Lands Inventory (BLI) in December 2023 (Ordinance 191547). The HNA provides information on the future housing need in Portland to 2045 to inform future policy decisions that can influence future housing development, and the BLI identifies the supply of land available to provide this needed housing. The HNA establishes a housing need of 106,571 additional units in Portland by 2045. The BLI estimates that Portland has the capacity for 236,977 additional housing units, which is sufficient capacity to meet the requirements under Statewide Planning Goal 10: Housing and ORS197.296. These documents inform the policy direction that planning projects ensure that a variety of housing be provided to meet the needs of all Portlanders.

The MPAP amendments expand housing in inner northwest Portland, a “high opportunity area” per the Portland Housing Bureau’s opportunity mapping analysis and provide options for affordable housing through inclusionary housing regulations and by facilitating compact housing types. The amendments also increase options for people to live in locations close to transit and other services and reduce transportation costs, which in turn supports financial resources for households at lower income levels. Therefore, the amendments complies with Goal 5.A.

**Goal 5.B: Equitable access to housing.** Portland ensures equitable access to housing, making a special effort to remove disparities in housing access for people with disabilities, people of color, low-income households, diverse household types, and older adults.

**152. Finding:** City Council defines “equitable access to housing” as a goal to create housing that is accessible and affordable to a wide range of households, including people with disabilities, people of color, low-income households, diverse household types, and older adults. The MPAP amendments require minimum densities the Central Employment zoned areas, and the expected residential development will be in a multi-story format. This type of development can be supportive of accessibility needs, diverse household types, and older adults. Further, the area’s location near a broad range of existing goods and services, and the planned streetcar extension through the area, will further support the needs of diverse households including accessibility for people with disabilities. The MPAP contributes to housing equity for low-income households by expanding where inclusionary housing regulations apply through the expanded mapping of the Central Employment zone, which allows a broad range of uses including high density housing. Therefore, the MPAP complies with Goal 5.B.

**Goal 5.C: Healthy connected city.** Portlanders live in safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe, convenient, and affordable multimodal transportation.

**153. Finding:** This goal ensures that housing be provided in areas of the city that also have access to the goods and services needed by the residents on a daily basis, often defined as a Complete Neighborhood, as well as to ensure access to affordable transportation options. This goal is generally implemented through the base zones and plan districts that concentrate the greatest amount of housing growth in the areas with the best access to services.

The MPAP zoning map amendments add Central Employment zoning, which allows a range of uses including housing, to the plan area. This expands housing options in inner northwest Portland, a vibrant area with a diverse range of goods and services and with access to the city and region by safe, convenient, and affordable transit and multimodal transportation. The MPAP amendments also support a range of employment opportunities, further bringing convenient access to jobs to new and existing households in and around the Northwest District Town Center area. Further, the MPAP zoning code amendments create the York Plan District that supports equitable development in this “high opportunity area” and a mix of uses to support access to a complete neighborhood. Therefore, the MPAP complies with 5.C.

**Goal 5.D: Affordable housing.** Portland has an adequate supply of affordable housing units to meet the needs of residents vulnerable to increasing housing costs.

**154. Finding:** City Council interprets this goal as to encourage the development of regulated affordable housing that provides long-term stability to low-income households. The primary way the MPAP amendments support this goal is by expanding where inclusionary housing provisions apply through expansion of the mapping of Central Employment zoning, which allows a broad range of uses including high density housing. The Plan’s amendments expand the amount of Central Employment zoning, where inclusionary housing requirements apply, by approximately 30 acres. Increasing the areas where regulated affordable housing applies provides opportunities for long-term housing stability in the future. Therefore, the MPAP complies with Goal 5.D.

**Goal 5.E: High-performance housing.** Portland residents have access to resource-efficient and high-performance housing for people of all abilities and income levels.

**155. Finding:** City Council defines “high-performance housing” to include housing that is developed with a lighter environmental impact (smaller carbon footprint, eco-friendly materials, longevity of construction, reducing waste, recycling).

The MPAP amendments that expand Central Employment zoning will allow for more compact, resource-efficient units in the plan area. According to a study published by Oregon DEQ, A Life Cycle Approach to Prioritizing Methods of Preventing Waste from the Residential Construction Sector in the State of Oregon, of 30 different material reduction and reuse practices evaluated, reducing home size and multi-family living achieved the largest greenhouse gas reductions along with significant reductions in other impact categories. Reducing home size by 50 percent results in a projected 36 percent reduction in lifecycle greenhouse gas emissions. Reducing home size is a significant leverage point for environmental impact reduction and may be equivalent to achieving minimum levels of “green” certification.

The Plan’s expansion of where inclusionary housing applies will allow for people of a wide range of income levels to afford this compact, resource-efficient housing. The Plan’s Central Employment zoning will also help contribute to resource efficiency by allowing more residents to live close to transit, minimizing the need to be dependent on cars and allowing for lower-carbon ways of travel. In addition, amendments also encourage new development to include green features such as ecoroofs, area for large trees and landscaping with native plants will which also further support high-performance housing by contributing to greater energy efficiency and reduced environmental impacts. Therefore, the MPAP complies with Goal 5.E.

## **Diverse and expanding housing supply**

**Policy 5.1. Housing supply.** Maintain sufficient residential development capacity to accommodate

Portland’s projected share of regional household growth.

**156. Finding:** The verb “maintain” is defined in the 2035 Comprehensive Plan as to keep what you have, conserve, continue. The City Council defines “sufficient residential development capacity” as having more capacity than the 20-year growth forecast, as required by Statewide Planning Goal 10. Further, the City Council finds that increasing development capacity beyond what is needed is desired to provide capacity over a longer planning horizon, as well as locational and housing type choice. The MPAP Zoning Map amendments are estimated to increase the capacity for residential household growth in the inner northwest area by at least 2,000 units. This change provides more flexibility for a greater diversity of housing types and expands opportunity for residential development close to services and transit.

Therefore, the MAPP complies with Policy 5.1.

**Policy 5.2. Housing growth.** Strive to capture at least 25 percent of the seven-county region’s residential growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania counties).

**157. Finding:** The verb “strive” is defined in the 2035 Comprehensive Plan as to work to achieve over time. The City Council interprets this policy as a performance measure that requires the City to monitor how much residential growth is occurring compared to the rest of the region. The MPAP Zoning Map amendments are estimated to increase the capacity for residential household growth in northwest Portland by at least 2,000 units and will contribute to Portland’s share of the region’s residential growth.

Therefore, the MPAP complies with Policy 5.2.

**Policy 5.3. Housing potential.** Evaluate plans and investments for their impact on housing capacity, particularly the impact on the supply of housing units that can serve low- and moderate-income households and identify opportunities to meet future demand.

**158. Finding:** The MPAP Zoning Map amendments increase housing capacity in northwest Portland by at least 2,000 units. The MPAP amendments increase the production and supply of housing for low- and moderate-income households by expansion of where inclusionary housing provisions apply through expanded mapping of the Central Employment zone, which allows a broad range of uses include high density housing. This higher density housing can provide options for housing types that are less expensive and help meet future housing demand by increasing capacity for housing in this part of the city. Therefore, the MPAP complies with Policy 5.3.

**Policy 5.4. Housing types.** Encourage new and innovative housing types that meet the evolving needs of Portland households, and expand housing choices in all neighborhoods. These housing types include but are not limited to single-dwelling units; multi-dwelling units; accessory dwelling units; small units; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.

**159. Finding:** “Encourage” is defined in the Comprehensive Plan as “promote or foster using some combination of voluntary approaches, regulations, or incentives.” Furthermore, the Comprehensive Plan includes a definition of “expand.” “Expand” means to “make something that already exists more extensive.”

In general, the types of housing allowed are specified in the base zones. The MPAP amendments propose Central Employment zoning which allows a broad range of uses including multi-dwelling housing. Multi dwelling housing, including affordable housing, is one type of housing that can support the evolving needs of a variety of households. Household needs are further supported by

the location of the plan area which allows households to meet daily their needs in the immediately surrounding area via a variety of transportation options.

The MPAP amendments provide additional housing and affordable housing options and therefore expand housing choice in this Portland Housing Bureau identified “high opportunity area”. Therefore, the MPAP complies with Policy 5.4.

**Policy 5.5. Housing in centers.** Apply zoning in and around centers that allows for and supports a diversity of housing that can accommodate a broad range of households, including multi-dwelling and family-friendly housing options.

**160. Finding:** The MPAP amendments propose to expand the Northwest District Town Center and incorporate the MPAP area within that center, and the designate the MPAP area largely with Central Employment zoning, which allows a broad range of uses including multi dwelling housing. Central Employment zoning supports housing diversity in the Northwest District Town Center. Therefore, the MPAP complies with Policy 5.5.

**Policy 5.6. Middle housing.** Enable and encourage development of middle housing. This includes multi-unit or clustered residential buildings that provide relatively smaller, less expensive units; more units; and a scale transition between the core of the mixed-use center and surrounding single family areas. Where appropriate, apply zoning that would allow this within a quarter mile of designated centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.

**161. Finding:** As defined by ORS 197.758, “middle housing” means duplexes, triplexes, quadplexes, cottage clusters, and townhouses. Middle housing is low to medium density housing. This policy is not applicable because the MPAP amendments propose Central Employment zoning and zoning code amendments that require a minimum density of one unit per 500 square feet, or 87 units per acre - high density housing - where residential uses are proposed.

**Policy 5.7. Adaptable housing.** Encourage adaption of existing housing and the development of new housing that can be adapted in the future to accommodate the changing variety of household types.

**162. Finding:** The MPAP amendments propose Central Employment zoning, which allows a wide variety of uses including residential uses. This zone does not limit conversion of existing or future structures to residential uses and therefore supports potential future adaptations to accommodate different housing options. Therefore, the MPAP complies with Policy 5.7.

**Policy 5.8. Physically-accessible housing.** Allow and support a robust and diverse supply of affordable, accessible housing to meet the needs of older adults and people with disabilities, especially in centers, station areas, and other places that are proximate to services and transit.

**Policy 5.9. Accessible design for all.** Encourage new construction and retrofitting to create physically-accessible housing, extending from the individual unit to the community, using Universal Design Principles.

**163. Finding:** Policies 5.8 and 5.9 are intended to foster housing that is accessible to people of all physical abilities. In general, the regulations requiring accessibility are determined through the state building codes, which are not preempted at the local level. These codes require a certain percentage of housing units to be accessible to those with disabilities.

The MPAP amendments propose Central Employment zoning, which allows a wide variety of uses including high density multi dwelling housing and retrofitting existing buildings for housing. The

provision of more housing within an expanded Northwest District Town Center supports options for accessible units. Therefore, the MPAP complies with these policies.

**Policy 5.10. Coordinate with fair housing programs.** Foster inclusive communities, overcome disparities in access to community assets, and enhance housing choice for people in protected classes throughout the city by coordinating plans and investments to affirmatively further fair housing.

**164. Finding:** This policy encourages programs and projects to ensure neighborhoods provide for a wide diversity of people in terms of people in terms of race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other characteristics. Generally, programs administered by the Housing Bureau, and regulations such as the Inclusionary Housing Program requirements provide the opportunity to create developments that provide access to housing for people in a range of classes.

The MPAP amendments propose Central Employment zoning, which allows and when developed with residential uses typically consists of high density multi dwelling housing. The Inclusionary Housing requirements apply to buildings with 20 units or more. As a result, the proposed zoning amendments introduce more opportunities to apply the requirements of the Inclusionary Housing requirements and expand access to this “high opportunity area”.

The MPAP amendments also include creation of new plan district regulations in the zoning code, including incentives and minimum densities, which serve to encourage development of more housing as well as affordable housing through the Inclusionary Housing Program. Plan district provisions also encourage projects that have a higher proportion of affordable units than required by the Inclusionary Housing Program provisions. These incentives support a broader range of housing options and affordability levels in the plan area.

In addition, a public benefits agreement with the property owners of the former ESCO Steel site supports inclusion of affordable housing at the 60% area median income level, increasing the diversity of housing affordability levels in the area.

Therefore, the MPAP complies with Policy 5.10.

## Housing access

**Policy 5.11. Remove barriers.** Remove potential regulatory barriers to housing choice for people in protected classes to ensure freedom of choice in housing type, tenure, and location.

**165. Finding:** The MPAP amendments do not add regulatory barriers to housing choice for people in protected classes. The MPAP zoning map and code amendments support through expansion of allowed multi dwelling housing and incentives for affordable housing, the choice in housing type, tenure, and location. Therefore, the MPAP complies with Policy 5.11.

**Policy 5.12. Impact analysis.** Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts.

**Policy 5.13. Housing stability.** Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.

**Policy 5.14. Preserve communities.** Encourage plans and investments to protect and/or restore the socioeconomic diversity and cultural stability of established communities.

**Policy 5.15. Gentrification/displacement risk.** Evaluate plans and investments, significant new infrastructure, and significant new development for the potential to increase housing costs for, or cause displacement of communities of color, low- and moderate-income households, and renters. Identify and implement strategies to mitigate the anticipated impacts.

**Policy 5.16. Involuntary displacement.** When plans and investments are expected to create neighborhood change, limit the involuntary displacement of those who are under-served and under-represented. Use public investments and programs, and coordinate with nonprofit housing organizations (such as land trusts and housing providers) to create permanently-affordable housing and to mitigate the impacts of market pressures that cause involuntary displacement.

**166. Finding:** The City Council interprets Policies 5.12 to 5.16 as requiring evaluation and analysis as to who will benefit and who will be burdened by a planning decision, including amendments to the Comprehensive Plan, the Comprehensive Plan Map, the Zoning Code, and the Zoning Map. The Council interprets “involuntary displacement” to occur when a resident is forced to relocate due to factors that are beyond the resident’s control including, but not limited to, increased rents due to market pressure and decisions by landlords to redevelop property. An analysis, described in the Montgomery Park to Hollywood (MP2H) Draft Equitable Development Report, was undertaken as part of the MP2H Strategy, the precursor and background to the MPAP, found that that the risk of significant displacement associated with the Plan’s amendments is relatively low due to three being very few housing units in the plan area. There are a few non-conforming single dwelling residences in the plan area which would become conforming under the plan but which over time might be redeveloped to a higher density or intensity. While the residential displacement risk is very low the plan amendments propose to increase opportunities for affordable housing and housing of all levels within a complete community and Portland Housing Bureau identified “high opportunity area.”

To understand any potential broader impact beyond the amendments and plan area, the analysis also considered a broader study area. The analysis used a proxy of lower rated 2 and 3 star Co-Start rated apartments to estimate potentially more affordable un-regulated housing in the area. There is un-regulated housing in the broader study area that could be vulnerable to remodeling or redevelopment following a streetcar extension investment. However, the analysis found that the broader Northwest area is already served by the existing streetcar and most of the studies about the impact of rail transit on rents and value focus on introduction of rail where it does not exist and thus it is not clear that a modest extension of the streetcar would create significant additional market pressure on the existing housing stock. In addition, the analysis notes caution should be used in using lower CoStar ratings as a proxy for affordability in highly desirable neighborhoods such as Northwest Portland, where even lower quality and amenity housing may attract premium rents.

Therefore, the MPAP complies with policies 5.12 through 5.16.

**Policy 5.17. Land banking.** Support and coordinate with community organizations to hold land in reserve for affordable housing, as an anti-displacement tool, and for other community development purposes.

**167. Finding:** This policy was specifically noted by the Planning Commission during MPAP deliberations. This policy is generally not applicable because this ordinance amends the Comprehensive Plan and Map, and the Zoning Code and Map and land banking programs are not authorized or managed through the Comprehensive Plan or Zoning Code. Further, the plan area does not include any public land or resources that could be used to support land banking efforts. Nonetheless, the

MPAP amendments do support the creation of more affordable housing units (with bonus FAR incentives) on sites that may be acquired in the future for affordable housing development. Therefore, on balance, the MPAP complies with this policy.

**Policy 5.18. Rebuild communities.** Coordinate plans and investments with programs that enable communities impacted by involuntary displacement to maintain social and cultural connections, and re-establish a stable presence and participation in the impacted neighborhoods.

**168. Finding:** This policy is generally not applicable because this ordinance amends the comprehensive plan and map and zoning map and code and land programs for maintaining social and cultural connections are not authorized or managed through these land use policy and implementation documents. Nonetheless, the MPAP through elements such as the Montgomery Park Character Statement and provisions for affordable housing, as well a public benefits agreement, do support strengthening connections to, and representation in, the plan area for communities with a historic connection to the plan area. Therefore, on balance, the MPAP complies with this policy.

**Policy 5.19. Aging in place.** Encourage a range of housing options and supportive environments to enable older adults to remain in their communities as their needs change.

**169. Finding:** The MPAP amendments propose Central Employment zoning which allows multi-dwelling housing. Multi dwelling housing, including affordable housing, is one type of housing that can support housing options for a variety of households, including older adults. The MPAP amendments also increase housing opportunities in an area with good access to everyday goods and services in a pedestrian and transit friendly area, further supporting options for older adults to meet every day needs close to home and as they age. Therefore, the MPAP complies with this policy.

## Housing location

**Policy 5.20. Coordinate housing needs in high-poverty areas.** Meet the housing needs of under-served and under-represented populations living in high-poverty areas by coordinating plans and investments with housing programs.

**170. Finding:** The MPAP area is not a high-poverty area. Therefore, this policy does not apply. Nonetheless, the MPAP amendments support housing, including affordable housing, which will provide more housing options in an area of the city near the central city, which does have higher rates of under-served populations. Therefore, the MPAP complies with this policy.

**Policy 5.21. Access to opportunities.** Improve equitable access to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities in areas with high concentrations of under-served and under-represented populations and an existing supply of affordable housing.

**171. Finding:** The MPAP area is not an area with a high population of under-served and under-represented communities. Therefore, this policy does not apply. Nonetheless, the MPAP amendments do support housing, including affordable housing, which will provide more housing options and access to jobs, goods and services in an area of the city near the central city, which does have higher rates of under-served populations and affordable housing. Therefore, the MPAP complies with this policy.

**Policy 5.22. New development in opportunity areas.** Locate new affordable housing in areas that have high/medium levels of opportunity in terms of access to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities.

**172. Finding:** Inner northwest Portland, where the MPAP is located, is considered a “high-opportunity” area because it is a complete neighborhood with many options for everyday goods, services, parks, schools, and transit, all within a pedestrian friendly environment. It also has good access to in the nearby industrial areas and the central city. The MPAP amendments expand opportunities for affordable housing in this “high-opportunity” area. Therefore, the MPAP complies with this policy.

**Policy 5.23. Higher-density housing.** Locate higher-density housing, including units that are affordable and accessible, in and around centers to take advantage of the access to active transportation, jobs, open spaces, schools, and various services and amenities.

**173. Finding:** The MPAP geography is adjacent to the existing Northwest District Town Center. The MPAP amendments include an expansion of this town center to incorporate the plan area. The MPAP amendments also include zoning map changes that will introduce housing opportunities and options, including affordable housing, in this area. This new housing will be able to take advantage of existing access to goods and services, transit, active transportation options, jobs, schools and open spaces. Therefore, the MPAP complies with this policy.

**Policy 5.24. Impact of housing on schools.** Evaluate plans and investments for the effect of housing development on school enrollment, financial stability, and student mobility. Coordinate with school districts to ensure plans are aligned with school facility plans.

**174. Finding:** The MPAP is within the Portland Public School (PPS) district. The MPAP project consulted with PPS at various junctures during the development of the plan. PPS did not identify any concerns related to expected long term growth in housing capacity in the plan area. Therefore, the MPAP complies with this policy.

## Housing affordability

**Policy 5.25. Housing preservation.** Preserve and produce affordable housing to meet needs that are not met by the private market by coordinating plans and investments with housing providers and organizations.

**Policy 5.26. Regulated affordable housing target.** Strive to produce at least 10,000 new regulated affordable housing units citywide by 2035 that will be affordable to households in the 0-80 percent MFI bracket.

**Policy 5.27. Funding plan.** Encourage development or financial or regulatory mechanisms to achieve the regulated affordable housing target set forth for 2035.

**Policy 5.28. Inventory of regulated affordable housing.** Coordinate periodic inventories of the supply of regulated affordable housing in the four-county (Clackamas, Clark, Multnomah and Washington) region with Metro.

**Policy 5.29. Permanently-affordable housing.** Increase the supply of permanently-affordable housing, including both rental and homeownership opportunities.

**175. Finding:** Policies 5.25 through 5.29 promote the production and preservation of regulated affordable housing. In general, these policies are implemented through city programs administered by the Portland Housing Bureau. Within the zoning code, the inclusionary housing provisions require buildings with 20 units or more to provide to provide a percentage of the units at affordable rates. While there is no existing regulated affordable housing in the plan area, thus no opportunities for preservation, the MPAP amendments do support production of new

regulated affordable housing which can be future opportunities for coordination with housing providers and organizations. Further, any new regulated affordable housing in the plan area will be permanently affordable as administered by the Portland Housing Bureau. Therefore, the MPAP complies with policies 5.25 through 5.29.

**Policy 5.30. Housing cost burden.** Evaluate plans and investments for their impact on household cost, and consider ways to reduce the combined cost of housing, utilities, and/or transportation. Encourage energy-efficiency investments to reduce overall housing costs.

**176. Finding:** The MPAP amendments including zoning map changes that add Central Employment zoning, which allows multi story and multi dwelling housing. Multi dwelling housing is considered a compact housing type and these can be generally less costly and with lower utility costs than detached housing types, which can reduce overall housing costs.

The plan’s zoning amendments also expand housing options in an area with good access to transit and multi modal transportation networks. Access to these supports reduced household transportation costs because they will allow more people to live close to transit, making transit and multi modal transportation a more feasible option for more residents, which can reduce reliance on more expensive automobile transportation.

Therefore, the MPAP complies with this policy.

**Policy 5.31. Household prosperity.** Facilitate expanding the variety of types and sizes of affordable housing units, and do so in locations that provide low-income households with greater access to convenient transit and transportation, education and training opportunities, the Central City, industrial districts, and other employment areas.

**177. Finding:** The MPAP zoning amendments expand housing options, including affordable housing, in an area that has good access to everyday goods and services, transit, active transportation options, schools, open spaces, and jobs – both in the nearby industrial areas and the Central City. Therefore, the MPAP complies with this policy.

**Policy 5.32 Affordable Housing in Centers.** Encourage income diversity in and around centers by allowing a mix of housing types and tenures.

**178. Finding:** The MPAP geography is adjacent to the existing Northwest District Town Center. The MPAP amendments include an expansion of this town center to incorporate the plan area. The MPAP amendments also include zoning map changes that will introduce housing opportunities and options, including affordable housing, in this area. This new housing will support income and housing diversity in this town center. Therefore, the MPAP complies with this policy.

**Policy 5.33. Central City affordable housing.** Encourage the preservation and production of affordable housing in the Central City to take advantage of the area’s unique concentration of active transportation access, jobs, open spaces, and supportive services and amenities.

**179. Finding:** This policy is only relevant to the Central City, which is not within the MPAP geography. This policy does not apply.

**Policy 5.34. Affordable housing resources.** Pursue a variety of funding sources and mechanisms including new financial and regulatory tools to preserve and develop housing units and various assistance programs for households whose needs are not met by the private market.

**180. Finding:** This policy does not apply because it concerns affordable housing funding sources and mechanisms, which are not addressed by Comprehensive Plan Map, and Zoning Code and Map amendments that are the focus of the MPAP.

**Policy 5.35. Inclusionary housing.** Use inclusionary zoning and other regulatory tools to effectively link the production of affordable housing to the production of market-rate housing.

**181. Finding:** Inclusionary housing regulations were adopted in 2018. The MPAP amendments do not change that code or program. The MPAP amendments support the use of the Inclusionary Housing Program in the plan area through both zoning for high density multi dwelling housing, which is more likely to be subject to the inclusionary housing regulations, and by providing incentives in the zoning code to promote affordable housing. Therefore, the MPAP complies with this policy.

**Policy 5.36. Impact of regulations on affordability.** Evaluate how existing and new regulations affect private development of affordable housing, and minimize negative impacts where possible. Avoid regulations that facilitate economically-exclusive neighborhoods.

**182. Finding:** The MPAP amendments propose Central Employment zoning, which allows a wide range of uses, including multi dwelling housing and therein affordable housing. The Central Employment zone is a high-density zone. In addition, the plan’s proposed zoning code amendments, included in a new plan district for the area, also has a minimum density and general incentives for affordable housing. This combination of minimum density and incentives supports development of affordable housing through the Inclusionary Housing Program requirements and will avoid creation of economically exclusive neighborhood. Therefore, the MPAP complies with this policy.

**Policy 5.37. Mobile home parks.** Encourage preservation of mobile home parks as a low/moderate-income housing option. Evaluate plans and investments for potential redevelopment pressures on existing mobile home parks and impacts on park residents and protect this low/moderate-income housing option. Facilitate replacement and alteration of manufactured homes within an existing mobile home park.

**183. Finding:** There are no existing mobile home parks directly in, nor in the vicinity of, the plan area. Furthermore, existing mobile home parks are zoned RMP (Residential Manufactured Dwelling Park), and no changes are proposed for RMP zoning provisions with this plan. Therefore, this policy does not apply.

**Policy 5.38. Workforce housing.** Encourage private development of a robust supply of housing that is affordable to moderate-income households located near convenient multimodal transportation that provides access to education and training opportunities, the Central City, industrial districts, and other employment areas.

**184. Finding:** The MPAP amendments are consistent with this policy because the expanded mapping of Central Employment zoning will allow for increased opportunities for housing, including affordable housing, near transit and multi modal transportation networks, and also near employment centers of the NW Industrial and Central City areas. The expanded applicability of inclusionary housing provisions, in conjunction with the broader mapping of the Central Employment zoning, also promotes housing affordable to moderate-income households by providing options for inclusionary housing requirements to be met through units affordable to households either earning up to 60% or up to 80 percent of median household income. Therefore, the MPAP complies with this policy.

**Policy 5.39. Compact single-family options.** Encourage development and preservation of small

resource-efficient and affordable single-family homes in all areas of the city.

**185. Finding:** This policy does not apply because the MPAP amendments propose zoning the area a mix of Central Employment, which allows a range of uses including high-density housing, and Mixed Employment which prohibits housing. While there are a few single dwelling residences in the area, which are allowed to remain, it is anticipated that future development will consist largely of employment, commercial and multi dwelling uses.

**Policy 5.40. Employer-assisted housing.** Encourage employer-assisted affordable housing in conjunction with major employment development.

**186. Finding:** This policy does not apply because MPAP does not include any major employment development. The MPAP is a plan and does not directly result in development.

**Policy 5.41. Affordable homeownership.** Align plans and investments to support improving homeownership rates and locational choice for people of color and other groups who have been historically under-served and under-represented.

**Policy 5.42. Homeownership retention.** Support opportunities for homeownership retention for people of color and other groups who have been historically under-served and under-represented.

**Policy 5.43. Variety in homeownership opportunities.** Encourage a variety of ownership opportunities and choices by allowing and supporting including but not limited to condominiums, cooperatives, mutual housing associations, limited equity cooperatives, land trusts, and sweat equity.

**187. Finding:** Council finds that Policies 5.41 through 5.43 all aim to support opportunities for homeownership for all Portlanders, including historically under-served and under-represented Portlanders. These policies are primarily implemented through the work of the Housing Bureau. The MPAP amendments do not affect regulatory or funding programs that impact homeownership. Therefore, these policies do not apply.

**Policy 5.44. Regional cooperation.** Facilitate opportunities for greater regional cooperation in addressing housing needs in the Portland Metropolitan area, especially for the homeless, low- and moderate-income households, and historically under-served and under-represented communities.

**Policy 5.45. Regional balance.** Encourage development of a “regional balance” strategy to secure greater regional participation to address the housing needs of homeless people and communities of color, low- and moderate-income households, and historically under-served and under-represented communities throughout the region.

**188. Finding:** Council finds that Policies 5.44 through 5.45 address how the City engages with Metro and other jurisdictions in the Portland region on housing issues and do not apply to this legislative project.

## Homelessness

**Policy 5.46. Housing continuum.** Prevent homelessness and reduce the time spent being homeless by ensuring that a continuum of safe and affordable housing opportunities and related supportive services are allowed, including but not limited to Permanent Supportive Housing, transitional housing, self-built micro housing communities, emergency shelters, temporary shelters such as warming centers, and transitional campgrounds.

**189. Finding:** City Council defines permanent supportive housing as affordable housing combined with supportive services to help individuals and families lead more stable lives. City Council interprets

this policy to provide direction to provide a range of housing types, especially types that may not be considered traditional housing (detached single-dwellings, multi-dwelling buildings, manufactured dwelling parks). The MPAP amendments include zoning a portion of the plan area with Central Employment zoning, which allows a wide range of uses including multi dwelling housing. The Central Employment zone allows for a broad range of transitional housing types, including a variety of shelter arrangements. The Central Employment zone also has allowances for Group Living housing, including arrangements that include supportive services. The MPAP amendments are consistent with this policy in designating zoning that provides for more flexibility for transitional housing, Group Living, supportive services, and other housing arrangements. Therefore, the MPAP complies with this policy.

### **Health, safety, and well-being**

**Policy 5.47 Healthy housing.** Encourage development and maintenance of all housing, especially multi-dwelling housing, that protects the health and safety of residents and encourages healthy lifestyles and active living.

**190. Finding:** Where housing is proposed, the MPAP includes Zoning Code amendments to support healthy, active living and help minimize urban heat island impacts that can negatively impact health. These include requirements for outdoor space and urban green features, which include options for ecoroofs, vegetated outdoor space, or space for larger trees, all of which can help support physical and mental health and help reduce urban heat island impacts. The MPAP amendments include the addition of Central Employment zoning, which allows a wide range of uses, including multi-dwelling housing, in an area with good access to goods, services and transit. This supports active living by allowing more residents to be able to walk, roll or take transit to meet daily needs. The EG1 zone along Nicolai Street and provisions in the York Plan District serve to buffer new housing from offsite impacts from the industrial uses north of Nicolai Street. Therefore, the MPAP complies with this policy.

**Policy 5.48 Housing safety.** Require safe and healthy housing free of hazardous materials such as lead, asbestos, and radon.

**191. Finding:** This policy does not apply because the MPAP amendments primarily concern Comprehensive Plan Map changes and Zoning Code regulations that do not regulate interior building materials or construction. The amendments neither regulate such features nor create barriers to maintaining or creating housing free of hazardous materials.

**Policy 5.49. Housing quality.** Encourage housing that provides high indoor air quality, access to sunlight and outdoor spaces, and is protected from excessive noise, pests, and hazardous environmental conditions.

**192. Finding:** The MPAP amendments largely do not change regulations related to housing quality. The Plan amendments neither regulate such features nor create barriers to creating housing that provides high indoor air quality, and access to sunlight, and is protected from excessive noise, pests, and hazardous environmental conditions. However, the MPAP includes Zoning Code amendments in the plan district that support housing quality as it relates to access to outdoor spaces. Where housing is proposed in the Central Employment zone, development will be subject to requirements for minimum outdoor spaces, whether in individual or shared spaces. The EG1 zone along Nicolai Street and provisions in the York Plan District serve to buffer new housing from offsite impacts from the industrial uses north of Nicolai Street. In addition, proposed regulations

provide for a 20-foot landscape buffer between employment and mixed use development, which can include residential uses, within the plan district itself. Therefore, the MPAP complies with this policy.

**Policy 5.50. High-performance housing.** Encourage energy efficiency, green building practices, materials, and design to produce healthy, efficient, durable, and adaptable homes that are affordable or reasonably priced.

**193. Finding:** The MPAP’s application of the Central Employment zone, which allows a range of uses including housing, encourages multi dwelling residential types which results in improved energy efficiency and is consistent with the policy of creating high-performance housing. According to studies conducted by the State DEQ, “Reducing home size is among the best tier of options for reducing waste generation in the Oregon housing sector, while simultaneously achieving a large environmental benefit across many categories of impact...Reduction in home size is a significant leverage point for impact reduction [including non-renewable energy use] and may be a more effective measure than achieving minimum levels of ‘green certification’” [<https://www.oregon.gov/deq/FilterDocs/ADU-ResBldgLCA-Report.pdf>] Attached housing is also more energy efficient than detached forms of housing. According to the EPA, “fairly substantial differences are seen in detached versus attached homes [approximately 17.5% improved efficiency], but the most striking difference is the variation in energy use between single-family detached homes and multifamily homes [50% improved efficiency], due to the inherent efficiencies from more compact size and shared walls among units.” [[www.epa.gov/sites/production/files/2014-03/documents/location\\_efficiency\\_btu.pdf](http://www.epa.gov/sites/production/files/2014-03/documents/location_efficiency_btu.pdf)] Therefore, the MPAP complies with this policy.

**Policy 5.51. Healthy and active living.** Encourage housing that provides features supportive of healthy eating and active living such as useable open areas, recreation areas, community gardens, crime-preventive design, and community kitchens in multifamily housing.

**194. Finding:** The MPAP amendments largely do not change regulations related to housing quality. The Plan amendments neither regulate such features nor create barriers to creating housing with features supportive of healthy eating and active living. However, the MPAP includes Zoning Code amendments in the new plan district that support healthy and active living as it relates to access to useable open areas. Where housing is proposed in the Central Employment zone, development will be subject to requirements for minimum outdoor spaces, whether in individual or shared spaces. Therefore, the MPAP complies with this policy.

**Policy 5.52. Walkable surroundings.** Encourage active transportation in residential areas through the development of pathways, sidewalks, and high-quality onsite amenities such as secure bicycle parking.

**195. Finding:** While the MPAP area will be mixed use, it will include residential uses. The MPAP amendments are consistent with this policy because the proposed Central Employment zone includes standards for on-site pedestrian connections, including for materials and lighting. Amenities such as secure bicycle parking are also generally required by the zoning code for residential uses, further supporting this policy. Lastly, the MPAP’s recommended transportation projects, such as creation of new streets, enhanced crossings, and extending the pedestrian district designation onto the plan area, support the creation of safe pedestrian and bicycle connections through the plan area and will help residents connecting jobs, schools, parks, and other local destination and services. Therefore, the MPAP complies with this policy.

**Policy 5.53. Responding to social isolation.** Encourage site designs and relationship to adjacent

developments that reduce social isolation for groups that often experience it, such as older adults, people with disabilities, communities of color, and immigrant communities.

**196. Finding:** The MPAP amendments include provisions in the Central Employment zone for outdoor spaces, which can support interaction among community members and help reduce social isolation, and for design features supportive of more pedestrian-friendly streetscapes, such as limitations on surface parking and requirements for active ground floor uses and ground-floor windows, which can create conditions that support more walking and opportunities to interact with neighbors.

The amendments also include application of the Design 'd' overlay zone on all Central Employment zoned areas and a Montgomery Park Character Statement to guide development subject to Design review. The 'd' overlay requires that development either meet the Citywide Design Guidelines (discretionary, guided by character statement) or the Design Standards (objective). The application of the standards or guidelines will encourage development to provide public open spaces and to locate them to encourage community activity and social connections. Design Guideline 05 encourages development to provide room for a diversity of publicly accessible spaces to invite community-building and social interaction. Design Standards support this guidance with requirements for development to provide physical and visual connection to both public and private open spaces on site. Further guidance within the Montgomery Park Character Statement encourages integrating intimate, multi-functional and accessible gathering spaces to encourage intergenerational community connections. The character statement also provides guidance on incorporating features that draw on and articulate connections to historical and social context of the area through integration of art and historical references. These features can help build community identity and support community connections within the district as well as to surrounding areas.

Therefore, the MPAP complies with this policy.

**Policy 5.54 Renter protections.** Enhance renter health, safety, and stability through education, expansion of enhanced inspections, and support of regulations and incentives that protect tenants and prevent involuntary displacement.

**197. Finding:** The MPAP amendments do not alter regulations establishing tenant protections including required relocation assistance when properties are sold and/or redeveloped (PCC 30.01.085). As a result, this policy does not apply.

## Chapter 6: Economic Development

**Goal 6.A: Prosperity.** Portland has vigorous economic growth and a healthy, diverse economy that supports prosperity and equitable access to employment opportunities for an increasingly diverse population. A strong economy that is keeping up with population growth and attracting resources and talent can:

- Create opportunity for people to achieve their full potential.
- Improve public health.
- Support a healthy environment.
- Support the fiscal well-being of the city.

**198. Finding:** The MPAP supports Goal 6A, Prosperity, by adopting land use and transportation changes that will allow transformation of the plan area into a mixed-use employment district that provides opportunity for access to a diverse array of employment opportunities, while allowing for housing and other uses, such as supportive commercial and community services. The creation of opportunities for over 4,000 new jobs in a variety of fields, 400 of which are targeted as middle-wage jobs, 500,000 square feet of non-residential employment space and an estimated 8,000 – 14,000 square feet of affordable commercial space represents a significant contribution to a vigorous, diverse economy that will attract resources, talent and support the fiscal well-being of the city. Therefore, MPAP complies with Goal 6.A.

**Goal 6.B: Development.** Portland supports an attractive environment for industrial, commercial, and institutional job growth and development by: 1) maintaining an adequate land supply; 2) a local development review system that is nimble, predictable, and fair; and 3) high-quality public facilities and services.

**199. Finding:** Goal 6.B: The MPAP supports Goal 6B, Development, by maintaining an adequate supply of industrial land based on the adopted EOA; by adopting zoning regulations that provide clarity for development; and by encouraging high-quality public facilities, including future extension of streetcar transit and other transportation improvements such as streets and modal improvements. The creation of opportunities for over 2,000 units of housing, 500,000 square feet of employment space, the development of a 40,000 square foot park and .65mile streetcar extension supports an attractive environment for a range of development activities, including industrial and employment uses, commercial, and institutional uses. The conversion of 30 acres from the city's industrial land supply still leaves adequate supply of land for industrial uses (see BPS memos dated September 20, 2024, and November 25, 2024). The MPAP does not change the local development review system. The creation of the park, a streetcar extension and associated street extensions and improvements represent significant investments in high-quality public facilities and services. Therefore, the MPAP complies with Goal 6.B.

**Goal 6.C: Business district vitality.** Portland implements land use policy and investments to:

- Ensure that commercial, institutional, and industrial districts support business retention and expansion.
- Encourage the growth of districts that support productive and creative synergies among local businesses.
- Provide convenient access to goods, services, and markets.

- Take advantage of our location and quality of life advantages as a gateway to world-class natural landscapes in Northwest Oregon, Southwest Washington, and the Columbia River Basin, and a robust interconnected system of natural landscapes within the region’s Urban Growth Boundary.

**200. Finding:** Goal 6.C: The amendments support Goal 6C, Business district vitality, through the use of Employment zones that will allow for a broad array of uses ranging from industrial to commercial, in a location that provides for local as well as broader regional access, and that provides connections to resources such as Forest Park and the Willamette River. The EG1 zone along Nicolai Street and provisions in the York Plan District serve to reduce conflicts between housing and industrial and employment uses. Extension of the streetcar coupled with the projected employment and public facilities in the MPAP will connect the business and institutional districts of the Central City to a new high-density employment area. Therefore, the MPAP complies with Goal 6.C.

### **Diverse, expanding city economy**

**Policy 6.1. Diverse and growing community.** Expand economic opportunity and improve economic equity for Portland’s diverse, growing population through sustained business growth.

**201. Finding:** The MPAP expands economic opportunity and improves economic equity in Portland by allowing a broader mix of uses in a high-opportunity area with expanded transit access. The EX zone allows a high density mix of uses, including office, light manufacturing and housing. As explained in the BPS memo dated November 25, 2024, the job density of purely industrial sector uses is 12.2 jobs per acre, with 71% of those jobs identified as middle-wage jobs, while the office sector has a higher density of jobs per acre at 275 with a lower percentage, 18%, of those jobs identified as middle wage jobs. The EX zone in the MPAP is expected to result in a higher density of jobs per acre than a purely industrial zone, as is appropriate for a transit rich area. Therefore, the MPAP complies with this policy.

**Policy 6.2. Diverse and expanding economy.** Align plans and investments to maintain the diversity of Portland’s economy and status as Oregon’s largest job center with growth across all sectors (commercial, industrial, creative, and institutional) and across all parts of the city.

**202. Finding:** The MPAP specifically aligns land use planning with infrastructure and private investment to diversify Portland’s economy and increase opportunity for jobs. The streetcar extension from NW Lovejoy Street to Montgomery Park is a \$120 million infrastructure investment. The owners of the former ESCO Steel site indicated in testimony at the November 13, 2024, City Council hearing an interest in investments in the site specifically for employment related uses. The application of the high-density EX zone along with the regulations in the York Plan District requiring non-residential uses are elements of the MPAP that promote a diverse economy and bolsters Portland’s job center status. Therefore, the MPAP complies with this policy.

**Policy 6.3. Employment growth.** Strive to capture at least 25 percent of the seven-county region’s employment growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania counties).

**Policy 6.4. Fiscally-stable city.** Promote a high citywide jobs-to-households ratio that supports tax revenue growth at pace with residential demand for municipal services.

**Policy 6.5. Economic resilience.** Improve Portland’s economic resilience to impacts from climate change

and natural disasters through a strong local economy and equitable opportunities for prosperity.

**Policy 6.6. Low-carbon and renewable energy economy.** Align plans and investments with efforts to improve energy efficiency and reduce lifecycle carbon emissions from business operations. Promote employment opportunities associated with energy efficiency projects, waste reduction, production of more durable goods, and recycling.

**Policy 6.7. Competitive advantages.** Maintain and strengthen the city’s comparative economic advantages including access to a high-quality workforce, business diversity, competitive business climate, and multimodal transportation infrastructure.

**Policy 6.8. Business environment.** Use plans and investments to help create a positive business environment in the city and provide strategic assistance to retain, expand, and attract businesses.

**Policy 6.9. Small business development.** Facilitate the success and growth of small businesses and coordinate plans and investments with programs that provide technical and financial assistance to promote sustainable operating practices.

**Policy 6.10. Business innovation.** Encourage innovation, research, development, and commercialization of new technologies, products, and services through responsive regulations and public sector approaches.

**Policy 6.11. Sharing economy.** Encourage mechanisms that enable individuals, corporations, non-profits, and government to market, distribute, share, and reuse excess capacity in goods and services. This includes peer-to-peer transactions, crowd funding platforms, and a variety of business models to facilitate borrowing and renting unused resources.

**Policy 6.12. Economic role of livability and ecosystem services.** Conserve and enhance Portland’s cultural, historic, recreational, educational, food-related, and ecosystem assets and services for their contribution to the local economy and their importance for retention and attraction of skilled workers and businesses.

**203. Finding:** Policies 6.3 through 6.12 provide direction regarding economic and employment growth. The MPAP amendments support Policies 6.1 – 6.12 generally by employing land use regulatory tools such as land use designations, zoning, and zoning code regulations that foster the development of the area as a mixed-use employment district. Therefore, the MPAP complies with these policies.

## Land development

**Policy 6.13. Land supply.** Provide supplies of employment land that are sufficient to meet the long-term and short-term employment growth forecasts, adequate in terms of amounts and types of sites, available and practical for development and intended uses. Types of sites are distinguished primarily by employment geographies identified in the Economic Opportunities Analysis, although capacity needs for building types with similar site characteristics can be met in other employment geographies.

**204. Finding:** The MPAP project makes changes to land planned for industrial and employment uses, but maintains an adequate supply of industrial land, based on the adopted Economic Opportunities Analysis (EOA). The MPAP project retains over 50 acres of prime industrial land previously considered for change, and focuses the map changes in a more limited area. As explained in the BPS memos dated September 20, 2024, and November 25, 2024, the MPAP amendments change the land use designation on 30 acres identified in the EOA as industrial and employment land to Central Employment. This represents less than 0.2 percent of total industrial/employment land

base of 13,175 acres, and 3 percent of the 1,067 acres of buildable land in the Harbor & Airport Districts. The adopted EOA found a surplus of 54 acres of land in Harbor and Airport Districts, which has subsequently been reduced to 6 acres through other land use actions. The EOA also identified a surplus of 66 acres of industrial land in the Columbia East District, a district that can accommodate similar land uses as the Harbor and Airport Districts. No land use actions have affected the supply of land in the Columbia East district since adoption of the EOA. Therefore, the EOA shows a citywide surplus of 62 acres with the MPAP land use change.

The ESCO site represents a large industrial site of about 18 acres. The 2016 EOA showed a deficit of 85 acres in the 10-20 acre site size range. However, this deficit was covered by surplus capacity of 585 acres in the 20+ acre site categories. Therefore, the conversion of one large site is not expected to significantly impact the supply of larger industrial sites in Portland.

Therefore, the MPAP complies with this policy.

**Policy 6.14. Brownfield redevelopment.** Overcome financial-feasibility gaps to cleanup and redevelop 60 percent of brownfield acreage by 2035.

**205. Finding:** The MPAP area includes industrial sites that, while not identified as brownfields, are known to have environmental issues. The changes in land use designations and implementing zones from Employment and Industrial to Central Employment and General Employment changes the economics of development, as shown in economic analysis performed by the MP2H project consulting team. These changes will help facilitate cleanup and redevelopment of sites in the MPAP area that are currently underutilized. Therefore, the MPAP complies with this policy.

**Policy 6.15. Regionally-competitive development sites.** Improve the competitiveness of vacant and underutilized sites located in Portland’s employment areas using incentives, and regional and state assistance for needed infrastructure and site readiness improvements.

**206. Finding:** The MPAP area includes vacant and underutilized sites. The changes in land use designations and implementing zones from Employment and Industrial to Central Employment changes the economics of development, as shown in economic analysis performed by the MP2H project consulting team, which will help facilitate cleanup and redevelopment of sites that are currently underutilized. The regulatory changes also facilitate the ability to pursue federal, state, and regional financial assistance for transportation infrastructure improvements, including construction of a streetcar transit extension and new streets. Therefore, the MPAP complies with this policy.

**Policy 6.16. Regulatory climate.** Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:

**6.16.a.** Assess and understand cumulative regulatory costs to promote Portland’s financial competitiveness with other comparable cities.

**6.16.b.** Promote certainty for new development through appropriate allowed uses and “clear and objective” standards to permit typical development types without a discretionary review.

**6.16.c.** Allow discretionary-review to facilitate flexible and innovative approaches to meet requirements.

**6.16.d.** Design and monitor development review processes to avoid unnecessary delays.

**6.16.e.** Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and efficient, well-coordinated development review and permitting procedures.

**207. Finding:** Policy 6.16 and the sub-policies 6.16.a through 6.16e provide direction regarding development review processes and regulations in employment areas. The MPAP amendments provide additional development flexibility overall. In the General Employment (EG1 zone) areas, the amendments allow for greater floor area and a broader array of employment-focused uses; the amendments utilize clear and objective development standards for development in the EG1-zoned areas and do not employ the Design overlay zone. In the Central Employment (EX zone) areas, additional use flexibility and development intensity is allowed. A new zoning plan district (York) facilitates a mix of nonresidential and residential development in a transit-oriented manner. The EX zoned areas employ the Design overlay zone, but allow many forms of development to utilize a set of objective citywide design standards for development rather than Design Review, a discretionary land use review. The use of objective development and design standards help provide certainty for development and reduce pre-development time and cost. Therefore, the MPAP complies with Policy 6.16 and its sub-policies.

**Policy 6.17. Short-term land supply.** Provide for a competitive supply of development-ready sites with different site sizes and types, to meet five-year demand for employment growth in the Central City, industrial areas, campus institutions, and neighborhood business districts.

**208. Finding:** The MPAP project makes changes to land planned for industrial and employment uses, but maintains adequate growth capacity by maintaining an adequate supply of land zoned an available for industrial use. The MPAP project retains over 50 acres of prime industrial land previously considered for land use changes, and focuses change in a more limited area. As explained in the BPS memos dated September 20, 2024, and November 25, 2024, the MPAP amendments change the land use designation on 30 acres of land identified in the adopted EOA as industrial in the Harbor and Airport District to Central Employment. This represents less than 0.2 percent of total industrial/employment land base of 13,175 acres, and 3 percent of the 1,067 acres of buildable land in the Harbor & Airport Districts. Council finds this evidence to be compelling and there is no other evidence to the contrary.

As explained in the BPS memo dated September 20, 2024, the ESCO site represents a large industrial site of about 18 acres. The 2016 EOA showed a deficit of 85 acres in the 10-20 acre site size range. However, this deficit was covered by surplus capacity of 585 acres in the 20+ acre site categories. Therefore, Council finds that the conversion of one large site is not expected to significantly impact the supply of larger industrial sites in Portland.

Therefore, the MPAP complies with this policy.

**Policy 6.18. Evaluate land needs.** Update the Economic Opportunities Analysis and short-term land supply strategies every five to seven years.

**209. Finding:** This policy provides general direction to regularly update the EOA. The EOA is not being updated as part of MPAP. Council finds that the current adopted EOA is a sufficient basis for adopting the MPAP. Policy 6.18 is not applicable.

**Policy 6.19. Corporate headquarters.** Provide land opportunities for development of corporate headquarters campuses in locations with suitable transportation facilities.

**210. Finding:** The MPAP map amendments include changing the 18-acre ESCO site to Central Employment with the associated EX zone, which allows high density office along with commercial and light-industrial uses appropriate for a corporate headquarters campus in an area with streetcar access. Therefore, MPAP complies with 6.19.

### **Traded sector competitiveness**

**Policy 6.20. Traded sector competitiveness.** Align plans and investments with efforts to improve the city and regional business environment for traded sector and export growth. Participate in regional and statewide initiatives.

**Policy 6.21. Traded sector diversity.** Encourage partnerships to foster the growth, small business vitality, and diversity of traded sectors.

**Policy 6.22. Clusters.** Align plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters.

**Policy 6.23. Trade and freight hub.** Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub.

**Policy 6.24. Traded sector land supply.** Foster traded sector retention, growth, and competitive advantages in industrial districts and the Central City. Recognize the concentration of traded-sector businesses in these districts.

**Policy 6.25. Import substitution.** Encourage local goods production and service delivery that substitute for imports and help keep the money Portlanders earn in the local economy.

**Policy 6.26. Business opportunities in urban innovation.** Strive to have Portland’s built environment, businesses, and infrastructure systems showcase examples of best practices of innovation and sustainability.

**211. Finding:** Policies 6.20 through 6.26 address Portland’s traded sector competitiveness. Generally, the MPAP amendments do not impact the overall city and regional business climate as it relates to traded sector competitiveness.

Policy 6.22, Clusters, calls for aligning plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters plans. The MPAP applies land use and zoning designations that allow for a very broad array of employment oriented uses - including Manufacturing and Production, Warehouse and Freight Movement, Wholesale Sales, Industrial Service and a broad array of Commercial uses including Office - which can accommodate firms in traded sectors. The changes allow employment uses and as such are likely to continue to support targeted clusters in Green Cities, Software and Media, and Athletic and Outdoor industries. The changes also allow housing and support economic policies supporting transit-oriented housing. Further, the MPAP limits the area of industrial land use change to 30 acres, about 0.2 percent of the city’s supply, and maintains over 13,000 acres of industrial land to accommodate industrial uses. Therefore, the MPAP complies with this policy.

Policy 6.24, Traded sector land supply, calls for fostering traded sector retention, growth, and competitive advantages in industrial districts and the Central City and recognizing the concentration of traded-sector businesses in these districts. The MPAP supports this policy by limiting the industrial acreage proposed for change within the original study area. The area of

industrial land use change represents less than 0.2 percent of the city’s industrial land supply. The changes further support this policy by applying employment zones that allow a broad array of industrial, employment and other uses, and by requiring minimum amounts of nonresidential use in new development. Therefore, the MPAP complies with this policy.

The remaining traded sector competitiveness policies do not directly apply to the MPAP amendments. As previously described, the MPAP amendments make changes to land planned for industrial and employment uses, but maintains adequate growth capacity by maintaining an adequate supply of industrial land. The MPAP project retains over 50 acres of prime industrial land previously considered for change, and focuses change in a more limited area. The MPAP amendments change the land use designation on 30 acres of land in the Harbor and Airport District to Central Employment, a mixed-use employment zone. This represents less than 0.2 percent of total industrial/employment land base of 13,175 acres. As explained in the BPS memos dated September 20, 2024, and November 25, 2024, the adopted EOA found a surplus of 54 acres of land in Harbor and Airport Districts, which has subsequently been reduced to 6 acres, through other land use actions. The EOA also identified a surplus of 66 acres of industrial land in the Columbia East District, a district that can accommodate similar land uses as the Harbor and Airport Districts. No land use actions have affected the supply of land in the Columbia East district since adoption of the EOA. Therefore, the EOA shows a citywide surplus of 62 acres with the MPAP land use change.

### **Equitable household prosperity**

**Policy 6.27. Income self-sufficiency.** Expand access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities to support and expand opportunities in Portland for middle- and high-wage jobs that do not require a 4-year college degree.

**6.27.a.** Support the role of industrial districts as a leading source of middle-wage jobs that do not require a 4-year college degree and as a major source of wage-disparity reduction for underserved and under-represented communities.

**6.27.b.** Evaluate and limit negative impacts of plans and investments on middle and high wage job creation and retention.

**212. Finding:** Policy 6.27. Income self-sufficiency calls for expanding access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities to support and expand opportunities in Portland for middle- and high-wage jobs that do not require a 4-year college degree. Policy 6.27.a calls for supporting the role of industrial districts in reducing wage disparity for underserved communities and 6.27.b calls for plans to evaluate and limit negative impacts on middle and high wage job creation and retention. As previously noted, the MPAP project makes limited changes to land planned for industrial and employment uses, but maintains adequate growth capacity by maintaining an adequate supply of land zoned for industrial use. The MPAP amendments limit the area of industrial land change and retain over 50 acres of prime industrial land previously considered for change in the planning process and focuses change in a more limited area. The MPAP amendments change the land use designation on 30 acres of land identified in the adopted EOA as prime industrial in the Harbor and Airport District to Central Employment. This represents less than 0.2 percent of total industrial/employment land base of 13,175 acres, and 3 percent of the 1,067 acres of buildable land in the Harbor & Airport Districts. Other parts of the Guild’s Lake

Industrial District are unchanged and continue to support industrial and employment uses that provide jobs that do not require a 4-year degree. Further, the MPAP amendments employ Central Employment (EX) and General Employment (EG1) land use designations and zones in the area of change. The potential negative impacts associated with these changes are mitigated by the regulations in the new York Plan District (33.597) that require minimum amounts on nonresidential space (floor area) in development, and bonuses and incentives that are aimed at encouraging employment-oriented uses. The broad array of employment uses allowed in the MPAP area via the EX zone can support jobs with a wide array of incomes, and will not negatively impact the ability to support middle and high wage job creation and retention. In addition, a related Public Benefits Agreement calls for creation of 400 net new middle-wage jobs on-site on the largest properties within the plan area.

As explained in the BPS memo dated November 25, 2024, the combination of the middle-wage job target and minimum non-residential space requirement has the potential to create more middle-wage jobs than could be expected from the current industrial zoning.

Therefore, the MPAP complies with Policy 6.27 and its sub-policies.

**Policy 6.28. East Portland job growth.** Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.

**213. Finding:** The MPAP amendments are not focused on East Portland, therefore this policy does not directly apply.

**Policy 6.29. Poverty reduction.** Encourage investment in, and alignment of, poverty-reduction efforts that address economic development, land use, transportation, housing, social services, public health, community development, and workforce development.

**Policy 6.30. Disparity reduction.** Encourage investment in, and alignment of, public efforts to reduce racial, ethnic, and disability-related disparities in income and employment opportunity.

**Policy 6.31. Minority-owned, woman-owned and emerging small business (MWESB) assistance.** Ensure that plans and investments improve access to contracting opportunities for minority-owned, woman-owned, and emerging small businesses.

**214. Finding:** Policies 6.29 – 6.31 address reduction of poverty and disparities as well as providing access and contracting opportunities for minority-owned, woman-owned, and emerging small businesses. The MPAP amendments address Policies 6.29 and 6.30 by including zoning map and code provisions that require nonresidential development and support employment growth in the plan area, which can in-turn reduce poverty. The zoning provisions in the new York Plan District (33.597) also support development of affordable housing beyond required inclusionary housing, and provision of affordable commercial spaces, both of which support and enhance opportunity for low-income households, provide opportunity for a broader array of people and may address poverty. The plan envisions a future transit-oriented district that also includes investments in transportation facilities such streetcar and other modal improvements that will make transportation more affordable, and also create construction jobs. Other elements of the plan, such as a public benefits agreement, call for meeting specific middle-wage jobs targets; the agreement also provides financial offsets aimed at workforce development if the jobs targets are not met on site. Finally, transportation and other related investments, which will be implemented through contracts that must meet MWESB requirements, will help fulfill the goal of improving access to contracting opportunities for minority-owned, woman-owned, and emerging small businesses. Therefore, the MPAP complies with policies 6.29 through 6.31.

**Policy 6.32. Urban renewal plans.** Encourage urban renewal plans to primarily benefit existing residents and businesses within the urban renewal area through:

- Revitalization of neighborhoods.
- Expansion of housing choices.
- Creation of business and job opportunities.
- Provision of transportation linkages.
- Protection of residents and businesses from the threats posed by gentrification and displacement.
- The creation and enhancement of those features which improve the quality of life within the urban renewal area.

**215. Finding:** Policy 6.32 addresses urban renewal plans. The MPAP amendments are not associated with urban renewal areas or tax increment financing (TIF) districts. Therefore, these policies do not apply.

### Central City

**Policy 6.33. Central City.** Improve the Central City’s regional share of employment and continue its growth as the unique center of both the city and the region for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

**Policy 6.34. Central City industrial districts.** Protect and facilitate the long-term success of Central City industrial districts, while supporting their evolution into places with a broad mix of businesses with high employment densities.

**Policy 6.35. Innovation districts.** Provide for expanding campus institutions in the Central City and Marquam Hill, and encourage business development that builds on their research and development strengths.

**216. Finding:** Policies 6.33 through 6.35 provide direction regarding economic development in the Central City. The MPAP amendments have no impact on Central City or Marquam Hill employment zones. Therefore, these policies do not apply.

### Industrial and employment districts

**Policy 6.36. Industrial land.** Provide industrial land that encourages industrial business retention, growth, and traded sector competitiveness as a West Coast trade and freight hub, a regional center of diverse manufacturing, and a widely-accessible base of family-wage jobs, particularly for under-served and under-represented people.

**217. Finding:** Policy 6.36 calls for providing industrial land in the City as a whole. The MPAP amendments propose changes to a limited amount of industrial land. The amendments change 30 net acres of land west of Highway US 30 with an industrial or employment zone to Central Employment (EX) and about 14 acres from industrial to General Employment (EG1) zones. The MPAP retains industrial zoning on over 50 acres of land east of Highway US 30 previously considered for change. Further, the MPAP does not affect the over 13,000 acres of existing industrial zoned land in Portland. The change to EX and EG1 zones ensures that the existing uses are allowed uses that will support their retention by not making them non-conforming uses. The new York Plan District (33.597) requires minimum amounts of nonresidential space (floor area) in development, and bonuses and incentives that are aimed at encouraging employment-oriented

uses. In addition, a separate Public Benefits Agreement calls for creation of 400 net new middle-wage jobs on-site on the largest properties within the plan area. As explained in the BPS memo dated November 25, 2024, the combination of the middle-wage job target and minimum non-residential space requirement has the potential to create more middle-wage jobs than could be expected from the current industrial zoning.

Therefore, the MPAP complies with Policy 6.36.

**Policy 6.37. Industrial sanctuaries.** Protect industrial land as industrial sanctuaries identified on the Comprehensive Plan Map primarily for manufacturing and distribution uses and to encourage the growth of industrial activities in the city.

**218. Finding:** The MPAP amendments propose changes to a limited amount of the industrial sanctuary which is identified through use of the Industrial Sanctuary (IS) Comprehensive Plan map designation. The amendments change 9.4 net acres of land west of Highway US 30 designated as Industrial Sanctuary in the 2035 Comprehensive Plan to Central Employment and Mixed Employment designations. The MPAP retains Industrial Sanctuary designations on over 50 acres of land east of Highway US 30 previously considered for change. Further, the MPAP does not affect the over 13,000 acres of existing industrial sanctuary land in Portland.

The MPAP does not change the regulatory protections of the remaining Industrial Sanctuary designated land. The EG zone along NW Nicolai Street along with provisions in the York Plan District will buffer the remaining Industrial Sanctuary designated land in the area from conflict with residential and other uses. The establishment of a larger mixed-use area between the heavy industrial uses in Guild’s Lake and the dense residential uses in the Northwest District is intended to reduce conflicts. The policy and regulatory intent of MPAP is to better protect the remaining Industrial Sanctuary designated land from conflicts that would erode its viability.

While the MPAP removes Industrial Sanctuary designation from land it has limited impact on industrial sanctuaries at a citywide level and includes mitigation measures. The York Plan District contains provision requiring non-residential uses and limiting residential uses in the area east of NW 24<sup>th</sup> Avenue where there are more active businesses. Furthermore, a separate public benefits agreement contains commitments to provide 400 middle-wage jobs on the largest properties in the MPAP.

Therefore, on balance, the MPAP complies with Policy 6.37.

**Policy 6.38. Prime industrial land retention.** Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land that is prioritized for long-term retention.

**219. Finding:** The verb “protect”, which is defined in the 2035 Comprehensive Plan, means to defend or guard against loss, injury, or destruction. This policy is implemented through the Prime Industrial (k) Overlay Zone (33.471). The MPAP amendments do not include changes to the overlay zone or to the Zoning Map in the Portland Harbor, Columbia Corridor or the Brooklyn Yard and these areas continue to be prioritized for long-term retention. Therefore, this policy is not applicable.

**6.38.a.** Protect prime industrial lands from quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land to non-industrial uses, and consider the potential for other map amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.

**220. Finding:** The MPAP amendments are a legislative change. These changes do not amend the Prime Industrial (k) Overlay Zone (33.471), which is where the prohibition on quasi-judicial map amendments is located. The MPAP amendments change 35.2 acres, about 0.2 percent of the total prime industrial acreage, of land identified as “prime industrial,” and retain and thus protect other lands that are so designated. This is a minimal amount; it does not severely affect the overall city supply of industrial land. The MPAP planning process resulted in the retention of over 50 acres of industrial zoning east of Highway US 30 that was previously considered for change. Further, the MPAP does not affect the over 13,000 acres of existing industrial zoned land in Portland. The EG zone along NW Nicolai Street along with provisions in the York Plan District will buffer the remaining prime industrial land north of NW Nicolai Street from conflict with residential and other uses. Finally, as explained in the BPS memos dated September 20, 2024, and November 25, 2024, the city has sufficient available capacity to accommodate this change, as shown in Finding for Policy 6.13. Therefore, the MPAP complies with this policy.

**6.38.b.** Limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

**221. Finding:** The MPAP amendments have limited the conversion of prime industrial land to 35.2 net acres. This is a minimal amount, about 0.2 percent of the total prime industrial acreage in Portland, and does not severely affect the overall city supply of industrial land. The MPAP planning process resulted in the retention of over 50 acres of industrial zoning east of Highway US 30 that was previously considered for change. Further, the MPAP does not affect the over 13,000 acres of existing industrial zoned land in Portland. Finally, none of the MPAP planning area has access to the Willamette River, so that there is no impact to land that can be used by river-dependent and river-related industrial uses. Therefore, the MPAP complies with this policy.

**6.38.c.** Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area while ensuring environmental resources are also protected.

**222. Finding:** The MPAP amendments do not amend the Prime Industrial (k) Overlay Zone (33.471) and do not change the environmental resource protections in the prime industrial area. Therefore, the MPAP complies with this policy.

**6.38.d.** Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics. Offsets may include but are not limited to additional brownfield remediation, industrial use intensification, strategic investments, and other innovative tools and partnerships that increase industrial utilization of industrial land.

**223. Finding:** The verb “strive”, which is defined in the 2035 Comprehensive Plan, means to devote serious effort or energy to; work to achieve over time. The MPAP amendments strive to offset the reduction of prime industrial capacity by: 1) applying Employment zones (Central Employment and General Employment) in areas of change. These zones allow a broad array of industrial uses and are coupled with new zoning code regulations (33.597) that encourage some types of industrial and employment uses, and allow for intense development; 2) through zoning requirements that require a minimum amount of nonresidential uses in development; and 3) by providing zoning incentives for certain types of industrial and employment uses.

Council finds that considerable effort went into the Public Benefits Agreement, which includes mitigation through a middle-wage jobs requirement in new development. Middle-wage job opportunity is one of the underlying reasons for retaining prime industrial land.

The MPAP amendments have limited the conversion of prime industrial land to 35.2 net acres. This is a minimal amount, about 0.2 percent of the total prime industrial acreage in Portland, and does not severely affect the overall city supply of industrial land. The City Council finds that there is no need to offset the development capacity of this limited amount of prime industrial capacity. The City will continue to invest in other broad based programs that apply to the prime industrial area outside of the MPAP project area, such as the Bureau of Environmental Services brownfield remediation program and strategic investments made by Prosper Portland to implement the [Advance Portland](#) economic development strategy and other programs and investments identified in the [2024 State of the Portland Economy](#) report. Therefore, the MPAP complies with this policy.

**6.38.e.** Protect prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.

**224. Finding:** The MPAP amendments do not amend code of the Prime Industrial (k) Overlay Zone (33.471), which is where the regulatory limits on parks, schools, large-format places of assembly and large-format retail are located.

**6.38.f.** Promote efficient use of freight hub infrastructure and prime industrial land by limiting non-industrial uses that do not need to be in the prime industrial area.

**225. Finding:** The MPAP amendments do not amend code of the Prime Industrial (k) Overlay Zone (33.471), which is where the regulatory limits on non-industrial uses are located.

**Policy 6.39. Harbor access lands.** Limit use of harbor access lands to river- or rail-dependent or related industrial land uses due to the unique and necessary infrastructure and site characteristics of harbor access lands for river-dependent industrial uses.

**Policy 6.40. Portland Harbor Superfund Site.** Take a leadership role to facilitate a cleanup of the Portland Harbor that moves forward as quickly as possible and that allocates cleanup costs fairly and equitably. Encourage a science-based and cost-effective cleanup solution that facilitates re-use of land for river- or rail-dependent or related industrial uses.

**226. Finding:** The MPAP amendments do not affect Harbor access lands or the Portland Harbor Superfund Site, therefore policies 6.39 and 6.40 do not apply.

**Policy 6.41. Multimodal freight corridors.** Encourage freight-oriented industrial development to locate where it can maximize the use of and support reinvestment in multimodal freight corridors.

**227. Finding:** Multimodal freight corridors in the Northwest Industrial District include the combination of Highway 30, the railroad and the marine facilities in the Portland Harbor. The MPAP amendments apply employment designations that allow for warehouse and distribution west of Highway 30, and also maintain over 50 acres of industrial land use designations that allow such activity in the area east of Highway 30, and do not affect industrial designations in other areas.

The MPAP does not impact marine facilities or the nearby mainline railroads or rail yards. The MPAP area includes remnant rail spurs that could serve the area, however these are on private tax lots and there are no longer industrial uses that rely on these rail spurs. Therefore, there is no impact to rail service in the Northwest Industrial District.

Highway 30 is a major freight route. The plan includes transportation and transit investments intended to reduce reliance on automobiles and conserve capacity for freight mobility.

NW Nicolai Street is designated as a truck street. A General Employment land use designation is applied adjacent to NW Nicolai Street on the south in the MPAP area as a buffer to limit impacts on industrial uses, including the freight movement functions of NW Nicolai Street. This designation supports an array of industrial and employment uses and prohibits housing. North of NW Nicolai Street, existing Industrial Sanctuary designations are retained and will help maintain the freight functions of NW Nicolai Street.

Both areas will have access to the NW Nicolai freight corridor. Therefore, the MPAP complies with this policy.

**Policy 6.42. Columbia East.** Provide a mix of industrial and limited business park development in Columbia East (east of 82nd Avenue) that expand employment opportunities supported by proximity to Portland International Airport and multimodal freight access.

**Policy 6.43. Dispersed employment areas.** Provide small, dispersed employment areas for a flexible and affordable mix of office, creative services, small-scale manufacturing, traded sector and distribution, and other small-format light industrial and commercial uses with access to nearby freeways or truck streets.

**228. Finding:** The MPAP amendments do not make changes within the Columbia East area or Dispersed employment areas, therefore Policies 6.42 and 6.43 do not apply.

**Policy 6.44. Industrial land use intensification.** Encourage reinvestment in, and intensification of, industrial land use, as measured by output and throughput per acre.

**Policy 6.45. Industrial brownfield redevelopment.** Provide incentives, investments, technical assistance and other direct support to overcome financial-feasibility gaps to enable remediation and redevelopment of brownfields for industrial growth.

**229. Finding:** Policies 6.44 and 6.45 provide citywide direction regarding intensification and redevelopment of industrial districts. Policy 6.45 speaks to incentives, direct investment, and other financial tools for the remediation of brownfields in industrial areas. The MPAP includes Comprehensive Plan Map and Zoning Code amendments and does not deal with financial incentives or investments in brownfields. The MPAP does not change the intensity of uses permitted or incentivized in industrial areas. Therefore, these policies are not applicable to the MPAP.

**Policy 6.46. Impact analysis.** Evaluate and monitor the impacts on industrial land capacity that may result from land use plans, regulations, public land acquisition, public facility development, and other public actions to protect and preserve existing industrial lands.

**230. Finding:** The City Council interprets this policy to provide direction to the city to evaluate and monitor industrial land capacity and development trends. The MPAP makes changes to land zoned for industrial use. The MPAP was evaluated as part of the process; industrial land capacity resulting from the MPAP changes was found to be adequate based on review of the city's adopted Economic Opportunities Analysis (EOA), which identified a surplus of industrially-zoned acreage in the Columbia East category which can accommodate a similar array of land uses, and is located in an area that accommodates freight mobility. Therefore, the MPAP complies with this policy.

**Policy 6.47. Clean, safe, and green.** Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitating adoption of market feasible

new technology and design.

**231. Finding:** The MPAP amendments change the land use designations and zoning on key parcels and development standards of the designations encourage development that is clean, safe and include features such as landscaping or other types of “green features” to address climate friendliness. The new land use designations may improve market feasibility of new development which can support these features. Mixed employment land uses are applied and located adjacent to NW Nicolai, which is a freight corridor. On balance, the MPAP supports this policy.

**Policy 6.48. Fossil fuel distribution.** Limit fossil fuels distribution and storage facilities to those necessary to serve the regional market.

**232. Finding:** The MPAP does not impact existing fossil fuel distribution and storage facilities and do not amend the regulations that regulate those facilities. Therefore, the MPAP complies with this policy.

**Policy 6.49. Industrial growth and watershed health.** Facilitate concurrent strategies to protect and improve industrial capacity and watershed health in the Portland Harbor and Columbia Corridor areas.

**233. Finding:** The MPAP amendments focus a limited amount of land use changes in the plan area. The MPAP amendments do not affect industrial capacity in the Portland Harbor and Columbia Corridor areas substantially. The amendments have the potential to improve watershed health through regulatory measures that call for landscaping or other “green features” in development. On balance, the MPAP complies with this policy.

**Policy 6.50. District expansion.** Provide opportunities for expansion of industrial areas based on evaluation of forecasted need and the ability to meet environmental, social, economic, and other goals.

**234. Finding:** The MPAP amendments change land use designations on a limited area of land identified for industrial use. Analysis and evaluation demonstrate that the city has capacity to change land use designations on this limited acreage based on the current Economic Opportunities Analysis, which indicates a surplus of land in the Columbia East subdistrict, which has similar characteristics to the Harbor and Airport district in which the changes are located. While the MPAP does not expand industrial districts, the amendments limit the amount of change to industrial areas, and meets other city goals and policies focused on environmental, social, economic issues. The MPAP amendments call for development of nonresidential space which can accommodate employment and other activities; allow for housing, and provide bonuses for additional affordable housing; and require “green features” in new development that will help to achieve environmental and climate-related goals. Therefore, on balance, the MPAP complies with this policy.

**Policy 6.51. Golf course reuse and redevelopment.** Facilitate a mix of industrial, natural resource, and public open space uses on privately-owned golf course sites in the Columbia Corridor that property owners make available for reuse.

**235. Finding:** The MPAP amendments do not affect golf courses in the Columbia Corridor, therefore this policy does not apply.

**Policy 6.52. Residential and commercial reuse.** Facilitate compatible industrial or employment redevelopment on residential or commercial sites that become available for reuse if the site is in or near prime industrial areas, and near a freeway or on a freight street.

**236. Finding:** The MPAP amendments do not affect existing residential or commercial sites, therefore this policy does not apply.

**Policy 6.53. Mitigation banks.** Facilitate industrial site development by promoting and allowing environmental mitigation banks that serve industrial land uses on prime industrial land.

**237. Finding:** The MPAP amendments do not affect environmental zones and do not address environmental mitigation banks. This policy does not apply.

**Policy 6.54. Neighborhood buffers.** Maintain and enhance major natural areas, open spaces, and constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas.

**238. Finding:** The MPAP amendments include a buffer between the planned mixed use employment areas within the plan area where the Central Employment designation and zone are applied, and the Industrial Sanctuary designated and IH zoned areas to the north of NW Nicolai Street and east of Highway US 30. The plan accomplishes the buffer through use of major streets – NW Nicolai Street and US 30 - to form a constructed buffer; the plan also applies General Employment designations and correlated EG1 zones, which do not allow residential uses, in the areas adjacent to these roadways to increase the distance between industrial and residential development. In addition, within the MPAP area of change, a landscaped setback is proposed between zones that allow residential use and those that are strictly employment-oriented, to further buffer uses and minimize conflicts. Therefore, the MPAP complies with this policy.

**Policy 6.55. Neighborhood park use.** Allow neighborhood park development within industrial zones where needed to provide adequate park service within one-half mile of every resident.

**239. Finding:** The MPAP amendments change map designations from Industrial to Central Employment. Parks are an allowed use in the new Central Employment zone. The plan provides incentives for the development of a public park or public open area within the plan area to serve residents in the new district and nearby community. The MPAP, on balance, complies with the intent of this policy.

## Campus institutions

**Policy 6.56. Campus institutions.** Provide for the stability and growth of Portland’s major campus institutions as essential service providers, centers of innovation, workforce development resources, and major employers.

**Policy 6.57. Campus land use.** Provide for major campus institutions as a type of employment land, allowing uses typically associated with health care and higher education institutions. Coordinate with institutions in changing campus zoning to provide land supply that is practical for development and intended uses.

**Policy 6.58. Development impacts.** Protect the livability of surrounding neighborhoods through adequate infrastructure and campus development standards that foster suitable density and attractive campus design. Minimize off-site impacts in collaboration with institutions and neighbors, especially to reduce automobile traffic and parking impacts.

**Policy 6.59. Community amenities and services.** Encourage campus development that provides amenities and services to surrounding neighborhoods, emphasizing the role of campuses as centers of community activity.

**Policy 6.60. Campus edges.** Provide for context-sensitive, transitional uses, and development at the edges of campus institutions to enhance their integration into surrounding neighborhoods, including mixed-use and neighborhood-serving commercial uses where appropriate.

**Policy 6.61. Satellite facilities.** Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality.

**240. Finding:** Policies 6.56 through 6.61 provide direction regarding campus institutions. There are no zones with a campus institution land use designation impacted by MPAP. Therefore, these policies do not apply.

### **Neighborhood business districts**

**Policy 6.62. Neighborhood business districts.** Provide for the growth, economic equity, and vitality of neighborhood business districts.

**Policy 6.63. District function.** Enhance the function of neighborhood business districts as a foundation of neighborhood livability.

**Policy 6.64. Small, independent businesses.** Facilitate the retention and growth of small and locally-owned businesses.

**Policy 6.65. Home-based businesses.** Encourage and expand allowances for small, low-impact home based businesses in residential areas, including office or personal service uses with infrequent or by-appointment customer or client visits to the site. Allow a limited number of employees, within the scale of activity typical in residential areas. Allow home-based businesses on sites with accessory dwelling units.

**241. Finding:** Policies 6.62 through 6.65 provide direction regarding neighborhood districts and smaller businesses. The plan applies Central Employment (EX) zoning to allow a broad mix of uses including commercial uses that support a wide array of businesses and business types. The zoning will facilitate a mix of uses to serve residents and workers within the district as well as expand opportunities offered to nearby residential, mixed use and industrial areas. In some cases, existing businesses will benefit from regulations that allow a larger amount of commercial use that is currently allowed in industrial zones. The MPAP also includes requirements for affordable commercial spaces that will benefit small businesses. The amendments support policy 6.65 by creating more opportunity for home-based businesses through zoning that will allow a mix of uses, including residential. Therefore, the MPAP complies with these policies.

**Policy 6.66. Neighborhood-serving business.** Provide for neighborhood business districts and small commercial nodes in areas between centers to expand local access to goods and services. Allow nodes of small-scale neighborhood-serving commercial uses in large planned developments and as a ground floor use in high density residential areas.

**242. Finding:** The plan includes expansion of the Northwest town center to encompass much of the area, so the policy addressing areas between centers does not apply. The plan does call for active ground floor uses in key locations near transit, as well as a minimum amount of nonresidential floor area throughout the plan area to support business and job growth. Therefore, the MPAP complies with this policy.

**Policy 6.67. Retail development.** Provide for a competitive supply of retail sites that support the wide range of consumer needs for convenience, affordability, accessibility, and diversity of goods and services, especially in under-served areas of Portland.

**243. Finding:** The plan calls for active ground floor uses, including retail uses, in key locations near transit, as well as a minimum amount of nonresidential floor area throughout the plan area to support business and job growth. These regulations apply in an area that currently lacks significant

retail use, and are intended to serve the plan area and surrounding community. The EX zoning applied to the MPAP area allows a broad array of commercial uses, including community-serving retail and services. Therefore, the MPAP complies with this policy.

**Policy 6.68. Investment priority.** Prioritize commercial revitalization investments in neighborhoods that serve communities with limited access to goods and services.

**244. Finding:** The plan does not include direct commercial revitalization investments; therefore, this does not apply. However, the plan will help to serve an emerging neighborhood by applying zoning that will facilitate commercial uses to serve the area, and includes requirements for affordable commercial space in some new development.

**Policy 6.69. Non-conforming neighborhood business uses.** Limit non-conforming uses to reduce adverse impacts on nearby residential uses while avoiding displacement of existing neighborhood businesses.

**245. Finding:** The plan applies Central Employment (EX) zoning that will facilitate a broad range of uses including commercial uses to serve the area, and thereby will minimize creation of non-conforming uses or direct displacement of businesses. Therefore, the MPAP complies with this policy.

**Policy 6.70. Involuntary commercial displacement.** Evaluate plans and investments for their impact on existing businesses.

**6.70.a.** Limit involuntary commercial displacement in areas at risk of gentrification, and incorporate tools to reduce the cost burden of rapid neighborhood change on small business owners vulnerable to displacement.

**6.70.b.** Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.

**246. Finding:** The plan applies Central Employment zoning that will facilitate a broad range of uses, including commercial uses, to serve the area. The flexibility of this zone, and requirements for nonresidential uses, may allow continuation and expansion of small businesses. Because the Central Employment zone allows for many industrial and employment uses, and zoning provides for non-conforming use continuation, existing industrial businesses, including industrial and manufacturing ones, will be able to continue and, in some cases, expand operations. The plan also includes provisions that call for creation of affordable commercial spaces in development when a significant amount of retail or office is developed. This provision is intended to support development of local small businesses within new development. Council received testimony that naturally occurring affordable commercial, 'maker', and incubator spaces in certain parts of the district would be vulnerable to displacement. Council finds that along with the zoning map changes there are sufficient regulations and incentives proposed in the MPAP to support options for those businesses to remain in place or in the district. Therefore, the MPAP complies with this policy and its sub-policies.

**Policy 6.71. Temporary and informal markets and structures.** Acknowledge and support the role that temporary markets (farmer's markets, craft markets, flea markets, etc.) and other temporary or mobile-vending structures play in enabling startup business activity. Also, acknowledge that temporary uses may ultimately be replaced by more permanent development and uses.

**247. Finding:** Through zoning amendments, the plan broadens allowances for commercial activity and does not limit temporary and informal markets and structures. Therefore, the MPAP complies with this policy.

**Policy 6.72. Community economic development.** Encourage collaborative approaches to align land use and neighborhood economic development for residents and business owners to better connect and compete in the regional economy.

**6.72.a.** Encourage broad-based community coalitions to implement land use and economic development objectives and programs.

**6.72.b.** Enhance opportunities for cooperation and partnerships between public and private entities that promote economic vitality in communities most disconnected from the regional economy.

**6.72.c.** Encourage cooperative efforts by area businesses, Business Associations, and Neighborhood Associations to work together on commercial revitalization efforts, sustainability initiatives, and transportation demand management.

**248. Finding:** The plan and amendments are public sector actions intended to further community economic development in the private sector. The plan includes land use and zoning amendments that will facilitate development and redevelopment over time. This is coupled with additional public and private sector investment in transportation system improvements (streetcar transit, streets, sidewalks, etc.) that will help support additional community investment. Therefore, the MPAP complies with this policy.

**Policy 6.73. Centers.** Encourage concentrations of commercial services and employment opportunities in centers.

**6.73.a.** Encourage a broad range of neighborhood commercial services in centers to help residents and others in the area meet daily needs and/or serve as neighborhood gathering places.

**6.73.b.** Encourage the retention and further development of grocery stores and local markets as essential elements of centers.

**6.73.c.** Enhance opportunities for services and activities in centers that are responsive to the needs of the populations and cultural groups of the surrounding area.

**6.73.d.** Require ground-level building spaces in core areas of centers accommodate commercial or other street-activating uses and services.

**6.73.e.** Encourage employment opportunities as a key function of centers, including connections between centers, institutions, and other major employers to reinforce their roles as vibrant centers of activity.

**249. Finding:** The plan calls for expansion of the Northwest town center to encompass the plan area. The zoning for the plan area allows for a broad range of uses, including commercial and employment uses, and has requirements for development on non-residential space/floor area in addition to the use allowances. The regulatory zoning plan district also includes bonuses and incentives for non-residential employment and commercial uses. Therefore, the plan area will act as an extension of the northwest town center and is expected to include commercial and employment opportunities. In addition, the plan regulatory framework makes retail size allowances to accommodate grocery stores to serve this area and surrounding community, as well as requirement for active uses in areas designated in the plan as “main street” areas near the

streetcar transit alignment. The goals for employment in the plan area are furthered by a separate public benefits agreement which calls for creation of middle-wage jobs in the area. Therefore, the MPAP complies with this policy.

## Chapter 7: Environmental and Watershed Health

**Goal 7.A: Climate.** Carbon emissions are reduced to 50 percent below 1990 levels by 2035.

**250. Finding:** The City’s adopted Climate Action Plan (CAP) identifies objectives and actions for reducing carbon emissions and one of the objectives is to reduce emissions related to transportation. Several actions related to reducing emissions (including actions 4O and 4Q) call for reducing emissions by focusing on “concentrating growth and density in areas with access to transit services, bike and pedestrian infrastructure...to reduce transportation fuel use. Such development patterns have helped reduce total gasoline sales in Multnomah County by 29 percent per person below 1990.” (Climate Action Plan, City of Portland, Oregon and Multnomah County, pg. 77, June 30, 2015.)

The MPAP amendments support carbon emission reductions, consistent with Goal 7.A and the Climate Action Plan, by supporting the development of compact housing close to services and transit, which helps provide services nearer to where they live and options beyond the automobile. The Plan’s recommended transportation project, including the extension of streetcar service to the area and other transportation projects to support multimodal options for walking, biking, and transit use.

Therefore, the MPAP complies with Goal 7.A.

**Goal 7.B: Healthy watersheds and environment.** Ecosystem services and ecosystem functions are maintained and watershed conditions have improved over time, supporting public health and safety, environmental quality, fish and wildlife, cultural values, economic prosperity, and the intrinsic value of nature.

**251. Finding:** This goal provides direction regarding planning for natural resource protection and provide a framework for governing the City’s environmental overlay zones. The MPAP does not include any amendments to the regulations (the existing environmental overlay zones) that implement this goal. However, elements of the MPAP support watershed health including:

- The MPAP urban design framework envisions NW Vaughn being redeveloped with more trees and landscaping to reinforce the areas connection to Forest Park – a new ‘green curtain’ to replace the former ‘steel curtain’.
- In addition to the improvements envisioned along NW Vaughn, the MPAP urban design framework also shows how future street and transportation improvements, primarily along the proposed streetcar extension, will create new connections within the plan area. Trees and additional landscaping will be a part of these improvements, significantly increasing the amount of tree canopy and vegetation in the district above what exists today.
- The MPAP includes zoning code regulations that will ensure green elements are integrated into the urban environment to help soften the effects of built and paved areas, cool the air temperature, intercept rainfall and reduce stormwater runoff. A range of options are provided to address this area’s urban development patterns and characteristics.

Therefore, the MPAP complies with Goal 7.B.

**Goal 7.C: Resilience.** Portland’s built and natural environments function in complementary ways and are resilient in the face of climate change and natural hazards.

**252. Finding:** The MPAP creates the foundation for a resilient neighborhood by:

- Proposing the creation of a new, transit-oriented mixed-use neighborhood with housing, jobs, local services, and transit, adjacent to an existing complete, connected neighborhood to the south. Over time, this will allow more residents the opportunity to live and work within walking distance of jobs and commercial services, thereby reducing dependence on cars, allowing for reduced carbon emissions and a reduced impact on climate and natural systems.
- Recommending the extension of streetcar service to the new mixed-use neighborhood and recommending transportation projects to support and improve multimodal options for walking, biking, and transit use.
- Including zoning code regulations that will ensure green elements are integrated into the urban environment to help soften the effects of built and paved areas, cool the air temperature, intercept rainfall, and reduce stormwater runoff.

Therefore, the MPAP complies with Goal 7.C.

**Goal 7.D: Environmental equity.** All Portlanders have access to clean air and water, can experience nature in their daily lives, and benefit from development designed to lessen the impacts of natural hazards and environmental contamination.

**253. Finding.** Several aspects of the MPAP supports environmental equity:

- As shown in the findings for Goal 7.A, concentrating growth and density in areas with access to transit services, bike and pedestrian infrastructure is a key strategy for reducing carbon emissions that can impact clean air.
- The new transit-oriented mixed-use district is expected to support thousands of workers and residents in the future. While Northwest Portland currently has neighborhood parks (Couch Park, Wallace Park) and Forest Park, which serves the broader region, a new greenspace to allow those living and working in this district to access nature is necessary. The plan offers regulatory incentives to the private sector to aid in creating publicly accessible open spaces to serve the need in this district.
- Zoning code regulations that will ensure green elements are integrated into the urban environment to help soften the effects of built and paved areas, cool the air temperature, intercept rainfall, and reduce stormwater runoff. A range of options are provided to address this area’s urban development patterns and characteristics.

Therefore, the MPAP complies with Goal 7.D.

**Goal 7.E: Community stewardship.** Portlanders actively participate in efforts to maintain and improve the environment, including watershed health.

**254. Finding:** This goal focuses on City programs and actions to encourage community stewardship. The MPAP amendments do not include amendments to any programs or actions that implement this goal.

### Improving environmental quality and resilience

**Policy 7.1. Environmental quality.** Protect or support efforts to protect air, water, and soil quality, and associated benefits to public and ecological health and safety, through plans and investments.

**255. Finding:** The MPAP does not amend the City’s adopted Natural Resources Inventory or any of the City’s environmental overlay zone regulations and does not affect any City programs related to

flood management or erosion and sediment control (e.g., Title 10 Erosion Control, and the balanced cut and fill requirements of Title 24), all of which are the primary implementation tools for this policy. However, the MPAP supports this policy as follows:

- The zoning map amendments, zoning code regulations and recommended actions promote a compact, multi-modal and transit rich neighborhood. As shown in the findings for Goal 7.A, concentrating growth and density in areas with access to transit services, bike and pedestrian infrastructure is a key strategy for reducing carbon emissions.
- As the Montgomery Park plan area transitions from an industrial area with few trees and vegetation to a new mixed-use neighborhood, the boundary of the industrial district will be relocated from NW Vaughn to NW Nicolai. The MPAP urban design framework envisions NW Vaughn being redeveloped with more trees and landscaping to reinforce the areas connection to Forest Park – a new ‘green curtain’ to replace the former ‘steel curtain’.
- In addition to the improvements envisioned along NW Vaughn, the MPAP urban design framework also shows how future street and transportation improvements, primarily along the proposed streetcar extension, will create new connections within the plan area. Trees and additional landscaping will be a part of these improvements, significantly increasing the amount of tree canopy and vegetation in the district above what exists today.
- The new transit-oriented mixed-use district is expected to support thousands of workers and residents in the future. While Northwest Portland currently includes neighborhood parks (Couch Park, Wallace Park) as well as Forest Park which serves the broader region, a new greenspace to serve those living and working in this district is necessary. The plan offers regulatory incentives to the private sector to aid in creating publicly accessible open spaces to serve the need in this district.
- The MPAP includes zoning code regulations that will ensure green elements are integrated into the urban environment to help soften the effects of built and paved areas, cool the air temperature, intercept rainfall, and reduce stormwater runoff. A range of options are provided to address this area’s urban development patterns and characteristics.

For these reasons, the MPAP complies with this policy.

**Policy 7.2. Environmental equity.** Prevent or reduce adverse environment-related disparities affecting under-served and under-represented communities through plans and investments. This includes addressing disparities relating to air and water quality, natural hazards, contamination, climate change, and access to nature.

**256. Finding:** The MPAP proposes the creation of a new, transit-oriented, mixed-use employment and residential neighborhood in the area west of Highway 30 between NW Vaughn and south of NW Nicolai. Currently, the area is primarily an underutilized industrial area with relatively few residents. The plan envisions a transition to a vibrant, mixed-use employment district that will support both job growth and housing development. The MPAP includes vision statements, actions, and implementation tools that directly address the desire to weave parks, open areas, trees, and other green features into the new neighborhood with the intension to improve air and water quality, reduce impacts from climate change and improve access to nature. In addition, new regulatory tools and a related public benefits agreement require a substantial investment in affordable housing that will help provide housing opportunities for a broad array of Portlanders including those in under-served and under-represented communities. Together, these two aspects

of the plan have the potential to improve environmental conditions in the area and increase access to a vibrant neighborhood that contains jobs, housing and commercial services while promoting integration of green spaces to support climate resilience and access to nature. For these reasons, the MPAP complies with this policy.

**Policy 7.3. Ecosystem services.** Consider the benefits provided by healthy ecosystems that contribute to the livability and economic health of the city.

**Policy 7.4. Climate change.** Update and implement strategies to reduce carbon emissions and impacts and increase resilience through plans and investments and public education.

**7.4.a. Carbon sequestration.** Enhance the capacity of Portland’s urban forest, soils, wetlands, and other water bodies to serve as carbon reserves.

**7.4.b. Climate adaptation and resilience.** Enhance the ability of rivers, streams, wetlands, floodplains, urban forest, habitats, and wildlife to limit and adapt to climate-exacerbated flooding, landslides, wildfire, and urban heat island effects.

**Policy 7.5. Air quality.** Improve, or support efforts to improve, air quality through plans and investments, including reducing exposure to air toxics, criteria pollutants, and urban heat island effects. Consider the impacts of air quality on the health of all Portlanders.

**Policy 7.6. Hydrology.** Through plans and investments, improve or support efforts to improve watershed hydrology to achieve more natural flow and enhance conveyance and storage capacity in rivers, streams, floodplains, wetlands, and aquifers. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly-infiltrating soils and limited public stormwater discharge points, and encourage restoration of degraded hydrologic functions.

**Policy 7.7. Water quality.** Improve, or support efforts to improve, water quality in rivers, streams, floodplains, groundwater, and wetlands through land use plans and investments, to address water quality issues including toxics, bacteria, temperature, metals, and sediment pollution. Consider the impacts of water quality on the health of all Portlanders.

**Policy 7.8. Biodiversity. Strive to achieve and** maintain self-sustaining populations of native species, including native plants, native resident and migratory fish and wildlife species, at-risk species, and beneficial insects (such as pollinators) through plans and investments.

**Policy 7.9. Habitat and biological communities.** Improve, or support efforts to improve, fish and wildlife habitat and biological communities. Use plans and investments to enhance the diversity, quantity, and quality of habitats habitat corridors, and especially habitats that:

- Are rare or declining.
- Support at-risk plant and animal species and communities.
- Support recovery of species under the Endangered Species Act, and prevent new listings.
- Provide culturally important food sources, including those associated with Native American fishing rights as well as traditional foods including plants and wildlife.

**Policy 7.10. Habitat connectivity.** Improve or support efforts to improve terrestrial and aquatic habitat connectivity for fish and wildlife by using plans and investments, to:

- Prevent and repair habitat fragmentation.
- Improve habitat quality.

- Weave habitat into sites as new development occurs.
- Enhance or create habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas.
- Promote restoration and protection of floodplains.

**Policy 7.11. Urban forest.** Improve, or support efforts to improve the quantity, quality, and equitable distribution of Portland’s urban forest through plans and investments.

**7.11.a. Tree preservation.** Require or encourage preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas.

**7.11.b. Urban forest diversity.** Coordinate plans and investments with efforts to improve tree species diversity and age diversity.

**7.11.c. Tree canopy.** Support progress toward meeting City tree canopy targets.

**7.11.d. Tree planting.** Invest in tree planting and maintenance, especially in low-canopy areas, neighborhoods with under-served or under-represented communities, and within and near urban habitat corridors.

**7.11.e. Vegetation in natural resource areas.** Require native trees and vegetation in significant natural resource areas.

**7.11.f. Resilient urban forest.** Encourage planting of Pacific Northwest hardy and climate change resilient native trees and vegetation generally, and especially in urban habitat corridors.

**7.11.g. Trees in land use planning.** Identify priority areas for tree preservation and planting in land use plans.

**7.11.h. Managing wildfire risk.** Address wildfire hazard risks and management priorities through plans and investments.

**Policy 7.12. Invasive species.** Prevent the spread of invasive plants, and support efforts to reduce the impacts of invasive plants, animals, and insects, through plans, investments, and education.

**Policy 7.13. Soils.** Coordinate plans and investments with programs that address human-induced soil loss, erosion, contamination, or other impairments to soil quality and function.

**Policy 7.14. Natural hazards.** Prevent development-related degradation of natural systems and associated increases in landslide, wildfire, flooding, and earthquake risks.

**Policy 7.15. Brownfield remediation.** Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.

**Policy 7.16. Adaptive management.** Evaluate trends in watershed and environmental health using current monitoring data and information to guide and support improvements in the effectiveness of City plans and investments.

**Policy 7.17. Restoration partnerships.** Coordinate plans and investments with other jurisdictions, air and water quality regulators, watershed councils, soil and water conservation districts, Sovereign nations, and community organizations and groups including under-served and under-represented communities, to optimize the benefits, distribution, and cost-effectiveness of watershed restoration and enhancement efforts.

**Policy 7.18. Community stewardship.** Encourage voluntary cooperation between property owners, community organizations, and public agencies to restore or re-create habitat on their property, including removing invasive plants and planting native species.

**257. Finding:** Policies 7.3 through 7.18 are focused on City programs and actions to improve environmental quality and resilience. These policies address City actions, coordination, and in some cases regulatory systems related to development. They address ecosystem services, climate, air and water, biodiversity and wildlife habitats, forests, invasive species, soils, hazards, stewardship and adaptive management. The MPAP amendments do not include amendments to any programs or regulations that implement these policies. However, the MPAP amendments support this policy as follows:

- The zoning map amendments, zoning code regulations and recommended actions promote a compact, multi-modal and transit rich neighborhood. As shown in the findings for Goal 7.A, concentrating growth and density in areas with access to transit services, bike and pedestrian infrastructure is a key strategy for reducing carbon emissions.
- As the Montgomery Park plan area transitions from an industrial area with few trees and vegetation to a new mixed-use neighborhood, the boundary of the industrial district will be relocated from NW Vaughn to NW Nicolai. The MPAP urban design framework envisions NW Vaughn being redeveloped with more trees and landscaping to reinforce the areas connection to Forest Park – a new ‘green curtain’ to replace the former ‘steel curtain’.
- In addition to the improvements envisioned along NW Vaughn, the MPAP urban design framework also shows how future street and transportation improvements, primarily along the proposed streetcar extension, will create new connections within the plan area. Trees and additional landscaping will be a part of these improvements, significantly increasing the amount of tree canopy and vegetation in the district above what exists today.
- The new transit-oriented mixed-use district is expected to support thousands of workers and residents in the future. While Northwest Portland currently includes neighborhood parks (Couch Park, Wallace Park) as well as Forest Park which serves the broader region, a new greenspace to serve those living and working in this district is necessary. The plan offers regulatory incentives to the private sector to aid in creating publicly accessible open spaces to serve the need in this district.
- The MPAP includes zoning code regulations that will ensure green elements are integrated into the urban environment to help soften the effects of built and paved areas, cool the air temperature, intercept rainfall, and reduce stormwater runoff. A range of options are provided to address this area’s urban development patterns and characteristics.

For these reasons, the MPAP complies with these policies and the applicable sub-policies.

### **Planning for natural resource protection**

**Policy 7.19. Natural resource protection.** Protect the quantity, quality, and function of significant natural resources identified in the City’s natural resource inventory, including:

- Rivers, streams, sloughs, and drainageways.
- Floodplains.
- Riparian corridors.

- Wetlands.
- Groundwater.
- Native and other beneficial vegetation species and communities.
- Aquatic and terrestrial habitats, including special habitats or habitats of concern, large anchor habitats, habitat complexes and corridors, rare and declining habitats such as wetlands, native oak, bottomland hardwood forest, grassland habitat, shallow water habitat, and habitats that support special-status or at-risk plant and wildlife species.
- Other resources identified in natural resource inventories.

**Policy 7.20. Natural resource inventory.** Maintain an up-to-date inventory by identifying the location and evaluating the relative quantity and quality of natural resources.

**Policy 7.21. Environmental plans and regulations.** Maintain up-to-date environmental protection plans and regulations that specify the significant natural resources to be protected and the types of protections to be applied, based on the best data and science available and on an evaluation of cumulative environmental, social, and economic impacts and tradeoffs. *See Figure 7-2 — Adopted Environmental Plans.*

**7.21.a.** Improve the effectiveness of environmental protection plans and regulations to protect and encourage enhancement of ecological functions and ecosystem services.

**Policy 7.22. Land acquisition priorities and coordination.** Maintain a land acquisition program as a tool to protect and support natural resources and their functions. Coordinate land acquisition with the programs of City bureaus and other agencies and organizations.

**258. Finding:** Policies 7.19 through 7.22 provide direction regarding planning for natural resource protection. The *2035 Comprehensive Plan* background documents included an updated Natural Resources Inventory (NRI), which was adopted (Ordinance 185657) and acknowledged by LCDC on June 13, 2014. The NRI identified the location, quantity, and quality of all significant natural resources as required by the inventory provisions of Statewide Planning Goal 5. From the set of all significant resources, high and medium quality resources, ranked primarily from riparian corridor and wildlife habitat considerations, were identified to comply with the inventory requirements of Title 13 of Metro’s Urban Growth Management Functional Plan.

The City’s environmental overlay zones are the primary zoning tool to protect resources and functional values that have been identified by the City as providing benefits to the public (including the Environmental overlay zones, the River Natural overlay zone, the River Environmental overlay zone, and the Pleasant Valley Natural Resource overlay zone). The MPAP amendments do not change these zones or regulations. The amendments also do not include or change any land acquisition programs which will continue to be coordinated between City bureaus and other agencies and organizations.

Therefore, these policies and their sub-policies are not applicable to the MPAP.

### **Protecting natural resources in development situations**

**Policy 7.23. Impact evaluation.** Evaluate the potential adverse impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide to inform and guide development design and mitigation consistent with policies 7.24-7.26. and other relevant Comprehensive Plan policies.

**Policy 7.24. Regulatory hierarchy: avoid, minimize, mitigate.** Maintain regulations requiring that the potential adverse impacts of new development on significant natural resources and their functions first be avoided where practicable, then minimized, then lastly, mitigated.

**Policy 7.25. Mitigation effectiveness.** Require that mitigation approaches compensate fully for adverse impacts on locally and regionally significant natural resources and functions. Require mitigation to be located as close to the impact as possible. Mitigation must also take place within the same watershed or portion of the watershed that is within the Portland Urban Services Boundary, unless mitigating outside of these areas will provide a greater local ecological benefit. Mitigation will be subject to the following preference hierarchy:

1. On the site of the resource subject to impact with the same kind of resource; if that is not possible, then
2. Off-site with the same kind of resource; if that is not possible, then
3. On-site with a different kind of resource; if that is not possible, then
4. Off-site with a different kind of resource.

**Policy 7.26. Improving environmental conditions through development.** Encourage ecological site design, site enhancement, or other tools to improve ecological functions and ecosystem services in conjunction with new development and alterations to existing development.

**259. Finding:** 7.23 through 7.26 provide direction regarding the protection of significant natural resources in development situations. The City’s environmental overlay zones (including the Environmental overlay zones, the River Natural overlay zone, the River Environmental overlay zone, and the Pleasant Valley Natural Resource overlay zone) are the regulations that control development in order to protect, or ensure mitigation for, the resources and functional values while allowing environmentally sensitive urban development. The MPAP amendments to not change any of the environmental overlay regulations. Therefore, these policies are not applicable to the MPAP.

### **Aggregate resources**

**Policy 7.27. Aggregate resource protection.** Protect aggregate resource sites for current and future use where there are no major conflicts with urban needs, or where these conflicts may be resolved.

**Policy 7.28. Aggregate resource development.** When aggregate resources are developed, ensure that development minimizes adverse environmental impacts and impacts on adjacent land uses.

**Policy 7.29. Mining site reclamation.** Ensure that the reclamation of mining sites protects public health and safety, protects fish and wildlife (including at-risk species), enhances or restores habitat (including rare and declining habitat types), restores adequate watershed conditions and functions on the site, and is compatible with the surrounding land uses and conditions of nearby land.

**260. Finding:** Policies 7.27 through 7.29 provide direction regarding aggregate resources. The MPAP amendments do not impact aggregate resources or mine sites. These policies do not apply.

### **Columbia River Watershed**

**Policy 7.30. In-water habitat.** Enhance in-water habitat for native fish and wildlife, particularly in the Oregon Slough and near-shore environments along the Columbia River.

**Policy 7.31. Sensitive habitats.** Enhance grassland, beach, riverbanks, wetlands, bottomland forests,

shallow water habitats, and other key habitats for wildlife traveling along the Columbia River migratory corridor, while continuing to manage the levees and floodplain for flood control.

**Policy 7.32. River-dependent and river-related uses.** Maintain plans and regulations that recognize the needs of river-dependent and river-related uses while also supporting ecologically-sensitive site design and practices.

**261. Finding:** Policies 7.30 through 7.32 provide direction regarding habitat and river-related uses in the Columbia River Watershed. The MPAP amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat enhancement, or river-dependent or river-related uses. The findings earlier in this chapter that apply to all of Portland's watersheds are incorporated by reference. Therefore, these policies do not apply to the MPAP.

### **Willamette River Watershed**

**Policy 7.33. Fish habitat.** Provide adequate intervals of ecologically-functional shallow-water habitat for native fish along the entire length of the Willamette River within the city, and at the confluences of its tributaries.

**Policy 7.34. Stream connectivity.** Improve stream connectivity between the Willamette River and its tributaries.

**Policy 7.35. River bank conditions.** Preserve existing river bank habitat and encourage the rehabilitation of river bank sections that have been significantly altered due to development with more fish and wildlife friendly riverbank conditions.

**Policy 7.36. South Reach ecological complex.** Enhance habitat quality and connections between Ross Island, Oaks Bottom, and riverfront parks and natural areas south of the Central City, to enhance the area as a functioning ecological complex.

**Policy 7.37. Contaminated sites.** Promote and support programs that facilitate the cleanup, reuse, and restoration of the Portland Harbor Superfund site and other contaminated upland sites.

**Policy 7.38. Sensitive habitats.** Protect and enhance grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific Flyway and the Willamette River corridor.

**Policy 7.39. Riparian corridors.** Increase the width and quality of vegetated riparian buffers along the Willamette River.

**Policy 7.40. Connected upland and river habitats.** Enhance habitat quality and connectivity between the Willamette riverfront, the Willamette's floodplain, and upland natural resource areas.

**Policy 7.41. River-dependent and river-related uses.** Develop and maintain plans and regulations that recognize the needs of river-dependent and river-related uses, while also supporting ecologically-sensitive site design and practices.

**Policy 7.42. Forest Park.** Enhance Forest Park as an anchor habitat and recreational resource.

**262. Finding:** Policies 7.33 through 7.42 provide direction regarding habitat and river-related uses in the Willamette River Watershed. The MPAP amendments do not affect the Environmental, Greenway, or River overlay zones that apply in this area, or other regulations or programs related

to habitat or watershed health. The findings earlier in this chapter that apply to all of Portland’s watersheds are incorporated by reference. Therefore, these policies do not apply to the MPAP.

### **Columbia Slough Watershed**

**Policy 7.43. Fish passage.** Restore in-stream habitat and improve fish passage within the Columbia Slough, including for salmonids in the lower slough.

**Policy 7.44. Flow constriction removal.** Reduce constriction, such as culverts, in the slough channels, to improve the flow of water and water quality.

**Policy 7.45. Riparian corridors.** Increase the width, quality, and native plant diversity of vegetated riparian buffers along Columbia Slough channels and other drainageways within the watershed, while also managing the slough for flood control.

**Policy 7.46. Sensitive habitats.** Enhance grasslands and wetland habitats in the Columbia Slough, such as those found in the Smith and Bybee Lakes and at the St. Johns Landfill site, to provide habitat for sensitive species, and for wildlife traveling along the Columbia and Willamette river migratory corridors.

**Policy 7.47. Connected rivers habitats.** Enhance upland habitat connections to the Willamette and Columbia rivers.

**Policy 7.48. Contaminated sites.** Ensure that plans and investments are consistent with and advance programs that facilitate the cleanup, reuse, and restoration of contaminated sites that are adjacent, or that discharge stormwater, to the Columbia Slough.

**Policy 7.49. Portland International Airport.** Protect, restore, and enhance natural resources and functions in the Portland International Airport plan district, as identified in Portland International Airport/Middle Columbia Slough Natural Resources Inventory. Accomplish this through regulations, voluntary strategies, and the implementation of special development standards.

**263. Finding:** Policies 7.43 through 7.49 provide direction regarding the environment and watershed health in the Columbia Slough Watershed. The MPAP amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. The findings earlier in this chapter that apply to all of Portland’s watersheds are incorporated by reference.

### **Fanno and Tryon Creek Watersheds**

**Policy 7.50. Stream connectivity.** Encourage the daylighting of piped portions of Tryon and Fanno creeks and their tributaries.

**Policy 7.51. Riparian and habitat corridors.** Protect and enhance riparian habitat quality and connectivity along Tryon and Fanno creeks and their tributaries. Enhance connections between riparian areas, parks, anchor habitats, and areas with significant tree canopy. Enhance in-stream and upland habitat connections between Tryon Creek State Natural Area and the Willamette River.

**Policy 7.52. Reduced hazard risks.** Reduce the risks of landslides and streambank erosion by protecting trees and vegetation that absorb stormwater, especially in areas with steep slopes or limited access to stormwater infrastructure.

**264. Finding:** Policies 7.50 through 7.52 provide direction regarding habitat and river-related uses in the Fanno and Tryon Creek Watersheds. The MPAP amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed

health. The findings earlier in this chapter that apply to all of Portland’s watersheds are incorporated by reference.

### **Johnson Creek Watershed**

**Policy 7.53. In-stream and riparian habitat.** Enhance in-stream and riparian habitat and improve fish passage for salmonids along Johnson Creek and its tributaries.

**Policy 7.54. Floodplain restoration.** Enhance Johnson Creek floodplain functions to increase flood-storage capacity, improve water quality, and enhance fish and wildlife habitat.

**Policy 7.55. Connected floodplains, springs, and wetlands.** Enhance hydrologic and habitat connectivity between the Johnson Creek floodplain and its springs and wetlands.

**Policy 7.56. Reduced natural hazards.** Reduce the risks of landslides, streambank erosion and downstream flooding by protecting seeps, springs, trees, vegetation, and soils that absorb stormwater in the East Buttes.

**Policy 7.57. Greenspace network.** Enhance the network of parks, trails, and natural areas near the Springwater Corridor Trail and the East Buttes to enhance habitat connectivity and nature-based recreation in East Portland.

**265. Finding:** Policies 7.53 through 7.57 provide direction regarding habitat and river-related uses in the Johnson Creek Watersheds. The MPAP amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. The findings earlier in this chapter that apply to all of Portland’s watersheds are incorporated by reference.

## Chapter 8: Public Facilities and Services

**Goal 8.A: Quality public facilities and services.** High-quality public facilities and services provide Portlanders with optimal levels of service throughout the city, based on system needs and community goals, and in compliance with regulatory mandates.

**Goal 8.B: Multiple benefits.** Public facility and service investments improve equitable service provision, support economic prosperity, and enhance human and environmental health.

**Goal 8.C: Reliability and resiliency.** Public facilities and services are reliable, able to withstand or recover from catastrophic natural and manmade events, and are adaptable and resilient in the face of long-term changes in the climate, economy, and technology.

**Goal 8.D: Public rights-of-way.** Public rights-of-way enhance the public realm and provide a multi-purpose, connected, safe, and healthy physical space for movement and travel, public and private utilities, and other appropriate public functions and uses.

**Goal 8.E: Sanitary and stormwater systems.** Wastewater and stormwater are managed, conveyed, and/or treated to protect public health, safety, and the environment, and to meet the needs of the community on an equitable, efficient, and sustainable basis.

**Goal 8.F: Flood management.** Flood management systems and facilities support watershed health and manage flooding to reduce adverse impacts on Portlanders' health, safety, and property.

**Goal 8.G: Water.** Reliable and adequate water supply and delivery systems provide sufficient quantities of high-quality water at adequate pressures to meet the needs of the community on an equitable, efficient, and sustainable basis.

**Goal 8.H: Parks, natural areas, and recreation.** All Portlanders have safe, convenient, and equitable access to high-quality parks, natural areas, trails, and recreational opportunities in their daily lives, which contribute to their health and well-being. The City manages its natural areas and urban forest to protect unique urban habitats and offer Portlanders an opportunity to connect with nature.

**Goal 8.I: Public safety and emergency response.** Portland is a safe, resilient, and peaceful community where public safety, emergency response, and emergency management facilities and services are coordinated and able to effectively and efficiently meet community needs.

**Goal 8.J: Solid waste management.** Residents and businesses have access to waste management services and are encouraged to be thoughtful consumers to minimize upstream impacts and avoid generating waste destined for the landfill. Solid waste — including food, yard debris, recyclables, electronics, and construction and demolition debris — is managed, recycled, and composted to ensure the highest and best use of materials.

**Goal 8.K: School facilities.** Public schools are honored places of learning as well as multifunctional neighborhood anchors serving Portlanders of all ages, abilities, and cultures.

**Goal 8.L: Technology and communications.** All Portland residences, businesses, and institutions have access to universal, affordable, and reliable state-of-the-art communication and technology services.

**Goal 8.M: Energy infrastructure and services.** Residents, businesses, and institutions are served by reliable energy infrastructure that provides efficient, low-carbon, affordable energy through decision-making based on integrated resource planning.

**266. Finding:** The policies in this chapter, and these goals, generally address provision of public services, and adequacy of services as it relates to growth and development. The adopted 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017. The CSP includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects.

Some of these goals are not applicable because they guide public agencies that provide public facilities on how those facilities should be provided. The policy-specific findings below address the applicable goals. Transportation facilities are addressed under Chapter 9 (Transportation), below. The findings for Statewide Planning Goals 11 and 12 also address public facilities and are incorporated by reference.

The MPAP amendments affect the amount of development anticipated in the plan area. A growth analysis undertaken for the plan area based on the Plan's land use and zoning changes estimated that the zone changes could result in 2,000 or more additional housing units and 2,000 additional jobs in the plan area by 2045. The total zoned capacity resulting from the zone changes is estimated to increase housing capacity further, although only a portion of this increase is expected to be built by 2045. The infrastructure bureaus provided assessments of the adequacy of infrastructure to accommodate the additional housing units and jobs associated with the MPAP zone changes, summarized below.

#### Sanitary Sewer and Stormwater

The Bureau of Environmental Services (BES) assessed sanitary sewer service and stormwater facilities in the plan area and determined that the existing system, while limited in capacity, could accommodate anticipated development with some additional risk, using best practices for stormwater management and a strategic approach for development.

Initial modeling of existing conditions identified localized capacity issues in NW Nicolai Street. Other combined pipes in the area also have limited remaining capacity to manage additional combined sanitary and stormwater flows. In addition, a storm sewer pipe within NW Nicolai Street has capacity issues, which could contribute to street flooding. If new development manages stormwater consistent with the Stormwater Management Manual, these risks should not increase; however, to manage combined sewer capacity in NW Nicolai Street, BES may consider having future development connect sanitary services to combined pipes on NW Wardway or NW Wilson Street.

The Stormwater Management Manual allows flexibility in the type of stormwater management facilities that developments can use, however, within this area, high densities, poorly infiltrating soils, and potential soil contaminants associated with historic industrial uses could limit those choices. Ecoroofs are stormwater facilities that are suited to these site conditions. They also provide public benefits, such as mitigating urban heat island impacts, attracting birds and pollinators, and improving air quality. BES modeling results indicate that having substantial ecoroof coverage in this area could also reduce the risk of summertime combined system overflows into the Willamette River.

In addition to complying with the Stormwater Management Manual, developers will be required to ensure that new development is adequately served by sanitary and stormwater infrastructure. As the street grid is built out and development takes place sanitary and stormwater infrastructure will be constructed, either as part of the streetcar/street construction or as part of the normal

course of development. Furthermore, on the two large sites, a public benefits agreement requires developers to submit an infrastructure plan that demonstrates that new storm, sanitary, or combined systems are phased, sited, and sized to serve final build out of the site, and that their connections to existing infrastructure make effective use of existing system capacity. Such a plan will demonstrate how infrastructure will be designed and implemented on the site in a coordinated manner.

#### Water

The Water Bureau reviewed the MPAP zone changes and amendments. The Water Bureau found that the system is capable of serving the plan area but will require extension of lines to serve individual development parcels as streets are constructed and development is proposed. The Streetcar extension and changes to the streetscapes in the Plan area will be coordinated with the need for water system infrastructure expansion and integration. As development occurs extensions and hook ups to the water system infrastructure will be the responsibility of individual sites and developments. Coordination and planning for facilities on the two large sites is also reinforced by a related public benefits agreement.

#### Parks

The prior land uses in the plan area were non-residential, so the area is not currently identified as parks deficient on Portland Parks and Recreation (PP&R) Level of Service analysis maps. PP&R generally prioritizes new park investments in areas currently identified as under-served. Since the plan proposes the creation of a significant residential and mixed-use neighborhood, a park would be needed based on current PP&R metrics. To meet the park needs of the new community being created by the MPAP a greenspace is envisioned to be developed either through requirements and incentives in the zoning code or through a public-private partnership with one area property owner.

Provisions in the York Plan District would require significant outdoor space based on a per-dwelling unit calculation. As an incentive to create publicly accessible spaces in the area, this requirement can be reduced by half in Subdistrict D (roughly the former ESCO Steel site), if a 40,000 square foot public open space is created that meets Portland Parks & Recreation standards. This open space reduction is only available to the first 2,000 dwelling units developed in this subdistrict. Furthermore, the public benefits agreement requires a 40,000 square foot park be created in a central location in the MPAP. This park is envisioned as a “green park block” space of roughly 40,000 square feet, developed with pervious surfaces and programmed to provide generally passive recreation opportunities for those in the district. Elsewhere in plan area, smaller public spaces are also encouraged through reductions to outdoor space requirements where publicly accessible space is provided.

The City of Portland has a robust and diverse system of parks, recreation areas and open spaces. The City’s Parks 2020 Vision documents the City’s long-term plan to provide a wide variety of high-quality park and recreation services and opportunities for all residents. The MPAP amendments support and do not impact that existing vision. The Parks 2020 Vision identifies a goal that 100% of Portlanders are within half a mile of a park or natural area. In addition, Portland Parks and Recreation’s citywide level of service (LOS) guidance and metrics also consider population density. The Plan area has not previously been reviewed for LOS because it has had industrial and employment land use designations that prohibit residential uses until now. Nonetheless, the majority of the plan area is within a half mile walking distance of a developed park (Wallace Park)

and within a half mile of a natural area park (Lower Macleay Park and trailhead), which is within the City's stated level of service goals for distance from residential uses. However, given the existing high residential density surrounding these existing park facilities and the proposed MPAP zoning amendments that could add more than 2,000 housing units in the long term, Portland Parks and Recreation recognizes that an additional developed park is needed in the plan area to serve the expected households over time. Portland Parks and Recreation will seek opportunities to achieve a new park for the area, including through public-private partnerships.

Testimony was received regarding increases in housing capacity and need for a community center with a pool and public park space to serve existing and future population in and around the plan area. The public park space is addressed above. Specific to community center needs, Portland Parks and Recreation LOS guidance, as discussed in the April 2022 report Level of Service Guidance: Full-service Community Centers, is that households should be within 3 miles of a full-service community center. The plan area is within the 3-mile service area of the Matt Dishman Community Center. Existing Portland Parks and Recreation plans call for building an additional full-service community center at a City-owned property near SE 12<sup>th</sup> Ave and SE Stark St, to serve central eastside and westside residents. While the plan area would be just outside the 3-mile distance of that future center, a large part of the surrounding Northwest Town Center would be within the level of service distance and that center will be an additional resource to meet community recreational needs. In general, Council finds there is compelling evidence that there will be enough parks to serve the plan area.

#### Transportation

Transportation facilities are addressed under Chapter 9 (Transportation), below. Transportation findings in response to Statewide Planning Goal 12 also address transportation and are incorporated by reference.

The findings for Statewide Planning Goal 11 also address public facilities and are incorporated by reference.

The MPAP, on balance, complies with these goals.

### **Service provision and urbanization**

**Policy 8.1. Urban services boundary.** Maintain an Urban Services Boundary for the City of Portland that is consistent with the regional urban growth policy, in cooperation with neighboring jurisdictions. The Urban Services Boundary is shown on the Comprehensive Plan Map.

**Policy 8.2. Rural, urbanizable, and urban public facility needs.** Recognize the different public facility needs in rural, urbanizable and urban land as defined by the Regional Urban Growth Boundary, the City Urban Services Boundary, and the City Boundaries of Municipal Incorporation. See Figure 8-1 — Urban, Urbanizable, and Rural Lands.

**267. Finding:** The City Council interprets policies 8.1 through 8.2 to provide direction on the provision of public facilities and services and the process of urbanization. The MPAP amendments do not urbanize any rural land. Therefore these policies do not apply.

**Policy 8.3. Urban service delivery.** Provide the following public facilities and services at urban levels of service to urban lands within the City's boundaries of incorporation:

- Public rights-of-way, streets, and public trails

- Sanitary sewers and wastewater treatment
- Stormwater management and conveyance
- Flood management
- Protection of the waterways of the state
- Water supply
- Police, fire, and emergency response
- Parks, natural areas, and recreation
- Solid waste regulation

**Policy 8.4. Supporting facilities and systems.** Maintain supporting facilities and systems, including public buildings, technology, fleet, and internal service infrastructure, to enable the provision of public facilities and services.

**268. Finding:** Policies 8.3 and 8.4 call on the City to provide and maintain urban levels of certain services. The 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017. The MPAP amendments change land use and zoning designations in an area of Portland that is highly urbanized and in which these services are currently provided and will be improved over time. Therefore, the MPAP complies with this policy.

**Policy 8.5. Planning service delivery.** Provide planning, zoning, building, and subdivision control services within the boundaries of incorporation, and as otherwise provided by intergovernmental agreement within the City’s Urban Services Boundary.

**269. Finding:** The City of Portland provides planning, zoning, building, and subdivision control services in the area affected by the MPAP. Therefore, the MPAP complies with this policy.

### Service coordination

**Policy 8.6. Interagency coordination.** Maintain interagency coordination agreements with neighboring jurisdictions and partner agencies that provide urban public facilities and services within the City of Portland’s Urban Services Boundary to ensure effective and efficient service delivery. See Policy 8.3 for the list of services included. Such jurisdictions and agencies include, but may not be limited to:

- Multnomah County for transportation facilities and public safety.
- State of Oregon for transportation and parks facilities and services.
- TriMet for public transit facilities and services.
- Port of Portland for air and marine facilities and services.
- Metro for regional parks and natural areas, and for solid waste, composting, and recycling facilities and transfer stations.
- Gresham, Milwaukie, Clackamas County Service District #1, and Clean Water Services for sanitary sewer conveyance and treatment.
- Multnomah County Drainage District No. 1, Peninsula Drainage District No 1, and Peninsula Drainage District No. 2 for stormwater management and conveyance, and for flood mitigation,

protection, and control.

- Rockwood People’s Utility District; Sunrise Water Authority; and the Burlington, Tualatin Valley, Valley View, West Slope, Palatine Hill, Alto Park, and Clackamas River Water Districts for water distribution.
- Portland Public Schools and the David Douglas, Parkrose, Reynolds, Centennial, and Riverdale school districts for public education, park, trail, and recreational facilities.

**Policy 8.7. Outside contracts.** Coordinate with jurisdictions and agencies outside of Portland where the City provides services under agreement.

**Policy 8.8. Public service coordination.** Coordinate with the planning efforts of agencies providing public education, public health services, community centers, urban forest management, library services, justice services, energy, and technology and communications services.

**Policy 8.9. Internal coordination.** Coordinate planning and provision of public facilities and services, including land acquisition, among City agencies, including internal service bureaus.

**Policy 8.10. Co-location.** Encourage co-location of public facilities and services across providers where co-location improves service delivery efficiency and access for historically under-represented and under-served communities.

**270. Finding:** The City Council interprets policies 8.6 through 8.10 to provide direction on coordination with neighboring jurisdictions and partner agencies that provide urban public facilities and services within the City of Portland’s Urban Services Boundary. The MPAP amendments do not include new public facility or infrastructure projects or amendments to public service coordination agreements. Therefore, these policies do not apply. These agencies were, however, notified of the amendments pursuant to the City’s legislative procedures (33.740).

### Service extension

**Policy 8.11. Annexation.** Require annexation of unincorporated urbanizable areas within the City’s Urban Services Boundary as a prerequisite to receive urban services.

**Policy 8.12. Feasibility of service.** Evaluate the physical feasibility and cost-effectiveness of extending urban public services to candidate annexation areas to ensure sensible investment and to set reasonable expectations.

**Policy 8.13. Orderly service extension.** Establish or improve urban public services in newly-annexed areas to serve designated land uses at established levels of service, as funds are available and as responsible engineering practice allows.

**Policy 8.14. Coordination of service extension.** Coordinate provision of urban public services to newly-annexed areas so that provision of any given service does not stimulate development that significantly hinders the City’s ability to provide other urban services at uniform levels.

**Policy 8.15. Services to unincorporated urban pockets.** Plan for future delivery of urban services to urbanizable areas that are within the Urban Services Boundary but outside the city limits.

**Policy 8.16. Orderly urbanization.** Coordinate with counties, neighboring jurisdictions, and other special districts to ensure consistent management of annexation requests, and to establish rational and orderly process of urbanization that maximize efficient use of public funds.

**Policy 8.17. Services outside the city limits.** Prohibit City provision of new urban services, or expansion

of the capacity of existing services, in areas outside city limits, except in cases where the City has agreements or contracts in place.

**Policy 8.18. Service district expansion.** Prohibit service district expansion or creation within the City’s Urban Services Boundary without the City’s expressed consent.

**Policy 8.19. Rural service delivery.** Provide the public facilities and services identified in Policy 8.3 in rural areas only at levels necessary to support designated rural residential land uses and protect public health and safety. Prohibit sanitary sewer extensions into rural land and limit other urban services.

**271. Finding:** The City Council interprets policies 8.11 through 8.19 to provide direction on extending public services to area considered for annexation or other unserved areas. The MPAP amendments do not include new public facility or infrastructure projects or service extensions to these types of areas. Therefore, these policies do not apply.

### Public investment

**Policy 8.20. Regulatory compliance.** Ensure public facilities and services remain in compliance with state and federal regulations. Work toward cost-effective compliance with federal and state mandates through intergovernmental coordination and problem solving.

**272. Finding:** The MPAP is a long range policy and land use regulatory plan and does not include construction of public facilities or provision of services. The findings for statewide planning goals address compliance with state regulations. Therefore, the MPAP complies with this policy.

**Policy 8.21. System capacity.** Establish, improve, and maintain public facilities and services at levels appropriate to support land use patterns, densities, and anticipated residential and employment growth, as physically feasible and as sufficient funds are available.

**273. Finding:** The MPAP includes changes to land use designations in the plan area. The MPAP Transportation Plan proposes future improvements to address transportation system needs in the plan area. Other urban service systems, including sanitary sewer, stormwater management, and water, are or can be made capable of serving the plan area over time as documented in the plan. Therefore, the MPAP complies with this policy.

**Policy 8.22. Equitable service.** Provide public facilities and services to alleviate service deficiencies and meet level-of-service standards for all Portlanders, including individuals, businesses, and property owners.

**8.22.a.** In places that are not expected to grow significantly but have existing deficiencies, invest to reduce disparity and improve livability.

**8.22.b.** In places that lack basic public facilities or services and also have significant growth potential, invest to enhance neighborhoods, fill gaps, maintain affordability, and accommodate growth.

**8.22.c.** In places that are not expected to grow significantly and already have access to complete public facilities and services, invest primarily to maintain existing facilities and retain livability.

**8.22.d.** In places that already have access to complete public facilities and services, but also have significant growth potential, invest to fill remaining gaps, maintain affordability, and accommodate growth.

**274. Finding:** The MPAP includes changes to land use designations in the plan area, which is currently served by public facilities and services. The MPAP calls for additional growth in the area. Additional or new services such as transportation system improvements or provision of public open space are in service to the additional significant growth potential created by the MPAP, and address Policy 8.22.d. Therefore, the MPAP complies with this policy.

**Policy 8.23. Asset management.** Improve and maintain public facility systems using asset management principles to optimize preventative maintenance, reduce unplanned reactive maintenance, achieve scheduled service delivery, and protect the quality, reliability, and adequacy of City services.

**Policy 8.24. Risk management.** Maintain and improve Portland’s public facilities to minimize or eliminate economic, social, public health and safety, and environmental risks.

**Policy 8.25. Critical infrastructure.** Increase the resilience of high-risk and critical infrastructure through monitoring, planning, maintenance, investment, adaptive technology, and continuity planning.

**Policy 8.26. Capital programming.** Maintain long-term capital improvement programs that balance acquisition and construction of new public facilities with maintenance and operations of existing facilities.

**275. Finding:** The City Council interprets policies 8.23 through 8.26 to provide direction on investment priorities for public facilities. The MPAP amendments do address these issues. Therefore, these policies do not apply.

## Funding

**Policy 8.27. Cost-effectiveness.** Establish, improve, and maintain the public facilities necessary to serve designated land uses in ways that cost-effectively provide desired levels of service, consider facilities’ lifecycle costs, and maintain the City’s long-term financial sustainability.

**Policy 8.28. Shared costs.** Ensure the costs of constructing and providing public facilities and services are equitably shared by those who benefit from the provision of those facilities and services.

**Policy 8.29. System development.** Require private or public entities whose prospective development or redevelopment actions contribute to the need for public facility improvements, extensions, or construction to bear a proportional share of the costs.

**Policy 8.30. Partnerships.** Maintain or establish public and private partnerships for the development, management, or stewardship of public facilities necessary to serve designated land uses, as appropriate.

**276. Finding:** The City Council interprets policies 8.27 through 8.30 to provide direction on funding public facilities and services within the City of Portland’s Urban Services Boundary. The MPAP amendments include land use and zoning changes that will facilitate a broader array of land uses and higher densities. The MPAP also calls for public and private investments in facilities and services to support anticipated development. The MPAP addresses the policies in the following ways:

Policy 8.27. Cost-effectiveness. The MPAP proposes an extension of Portland Streetcar to provide transit service to the plan area. The selected route of the extension is the most direct route to provide service to the plan area, and is the lowest cost of alternatives considered, while also serving the highest growth area. In addition, it leverages funds to upgrade street and other infrastructure along the route in areas where infrastructure upgrades are needed and planned (NW 23<sup>rd</sup> Avenue).

Policy 8.28, 8.29, 3.30. Shared costs, System development, and Partnerships. The construction costs of the proposed streetcar and related transportation system improvement will be shared between public entities and the private sector landowners that are proximate to the improvements and will benefit from the investments. The requirements for financial participation by large property owners is memorialized in a public benefits agreement; this will be supplemented by further actions, including a Local Improvement District, that require partnership. Upgrades to and extension of other services (sanitary, stormwater, water) will largely be borne by private entities through the development process.

## Public benefits

**Policy 8.31. Application of Guiding Principles.** Plan and invest in public facilities in ways that promote and balance the Guiding Principles established in The Vision and Guiding Principles of this Comprehensive Plan.

**277. Finding:** See findings for Guiding Principles.

**Policy 8.32. Community benefit agreements.** Encourage the use of negotiated community benefit agreements for large public facility projects as appropriate to address environmental justice policies in Chapter 2: Community Involvement.

**278. Finding:** Policy 8.32 encourages, but does not require, the use of a community benefits agreement for large public facilities projects. The MPAP envisions future investment in a public facility project (streetcar). However, additional planning and process will be required for the infrastructure project. The MPAP does not, at this stage, specifically include a “community benefits agreement” but instead employs a negotiated “Public Benefits Agreement” that addresses land use and transportation issues and provides for a combination of public and community benefits that will be required, such as affordable housing, middle-wage jobs, and public open space/park, as well as commitments for future infrastructure support. See Chapter 2 for additional findings. The MPAP is consistent with this policy.

**Policy 8.33. Community knowledge and experience.** Encourage public engagement processes and strategies for larger public facility projects to include community members in identifying potential impacts, mitigation measures and community benefits.

**279. Finding:** Policy 8.33 encourages, but does not require, public engagement processes and strategies for larger public facility projects to include community members in identifying potential impacts, mitigation measures and community benefits. The MPAP land use plan, transportation plan, and related public benefits agreement, were shaped by community input, which included initial work with four community based organizations, discussions with local neighborhood and business groups, as well as other members of the public, and substantial work with the York Street Work Group, a community group focused on commemoration of York (the enslaved member of the Corps of Discovery for whom NW York Street is named), and community/public benefits. This engagement led to identification and confirmation of key plan objectives, modifications of elements of the land use and transportation plan, and helped to inform the public benefits being achieved through regulatory measures, as well as through a separate public benefits agreement. Therefore, the MPAP complies with this policy.

**Policy 8.34. Resource efficiency.** Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses to meet adopted City goals and targets.

**280. Finding:** The MPAP includes a proposed extension of Portland Streetcar, a resource efficient, low-carbon transportation mode designed to serve the future land uses anticipated. Therefore, the MPAP complies with this policy.

**Policy 8.35. Natural systems.** Protect, enhance, and restore natural systems and features for their infrastructure service and other values.

**281. Finding:** The MPAP land use regulations in Title 33 and a new York Plan district (33.597), includes regulations such as “green features” (landscaping, large trees or ecoroofs), that will enhance and support infrastructure systems and other values such as greening, open or landscaped area, and reduction of heat-island effects. Therefore, the MPAP complies with this policy.

**Policy 8.36. Context-sensitive infrastructure.** Design, improve, and maintain public rights-of-way and facilities in ways that are compatible with, and that minimize negative impacts on, their physical, environmental, and community context.

**282. Finding:** The MPAP transportation plan includes proposed facilities that have been designed to be compatible with while minimizing negative impacts on the physical, environmental, and community context. All recommended improvements consider rights-of-way widths, multimodal travel patterns, and greening improvements and stormwater remediation to most appropriately meet the needs of the area. For improvements in existing rights-of-way, typical road widths are maintained to minimize negative impacts; any future dedication requirements would be contingent on adjacent development and would focus on implementing the design requirements of Portland’s Pedestrian Design Guide. New streets recommended in the MPAP are also compatible with the area context, considering scale and modal needs for the area as it grows. Therefore, the MPAP is consistent with this policy.

**Policy 8.38. Age-friendly public facilities.** Promote public facility designs that make Portland more age-friendly.

**283. Finding:** The MPAP’s recommended public facilities (streets, sidewalks, and transit system) promote designs for users of all ages and abilities. All network improvements will meet current Americans with Disabilities Act standards, including curb ramps, wider sidewalks, accessible transit stations, and separated and alternative bicycle and pedestrian routes to offer multiple options for users based on comfort. Therefore, the MPAP is consistent with this policy.

### **Public rights-of-way**

**Policy 8.39. Interconnected network.** Establish a safe and connected rights-of-way system that equitably provides infrastructure services throughout the city.

**Policy 8.40. Transportation function.** Improve and maintain the right-of-way to support multimodal transportation mobility and access to goods and services as is consistent with the designated street classification.

**284. Finding:** Policies 8.39 and 8.40 address the provision of a safe and connected rights-of-way system, including multimodal transportation mobility support and improvements. The MPAP is consistent with these policies because it recommends a suite of transportation project recommendations for improving the area’s multimodal rights-of-way street and infrastructure grid in a space with presently limited connectivity. Recommended improvements will support multimodal mobility and access through improvements for all modes, consistent with recommended street classifications updates in the plan. More information is available under the

findings for Chapter 9: Transportation (below); those findings are incorporated by reference. Therefore, the MPAP complies with this policy.

**Policy 8.41. Utility function.** Improve and maintain the right-of-way to support equitable distribution of utilities, including water, sanitary sewer, stormwater management, energy, and communications, as appropriate.

**285. Finding:** Policy 8.41 addresses the equitable distribution of utilities. Any recommended transportation improvements in the MPAP will be coordinated to ensure the provision and equitable distribution of utilities, in compliance with all relevant City code. Therefore, the MPAP complies with this policy.

**Policy 8.42. Stormwater management function.** Improve rights-of-way to integrate green infrastructure and other stormwater management facilities to meet desired levels-of-service and economic, social, and environmental objectives.

**286. Finding:** Policy 8.41 addresses stormwater management. All rights-of-way improvements recommended in the MPAP will be subject to the City’s 2020 Stormwater Management Manual and include onsite stormwater management within the right-of-way wherever required and feasible. Additionally, new streets in the Plan area will be subject to furnishing zone requirements in compliance with the Pedestrian Design Guide, contingent upon redevelopment; those furnishing zones include depaved segments to support the objectives of this Policy. Therefore, the MPAP is consistent with this policy.

**Policy 8.43. Trees in rights-of-way.** Integrate trees into public rights-of-way to support City canopy goals, transportation functions, and economic, social, and environmental objectives.

**287. Finding:** Policy 8.43 addresses trees in the right-of-way. All rights-of-way improvements on new streets recommended in the MPAP, as well as improvements to rights-of-way as recommended triggered by adjacent redevelopment, will meet Title 11 Trees requirements, as well as meet the standards of the Pedestrian Design Guide (which requires furnishing zones for street trees). As such, the MPAP is consistent with this policy.

**Policy 8.44. Community uses.** Allow community use of rights-of-way for purposes such as public gathering space, events, or temporary festivals, if the community uses are integrated in ways that balance and minimize conflict with the designated through movement and access roles of rights-of-ways.

**288. Finding:** Policy 8.44 provides direction on the programming and management of rights-of-way. All rights-of-way, including those within the MPAP plan area, are eligible for community uses and plaza development as allowed by existing programs at the City. Therefore, the MPAP is consistent with this policy.

**Policy 8.45. Pedestrian amenities.** Encourage facilities that enhance pedestrian enjoyment, such as transit shelters, garbage containers, benches, etc. in the right-of-way.

**289. Finding:** Policy 8.45 addresses pedestrian amenities within the right-of-way. The MPAP includes a recommended Pedestrian District for the plan area, which will require wide sidewalk corridors and furnishing zones within the plan area, encouraging pedestrian-supportive facilities in the rights-of-way. Therefore, the MPAP is consistent with this policy.

**Policy 8.46. Commercial uses.** Accommodate allowable commercial uses of the rights-of-way for enhancing commercial vitality, if the commercial uses can be integrated in ways that balance and

minimize conflict with the other functions of the right-of-way.

**290. Finding:** Policy 8.46 addresses the programming and management of rights-of-way to enhance commercial vitality. The MPAP’s recommendations do not make changes to this policy, and management of rights-of-way in the MPAP Plan Area will be consistent with existing commercial use accommodations and allowances. Therefore, the MPAP is consistent with this policy.

**Policy 8.47. Flexible design.** Allow flexibility in right-of-way design and development standards to appropriately reflect the pattern area and other relevant physical, community, and environmental contexts and local needs.

**8.47.a.** Use a variety of transportation resources in developing and designing projects for all City streets, such as the City of Portland’s Pedestrian Design Guide, Bicycle Master Plan-Appendix A, NACTO Urban Bikeway Design Guide, NACTO Urban Street Design Guide, Portland Parks and Recreation Trail Design Guidelines, Designing for Truck Movements and Other Large Vehicles, and City of Portland Green Street Policy, Stormwater Management Manual, Design Guide for Public Street Improvements, and Neighborhood Greenways. (TSP objective 8.1.e.).

**291. Finding:** Policy 8.47 addresses direction on the flexibility of design and development standards for rights-of-way to support reflection of local patterns and contexts. The MPAP’s recommended transportation projects address rights-of-way design in proposed cross sections that utilize various resources toward those recommendations, including the Pedestrian Design Guide, the Stormwater Management Manual, and others. Further contextual considerations and utilization of resources will be applied during future stages of project development for proposed projects, in compliance with Policy 8.47. Therefore, the MPAP is consistent with this policy.

**Policy 8.48. Corridors and City Greenways.** Ensure public facilities located along Civic Corridors, Neighborhood Corridors, and City Greenways support the multiple objectives established for these corridors.

**292. Finding:** The MPAP provides planning-level design recommendations for various transportation projects, including improvements to City Greenways. Designs in future project development phases for recommended projects will support policy guidance toward established corridor objectives, as described in Transportation Findings (Chapter 9) below. Those findings are incorporated here by reference. Therefore, the MPAP is consistent with this policy.

**Policy 8.49. Coordination.** Coordinate the planning, design, development, improvement, and maintenance of public rights-of-way among appropriate public agencies, private providers, and adjacent landowners.

**8.49.a.** Coordination efforts should include the public facilities necessary to support the uses and functions of rights-of-way, as established in policies 8.40 to 8.46.

**8.49.b.** Coordinate transportation and stormwater system plans and investments, especially in unimproved or substandard rights-of-way, to improve water quality, public safety, including for pedestrians and bicyclists, and neighborhood livability.

**Policy 8.50. Undergrounding.** Encourage undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in centers and along Civic Corridors.

**Policy 8.51. Right-of-way vacations.** Maintain rights-of-way if there is an established existing or future need for them, such as for transportation facilities or for other public functions established in policies 8.40 to 8.46.

**Policy 8.52. Rail rights-of-way.** Preserve existing and abandoned rail rights-of-way for future rail or public trail uses.

**293. Finding:** The City Council interprets Policies 8.49 through 8.52 to provide direction on the design, programming, and management of public rights-of-ways. The MPAP is adopting land use changes and a set of planning-level recommendations for supportive public facility investments, including transportation. Design, engineering, and coordination for recommended transportation improvements will occur in later phases of implementation and will be consistent with these policies. Therefore, the MPAP is consistent with these policies.

## Trails

**Policy 8.53. Public trails.** Establish, improve, and maintain a citywide system of public trails that provide transportation and/or recreation options and are a component of larger network of facilities for bicyclists, pedestrians, and recreational users.

**Policy 8.54. Trail system connectivity.** Plan, improve, and maintain the citywide trail system so that it connects and improves access to Portland’s neighborhoods, commercial areas, employment centers, schools, parks, natural areas, recreational facilities, regional destinations, the regional trail system, and other key places that Portlanders access in their daily lives.

**Policy 8.55. Trail coordination.** Coordinate planning, design, improvement, and maintenance of the trail system among City agencies, other public agencies, non-governmental partners, and adjacent landowners.

**Policy 8.56. Trail diversity.** Allow a variety of trail types to reflect a trail’s transportation and recreation roles, requirements, and physical context.

**Policy 8.57. Public access requirements.** Require public access and improvement of public trails along the future public trail alignments shown in Figure 8-2 — Future Public Trail Alignments.

**Policy 8.58. Trail and City Greenway coordination.** Coordinate the planning and improvement of trails as part of the City Greenways system.

**Policy 8.59. Trail and Habitat Corridor coordination.** Coordinate the planning and improvement of trails with the establishment, enhancement, preservation, and access to habitat corridors.

**Policy 8.60. Intertwine coordination.** Coordinate with the Intertwine Alliance and its partners, including local and regional parks providers, to integrate Portland’s trail and active transportation network with the bi-state regional trail system.

**294. Finding:** The City Council interprets policies 8.53 through 8.60 to apply to designated trails. The MPAP amendments do not amend the designated trail alignments or regulations that implement designated trails. Therefore, these policies do not apply to the MPAP amendments.

## Sanitary system

**Policy 8.61. Sewer connections.** Require all developments within the city limits to be connected to sanitary sewers unless the public sanitary system is not physically or legally available per City Code and state requirements; or the existing onsite septic system is functioning properly without failure or complaints per City Code and state requirements; and the system has all necessary state and county permits.

**Policy 8.62. Combined sewer overflows.** Provide adequate public facilities to limit combined sewer

overflows to frequencies established by regulatory permits.

**Policy 8.63. Sanitary sewer overflows.** Provide adequate public facilities to prevent sewage releases to surface waters as consistent with regulatory permits.

**Policy 8.64. Private sewage treatment systems.** Adopt land use regulations that require any proposed private sewage treatment system to demonstrate that all necessary state and county permits are obtained.

**Policy 8.65. Sewer extensions.** Prioritize sewer system extensions to areas that are already developed at urban densities and where health hazards exist.

**Policy 8.66. Pollution prevention.** Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical and that reduce the amount of pollution entering the sanitary system.

**Policy 8.67. Treatment.** Provide adequate wastewater treatment facilities to ensure compliance with effluent standards established in regulatory permits.

**295. Finding:** The City Council interprets policies 8.61 through 8.67 to apply to the provision of sanitary sewer facilities. The MPAP amendments to not impact any capital improvement projects related to sewer or sanitary systems. Policies 8.61 and 8.64 apply to development and are ensured through Title 25, Plumbing Regulations and verified at the time of development permit application. The MPAP amendments do not alter or affect Title 25 requirements. The MPAP describes how existing conditions relevant to stormwater management and sanitary service in the MPAP area influence future growth and describes BES's planning efforts to address the needs of the area. Therefore, the MPAP complies with these policies.

## Stormwater Systems

**Policy 8.68. Stormwater facilities.** Provide adequate stormwater facilities for conveyance, flow control, and pollution reduction.

**Policy 8.69. Stormwater as a resource.** Manage stormwater as a resource for watershed health and public use in ways that protect and restore the natural hydrology, water quality, and habitat of Portland's watersheds.

**Policy 8.70. Natural systems.** Protect and enhance the stormwater management capacity of natural resources such as rivers, streams, creeks, drainageways, wetlands, and floodplains.

**Policy 8.71. Green infrastructure.** Promote the use of green infrastructure, such as natural areas, the urban forest, and landscaped stormwater facilities, to manage stormwater.

**Policy 8.72. Stormwater discharge.** Avoid or minimize the impact of stormwater discharges on the water and habitat quality of rivers and streams.

**Policy 8.73. On-site stormwater management.** Encourage on-site stormwater management, or management as close to the source as practical, through land use decisions and public facility investments.

**Policy 8.74. Pollution prevention.** Coordinate policies, programs, and investments with partners to prevent pollutants from entering the stormwater system by managing point and non-point pollution sources through public and private facilities, local regulations, and education.

**Policy 8.75. Stormwater partnerships.** Provide stormwater management through coordinated public

and private facilities, public-private partnerships, and community stewardship.

**296. Finding:** The City Council interprets policies 8.68 through 8.75 to apply to the provision of stormwater facilities. Stormwater is conveyed through the combined sewer system, pipes, ditches, or drainageways to streams and rivers. In some cases, stormwater is managed in detention facilities, other vegetated facilities, or allowed to infiltrate in natural areas. The Citywide Systems Plan includes projects to address facilities needed for conveyance, flow control and pollution reduction.

Many of these policies are ensured through application of the City’s Stormwater Management Manual. Stormwater management is critical to maintaining and enhancing the City’s livability and improving watershed health. The Stormwater Management Manual (SWMM) allows the City of Portland to protect both watershed resources and infrastructure investments with every development or improvement. Implementing the requirements in this manual helps protect Portland’s water resources, which in turn will provide great benefit to human health, fish and wildlife habitat, recreational resources, and drinking water. Environmental Services evaluates development proposals that increase impervious area (including buildings and hardscape) against the SWMM and Source Control Manual to effectively comply with local, state and federal point and non-point pollution water quality mandates. The MPAP amendments do not affect the SWMM or Source Control Manual.

Further, the MPAP amendments include regulations for “green features” in new development that include landscaping, large trees, and ecoroofs. These features help reduce stormwater discharge and assist with on-site stormwater management in new development. The MPAP transportation plan includes public infrastructure designs that will utilize natural systems and green infrastructure and thereby better manage stormwater. Therefore, the MPAP complies with these policies.

**Policy 8.76. Flood management.** Improve and maintain the functions of natural and managed drainageways, wetlands, and floodplains to protect health, safety, and property, provide water conveyance and storage, improve water quality, and maintain and enhance fish and wildlife habitat.

**Policy 8.77. Floodplain management.** Manage floodplains to protect and restore associated natural resources and functions and to minimize the risks to life and property from flooding.

**Policy 8.78. Flood management facilities.** Establish, improve, and maintain flood management facilities to serve designated land uses through planning, investment and regulatory requirements.

**Policy 8.79. Drainage district coordination.** Coordinate with drainage districts that provide stormwater management, conveyance, and flood mitigation, protection, and control services within the City’s Urban Services Boundary.

**Policy 8.80. Levee coordination.** Coordinate plans and investments with special districts and agencies responsible for managing and maintaining certification of levees along the Columbia River.

**297. Finding:** The City Council interprets policies 8.76 through 8.80 to apply to the management of floodplains. There are no floodplains in the MPAP area therefore these policies do not apply.

## Water systems

**Policy 8.81. Primary supply source.** Protect the Bull Run watershed as the primary water supply source for Portland.

**Policy 8.82. Bull Run protection.** Maintain a source-protection program and practices to safeguard the Bull Run watershed as a drinking water supply.

**Policy 8.83. Secondary supply sources.** Protect, improve, and maintain the Columbia South Shore wellfield groundwater system, the Powell Valley wellfield groundwater system, and any other alternative water sources designated as secondary water supplies.

**Policy 8.84. Groundwater wellfield protection.** Maintain a groundwater protection program and practices to safeguard the Columbia South Shore wellfield and the Powell Valley wellfield as drinking water supplies.

**Policy 8.85. Water quality.** Maintain compliance with state and federal drinking water quality regulations.

**Policy 8.86. Storage.** Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability.

**Policy 8.87. Fire protection.** Provide adequate water facilities to serve the fire protection needs of all Portlanders and businesses.

**Policy 8.88. Water pressure.** Provide adequate water facilities to maintain water pressure in order to protect water quality and provide for the needs of customers.

**Policy 8.89. Water efficiency.** Reduce the need for additional water facility capacity and maintain compliance with state water resource regulations by encouraging efficient use of water by customers within the city.

**Policy 8.90. Service interruptions.** Maintain and improve water facilities to limit interruptions in water service to customers.

**Policy 8.91. Outside user contracts.** Coordinate long-term water supply planning and delivery with outside-city water purveyors through long-term wholesale contracts.

**298. Finding:** The City Council interprets policies 8.81 through 8.91 to apply to the provision of water service. Primarily these policies govern how the City manages its water system and are not applicable to development. Policies 8.81 through 8.85 are addressed through the requirements in Title 21 Water. Protections for the Bull Run watershed are enumerated in Chapter 21.36. Groundwater wellfield protections are ensured through regulations in Chapter 21.35. And water quality is locally regulated by Chapter 21.12, as well as Title 25 Plumbing Regulations, in addition to compliance mandates at the state and federal level. Implementation of these policies is unaffected by the MPAP amendments.

## **Parks and recreation**

**Policy 8.92. Acquisition, development, and maintenance.** Provide and maintain an adequate supply and variety of parkland and recreational facilities to serve the city's current and future population based on identified level-of-service standards and community needs.

**Policy 8.93. Service equity.** Invest in acquisition and development of parks and recreation facilities in areas where service-level deficiencies exist.

**Policy 8.94. Capital programming.** Maintain a long-range park capital improvement program, with criteria that considers acquisition, development, and operations; provides opportunities for public input; and emphasizes creative and flexible financing strategies.

**Policy 8.95. Park planning.** Improve parks, recreational facilities, natural areas, and the urban forest in accordance with current master plans, management plans, or adopted strategies that reflect user group needs, development priorities, development and maintenance costs, program opportunities, financing strategies, and community input.

**299. Finding:** Policies 8.92 to 8.95 address acquisition, equity, programming, and planning aspects of park development. The MPAP amendments do not address these broader policy areas specifically. However, aspects of the plan are intended to help support provision of both private and public open space or park land in the MPAP area, which is expected to have significantly more households and employees over time. The MPAP helps to support these policies by including zoning requirements for on-site outdoor areas in new residential development, which will help meet the open area and passive recreation needs of new residents. The MPAP further supports these policies through zoning regulations that incentivize creation of public open space rather than, or in addition, to private on-site outdoor areas. These policies are further supported by a separate public benefits agreement that builds on the zoning regulatory provisions to encourage creation of a public open space/park to serve the area. Therefore, the MPAP complies with and does not conflict with these policies.

**Policy 8.96. Recreational trails.** Establish, improve, and maintain a complete and connected system of public recreational trails, consistent with Portland Parks & Recreation’s trail strategy.

**Policy 8.97. Natural resources.** Preserve, enhance, and manage City-owned natural areas and resources to protect and improve their ecological health, in accordance with both the natural area acquisition and restoration strategies, and to provide compatible public access.

**Policy 8.98. Urban forest management.** Manage urban trees as green infrastructure with associated ecological, community, and economic functions, through planning, planting, and maintenance activities, education, and regulation.

**Policy 8.99. Recreational facilities.** Provide a variety of recreational facilities and services that contribute to the health and well-being of Portlanders of all ages and abilities.

**Policy 8.100. Self-sustaining Portland International Raceway (PIR).** Provide for financially self-sustaining operations of PIR, and broaden its programs and activities to appeal to families, diverse communities, and non-motorized sports such as biking and running.

**Policy 8.101. Self-sustaining and inclusive golf facilities.** Provide financially self-sustaining public golf course operations. Diversify these assets to attract new users, grow the game, provide more introductory-level programming, and expand into other related recreational opportunities such as foot golf and disk golf.

**Policy 8.102. Specialized recreational facilities.** Establish and manage specialized facilities within the park system that take advantage of land assets and that respond to diverse, basic, and emerging recreational needs.

**300. Finding:** The City Council interprets policies 8.96 through 8.102 to primarily address City-owned parks and natural areas and not development on private land. Therefore, these policies do not apply.

**Policy 8.103. Public-private partnerships.** Encourage public-private partnerships to develop and operate publicly-accessible recreational facilities that meet identified public needs.

**301. Finding:** The MPAP amendments create the opportunity for a significant amount of new housing and employment in the plan area. Portland Parks and Recreation (PP&R) had previously determined that the plan area was not deficient in parks facilities based on the current non-residential land uses and map designations. With the introduction of housing, PP&R has determined that the area would benefit from a public park/open space. The MPAP facilitates creation of a publicly-accessible open area or park through a public-private partnership employing regulatory (zoning) and non-regulatory (public benefits agreement) approaches. Therefore, the MPAP complies with this policy.

### **Public safety and emergency response**

**Policy 8.104. Emergency preparedness, response, and recovery coordination.** Coordinate land use plans and public facility investments between City bureaus, other public and jurisdictional agencies, businesses, community partners, and other emergency response providers, to ensure coordinated and comprehensive emergency and disaster risk reduction, preparedness, response, and recovery.

**Policy 8.105. Emergency management facilities.** Provide adequate public facilities – such as emergency coordination centers, communications infrastructure, and dispatch systems – to support emergency management, response, and recovery.

**Policy 8.106. Police facilities.** Improve and maintain police facilities to allow police personnel to efficiently and effectively respond to public safety needs and serve designated land uses.

**Policy 8.107. Community safety centers.** Establish, coordinate, and co-locate public safety and other community services in centers.

**Policy 8.108. Fire facilities.** Improve and maintain fire facilities to serve designated land uses, ensure equitable and reliable response, and provide fire and life safety protection that meets or exceeds minimum established service levels.

**Policy 8.109. Mutual aid.** Maintain mutual aid coordination with regional emergency response providers as appropriate to protect life and ensure safety.

**Policy 8.110. Community preparedness.** Enhance community preparedness and capacity to prevent, withstand, and recover from emergencies and natural disasters through land use decisions and public facility investments.

**Policy 8.111. Continuity of operations.** Maintain and enhance the City's ability to withstand and recover from natural disasters and human-made disruptions in order to minimize disruptions to public services.

**302. Finding:** The City Council interprets policies 8.104 through 8.111 to address the provision of public safety and emergency response services citywide. MPAP does not impact public facilities identified in the policies, nor does the zoning affect where various public safety facilities can locate. Therefore, these policies do not apply.

### **Solid waste management**

**Policy 8.112. Waste management.** Ensure land use programs, rights-of-way regulations, and public facility investments allow the City to manage waste effectively and prioritize waste management in the following order: waste reduction, recycling, anaerobic digestion, composting, energy recovery, and then landfill.

**303. Finding:** The City Council interprets this policy to address the provision of waste management services. The changes being made by the MPAP project do not impact these waste management services. Therefore, this policy does not apply.

### School facilities

**Policy 8.113. School district capacity.** Consider the overall enrollment capacity of a school district – as defined in an adopted school facility plan that meets the requirements of Oregon Revised Statute 195 – as a factor in land use decisions that increase capacity for residential development.

**304. Finding:** David Douglas School District (DDSD) is the only school district in Portland with an adopted school facility plan that meets ORS 195. Its enrollment boundary covers much of East Portland. The overall expectation for growth in East Portland is grounded in regional housing demand forecasts made by Metro, and those demand forecasts have not been altered by the changes made within the MPAP project. Further, the MPAP increases capacity for residential development in the plan area, and the overall enrollment capacity of the public school district was considered. In meetings with Portland Public Schools, district staff identified possible current and future capacity and/or transportation impacts in some schools within the local cluster, however overall PPS has physical capacity within the district for additional student enrollment. Therefore, the MPAP complies with this policy.

**Policy 8.114. Facilities Planning.** Facilitate coordinated planning among school districts and City bureaus, including Portland Parks and Recreation, to accommodate school site/facility needs in response to most up-to-date growth forecasts.

**Policy 8.115. Co-location.** Encourage public school districts, Multnomah County, the City of Portland, and other providers to co-locate facilities and programs in ways that optimize service provision and intergenerational and intercultural use.

**Policy 8.116. Community use.** Encourage public use of public school grounds for community purposes while meeting educational and student safety needs and balancing impacts on surrounding neighborhoods.

**Policy 8.117. Recreational use.** Encourage publicly-available recreational amenities (e.g. athletic fields, green spaces, community gardens, and playgrounds) on public school grounds for public recreational use, particularly in neighborhoods with limited access to parks.

**Policy 8.118. Schools as emergency aid centers.** Encourage the use of seismically-safe school facilities as gathering and aid-distribution locations during natural disasters and other emergencies.

**Policy 8.119. Facility adaptability.** Ensure that public schools may be upgraded to flexibly accommodate multiple community-serving uses and adapt to changes in educational approaches, technology, and student needs over time.

**Policy 8.120. Leverage public investment.** Encourage City public facility investments that complement and leverage local public school districts' major capital investments.

**Policy 8.121. School access.** Encourage public school districts to consider the ability of students to safely walk and bike to school when making decisions about the site locations and attendance boundaries of schools.

**Policy 8.122. Private institutions.** Encourage collaboration with private schools and educational institutions to support community and recreational use of their facilities.

**305. Finding:** The City Council interprets policies 8.114 through 8.122 to address school facilities and school sites. The MPAP amendments change zoning designations, and broaden the locations where school facilities can locate. These policies are generally not applicable to the MPAP, but the plan is not inconsistent with these policies.

### **Technology and communications**

**Policy 8.123. Technology and communication systems.** Maintain and enhance the City’s technology and communication facilities to ensure public safety, facilitate access to information, and maintain City operations.

**Policy 8.124. Equity, capacity, and reliability.** Encourage plans and investments in technology and communication infrastructure to ensure access in all areas of the city, reduce disparities in capacity, and affordability, and to provide innovative high-performance, reliable service for Portland’s residents and businesses.

**306. Finding:** The City Council interprets policies 8.123 and 8.124 to address the provision technology and communication services. Therefore, these policies do not apply.

### **Energy infrastructure**

**Policy 8.125. Energy efficiency.** Promote efficient and sustainable production and use of energy resources by residents and businesses, including low-carbon renewable energy sources, district energy systems, and distributed generation, through land use plans, zoning, and other legislative land use decisions.

**Policy 8.126. Coordination.** Coordinate with energy providers to encourage investments that ensure reliable, equitable, efficient, and affordable energy for Portland residents and businesses.

**307. Finding:** The MPAP amendments do not amend the sections of the zoning code that regulate the production of energy or other types of energy infrastructure and do not affect coordination efforts. Therefore, these policies do not apply.

## Chapter 9 Transportation

**GOAL 9.A: Safety.** Transportation safety impacts the livability of a city and the comfort and security of those using City streets. Comprehensive efforts to improve transportation safety through engineering, education, enforcement and evaluation will be used to eliminate traffic-related fatalities and serious injuries from Portland’s transportation system.

**Goal 9.B: Multiple goals.** Portland’s transportation system is funded and maintained to achieve multiple goals and measurable outcomes for people and the environment. The transportation system is safe, complete, interconnected, multimodal, and fulfills daily needs for people and businesses.

**GOAL 9.C: Great places.** Portland’s transportation system enhances quality of life for all Portlanders, reinforces existing neighborhoods and great places, and helps make new great places in town centers, neighborhood centers and corridors, and civic corridors.

**GOAL 9.D: Environmentally sustainable.** The transportation system increasingly uses active transportation, renewable energy, or electricity from renewable sources, achieves adopted carbon reduction targets, and reduces air pollution, water pollution, noise, and Portlanders’ reliance on private vehicles.

**GOAL 9.E: Equitable transportation.** The transportation system provides all Portlanders options to move about the city and meet their daily needs by using a variety of safe, efficient, convenient, and affordable modes of transportation. Transportation investments are responsive to the distinct needs of each community.

**GOAL 9.F: Positive health outcomes.** The transportation system promotes positive health outcomes and minimizes negative impacts for all Portlanders by supporting active transportation, physical activity, and community and individual health.

**GOAL 9.G: Opportunities for prosperity.** The transportation system supports a strong and diverse economy, enhances the competitiveness of the city and region, and maintains Portland’s role as a West Coast trade gateway and freight hub by providing efficient and reliable goods movement, multimodal access to employment areas and educational institutions, as well as enhanced freight access to industrial areas and intermodal freight facilities. The transportation system helps people and businesses reduce spending and keep money in the local economy by providing affordable alternatives to driving.

**GOAL 9.H. Cost Effectiveness.** The City analyzes and prioritizes capital and operating investments to cost effectively achieve the above goals while responsibly managing and protecting our past investments in existing assets.

**GOAL 9.I. Airport Futures.** Promote a sustainable airport (Portland International Airport [PDX]) by meeting the region’s air transportation needs without compromising livability and quality of life for future generations.

**308. Finding:** The goals and the policies of Chapter 9 address transportation improvements, programming, funding priorities and maintenance of the city’s transportation system.

Goal 9.A concerns safety. The MPAP promotes this goal by including recommendations for a number of pedestrian, bicycle, and traffic circulation safety improvements in the area, as well as specific project improvements to minimize conflicts between modes. Of particular concern in the MPAP area is the NW Vaughn Street corridor. The MPAP recommends prioritized short-term improvements to NW Vaughn Street, including pedestrian and bicycle crossing improvements and

the recommendation of further study and improvements to the corridor itself (Volume 3, page 72).

Goal 9.B speaks to how the performance of the transportation system is measured and is operationalized by the System Management policies of this chapter (9.45-9.51). The findings in response to those policies address this. Goal 9.C addresses Designing and Planning, as well as Land Use, Development, and Placemaking and Streets as Public Spaces (policies 9.1; 9.11-9.16). The findings in response to those policies address this.

Goal 9.D relates to promoting more sustainable transportation modes and reducing the impact of automobile travel. The findings in response to Policy 9.5 address this. Additionally, the MPAP recommendation to implement the extension of high-capacity streetcar transit to the area is supportive of this goal, by utilizing 100% renewable energy.

Goal 9.E addresses the distribution of transportation options, investments, and benefits. The MPAP responds to this goal by providing recommendations to improve outcomes in the MPAP area, which is an area that has many gaps in urban infrastructure. Project recommendations in the MPAP will provide a variety of safe, efficient, convenient, and affordable modes of transportation, while responding to the distinct needs of the community. The MPAP planning process also included an emphasis on equitable engagement with underserved community members. This is described in the engagement section of the plan (Volume 1, pages 10-14).

Goal 9.F encourages consideration of health outcomes. The MPAP promotes positive health outcomes by recommending transportation improvements that support active transportation, physical activity, and community and individual health, as well as multimodal access to health services in Northwest Portland, the Central City, and along the broader regional transit network.

Goal 9.G addresses prosperity. The MPAP furthers this goal by incorporating employment focus to support jobs in the area, as well as the creation of affordable commercial space and middle-wage job targets through a Public Benefits Agreement (Volume 1, page 77). Transportation recommendations in the MPAP support efficient and reliable goods movement, multimodal access to employment areas and educational institutions, and enhanced freight movement and access to the industrial areas north and east of the MPAP area. The plan also provides multimodal alternatives to driving within, to, from, and through the area.

Goal 9.H concerns cost effectiveness of capital and operating investments and asset management. The MPAP responds to this goal by organizing infrastructure recommendations so investments are made as development occurs in the area. Additionally, the MPAP recommendations work to cost effectively achieve the above goals by combining asset management needs and infrastructure improvements to minimize local costs and leverage a major capital transit investment that will qualify for major federal funding.

Goal 9.I concerns the Portland International Airport (PDX) and is therefore not applicable.

Therefore, the MPAP complies with the goals and policies of Chapter 9.

## **Designing and planning**

**Policy 9.1. Street design classifications.** Maintain and implement street design classifications consistent with land use plans, environmental context, urban design pattern areas, and the Neighborhood Corridor and Civic Corridor Urban Design Framework designations.

**Policy 9.2. Street policy classifications.** Maintain and implement street policy classifications for

pedestrian, bicycle, transit, freight, emergency vehicle, and automotive movement, while considering access for all modes, connectivity, adjacent planned land uses, and state and regional requirements.

**9.2.a.** Designate district classifications that emphasize freight mobility and access in industrial and employment areas serving high levels of truck traffic and to accommodate the needs of intermodal freight movement.

**9.2.b.** Designate district classifications that give priority to pedestrian access in areas where high levels of pedestrian activity exist or are planned, including the Central City, Gateway regional center, town centers, neighborhood centers, and transit station areas.

**9.2.c.** Designate district classifications that give priority to bicycle access and mobility in areas where high levels of bicycle activity exist or are planned, including Downtown, the River District, Lloyd District, Gateway Regional Center, town centers, neighborhood centers, and transit station areas.

**Policy 9.3. Transportation System Plan.** Maintain and implement the Transportation System Plan (TSP) as the decision-making tool for transportation-related projects, policies, programs, and street design.

**Policy 9.4. Use of classifications.** Plan, develop, implement, and manage the transportation system in accordance with street design and policy classifications outlined in the Transportation System Plan.

**9.4.a.** Classification descriptions are used to describe how streets should function for each mode of travel, not necessarily how they are functioning at present.

**309. Finding:** Policies 9.1 through 9.4 provide direction regarding transportation system classifications and the Transportation System Plan. The MPAP is consistent with these policies because it includes a comprehensive complementary transportation concept (Volume 1 page 63) that is consistent with the land use concept and urban design concept in the MPAP (see Volume 1). Street functions and design categories are related to the abutting land uses, and recommended zoning code amendments also include standards that apply on specific types of streets (in particular the Neighborhood Main Street designation along the streetcar alignment on NW Wilson Street). The MPAP includes recommendations to amend street design classifications within the area to better align with recommended land use changes and the transportation concept (Volume 3 pages 90-103). Modal street policy classifications are also recommended for amendments to support multimodal movement. In particular, attention has been paid to the movement of freight along NW Nicolai Street adjacent to the preserved Industrial District to be consistent with Policy 9.2.a, while pedestrian and bicycle circulation have also been prioritized within the MPAP area to be consistent with the Town Center designation and Policies 9.2.b and 9.2.c (volume 3 pages 90-103). Therefore, the MPAP complies with these policies.

**Policy 9.5. Mode share goals and Vehicle Miles Travelled (VMT) reduction.** Increase the share of trips made using active and low-carbon transportation modes. Reduce VMT to achieve targets set in the most current Climate Action Plan and Transportation System Plan and meet or exceed Metro's mode share and VMT targets.

**310. Finding:** Council interprets this policy to mean reducing the share of single occupant motor vehicle trips through actions, investments, and plans that either encourage use of other modes or discourage the use of single occupant vehicles. Specific goals for mode share are stated in policy 9.49. The MPAP includes several elements that work to reduce VMT and support low-carbon transportation modes (walking, rolling, biking, and high capacity transit).

- The MPAP increases development density potential within the MPAP area, increasing the potential residential and employee customer base for a wider range of commercial services to exist within the district. This helps people to meet their daily needs without a personal automobile. See Volume 2 of the plan for details.
- The MPAP supports VMT reduction by promoting increased transit ridership through the recommended investment in low-carbon, high-capacity streetcar transit to the area with a recommended multimodal transit hub at its terminus. This streetcar extension will connect transit users to the broader citywide and regional transit network (see Volume 3, pages 52 and 84).
- The MPAP recommends several pedestrian, bicycle, and local circulation improvements, including improvements to the local street grid within the district, dedicated bicycle facilities connecting to the city bicycle network, and the application of a Pedestrian District to the area which will support high volumes of pedestrian usage through required sidewalk widths and supportive frontage improvements (Volume 3, pages 56-85).
- The MPAP recommends the implementation of Transportation Demand Management (TDM) requirements for commercial/mixed use zones to the area, to promote VMT reduction and the use of active/low-carbon transportation modes. See Volume 2 of the plan for details.
- The MPAP also recommends the exploration of pilot projects to encourage walking, rolling, biking, and transit use in the area. See Volume 3, page 111.

Therefore, the amendments comply with this policy.

**Policy 9.6. Transportation strategy for people movement.** Implement a prioritization of modes for people movement by making transportation system decisions per the following ordered list:

1. Walking
2. Bicycling
3. Transit
4. Fleets of electric, fully automated, multiple passenger vehicles
5. Other shared vehicles
6. Low or no occupancy vehicles, fossil-fueled non-transit vehicles

When implementing this prioritization ensure that:

- The needs and safety of each group of users are considered, and changes do not make existing conditions worse for the most vulnerable users higher on the ordered list.
- All users' needs are balanced with the intent of optimizing the right of way for multiple modes on the same street.
- When necessary to ensure safety, accommodate some users on parallel streets as part of multi-street corridors.
- Land use and system plans, network functionality for all modes, other street functions, and complete street policies, are maintained.
- Policy-based rationale is provided if modes lower in the ordered list are prioritized.

**311. Finding:** The MPAP complies with Policy 9.6 because it implements the prioritization of modes as ordered in the policy’s list of user modes. The plan prioritizes multiple improvements for pedestrian, bicycle, and transit access and circulation (Volume 3, pages 52-85) to ensure that conditions are improved for the most vulnerable users. The plan also considers the needs and safety of each group of users within its recommendations, as all users’ needs are balanced through clear interventions to optimize the right-of-way for multiple modes on the same street; this approach supports reductions in modal conflicts and improved safety for all users, while maintaining network functionality for all modes including other street functions through complete streets policies implementation. Utilization of parallel streets for low-stress pedestrian and bicycle movement is also provided, through extensions of Neighborhood Greenways in the project area.

**Policy 9.7. Moving goods and delivering services.** In tandem with people movement, maintain efficient and reliable movement of goods and services as a critical transportation system function. Prioritize freight system reliability improvements over single-occupancy vehicle mobility where there are solutions that distinctly address those different needs.

**312. Finding:** Policy 9.7 supplements policies 9.30 through 9.36 below, related to freight movement. Those findings apply to this policy and are incorporated by reference. Freight system reliability is maintained through modal street classifications and design classifications supporting local, city, and regional freight mobility to and from the adjacent Freight District north/east of the Montgomery Park Area (Volume 3, pages 96 and 100). Therefore, the MPAP complies with this policy.

**Policy 9.8. Affordability.** Improve and maintain the transportation system to increase access to convenient and affordable transportation options for all Portlanders, especially those who have traditionally been under-served or under-represented or have historically borne unequal burdens.

**313. Finding:** The MPAP complies with Policy 9.8 by increasing access to active transportation options and transit for residents, employees, and visitors in the area through transportation system improvements that prioritize vulnerable road users and affordable, low-carbon modes of transportation (see Policy 9.6 findings above).

**Policy 9.9. Accessible and age-friendly transportation system.** Ensure that transportation facilities are accessible to people of all ages and abilities, and that all improvements to the transportation system (traffic, transit, bicycle, and pedestrian) in the public right-of-way comply with the Americans with Disabilities Act of 1990. Improve and adapt the transportation system to better meet the needs of the most vulnerable users, including the young, older adults, and people with different abilities.

**314. Finding:** The MPAP is consistent with Policy 9.9 by improving multimodal transportation facilities in the area, with focus on an all-ages-and-abilities active transportation network. All recommended improvements for users will comply with the Americans with Disabilities Act of 1990, and improvements will meet the needs of vulnerable road users by being consistent with Policy 9.6 (see above). Improvements include increased comfort and accessibility through complete streets designs, as well as through the utilization of parallel routes for low-stress pedestrian, mobility device, and bicycle travel route options. Therefore, the MPAP complies with these policies.

**Policy 9.10. Geographic policies.** Adopt geographically specific policies in the Transportation System Plan to ensure that transportation infrastructure reflects the unique topography, historic character, natural features, system gaps, economic needs, demographics, and land uses of each area. Use the

Pattern Areas identified in Chapter 3: Urban Form as the basis for area policies.

**315. Finding:** The City’s Transportation System Plan includes geographic-specific policies related to the City’s pattern areas, per Chapter 3 (see above). The MPAP is consistent with Policy 9.10 because it provides further geographically-specific transportation context and priorities for the Town Center area that consider the plan’s objectives related to transportation, land use, development, and placemaking. Therefore, the MPAP complies with these policies.

### **Land use, development, and placemaking**

**Policy 9.11. Land use and transportation coordination.** Implement the Comprehensive Plan Map and the Urban Design Framework through coordinated long-range transportation and land use planning. Ensure that street policy and design classifications and land uses complement one another.

**Policy 9.12. Growth strategy.** Use street design and policy classifications to support Goals 3A-3G in Chapter 3: Urban Form. Consider the different design contexts and transportation functions in Town Centers, Neighborhood Centers, Neighborhood Corridors, Employment Areas, Freight Corridors, Civic Corridors, Transit Station Areas, and Greenways.

**Policy 9.13. Development and street design.** Evaluate adjacent land uses to help inform street classifications in framing, shaping, and activating the public space of streets. Guide development and land use to create the kinds of places and street environments intended for different types of streets.

**316. Finding:** Policies 9.11 through 9.13 emphasize linkages between land use and transportation plans, both at the citywide scale of urban form and at the site and street level. The MPAP is consistent with these policies because it emphasizes linkages between long-range transportation and land use planning through the focus on transit-oriented development that expands a Comprehensive Plan Town Center designation to the MPAP area while implementing the Urban Design Framework, centered around the RTP’s and TSP’s plans to extend high-capacity streetcar transit to the area. Through intentional focus on linkages between street functions and abutting land uses, the MPAP ensures that street policy, design classifications, and land uses complement one another (see Chapter 3 above, Policy 9.4 findings above, Volume 1 page 44, Volume 1 page 55, Volume 1 page 61, and Volume 3 pages 90-103). Further, the MPAP includes recommendations that link land use and transportation planning together through specific requirements along the transit alignment and the Neighborhood Main Street designation on NW Wilson Street within the Town Center (see Volume 2). This designation will also support activation of the public space of the street, while its design classification will ensure supportive corridor widths and street design that invite public uses (see Volume 3). Therefore, MPAP complies with these policies.

### **Streets as public spaces**

**Policy 9.14. Streets for transportation and public spaces.** Integrate both placemaking and transportation functions when designing and managing streets by encouraging design, development, and operation of streets to enhance opportunities for them to serve as places for community interaction, environmental function, open space, tree canopy, recreation, and other community purposes.

**317. Finding:** Policy 9.14 addresses placemaking and transportation function integration to support and enhance opportunities for streets as public spaces. Consistent with this policy, the MPAP includes recommended street designs and TSP Street Design classifications updates that will guide the

design of future street improvements to support integrated public space and transportation functions. In particular, sidewalk corridor width requirements within the recommended Pedestrian District covering the MPAP Area and along the Neighborhood Main Street of NW Wilson Street will support active frontage uses, larger street trees, onsite stormwater remediation, and the integration of pedestrian movement, lingering, and gathering. Therefore, the MPAP complies with this policy.

**Policy 9.15. Repurposing street space.** Encourage repurposing street segments that are not critical for transportation connectivity to other community purposes.

**Policy 9.16. Design with nature.** Promote street alignments and designs that respond to topography and natural features, when feasible, and protect streams, wildlife habitat, and native trees.

**318. Finding:** Policies 9.15 and 9.16 relate to the repurposing of non-critical street segments to other community purposes and the integration of natural features. While all recommended segments in the MPAP are critical for transportation connectivity and trip dispersion in the area and thus do not qualify for repurposing, Neighborhood Greenway extensions in the area (see Volume 3 pages 68 and 76) combined with future street connections recommended in the proposed Master Street Plan (Volume 3 pages 88-89) provide flexibility for future street improvements to accommodate both community activity and natural features if feasible. Therefore, the MPAP complies with these policies.

### Modal policies

**Policy 9.17. Pedestrian transportation.** Encourage walking as the most attractive mode of transportation for most short trips, within and to centers, corridors, and major destinations, and as a means for accessing transit.

**Policy 9.18. Pedestrian networks.** Create more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment.

**Policy 9.19. Pedestrian safety and accessibility.** Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities.

**319. Finding:** Policies 9.17 through 9.19 address the encouragement of walking and rolling through network completion and safety, accessibility, and convenience improvements to the pedestrian network. The MPAP is consistent with these policies because it helps make walking and rolling more attractive for short trips by recommending a range of pedestrian access and capacity improvements, in conjunction with land use amendments to allow for dense, mixed-use development supportive of destinations within walking distance of plan area residents, workers, and visitors. The Plan's recommended transportation projects include a focus on improving safety, comfort, and accessibility for pedestrians to, from, and within the district through crossing and corridor improvements, as well as improved and widened sidewalk corridors along and adjacent to the proposed streetcar extension (Volume 3, pages 28-29, 54-85). The MPAP also recommends the extension of a Pedestrian District to the MPAP area in the TSP to support pedestrian prioritization and community activity (Volume 3, pages 90-91). Improvements will comply with the American with Disabilities Act of 1990, and the plan's recommendations will provide low-stress pedestrian network options for users of all ages and abilities. Therefore, the MPAP complies with these policies.

**Policy 9.20. Bicycle transportation.** Create conditions that make bicycling more attractive than driving for most trips of approximately three miles or less.

**Policy 9.21. Accessible bicycle system.** Create a bicycle transportation system that is safe, comfortable, and accessible to people of all ages and abilities.

**320. Finding:** Policies 9.20 and 9.21 address bicycle transportation modal policies that encourage bicycling for trips of approximately three miles or less, with focus on a safe, comfortable, and accessible all-ages-and-abilities network. The MPAP is consistent with these policies because it recommends a range of improvements to the area’s bicycle network, in conjunction with land use amendments to allow for more neighborhood businesses within a short bicycle ride for area residents, workers, and visitors. Consistent with these policies, the MPAP’s recommended transportation projects include enhanced bicycle facilities within the area through separated facilities along the streetcar alignment and extensions of Neighborhood Greenways through the area. Additionally, plan recommendations include the connection of the bicycle network to the broader Northwest District and its destinations, the Central City and its services, and the rest of the city’s bicycle network (Volume 3, pages 30-31, 54-85). Designs and options will support low-stress, comfortable, safe, and accessible options for people of all ages and abilities. Therefore, MPAP complies with these policies.

**Policy 9.22. Public transportation.** Coordinate with public transit agencies to create conditions that make transit the preferred mode of travel for trips that are longer than 3 miles or shorter trips not made by walking or bicycling.

**9.22.a** Consider and incorporate transit priority treatments, such as those in The Enhanced Transit Corridors Plan, to improve transit speed and reliability during the planning and design phase of capital projects and permitted projects along streets served by transit lines.

**Policy 9.23. Transportation to job centers.** Promote and enhance transit to be more convenient and economical than the automobile for people travelling more than three miles to and from the Central City and Gateway. Enhance regional access to the Central City and access from Portland to other regional job centers.

**Policy 9.24. Transit service.** In partnership with TriMet, develop a public transportation system that conveniently, safely, comfortably, and equitably serves residents and workers 24 hours a day, 7 days a week.

**Policy 9.25. Transit equity.** In partnership with TriMet, maintain and expand high-quality frequent transit service to all Town Centers, Civic Corridors, Neighborhood Centers, Neighborhood Corridors, and other major concentrations of employment, and improve service to areas with high concentrations of poverty and historically under-served and under-represented communities.

**9.25.a.** Support a public transit system and regional transportation that address the transportation needs of historically marginalized communities and provide increased mobility options and access.

**Policy 9.26. Transit funding.** Consider funding strategies and partnership opportunities that improve access to and equity in transit service, such as raising Metro-wide funding to improve service and decrease user fees/fares.

**Policy 9.27. Transit service to centers and corridors.** Use transit investments to shape the city’s growth and increase transit use. In partnership with TriMet and Metro, maintain, expand, and enhance Portland Streetcar, frequent service bus, and high-capacity transit, to better serve centers and corridors with the highest intensity of potential employment and household growth.

**9.27.a.** Locate major park-and-ride lots only where transit ridership is increased significantly, vehicle miles traveled are reduced, transit-supportive development is not hampered, bus service is not available or is inadequate, and the surrounding area is not negatively impacted.

**321. Finding:** Policies 9.22 through 9.27 address transit modal policies that encourage transit as the preferred mode for trips that are longer than 3 miles or for shorter trips as an alternative to walking or biking. The MPAP encourages transit use by centralizing its recommendations around a proposed extension of high-capacity streetcar transit to the Montgomery Park Area that connects to the Central City and to broader regional destinations on the regional transit network. The recommended streetcar extension project is part of the planned regional high-capacity transit system, as outlined in Metro’s High Capacity Transit Strategy (which is part of the Regional Transportation Plan). The preferred transit alignment is also consistent with Policy 9.27 because it focuses transit service along a Neighborhood Main Street with high transit priority in TSP policy, within the recommended expansion of the Northwest Town Center. Therefore, the MPAP complies with these policies.

**Policy 9.28. Intercity passenger service.** Coordinate planning and project development to expand intercity passenger transportation services in the Willamette Valley, and from Portland to Seattle and Vancouver, BC.

**322. Finding:** Policy 9.28 addresses intercity passenger transportation. The MPAP does not impact this subject. Therefore, this policy is not applicable.

**Policy 9.29. Regional trafficways and transitways.** Maintain capacity of regional transitways and existing regional trafficways to accommodate through-traffic.

**323. Finding:** Policy 9.29 addresses regional trafficways and transitways. US-30 through the MPAP area is a Regional trafficway and transitway. As described in the findings for Statewide Planning Goal 12 (see above), traffic modeling analysis was completed, and the results show that U-30 maintains acceptable levels of mobility with the MPAP zoning changes including US-30 freeway offramp queues. Therefore, the MPAP complies with this policy.

**Policy 9.30. Multimodal goods movement.** Develop, maintain, and enhance a multimodal freight transportation system for the safe, reliable, sustainable, and efficient movement of goods within and through the city.

**Policy 9.31. Economic development and industrial lands.** Ensure that the transportation system supports traded sector economic development plans and full utilization of prime industrial land, including brownfield redevelopment.

**Policy 9.32. Multimodal system and hub.** Maintain Portland’s role as a multimodal hub for global and regional movement of goods. Enhance Portland’s network of multimodal freight corridors.

**Policy 9.33. Freight network.** Develop, manage, and maintain a safe, efficient, and reliable freight street network to provide freight access to and from intermodal freight facilities, industrial and commercial districts, and the regional transportation system. Invest to accommodate forecasted growth of interregional freight volumes and provide access to truck, marine, rail, and air transportation systems. Ensure designated routes and facilities are adequate for over-dimensional trucks and emergency equipment.

**Policy 9.34. Sustainable freight system.** Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on- and off-street loading

spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

**Policy 9.35. Freight rail network.** Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network.

**Policy 9.36. Portland Harbor.** Coordinate with the Port of Portland, private stakeholders, and regional partners to improve and maintain access to marine terminals and related river dependent uses in Portland Harbor.

**9.36.a.** Support continued reinvestment in, and modernization of, marine terminals in Portland Harbor.

**9.36.b.** Facilitate continued maintenance of the shipping channels in Portland Harbor and the Columbia River.

**9.36.c.** Support more long-distance, high-volume movement of goods to river and oceangoing ships and rail.

**324. Finding:** Policies 9.30 through 9.36 direct the City to develop, maintain, and enhance a multimodal freight transportation system. MPAP plan recommendations support freight movement and access to adjacent industrial lands, including the Guild’s Lake Industrial Sanctuary preserved lands north of NW Nicolai Street and east of US-30, including nearby rail terminals and port land. Street classifications updates emphasize both local freight/delivery access and citywide/regional freight movement by maintaining an Industrial District that overlaps the Guild’s Lake Industrial Sanctuary’s recommended boundary changes (and thus directing supportive street design to support truck movement/access), while continuing to prioritize NW Nicolai Street and US-30 as freight routes (Volume 3, pages 100-101). The MPAP recommends changing the Street Design classification of NW Nicolai Street to an Industrial Road to ensure future street design is supportive of adjacent industrial land uses (Volume 3, pages 96-97). The MPAP ensures that goods can be delivered to the MPAP area, while reducing environmental and neighborhood impacts within the plan area and the rest of the mixed use areas of the Northwest District. Therefore, the MPAP complies with these policies.

**Policy 9.37. Portland Heliport.** Maintain Portland’s Heliport functionality in the Central City.

**325. Finding:** Policy 9.37 concerns a Central City Heliport which is not in the MPAP geography. Therefore, this policy does not apply.

**Policy 9.38. Automobile transportation.** Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

**Policy 9.39. Automobile efficiency.** Coordinate land use and transportation plans and programs with other public and private stakeholders to encourage vehicle technology innovation, shifts toward electric and other cleaner, more energy-efficient vehicles and fuels, integration of smart vehicle technology with intelligent transportation systems, and greater use of options such as car-share, carpool, and taxi.

**326. Finding:** Policies 9.38 and 9.39 address automobile transportation. As described in findings for Statewide Planning Goal 12 (see above), traffic modeling analysis was completed, and the results show that the MPAP maintains acceptable levels of mobility and access for private automobiles within the plan area. Any broader impacts are remedied through the TSP projects and MPAP projects recommended in the response findings to that goal. Additionally, the MPAP includes

several elements that work to reduce Vehicle Miles Travelled (VMT), as described in the findings for Policy 9.5 (see above). Consistent with Policy 9.39, the MPAP recommends the development of a multimodal transportation hub at the transit terminus station for the recommended streetcar extension, to connect transit to other options including car-share, taxi, e-bikes, etc. (Volume 3, pages 84-85). Therefore, the MPAP complies with these policies.

**Policy 9.40. Emergency response.** Maintain a network of accessible emergency response streets to facilitate safe and expedient emergency response and evacuation. Ensure that police, fire, ambulance, and other emergency providers can reach their destinations in a timely fashion, without negatively impacting traffic calming and other measures intended to reduce crashes and improve safety.

**327. Findings:** Policy 9.40 directs the City to maintain an accessible network of emergency response routes. This network is identified through street functional classifications in the TSP. The MPAP recommends updates to the TSP Emergency Response Classifications in and near the MPAP, in order to ensure that timely emergency responses are possible (Volume 3, pages 102-103). To avoid modal conflicts and to support improved safety in the area, a key recommendation is the prioritization of NW 25<sup>th</sup> Avenue for emergency access into the MPAP area; MPAP recommendations focus access and loading for vehicles, freight, and emergency to NW 25<sup>th</sup> Avenue to avoid conflicts with other modes, including pedestrians and bicycles on parallel Neighborhood Greenways in the area. Local emergency access will still be facilitated on all area streets. Therefore, the MPAP complies with this policy.

## Airport Futures

**Policy 9.41. Portland International Airport.** Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy.

**Policy 9.42. Airport regulations.** Implement the Airport Futures Plan through the implementation of the Portland International Airport Plan District.

**9.42.a.** Prohibit the development of a potential third parallel runway at PDX unless need for its construction is established through a transparent, thorough, and regional planning process.

**9.42.b.** Support implementation of the Aircraft Landing Zone to provide safer operating conditions for aircraft in the vicinity of Portland International Airport by limiting the height of structures, vegetation, and construction equipment.

**9.42.c.** Support the Port of Portland's Wildlife Hazard Management Plan by implementing airport-specific landscaping requirements in the Portland International Airport Plan District to reduce conflicts between wildlife and aircraft.

**Policy 9.43. Airport partnerships.** Partner with the Port of Portland and the regional community to address the critical interconnection between economic development, environmental stewardship, and social responsibility. Support an ongoing public advisory committee for PDX to:

**9.43.a.** Support meaningful and collaborative public dialogue and engagement on airport related planning and development.

**9.43.b.** Provide an opportunity for the community to inform the decision-making related to the airport of the Port, the City of Portland, and other jurisdictions/organizations in the region.

**9.43.c.** Raise public knowledge about PDX and impacted communities.

**Policy 9.44. Airport investments.** Ensure that new development and redevelopment of airport facilities supports the City’s and the Port’s sustainability goals and policies, and is in accordance with Figure 9-3 — Portland International Airport. Allow the Port flexibility in configuring airport facilities to preserve future development options, minimize environmental impacts, use land resources efficiently, maximize operational efficiency, ensure development can be effectively phased, and address Federal Aviation Administration’s airport design criteria.

**328. Finding:** Policies 9.41 through 9.44 provide policy direction related to Portland International Airport. The MPAP amendments do not change the Portland International Airport Plan District or have any impact on airport facilities. Therefore, these policies do not apply.

### **System management**

**Policy 9.45. System Management.** Give preference to transportation improvements that use existing roadway capacity efficiently and that improve the safety of the system for all users.

**9.45.a.** Support regional equity measures for transportation system evaluation.

**Policy 9.46. Traffic management.** Evaluate and encourage traffic speed and volume to be consistent with street classifications and desired land uses to improve safety, preserve and enhance neighborhood livability, and meet system goals of calming vehicle traffic through a combination of enforcement, engineering, and education efforts.

**9.46.a.** Use traffic calming tools, traffic diversion and other available tools and methods to create and maintain sufficiently low automotive volumes and speeds on neighborhood greenways to ensure comfortable cycling environment on the street.

**329. Finding:** Policies 9.45 and 9.46 address operations and evaluation of the transportation system and not planning and development. These policies do not apply.

**Policy 9.47. Connectivity.** Establish an interconnected, multimodal transportation system to serve centers and other significant locations. Promote a logical, direct, and connected street system through street spacing guidelines and district-specific street plans found in the Transportation System Plan, and prioritize access to specific places by certain modes in accordance with policies 9.6 and 9.7.

**9.47.a.** Develop conceptual master street plans for areas of the City that have significant amounts of vacant or underdeveloped land and where the street network does not meet City and Metro connectivity guidelines.

**9.47.b.** As areas with adopted Street Plans develop, provide connectivity for all modes by developing the streets and accessways as shown on the Master Street Plan Maps in the Comprehensive Plan.

**9.47.c.** Continue to provide connectivity in areas with adopted Street Plans for all modes of travel by developing public and private streets as shown on the Master Street Plan Maps in the Comprehensive Plan.

**9.47.d.** Provide street connections with spacing of no more than 530 feet between connections except where prevented by barriers such as topography, railroads, freeways, or environmental constraints. Where streets must cross over protected water features, provide crossings at an average spacing of 800 to 1000 feet, unless exceptional habitat quality of length of crossing prevents a full street connection.

**9.47.e** Provide bike and pedestrian connections at approximately 330 feet intervals on public

easements or rights-of-way when full street connections are not possible, except where prevented by barriers such as topography, railroads, freeways, or environmental constraints. Bike and pedestrian connections that cross protected water features should have an average spacing of no more than 530 feet, unless exceptional habitat quality or length of connection prevents a connection.

**330. Finding:** Policy 9.47 promotes a well-connected multimodal street grid. The MPAP is consistent with this policy because it recommends a Master Street Plan be adopted as part of the next TSP update for MPAP area to meet City street connectivity requirements as the area redevelops (Volume 3, pages 88-89). The MPAP also recommends several multimodal transportation improvements including new street connections as project recommendations that meet the policy’s standards (Volume 3, pages 54-69). Therefore, MPAP complies with this policy.

**Policy 9.48 Technology.** Encourage the use of emerging vehicle and parking technology to improve real-time management of the transportation network and to manage and allocate parking supply and demand.

**Policy 9.49 Performance measures.** Establish multimodal performance measures and measures of system completeness to evaluate and monitor the adequacy of transportation services based on performance measures in goals 9.A. through 9.I. Use these measures to evaluate overall system performance, inform corridor and area-specific plans and investments, identify project and program needs, evaluate and prioritize investments, and regulate development, institutional campus growth, zone changes, Comprehensive Plan Map amendments, and conditional uses.

**9.49.a.** Eliminate deaths and serious injuries for all who share Portland streets by 2025.

**9.49.b.** Maintain or decrease the number of peak period non-freight motor vehicle trips, system-wide and within each mobility corridor to reduce or manage congestion.

**9.49.c.** By 2035, reduce the number of miles Portlanders travel by car to 11 miles per day or less, on average.

**9.49.d.** Establish mode split targets in 2040 Growth Concept areas within the City, consistent with Metro’s targets for these areas.

**9.49.e.** By 2035, increase the mode share of daily non-drive alone trips to 70 percent citywide, and to the following in the five pattern areas:

Pattern Area	2035 daily target mode share
Central City	85%
Inner Neighborhoods	70%
Western Neighborhoods	65%
Eastern Neighborhoods	65%
Industrial and River	55%

**9.49.f.** By 2035, 70 percent of commuters walk, bike, take transit, carpool, or work from home at approximately the following rates:

Mode	Mode Share
Walk	7.5%
Bicycle	25%
Transit	25%
Carpool	12.5%
Single Occupant Vehicle (SOV)	30% or less
Work at home	10% below the line (calculated outside of the modal targets above)

**9.49.g.** By 2035, reduce Portland’s transportation-related carbon emissions to 50% below 1990 levels, at approximately 934,000 metric tons.

**9.49.h.** By 2025, increase the percentage of new mixed use zone building households not owning an automobile from approximately 13% (2014) to 25%, and reduce the percentage of households owning two automobiles from approximately 24% to 10%.

**9.49.i.** Develop and use alternatives to the level-of-service measure to improve safety, encourage multimodal transportation, and to evaluate and mitigate maintenance and new trip impacts from new development.

**9.49.j.** Use level-of-service, consistent with Table 9.1, as one measure to evaluate the adequacy of transportation facilities in the vicinity of sites subject to land use review:

LOS	Traffic Flow Characteristics
A	Virtually free flow; completely unimpeded
B	Stable flow with slight delays; reasonably unimpeded
C	Stable flow with delays; less freedom to maneuver
D	High density, but stable flow
E	Operating conditions at or near capacity; unstable flow
F	Forced flow; breakdown conditions
Greater than F	Demand exceeds roadway capacity, limiting volume that can be carried and forcing excess demand onto parallel routes and extending the peak period

**9.49.k.** Maintain acceptable levels of performance on state facilities and the regional arterial and throughway network, consistent with the interim standard in Table 9.2, in the development and adoption of, and amendments to, the Transportation System Plan and in legislative amendments to the Comprehensive Plan Map.

**9.49.l.** In areas identified by Metro that exceed the level-of-service in Table 9.2 and are planned to, but do not currently meet the alternative performance criteria, establish an action plan that does the following:

- Anticipates growth and future impacts of motor vehicle traffic on multimodal travel in the area
- Establishes strategies for mitigating the future impacts of motor vehicles
- Establishes performance standards for monitoring and implementing the action plan.

**9.49.m.** Develop performance measures to track progress in creating and maintaining the transportation system.

**Policy 9.50 Regional congestion management.** Coordinate with Metro to establish new regional multimodal mobility standards that prioritize transit, freight, and system completeness.

**9.50.a.** Create a regional congestion management approach, including a market-based system, to price or charge for auto trips and parking, better account for the cost of auto trips, and to more efficiently manage the regional system.

**Policy 9.51. Multimodal Mixed-Use Area.** Manage Central City Plan amendments in accordance with the designated Central City Multimodal Mixed-Use Area (MMA) in the geography indicated in Figure 9-2. The MMA renders congestion / mobility standards inapplicable to any proposed plan amendments under OAR 660-0012-0060(10).

**331. Finding:** Policies 9.48 through 9.51 address the management of the City’s transportation system in relation to certain performance measures incorporated into state, regional, and local transportation plans. Conformance with these standards and OAR 660-0012-0060 is discussed in the response to State Planning Goal 12 (see above). Therefore, the MPAP complies with these policies.

## Transportation Demand Management

**Policy 9.52. Outreach.** Create and maintain TDM outreach programs that work with Transportation Management Associations (TMA), residents, employers, and employees that increase the modal share of walking, bicycling, and shared vehicle trips while reducing private vehicle ownership, parking demand, and drive-alone trips, especially during peak periods.

**Policy 9.53. New development.** Create and maintain TDM regulations and services that prevent and reduce traffic and parking impacts from new development and redevelopment. Encourage coordinated area-wide delivery of TDM programs. Monitor and improve the performance of private-sector TDM programs.

**Policy 9.54. Projects and programs.** Integrate TDM information into transportation project and program development and implementation to increase use of new multimodal transportation projects and services.

**332. Finding:** Policies 9.52 through 9.54 provide direction regarding transportation demand management. The City has created TDM financial incentive programs but has elected to only require participation in those programs for larger developments (10 or more dwelling units). The MPAP complies with these policies as the MPAP applies existing City TDM requirements to all developments and alterations in the MPAP area that result in 10 or more residential units on a site (Volume 2).

### Parking management

**Policy 9.55. Parking management.** Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district vitality, vehicle miles traveled (VMT) reduction, and air quality. Implement strategies that reduce demand for new parking and private vehicle ownership, and that help maintain optimal parking occupancy and availability.

**Policy 9.56. Curb Zone.** Recognize that the Curb Zone is a public space, a physical and spatial asset that has value and cost. Evaluate whether, when, and where parking is the highest and best use of this public space in support of broad City policy goals and local land use context. Establish thresholds to utilize parking management and pricing tools in areas with high parking demand to ensure adequate on-street parking supply during peak periods.

**Policy 9.57. On-street parking.** Manage parking and loading demand, supply, and operations in the public right of way to achieve mode share objectives, and to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand.

**Policy 9.58. Off-street parking.** Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.

**Policy 9.59. Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space.

**Policy 9.60. Cost and price.** Recognize the high public and private cost of parking by encouraging prices that reflect the cost of providing parking and balance demand and supply. Discourage employee and resident parking subsidies.

**333. Finding:** Policies 9.55 through 9.60 address parking management and off-street parking. These policies direct us to consider mode share objectives, promote compact and walkable urban form, and encourage lower rates of car ownership to reduce VMT. The MPAP recommends the development of a proactive parking management strategy for the MPAP area, including implementation of on-street parking concurrently with new streets in the area (Volume 1, pages 80-81). The MPAP also limits surface parking lots near the Neighborhood Main Street on NW Wilson Street, limits the locations where structured off-street parking is allowed, and establishes maximum parking ratio allowances in the area (Volume 2). Additionally, the MPAP recommends a suite of transportation projects that make alternatives to car travel more feasible and attractive, including bicycle, pedestrian, and transit improvements in the area.

The Transportation Planning Rule points to the designation of on-street parking districts as a tool local governments can use to reduce reliance on automobile trips (660-012-0045). Portland has utilized an Area Parking Permit Program since 1981. This program has expanded to 17 zones. Per

City Council ordinance, the program can impose surcharges on parking permits; those surcharges can be used for Transportation Demand Management (TDM) strategies to reduce automobile trips. The MPAP area will be eligible for use of such tools, as more dense development patterns emerge over time. Therefore, the MPAP complies with these policies.

**Policy 9.61. Bicycle parking.** Promote the development of new bicycle parking facilities including dedicated bike parking in the public right-of-way. Provide sufficient bicycle parking at high-capacity transit stations to enhance bicycle connection opportunities. Require provision of adequate off-street bicycle parking for new development and redevelopment. Encourage the provision of parking for different types of bicycles. In establishing the standards for long-term bicycle parking, consider the needs of persons with different levels of ability.

**334. Finding:** The existing zoning code contains bicycle parking requirements to implement Policy 9.61 (Portland Zoning Code section 33.266.200). These requirements will apply to the MPAP area. Therefore, the MPAP complies with this policy.

### **Finance, programs, and coordination**

**Policy 9.62. Coordination.** Coordinate with state and federal agencies, local and regional governments, special districts, other City bureaus, and providers of transportation services when planning for, developing, and funding transportation facilities and services.

**335. Finding:** This policy addresses the planning, funding, and design of the City's transportation system. The MPAP complies with this policy because PBOT coordinated with other City bureaus, Metro, TriMet, and ODOT to help develop transportation plan recommendations for the MPAP. Further coordination will occur during Project Development phases of relevant projects.

**Policy 9.63. New development impacts.** Prevent, reduce, and mitigate the impacts of new development and redevelopment on the transportation system. Utilize strategies including transportation and parking demand management, transportation system analysis, and system and local impact mitigation improvements and fees.

**336. Finding:** This policy requires projects to consider the impact of development on the transportation system, and to consider strategies to reduce the impact. The findings in response to Statewide Planning Goal 12 address this and are incorporated by reference. Therefore, the MPAP complies with this policy.

**Policy 9.64. Education and encouragement.** Create, maintain, and coordinate educational and encouragement programs that support multimodal transportation and that emphasize safety for all modes of transportation. Ensure that these programs are accessible to historically under-served and under-represented populations.

**Policy 9.65. Telecommuting.** Promote telecommuting and the use of communications technology to reduce travel demand.

**Policy 9.66. Project and program selection criteria.** Establish transportation project and program selection criteria consistent with goals 9A through 9I, to cost-effectively achieve access, placemaking, sustainability, equity, health, prosperity, and safety goals.

**Policy 9.67. Funding.** Encourage the development of a range of stable transportation funding sources that provide adequate resources to build and maintain an equitable and sustainable transportation

system.

**337. Finding:** Policies 9.64 through 9.67 address the funding and management of the City’s transportation system and programs and not planning and development actions. Therefore, these policies do not apply.

### **Connected and Automated Vehicles**

**Policy 9.68 New mobility priorities and outcomes.** Facilitate new mobility vehicles and services with the lowest climate and congestion impacts and greatest equity benefits; with priority to vehicles that are fleet/shared ownership, fully automated, electric and, for passenger vehicles, shared by multiple passengers (known by the acronym FAVES). Develop and implement strategies for each following topic.

**9.68.a.** Ensure that all new mobility vehicles and services and levels of automated vehicles advance Vision Zero by operating safely for all users, especially for vulnerable road users. Require adequate insurance coverage for operators, customers, and the public-at-large by providers of new mobility vehicles and services.

**9.68.b.** Ensure that new mobility vehicles and services improve active transportation and shared ride travel time reliability and system efficiency by:

1. maintaining or reducing the number of vehicle trips during peak congestion periods;
2. reducing low occupancy vehicle trips during peak congestion periods;
3. paying for use of, and impact on, Portland’s transportation system including factors such as congestion level, carbon footprint, vehicle miles traveled, vehicle occupancy, and vehicle energy efficiency; and
4. supporting and encouraging use of public transportation.

**9.68.c.** Cut vehicle carbon pollution by reducing low occupancy “empty miles” traveled by passenger vehicles with zero or one passengers. Prioritize vehicles and services with the least climate pollution, and electric and other zero direct emission vehicles operated by fleets and carrying multiple passengers.

**9.68.d.** Make the benefits of new mobility available on an equitable basis to all segments of the community while ensuring traditionally disadvantaged communities are not disproportionately hurt by new mobility vehicles and services. This includes people with disabilities, as well as communities of color, women, and geographically underserved communities.

**9.68.e** Identify, prevent, and mitigate potential adverse impacts from new mobility vehicles and services.

**Policy 9.69 New mobility tools.** Use a full range of tools to ensure that new mobility vehicles and services and private data communications devices installed in the City right of way contribute to achieving Comprehensive Plan and Transportation System Plan goals and policies.

**9.69.a.** Maintain City authority to identify and develop appropriate data sharing requirements to inform and support safe, efficient, and effective management of the transportation system. Ensure that when new mobility vehicles and services use City rights-of-way or when vehicles connect with smart infrastructure within the City they share information including, but not limited to, vehicle type, occupancy, speed, travel routes, and travel times, crashes and citations, with

appropriate privacy controls. Ensure that private data communications devices installed in the City right of way are required to share anonymized transportation data.

**9.69.b.** Design and manage the mobility zone, curb/flex zone, and traffic control devices, e.g. to limit speeds to increase safety, to minimize cut-through traffic, evaluate future demand for pick-up and drop-off zones, and to prioritize automated electric vehicles carrying more passengers in congested times and locations;

**9.69.c.** Evaluate the public cost and benefit of investments in wayside communication systems serving new mobility vehicles and services.

**9.69.d.** Develop sustainable user-pays funding mechanisms to support new mobility vehicle infrastructure and service investments, transportation system maintenance, and efficient system management.

**9.69.e.** Ensure that new mobility vehicles and vehicles that connect to smart City infrastructure, and private data communications devices installed in the City right of way, help pay for infrastructure and service investments, and support system reliability and efficiency. Develop a tiered pricing structure that reflects vehicle and service impacts on the transportation system, including factors such as congestion level, carbon footprint, vehicle miles traveled, vehicle occupancy, and vehicle energy efficiency.

**338. Finding:** Policies 9.68 and 9.69 address the management of automated vehicles and other new mobility within the right of way. There is no aspect of the MPAP that relates to this topic; therefore, these policies do not apply.

## Chapter 10: Land Use Designations and Zoning

**Goal 10.A: Land use designations and zoning.** Effectively and efficiently carry out the goals and policies of the Comprehensive Plan through the land use designations, Zoning Map, and the Zoning Code.

**339. Finding:** The Montgomery Park Area Plan (MPAP) proposes the creation of a new, transit-oriented mixed-use employment neighborhood in the area west of Highway 30 between NW Vaughn and south of NW Nicolai. The MPAP amendments include changes to land use designations, the Zoning Map and the zoning code to implement the goals and objectives of the plan within the plan area. These amendments are consistent with the policies in the 2035 Comprehensive Plan, as described in the findings throughout this report.

Therefore, the MPAP complies with Goal 10.A.

### Land use designations

**Policy 10.1. Land use designations.** Apply a land use designation to all land and water within the City's Urban Services Boundary. Apply the designation that best advances the Comprehensive Plan goals and policies. The land use designations are shown on the adopted Land Use Map and on official Zoning Maps.

**340. Finding:** The MPAP proposes the creation of a new, transit-oriented mixed-use employment neighborhood in the area west of Highway 30 between NW Vaughn and south of NW Nicolai. The area is currently an underutilized industrial area, and the plan envisions a transition to a vibrant mixed-use employment district that will support both job growth and housing development. To support this transition, the amendments include changes to land use designations that will implement the MPAP plan objectives and advance the goals and policies of the 2035 Comprehensive Plan, as described in the findings throughout this report. Specific land use designation changes are proposed to advance the Comprehensive Plan Urban Design Framework and centers and corridors policies, by supporting and focusing urban levels of development in areas designated as centers and corridors. Therefore, the MPAP amendments comply with this policy.

### The Zoning Map and the Zoning Code

**Policy 10.2. Relationship of land use designations to base zones.** Apply a base zone to all land and water within the City's urban services boundary. The base zone applied must either be a zone that corresponds to the land use designation or be a zone that does not correspond but is allowed per Figure 10-1 — Corresponding and Less-Intense Zones for Each Plan Map Designation. In some situations, there are long-term or short-term obstacles to achieving the level of development intended by the land use designation (e.g., an infrastructure improvement to serve the higher level of development is planned but not yet funded). In these situations, a less intense zone (listed in Figure 10-1) may be applied. When a land use designation is amended, the zone may also have to be changed to a corresponding zone or a zone that does not correspond but is allowed.

**341. Finding:** The MPAP amends the base zone in some parts of the plan area and all of the amended base zones are in conformance with Figure 10-1. Therefore, the MPAP complies with this policy.

### Policy 10.3. Amending the Zoning Map.

**10.3.a.** Amending a base zone may be done legislatively or quasi-judicially.

**10.3.b.** When amending a base zone quasi-judicially, the amendment must be to a corresponding zone (see *Figure 10-1 – Corresponding and Allowed Zones for Each Land Use Designation*). When a designation has more than one corresponding zone, the most appropriate zone, based on the purpose of the zone and the zoning and general land uses of surrounding lands, will be applied.

**10.3.c.** When amending a base zone legislatively, the amendment may be to a corresponding zone or to a zone that does not correspond but is allowed (see *Figure 10-1 – Corresponding and Allowed Zones for each Land Use Designation for zones that are allowed*). A legislative Zoning Map amendment may not be to a zone that is not allowed.

**10.3.d.** An amendment to a base zone consistent with the land use designation must be approved when it is found that current public services can support the uses allowed by the zone, or that public services can be made capable by the time the development is complete. The adequacy of services is based on the proposed use and development. If a specific use and development proposal is not submitted, services must be able to support the range of uses and development allowed by the zone. For the purposes of this requirement, services include water supply, sanitary sewage disposal, stormwater management, transportation, school district capacity (where a school facility plan exists), and police and fire protection.

**10.3.e.** An amendment to apply or remove an overlay zone or plan district may be done legislatively or quasi-judicially, and must be based on a study or plan document that identifies a specific characteristic, situation, or problem that is not adequately addressed by the base zone or other regulations.

**342. Finding:** The MPAP includes amendments to the base zones within the plan area, and these amendments are accomplished through a legislative procedure. All the amended base zones conform to *Figure 10-1 – Corresponding and Allowed Zones for each Land Use Designation*. As described in the findings for Chapter 8, Public Facilities and Services, in some cases the existing services can support the proposed zoning, while in others the plan recommends projects and actions to ensure that services will be capable of supporting the range of uses and development allowed by the proposed zoning. And, finally, the MPAP applies a plan district within the plan area. Application of the plan district is based on a study (*Montgomery Park Area Plan—Recommended Draft, September 2024*) that identifies characteristics that are not adequately addressed by the base zones alone and require application of a plan district to achieve the vision of the MPAP.

Therefore, policy 10.3 and its relevant sub-policies are met.

**Policy 10.4. Amending the Zoning Code.** Amendments to the zoning regulations must be done legislatively and should be clear, concise, and applicable to a broad range of development situations faced by a growing city. Amendments should:

**10.4.a.** Promote good planning:

- Effectively and efficiently implement the Comprehensive Plan.
- Address existing and potential land use problems.
- Balance the benefits of regulations against the costs of implementation and compliance.
- Maintain Portland’s competitiveness with other jurisdictions as a location in which to live, invest, and do business.

**10.4.b.** Ensure good administration of land use regulations:

- Keep regulations as simple as possible.
- Use clear and objective standards wherever possible.

- Maintain consistent procedures and limit their number.
- Establish specific approval criteria for land use reviews.
- Establish application requirements that are as reasonable as possible, and ensure they are directly tied to approval criteria.
- Emphasize administrative procedures for land use reviews.
- Avoid overlapping reviews.

**10.4.c.** Strive to improve the code document:

- Use clear language.
- Maintain a clear and logical organization.
- Use a format and layout that enables use of the document by lay people as well as professionals.
- Use tables and drawings to clarify and shorten the document.
- Identify and act on regulatory improvement suggestions.

**343. Finding:** The MPAP recommendation amends the following chapters of the zoning code:

- List of Chapters and Tables of Contents
- 33.258, Nonconforming Situations
- 33.400, Aircraft Landing Zone
- 33.415, Constrained Sites Overlay Zone
- 33.470, Portland International Airport Noise Impact Zone
- 33.510, Central City Plan District
- 33.521, East Corridor Plan District
- 33.526, Gateway Plan District
- 33.531, Guilds Lake Industrial Sanctuary Plan District
- 33.534, Hillsdale Plan District
- 33.536, Hollywood Plan District
- 33.538, Kenton Plan District
- 33.540, Laurelhurst/Eastmoreland Plan District
- 33.550, Macadam Plan District
- 33.562, Northwest Plan District
- 33.583, St. Johns Plan District
- 33.595, West Portland Multicultural Plan District
- 33.750, Fees

Volume 2 of the MPAP present the legislative amendments to the zoning code to implement the concepts presented in Volume 1 of this ordinance and the legislative intent described in commentary in Volume 2 of this ordinance. In all cases, the zoning code amendments are presented in as clear and objective of a way possible to ensure the intended users will be able understand and utilize the zoning code as it applies to their development proposals, land use, and properties, consistent with Comprehensive Plan Policy 10.4. Therefore, the MPAP complies with this policy.

## Part IV. Area-Specific Plans

As required by 2035 Comprehensive Plan Policy 1.19, the following area-specific plans provide additional policy direction that is relevant within the policy framework provided by the overall Comprehensive Plan. The following plans were analyzed for policies related to the MPAP area.

**344. Finding:** The City Council has identified the following goals and policies to be applicable to the MPAP amendments. The City Council finds that area plans apply at a smaller geographic scale, and therefore compliance with the 2035 Comprehensive Plan supersedes any goals and policies in those area plans. The Portland Comprehensive Plan findings in prior sections of this document demonstrate that the Montgomery Park Area Plan (MPAP) complies with the 2035 Comprehensive Plan and therefore supersedes older area plans where geographic overlap occurs or policy conflicts arise. Further, other than the Northwest District Plan and the Guild’s Lake Industrial Sanctuary Plan, there are no other adopted and recognized area-specific plans applicable to the MPAP area.

### **Guild’s Lake Industrial Sanctuary Plan (2001)**

(Ordinance No. 176092 and Resolution No. 36041, effective December 2001)

The Guild’s Lake Industrial Sanctuary (GLIS) Plan provides a policy framework to protect and promote the area’s long-term economic viability as an industrial district for a broad variety of industrial land uses and businesses. As initially adopted, the GLIS covered an area that ran northwest of NW Vaughn Street along the Willamette River to the St. Johns Bridge. The GLIS Plan recognizes the unique role of industrial land in Portland’s economy and the importance of industrial businesses in providing living-wage jobs. The plan’s vision statement, policies and objectives have been adopted as part of Portland’s Comprehensive Plan and are implemented in the zoning code through the GLIS plan district (33.531), which adds land use prohibitions and use limitations that were (at the time) above and beyond the limits in the industrial base zones.

In the GLIS Plan area south of NW Nicolai and west of Highway 30, shifting work trends and large vacant or underutilized sites present an opportunity to re-envision much of the area as a more intensely developed mixed-use and transit-oriented district close to the Central City with an emphasis on the development of employment space and affordable housing within the plan area. The MPAP amendments in this area provide opportunities for new housing and jobs near the Central City and the thriving Northwest District connected by a high-quality transit investment which supports key City policies around employment, equity, housing needs, and climate resilience.

The MPAP geography covers the area bounded by NW Nicolai Street to the north, NW Vaughn Street and NW Wardway to the south and southwest, and Highway 30 to the east, overlapping with the GLIS Plan area south of NW Nicolai. To avoid overlap and conflicts between the two plans, the MPAP amendments to the Guilds Lake Industrial Sanctuary Plan remove the areas of overlap from the GLIS Plan boundary.

The MPAP amends the GLIS Plan such that the GLIS Plan’s southern boundary is the NW Nicolai Street corridor. The overlapping GLIS Plan subareas are clipped such that the guidance and regulations apply only to properties located north of the NW Nicolai Street corridor. Where necessary, the MPAP amends conflicting text references to areas currently within the GLIS Plan area to be removed with the adoption of the MPAP. No other changes to GLIS Plan policies, guidelines, or plan objectives are proposed.

**345. Finding:** The Portland City Council finds that the MPAP complies with the Portland Comprehensive Plan, the policies and the provisions of the Guild’s Lake Industrial Sanctuary Plan should no longer apply in the area encompassed by the Montgomery Park Area Plan, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the GLIS Plan boundary is amended to remove the area encompassed by the MPAP from the GLIS Plan area.

**Policy 1: Jobs and Economic Development**

Maintain and expand industrial business and employment opportunities in the Guild’s Lake Industrial Sanctuary. Stimulate investment in the area’s public and private infrastructure and industrial facilities.

**Objective 1.** Provide new employment opportunities by reusing or redeveloping reclaimed, underutilized and vacant land and buildings in the GLIS.

**Objective 2.** Foster a business and public policy environment that promotes continued private and public sector investments in infrastructure, facilities, equipment and jobs.

**Objective 3.** Enhance the GLIS as a competitive and forward-thinking industrial area by fostering innovative and environmentally-sensitive industrial projects and practices that improve the operational efficiency of GLIS firms while conserving natural resources and reducing pollution.

**346. Finding:** The 2035 Comprehensive Plan defines the verb “maintain” to mean keep what you have; conserve; preserve; continue. The 2035 Comprehensive Plan defines the verb “expand” to mean make something that already exists more extensive. The City Council interprets this policy and its objectives to apply to the GLISP area as whole and not to individual businesses or sectors of business.

The City Council interprets the verb “stimulate” to mean “encourage”, which is defined in the 2035 Comprehensive Plan as to promote or foster using some combination of voluntary approaches, regulations, or incentives.

The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the GLISP in areas where there is overlap. As such the GLIS plan boundary is amended to remove the area encompassed by the MPAP from the GLIS area and minor amendments are made to the GLIS plan maps and text to reconcile the plans. Further, the MPAP amendments remove from the GLISP the areas of overlap with the MPAP area, therefore GLISP Policy 1 does not apply to the MPAP area or amendments. Similarly, Objectives 1-3 do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives of the GLIS in several ways: by applying land use designations that will facilitate reuse and redevelopment of vacant land for employment and other uses (Objective 1); and by applying Central Employment land use designations in the area to facilitate employment-oriented and other types of development and developing a public-private partnership for investment in transit and other transportation infrastructure (Objective 2).

No other changes are proposed for the area remaining in the GLISP area, and therefore this policy and objectives are met.

**Policy 2: Transportation**

Maintain, preserve and improve the intermodal and multimodal transportation system to provide for the smooth movement of goods and employees into and through the Guild’s Lake Industrial Sanctuary.

**Objective 1.** Maintain, protect, and enhance the public and private multimodal transportation investments in the GLIS, including rail and marine terminal facilities, to ensure its continued viability as a major center for the import and export of industrial products in the state of Oregon.

**Objective 2.** Maintain operational characteristics on roads and at intersections that support truck movements and industrial economic growth, while accommodating traffic, transit, and emergency access needs.

**Objective 3.** Minimize traffic conflicts between industrial and nonindustrial uses.

**Objective 4.** Manage congestion on highways and roads within the GLIS through regional and area-wide systems planning and maximize the efficiency of transportation facilities for all modes of travel, with the participation of private industry.

**Objective 5.** Develop alternative transportation options for employees of the GLIS, including transit, carpools, bicycling, and walking to reduce parking needs, vehicle emissions, and congestion levels.

**Objective 6.** Locate safe pedestrian and bicycle routes within the GLIS that minimize conflicts with industrial traffic. Improve pedestrian and bicycle connections to nearby residential areas to reduce congestion levels and auto emissions, preserve capacity of the street system, and reduce parking needs.

**Objective 7.** Recognize the role of NW Vaughn Street as an important multimodal access route to the Guild's Lake Industrial Sanctuary and Northwest Portland.

**347. Finding:** The City Council interprets this policy consistent with other policies that address how to maintain and improve the multimodal transportation system (see Policy 6.23, 6.41, 9.30, 9.31 and 9.32). The City Council interprets this policy and the objectives to apply to the area as whole and not to individual businesses or sectors of business.

As noted in the findings above, the MPAP amendments are consistent with the goals and policies of Chapter 9 (Transportation) of the 2035 Comprehensive Plan and Statewide Planning Goal 12. The findings in response to those goals and policies are incorporated by reference.

The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the GLISP in areas where there is overlap. As such the GLIS plan boundary is amended to remove the area encompassed by the MPAP from the GLIS area and minor amendments are made to the GLIS plan maps and text to reconcile the plans. Further, the MPAP amendments remove from the GLISP the areas of overlap with the MPAP area, therefore Policy 2 does not apply to the MPAP area or amendments. Similarly, Objectives 1-7 do not apply to the MPAP area or amendments. However the MPAP amendments still support the GLIS policy and objectives in several ways: by maintaining and enhancing multi-modal transportation facilities through investments in transit, streets and pedestrian and bicycle improvements (Objective 1); by maintaining NW Nicolai as the main freight access route and access point to the regional traffic network, and by limiting traffic conflicts with the industrial area through transportation system design as shown I Volume 3 (Objectives 2, 3); by demonstrating, through transportation system modeling, limited impacts of the vehicular impacts of the proposed amendments (Objective 4); by creating new proposed transportation options including streetcar transit service and enhanced bicycle and pedestrian connections that will help reduce congestion levels and auto emissions, preserve capacity of the street system, and reduce parking needs (Objectives 5, 6).

No other changes are proposed for the area remaining in the GLISP area, and therefore this policy and objectives are met.

**Policy 3: Land Use**

Preserve and protect land primarily for industrial uses, and minimize land use conflicts in the Guild’s Lake Industrial Sanctuary. Allow compatible nonindustrial uses within the GLIS that provide retail and business services primarily to support industrial employees and businesses.

**Objective 1.** Preserve the overall industrial character of the Guild’s Lake Industrial Sanctuary.

**Objective 2.** Preserve the physical continuity of the area designated as Industrial Sanctuary within the Guild’s Lake Industrial Sanctuary.

**Objective 3.** Minimize conflicts between industrial and nonindustrial land uses.

**Objective 4.** Prohibit new residential uses within the GLIS.

**Objective 5.** Allow the provision of support services to employees and businesses in the GLIS to reduce trips outside of the GLIS.

**Objective 6.** Encourage industrial businesses to locate their accessory offices and showrooms along NW Vaughn Street.

**Objective 7.** Preserve the GLIS’s Willamette River waterfront as a location for river-dependent and river-related industrial uses.

**Objective 8.** Recognize the Willamette River as a valuable economic, transportation, natural and recreational resource for the entire city. Coordinate GLIS Plan policies and implementation measures with ongoing and future citywide planning efforts that address the significance of the river and the city’s industrial land supply.

**Objective 9.** The industrial character and economic viability of the Guild’s Lake Industrial Sanctuary must continue to be the priority when considering the public need for expanded access to the Willamette River. Design and implement any greenway enhancements along the river so as to avoid or minimize negative impacts on industrial operations.

**Objective 10.** Contribute to the maintenance and enhancement of all of Northwest Portland as a diverse urban environment that includes opportunities for housing, commercial services, and industrial employment in relatively close proximity.

**348. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the GLISP in areas where there is overlap. Further, the Portland City Council has determined that policies and the provisions of the Guild’s Lake Industrial Sanctuary Plan will no longer apply in the area encompassed by the Montgomery Park Area Plan, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the GLIS Plan boundary is amended to remove the area encompassed by the MPAP from the GLIS area and related minor amendments are made to the GLIS Plan maps and text reflect this change. Because the MPAP amendments remove from the GLISP the areas of overlap with the MPAP area, therefore Policy 3 does not apply to the MPAP area or amendments. Similarly, Objectives 1-10 do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives of the GLIS in several ways: by minimizing the area of land use change to the GLIS area to the area west of US 30, much of which had previously been designated for land use transition through the 2035 Comprehensive Plan, and by preserving the majority of the GLIS area as a prime industrial area (Objective 1. 2); by minimizing conflicts

between industrial and residential uses by creating an employment buffer using the EG1 zone that prohibits residential uses in the area adjacent to Nicolai on the south and adjacent to US 30 on the west, and continuing prohibitions on residential uses in the remainder of the GLIS (Objectives 3, 4); by allowing flexibility in the EX zoning to allow for industrial offices and showrooms along NW Vaughn (Objective 6); and by enhancing the Northwest area as diverse urban environment by fostering a diverse mix of allowed land uses through application of EX and EG1 employment zones that support industrial employment, commercial uses, and housing in close proximity (Objective 10).

No other changes are proposed for the area remaining in the GLISP area, and therefore this policy and objectives are met.

### **Northwest District Plan**

The Northwest District Plan (NWDP) provides policy direction in a number of key areas, including land use, urban design, transportation, housing, and economic development, and is intended to protect and enhance the livability, urban character and economic vitality of this inner-urban area while providing a means for guiding change over time. As initially adopted, the NWDP boundaries generally correspond to the Northwest District neighborhood, except for those portions that are within the Guild’s Lake Industrial Sanctuary (north of NW Vaughn Street) and the Central City (west of I-405 and along West Burnside Street) plan areas. The plan’s vision statement, policies and objectives have been adopted as part of Portland’s Comprehensive Plan and are implemented in the zoning code through the Northwest Plan District (33.562).

The MPAP geography covers the area bounded by NW Nicolai Street to the north, NW Vaughn Street and NW Wardway to the south and southwest, and Highway 30 to the east. The NWDP area currently includes portions of the MPAP geography, including the historic Montgomery Park building site. To avoid overlap and conflicts between the two plans, the MPAP amends the NWDP boundaries to remove the areas of overlap. The NWDP includes urban character areas that will no longer apply to properties north of the NW Vaughn/Wardway corridor. Further, the MPAP proposes a new urban design concept and character statement that will apply to the portions of the MPAP formerly within the NWDP boundaries.

The MPAP amends the NWDP such that the NWDP’s northern boundary is the NW Vaughn/Wardway corridor. The overlapping NWDP subareas and subdistricts are clipped such that the existing subareas and subdistrict guidance and regulations apply only to properties located south of the NW Vaughn/Wardway corridor. Where necessary, the MPAP amends conflicting text references to areas currently within the NWDP area removed with the adoption of the MPAP. No other changes to NWDP policies, guidelines, or plan objectives are proposed.

### **Policy 1: Land Use**

Participate in the growth of the metropolitan region in a manner that protects and enhances the quality of life in the Northwest District. Enhance the district’s sense of place as a distinct yet diverse community, with an active mix of housing and businesses.

**Objective A.** Support land use strategies and developments that increase the amount of housing in the district.

**Objective B.** Support land use strategies and developments that enhance employment opportunities in the district.

**Objective C.** Concentrate a mix of higher intensity residential and commercial development along main streets and the Portland Streetcar line.

**Objective D.** Reinforce main streets and the Portland Streetcar line as the focus for retail activity in the district.

**Objective E.** Limit large-scale auto-dependent retail throughout the district.

**Objective F.** Support small-scale developments that are oriented to pedestrian use.

**Objective G.** Promote development that includes useable public outdoor spaces such as plazas, play areas, gardens, and pocket parks.

**Objective H.** Promote neighborhood and citizen participation early in the land use review and development process.

**Objective I.** Encourage uses along edges of the district that serve the needs of the district and adjacent neighborhoods.

**349. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 1 does not apply. Similarly, Objectives A through I do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they support the region's growth, providing additional housing, employment, outdoor space, and transit options. Further, the amendments include York Plan District regulations and Montgomery Park Character Statement which support the Northwest District's quality of life and sense of place by emphasizing main streets and streetcar alignments as loci for activity and providing guidance so that future development fosters the distinctive qualities of the area and supports the Northwest District's sense of place.

## **Policy 2: Institutions**

Support institutional planning, programming, and development that provides educational, cultural, medical, religious, and social services and amenities in the Northwest District. Build a climate of cooperation between the community and district institutions to ensure both the success of the institution and the livability of the neighborhood.

**Objective A.** Encourage the development of and adherence to good neighbor agreements between institutions and neighborhood associations.

**Objective B.** Accommodate the establishment, retention, and growth of institutions that serve district residents and employees.

**Objective C.** Maintain and augment facilities and programs that provide educational, recreational, and cultural resources and opportunities.

**Objective D.** Maintain and augment facilities offering social and institutional services for community members.

**Objective E.** Encourage institutional development to be guided either by a Conditional Use Master Plan or an Impact Mitigation Plan that mitigates impacts of development.

**Objective F.** Encourage Legacy Good Samaritan Hospital and Medical Center (LGSHMC) to focus future expansion in underutilized and underdeveloped areas within its approved campus boundary.

**Objective G.** Promote institutional development that has an urban character, harmonizes with the district’s design context, and preserves the district’s street grid.

**Objective H.** Encourage institutions along main streets and the Portland Streetcar line to orient active uses to these street frontages.

**Objective I.** Encourage institutions to locate parking within structures.

**Objective J.** Utilize the resources of institutions to encourage partnerships among nonprofit, private housing developers, and social service providers.

**Objective K.** Expand opportunities for institutions and community organizations to work together on programs beneficial to those who use their services.

**350. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 2 does not apply. Similarly, Objectives A through K do not apply to the MPAP area or amendments. Further, there are no existing or proposed institutions in the MPAP area.

### **Policy 3: Transportation**

Provide a full range of transportation options for moving people and goods thereby supporting neighborhood livability and commerce and reducing reliance on the automobile.

**Objective A.** Increase the availability of, and incentives to use alternatives to the automobile.

**Objective B.** Maintain, reinforce, and re-establish the historic street grid, for example, by re-establishing streets or pedestrian connections through existing superblocks.

**Objective C.** Provide safe and convenient access to public transit.

**Objective D.** Improve the frequency of service and route coverage of public transportation services.

**Objective E.** Promote increased use of public transit by residents, employees and visitors.

**Objective F.** Maintain, improve, and expand pedestrian and bicycle connections within the district and to other parts of the city and minimize conflicts between motorized and non-motorized transportation.

**Objective G.** Enhance main streets and the Portland Streetcar line as key pedestrian places.

**Objective H.** Support bicycle use in the district by providing convenient facilities, such as parking and other support services.

**Objective I.** Preserve the local circulation function of streets that are classified as Local Service Traffic Streets in the Transportation Element of the Comprehensive Plan and encourage through-traffic to use streets that are consistent with their traffic classifications.

**Objective J.** Avoid street improvements in residential and commercial areas that are designed to accommodate increased vehicular traffic, except where such improvements establish or re-establish streets to provide connectivity.

**Objective K.** Discourage through-commuter and truck traffic in residential zones.

**Objective L.** Use a variety of traffic calming measures to ensure the appropriate functioning of streets, while discouraging street closures and closed-end streets.

**351. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 3 does not apply. Similarly, Objectives A through L do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they include zoning code amendments and development design guidance that promote alternatives to reduce reliance on the automobile and site designs that encourage pedestrian friendly spaces. Further the amendments include transportation recommendations to create a multimodal street network in the area with connections to the surrounding neighborhood and an extension of the Portland Streetcar line north and into the plan area.

## **Policy 4: Parking**

**Provide and manage parking to serve the community while protecting and enhancing the livability and urban character of the district.**

**Objective A.** Reduce the demand for automobile parking.

**Objective B.** Provide for efficient use of on- and off-street parking through such means as “shared use” of parking facilities and minimizing the number and size of curb cuts.

**Objective C.** Accommodate a limited amount of additional structured off-street commercial parking while preserving the overall pedestrian-friendly character of the district, and mitigating for negative impacts.

**Objective D.** Minimize the impacts of off-street parking along main streets and the Portland Streetcar line.

**Objective E.** Discourage parking in the district by PGE Park patrons and Central City commuters.

**Objective F.** Encourage turnover of on-street visitor parking.

**Objective G.** Focus short-term patron parking along NW 21st and 23rd Avenues.

**Objective H.** Encourage new off-street parking to locate within structures.

**Objective I.** Limit the size of new surface parking lots.

**352. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 4 does not apply. Similarly, Objectives A through I do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they include amendments that limit surface parking on the main street and Portland Streetcar alignment and promote reduced demand for parking through creation of welcoming pedestrian environments and recommended transit and street improvements.

## **Policy 5: Housing**

Retain the district’s existing housing stock and mix of types and tenures. Promote new housing opportunities that reflect the existing diversity of housing and support a population diverse in income, age, and household size.

**Objective A.** Increase the number of housing units in the district, including rental and ownership opportunities for current and future district residents.

**Objective B.** Increase the supply of housing that is affordable, accessible to a full range of incomes, and provides for special needs housing.

**Objective C.** Retain the existing supply of rental housing units affordable to the district’s low- and very low- income households.

**Objective D.** Encourage housing developments that accommodate a variety of living situations and support the district’s diverse population.

**Objective E.** Encourage the development of mixed-use projects that include housing in all commercial and most employment zones.

**Objective F.** Encourage the renovation and rehabilitation of existing housing as a preferred alternative to clearance and redevelopment.

**Objective G.** Encourage upkeep of residential properties.

**Objective H.** Encourage an increase of ownership opportunities through new development rather than conversion of existing rental housing stock.

**Objective I.** Increase the supply of housing attractive to families with children.

**353. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 5 does not apply. Similarly, Objectives A through H do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they include amendments that support opportunities for new housing and affordable housing in a mixed use area.

## **Policy 6: Business and Economic Development**

Foster a healthy and prosperous business community that serves the needs of the district. Retain and expand the diverse mix of businesses and jobs.

**Objective A.** Promote the formation of new, and the growth of established, businesses.

**Objective B.** Encourage commercial development that is oriented to pedestrians.

**Objective C.** Support the establishment and growth of retail businesses that provide goods and services needed by district residents and employees while responding to the regional nature of the Northwest retail and service market.

**Objective D.** Support businesses that provide living wage jobs and assist the city in attaining its economic and employment goals.

**Objective E.** Encourage new commercial development and job creation opportunities to locate along main streets, the Portland Streetcar line, and close to the I-405 freeway.

**Objective F.** Encourage live/work spaces and home occupations.

**Objective G.** Encourage businesses with large facilities to locate uses that meet the needs of employees, visitors, and adjacent neighbors at its edges.

**Objective H.** Recognize the important role that large employers play in providing employment opportunities to residents of both the district and the greater Portland region.

**Objective I.** Build on the unique identity and economic strength provided by the district's main streets.

**354. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the

MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 6 does not apply. Similarly, Objectives A through I do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they include amendments that support creation of new employment, active ground floor uses, and pedestrian friendly design to serve residents, workers, and visitors in and beyond the plan area.

### **Policy 7: Urban Design**

Respect the urban design principles and architectural qualities that define the district’s human-scaled, pedestrian-oriented character.

**Objective A.** Integrate new development with the existing urban fabric by acknowledging the scale, proportions, orientation, quality of construction and other architectural and site design elements of the building’s immediate area.

**Objective B.** Promote a high level of design quality in mixed-use areas, including main streets, the Portland Streetcar line, and other areas where more intensive development is anticipated.

**Objective C.** Preserve and enhance the distinct character of different parts of the Northwest District.

**Objective D.** Foster a continuous frontage of buildings and active uses along main streets and the Portland Streetcar line.

**Objective E.** Maintain and enhance identified gateways to acknowledge their roles as major access points to and from the district.

**Objective F.** Encourage new development on main streets and the Portland Streetcar line to include additions to the public realm, such as additional sidewalk width, a public square, or other open space.

**Objective G.** Encourage building designs that consider solar access impacts on streets and other public spaces.

**Objective H.** Foster the creation of public gathering places in areas with a concentration of activities and at neighborhood focal points.

**Objective I.** Discourage the creation of new vehicle areas between the fronts of residential buildings and streets.

**355. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 7 does not apply. Similarly, Objectives A through I do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they include zoning map amendments to apply the Design overlay on all Central Employment zoned sites. Further the zoning code amendments and development design guidance, through the Montgomery Park Character Statement, promote a wide array of elements that support this policy through things such as pedestrian oriented main street design and use requirements, incorporating vegetation and trees, and referencing of industrial context through materials and design elements.

### **Policy 8: Historic Preservation**

Identify, preserve, and protect historic resources and support development that enhances the historic qualities of the district.

**Objective A.** Promote restorations and renovations of residential and commercial structures that maintain the historic style, quality, and character of the original building.

**Objective B.** Encourage adaptive reuse of historic resources that maintain their historic character.

**Objective C.** Promote awareness of the district’s history and historic resources, which may include individual structures or groups of buildings, streetscapes, stairways, trees, gardens, parks, bridges, and natural areas.

**Objective D.** Encourage individual and multiple property listings in the National Register, including the development of additional historic districts outside of the Alphabet Historic District.

**356. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 8 does not apply. Similarly, Objectives A through D do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they do not impact the status of the historic resources in the plan area, Montgomery Park office building and the American Can Complex. The addition of the Design overlay on many of the properties adjacent to these sites, promotes consideration and inclusion of development features and design that references and enhances these resources. Further, in addition consideration of historic resources, guidance within the Montgomery Park Character Statement and the Public Benefits agreement strongly supports consideration and integration of cultural and historic references, particularly as they relate to Portland’s Black, Indigenous, and Chinese communities, through art and place making.

## Policy 9: Public Safety

Increase public safety by promoting measures that foster personal security and build a sense of community.

**Objective A.** Encourage site and building designs that incorporate “Crime Prevention Through Environmental Design” principles. These include designs that:

- bring more light and visibility to streets,
- create opportunities for those within buildings to observe activities taking place on the streets and in public open spaces, and
- avoid attractions to properties where potential harmful objects exist

**Objective B.** Encourage projects that support active and passive spaces that focus toward the street.

**Objective C.** Encourage and expand participation in community policing.

**Objective D.** Increase police visibility in the district.

**Objective E.** Improve security at parks in the district.

**Objective F.** Forge partnerships with adjacent neighborhoods to address common public safety issues and allocation of resources.

**357. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 9 does not apply. Similarly, Objectives A through F do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they promote pedestrian oriented spaces and streets which brings activity and visibility to area and supports community safety.

## Policy 10: Quality of Life

Strengthen the sense of community and ensure that cultural, educational and recreational resources continue to be a vital part of public life.

**Objective A.** Enhance and protect Forest Park as a natural resource area providing recreation activities.

**Objective B.** Maintain, enhance, and expand current parks, open spaces, and recreational facilities.

**Objective C.** Create new parks, plazas, and community facilities in areas where significant growth is anticipated, taking advantage of opportunities for new open space development when they arise.

**Objective D.** Improve public access to nearby parks, natural areas, and the Willamette River.

**Objective E.** Foster events and activities that create positive interactions among community members.

**Objective F.** Encourage residents and businesses to participate in planning efforts for major entertainment and recreation facilities, such as PGE Park, in and near the district.

**358. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 10 does not apply. Similarly, Objectives A through F do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because the MPAP amendments do not impact the area's existing amenities and resources that support public life, and seek to further contribute new open spaces, public art, vegetation and trees, and vibrant streets that support these objectives.

## **Policy 11: Environment**

Protect and enhance the environmental and natural resources of the district.

**Objective A.** Develop and operate public facilities and infrastructure to be sustainable and to address multiple objectives, including public health and safety, natural resource protection and recreation.

**Objective B.** Promote measures that protect and encourage landscaping with native species as a vital part of the urban landscape.

**Objective C.** Promote the use of innovative measures that improve air and water quality and energy efficiency.

**Objective D.** Improve environmental connections between existing and future parks, open spaces, and the Willamette River.

**Objective E.** Encourage recycling and the reduction of solid waste generation and litter in the district.

**359. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 11 does not apply. Similarly, Objectives A through E do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they do not impact existing resources but do promote development approaches that support public health and natural resources through elements such as open spaces and new trees and vegetation.

### **Policy 12: Business and Residential Interaction**

Foster cooperation between business and residential interests in the district, enhancing ways residential, commercial, and industrial uses can benefit from their interaction and mitigate negative impacts.

**Objective A.** Promote communication among residents, businesses, industries, neighborhood organizations, and the City.

**Objective B.** Promote the development of, and adherence to, formal and informal good neighbor agreements that mitigate nuisance-related impacts.

**Objective C.** Increase understanding and awareness of creative, community-based approaches to solving problems or conflicts between residents and nonresidential activities.

**360. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 12 does not apply. Similarly, Objectives A through C do not apply to the MPAP area or amendments.

### **Policy 13: Transition Subarea**

Integrate the subarea into the pedestrian-oriented, architecturally diverse urban fabric to the south and west. Encourage a mix of housing, commercial, institutional, open space, and light industrial uses.

**Objective A.** Encourage the mixing of land uses, both on individual sites and throughout the subarea.

**Objective B.** Promote the subarea as a prime location for increasing the supply of affordable housing.

**Objective C.** Encourage the retention of existing jobs and the creation of new jobs in the subarea.

**Objective D.** Protect existing industrial firms in the subarea from being forced to relocate out of the area.

**Objective E.** Reestablish key transportation system connections through the subarea.

**Objective F.** Implement multi-modal transportation improvements that address circulation and safety needs.

**Objective G.** Improve connections through the subarea and to the Willamette River.

**Objective H.** Support additional transit services and facilities to meet the growing needs of the subarea.

**Objective I.** Create plazas, parks, community facilities, and open spaces to meet the needs of the subarea’s residents and employees.

**Objective J.** Preserve the historic industrial character of NW Upshur Street north of the freeway.

**Objective K.** Protect the Guild’s Lake Industrial Sanctuary by locating activities and uses that are compatible with industry at the northern edge of the subarea.

**Objective L.** Reinforce the role of St. Patrick’s Church as a district landmark.

**361. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 13 does not apply. Similarly, Objectives A through L do not apply to the MPAP area or amendments. Furthermore, the Transition Subarea of the NWPD is located south of NW Vaughn Street and roughly east of NW 23rd Avenue. The MPAP area does not overlap with the Transition Subarea and the plan does not propose any land use or policy changes that will affect development in the Transition Subarea.

### **Policy 14: Eastern Edge Subarea**

Foster the development of the Eastern Edge as a transition between the more urban Central City and the Northwest District.

**Objective A.** Support the established mixed-use urban character of this subarea.

**Objective B.** Encourage the location of businesses that serve local needs along NW 18th and NW 19th Avenues.

**Objective C.** Foster the establishment and growth of firms that provide living-wage jobs in this subarea.

**Objective D.** Protect existing housing from conversion to other uses.

**Objective E.** Protect existing industrial firms in the subarea from being forced to relocate out of the area.

**Objective F.** Increase multi-modal connectivity between the Central City and the Eastern Edge.

**362. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area

encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 3 does not apply. Similarly, Objectives A through L do not apply to the MPAP area or amendments. Furthermore, the Eastern Edge Subarea of the NWDP is bounded by NW Pettygrove on the north, Interstate-405 on the east, NW Burnside on the south, and NW 20th and NW 19th avenues on the west. The MPAP area does not overlap with the Eastern Edge Subarea and the plan does not propose any land use or policy changes that will affect development in the Eastern Edge Subarea area.

### **Policy 15: Thurman-Vaughn Subarea**

Enhance this mixed-use subarea by emphasizing housing along NW Upshur and NW Thurman Streets and commercial uses on the south side of NW Vaughn Street and in nodes at intersections along NW Thurman Street.

**Objective A.** Enhance NW Thurman Street as a neighborhood-oriented main street that is primarily residential, with commercial uses clustered at intersections.

**Objective B.** Emphasize residential and live/work opportunities on NW Upshur Street.

**Objective C.** Encourage development on the south side of NW Vaughn Street that includes a continuous frontage of commercial buildings, unifies the streetscape, and supports both the mixed-use area to the south and the industrial sanctuary to the north.

**363. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 15 does not apply. Similarly, Objectives A through C do not apply to the MPAP area or amendments. However, the MPAP amendments still support the policy and objectives because they include Central Employment zoning along NW Vaughn Street, which allows a range of uses including commercial and employment, that can support commercial uses on the south side of NW Vaughn. Further, the amendments include development standards and design guidance that require or encourage active streets and pedestrian friendly design features which can also support uses on the south side of NW Vaughn.

### **Policy 16: Willamette Heights Subarea**

Maintain and protect the residential character and environmental resources of the Willamette Heights Subarea.

**Objective A.** Support infill development that can be accommodated by the subarea’s constrained transportation access routes and that mitigates for potential impact on environmentally sensitive areas.

**Objective B.** Preserve the subarea’s stock of historically significant housing.

**Objective C.** Ensure that emergency response vehicles have fast and clear routes into and out of Willamette Heights.

**Objective D.** Encourage the historic designation of the subarea’s historic resources, including the Thurman Street Bridge.

**Objective E.** Maintain or improve public transit service to Willamette Heights.

**Objective F.** Protect and enhance Forest Park as a regionally significant natural and recreational resource while reducing negative impacts on livability that may be associated with park usage.

**364. Finding:** The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and supersede the NWDP in areas where there is an overlap in mapping. Further, the Portland City Council finds that policies and the provisions of the NWDP should no longer apply in the area encompassed by the MPAP, and that the vision to create a mixed-use employment district in the MPAP area is an appropriate city policy direction. As such the NWDP boundary is amended to remove the area encompassed by the MPAP from the NWDP area and related minor amendments are made to the NWDP maps and text to reflect this change.

Because the MPAP amendments remove from the NWDP the areas of overlap with the MPAP area, Policy 16 does not apply. Similarly, Objectives A through F do not apply to the MPAP area or amendments. Furthermore, the MPAP area does not overlap with the Willamette Heights subarea of the NWDP and does not propose any land use or policy changes that will affect development in this subarea.

## Part V. Comprehensive Plan and Zoning Code Text Amendment Criteria

### 33.500.050 Adoption Criteria

A plan district may be established if all the following adoption criteria are met:

- A. The area proposed for the plan district has special characteristics or problems of a natural, economic, historic, public facility, or transitional land use or development nature which are not common to other areas of the City;
- B. Existing base and overlay zone provisions are inadequate to achieve a desired public benefit or to address an identified problem in the area;

**365. Finding:** The Montgomery Park Area Plan (MPAP) geography includes the area bounded by NW Nicolai Street to the north, NW Vaughn Street to the south, and Highway 30 to the east. The plan area is located between and serves as a transition between, the Guild’s Lake Industrial Sanctuary to the north and the Northwest District to the south. Located south of NW Vaughn Street, the Northwest District is Portland’s densest urban neighborhood and offers a wide range of important community and cultural resources.

Shifting employment trends and large vacant or underutilized sites present an opportunity to re- envision much of the area as a more intensely developed mixed-use and transit-oriented district in an area close the Central City, while emphasizing the development of affordable housing and employment space. New housing and jobs near the Central City and the thriving Northwest District connected by a high-quality transit investment supports key City policies around equity, housing needs, carbon reduction, and climate resilience. The characteristics of the plan area, including large, underutilized sites, proximity to high amenity areas, and opportunities to extend the existing street network and streetcar system are unique within the city.

The MPAP establishes a new land use and transportation framework for the area, allowing it to transition from the current mix of employment-focused land uses and large, underutilized land holdings into a new, mixed-use and transit-oriented neighborhood that includes housing and commercial services alongside current and future employment uses. Key objectives that highlight the special characteristics of the plan for the area include:

- Providing opportunities for new housing, with requirements for affordable housing beyond the inclusionary housing provisions;
- Retaining existing, and creating new, opportunities for middle-wage jobs;
- Creating opportunities for affordable commercial spaces to serve a variety of households and provide wealth-building opportunity;
- Providing broader access to amenities, including access to nature and recreation; and
- Encouraging and supporting opportunities for green, climate-resilient and responsive development.

Realizing these objectives cannot be achieved through base zone changes alone. Implementing the plan objectives and addressing the unique development opportunities located within the plan area requires the use of a plan district to supplement the regulations in the proposed base zoning. The plan district regulations include additional incentives and regulations beyond what the EX base zone provides or requires, many of which prioritize housing affordability and community

benefits, the establishment of a public park, and incorporation of green elements to support connections to Forest Park and climate resilience. For these reasons, criteria A and B are met.

**C.** The proposed plan district and regulations are the result of a legislative study or plan documenting the special characteristics or problems of the area and how a plan district will best address relevant issues; and

**D.** The regulations of the plan district are in conformance with the Comprehensive Plan and continue to meet the general purpose and intent of the base zone and any overlay zones applied in the district, and do not prohibit uses or development allowed by the base zone without clear justification.

**366. Finding:** The proposed plan district and regulations are the result of a nearly five-year-long legislative study—the Montgomery Park Area Plan—which documents the special characteristics of the Montgomery Park plan area and how the new York Plan District will address the relevant issues and objectives.

As noted throughout the findings in this document, the new plan district regulations conform to the Comprehensive Plan and they continue to meet the general purpose and intent of the base zones applied in the new plan district. The York plan district prohibits several uses, including Vehicle Repair, Self-Service Storage, Commercial Outdoor Recreation, and Agriculture, because they conflict with development of a transit-oriented mixed-use district, and may compromise the area’s multimodal transportation system, and are justified as follows:

- Prohibiting Self-Service Storage uses helps implement Comprehensive Plan policies that call for transit station areas to be near concentrations of housing, jobs, and commercial services.
- Commercial Outdoor Recreation and Agriculture uses are described in the zoning code as being generally large uses that take use large swaths of land. The York plan district is relatively small in total area and the development of Commercial Outdoor Recreation or Agriculture uses in the area would conflict with the vision of the plan that is develop as a mixed-use transit oriented neighborhood containing jobs and housing.
- Vehicle Repair uses are prohibited because such uses may conflict with goals to create a transit-oriented mixed use district that includes limits on the areas where vehicle parking and access are allowed.

Therefore, this criterion is met.

### **33.810.050 Comprehensive Plan Map Amendment Approval Criteria**

**B. Legislative.** Amendments to the Comprehensive Plan Map which are legislative must be found to be consistent with the goals and policies of the Comprehensive Plan, Metro’s Urban Growth Management Functional Plan, the Statewide Planning Goals, and any relevant area plans adopted by the City Council.

**367. Finding:** The City Council interprets that this criterion requires the Montgomery Park Area Plan amendments to show consistency on balance. The City Council has applied all applicable policies and the findings in this exhibit demonstrate how the Montgomery Park Area Plan amendments to the 2035 Comprehensive Plan Map are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, the Statewide Planning Goals, and relevant area plans. Therefore, this criterion is met.

### **33.835.040 Goal, Policy, and Regulation Amendments Approval Criteria**

**A. Amendments to the zoning code.** Text amendments to the zoning code must be found to be consistent with the Comprehensive Plan, Urban Growth Management Functional Plan, and the Statewide Planning Goals. In addition, the amendments must be consistent with the intent or purpose statement for the base zone, overlay zone, plan district, use and development, or land division regulation where the amendment is proposed, and any plan associated with the regulations. The creation of a new plan district is subject to the approval criteria stated in 33.500.050.

**368. Finding:** The findings in this exhibit demonstrate how the MPAP zoning code amendments are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and the Statewide Planning Goals. Findings showing consistency with the purpose statements of individual zoning code sections are provided below.

The Council interprets this criterion to require the ordinance to be consistent with the Comprehensive Plan. Council notes that the Comprehensive Plan defines the phrase “consistent with” to mean “the subject meets the requirements of, satisfies, or adheres to the regulations, mandate, or plan listed in the goal or policy.”

The City Council has considered all applicable policies, and the findings in this exhibit demonstrate how the amendments to the zoning code are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and with the Statewide Planning Goals.

Council further finds this criterion operates in conjunction with Comprehensive Plan Policy 1.10 which requires that amendments to the comprehensive Plan’s supporting documents, such as the zoning code, must “comply” with the Comprehensive Plan. “Comply” means “that amendments must be evaluated against the Comprehensive Plan’s applicable goals and policies and on balance be equally or more supportive of the Comprehensive Plan as a whole than the existing language or designation.” Additional findings in response to Policy 1.10 describe how the Council interprets “equally or more supportive” are incorporated here by reference.

PCC 33.835.040.A requires Council to demonstrate that the MPAP amendments are consistent with, or adhere to, the entire Comprehensive Plan. PCC 33.835.040.A does not require Council to demonstrate that the amendments are consistent with, or adhere to, individual goals and policies but rather the entire plan. Regardless, as demonstrated in this exhibit, Council has considered all applicable goals and policies and finds that the MPAP amendments are consistent with all the individual goals and policies.

Council finds that a proposed amendment is equally supportive when it is on its face directly supported by goals and policies in the Plan. The City Council finds that an amendment is more supportive of the Comprehensive Plan when the amendment will further advance goals and policies, particularly those that are aspirational in nature. The policy requires consideration as to whether amendments are equally or more supportive of the Plan as a whole. The City Council finds that amendments do not need to be equally or more supportive of individual goals and policies, but rather amendments must be equally or more supportive of the entire Comprehensive Plan. Therefore, there may be instances where specific goals and policies are not supported by the amendments but still the amendment is equally or more supportive of the entire Comprehensive Plan when considered cumulatively. There is no precise mathematical equation for determining when the Plan as a whole is supported but rather such consideration requires Council discretion in evaluating the competing interests and objectives of the plan.

Applying both the zoning code criterion and Policy 1.10 together, as discussed above, Council finds that the ordinance is consistent and complies with the Comprehensive Plan.

Council also finds that this criterion requires Council to consider whether the MPAP amendments are consistent with the Urban Growth Management Functional Plan and Statewide Planning Goals. As discussed fully above, Council finds that the MPAP amendments are consistent with both the Urban Growth Management Functional Plan and the Statewide Planning Goals.

Finally, as discussed directly below, this ordinance is consistent with the applicable intent or purpose statement for the Guild’s Lake Industrial Sanctuary plan district, where substantive amendments are proposed. Several technical amendments are made to clarify wording within other chapters of the zoning code. These technical amendments are done to increase clarity in the use of the zoning code, as stated in the findings for Chapter 10 of the Comprehensive Plan. These technical amendments include small changes and as such, they do not impact the Purpose Statements for those chapters.

For all of these reasons, Council finds that the MPAP amendments are consistent and comply with each applicable policy in the Comprehensive Plan and the amendments are consistent with the Urban Growth Management Functional Plan, the Statewide Planning Goals and relevant purpose statements. Therefore, this criterion is met.

### **33.531 Guild’s Lake Industrial Sanctuary Plan District**

#### **33.531.010 Purpose**

The Guild’s Lake Industrial Sanctuary plan district fosters the preservation and growth of this premier industrial area adjacent to Portland’s central city. The plan district’s large number of well-established industrial firms are dependent on the area’s multimodal transportation system, including marine, rail, and trucking facilities, and on the ability of area streets to accommodate truck movements. Because of its proximity to inner-city neighborhoods with high concentrations of commercial and residential uses, the Guild’s Lake Industrial Sanctuary is particularly vulnerable to impacts from, and redevelopment to, nonindustrial uses. The provisions of the plan district recognize that the displacement of industrial uses by inappropriate nonindustrial uses potentially threatens the integrity of this district and investments in public and private infrastructure. The provisions of this chapter protect the area from incompatible uses which threaten the district’s integrity, stability and vitality and compromise its transportation system.

**369. Finding:** The amendments to the Guild’s Lake Industrial Sanctuary Plan District remove references to, and regulations for, the area that will be removed from the Guild’s Lake plan district and incorporated into the new York plan district. The amendments include removing a sentence from the purpose statement related to NW Vaughn, regulations that apply in Subdistrict B—the area encompassing the Montgomery Park plan area—and amend maps showing Subdistrict B. The Council finds that the MPAP amendments comply with the 2035 Comprehensive Plan and thus supersede the GLIS Plan where there are conflicts or overlap. The Guild’s Lake Industrial Sanctuary plan district implements the Guild’s Lake Industrial Sanctuary (GLIS) plan and thus the purpose statement of the plan district will only apply to those areas that remain within the plan area. The code amendments are consistent with the purpose of the Guild’s Lake Industrial Sanctuary Plan District because they reflect the changes associated with the MPAP. Therefore, this criterion is met.

**B. Amendments to the goals and policies of the Comprehensive Plan.** Text amendments to the goals and policies of the Comprehensive Plan must be found to be consistent with the Comprehensive Plan, the Urban Growth Management Functional Plan, and with the Statewide Planning Goals.

**370. Finding:** The Montgomery Park Area Plan does not propose text amendments to the goals or policies of the Comprehensive Plan. Therefore, this criterion does not apply.

**C. Neighborhood plans.** Adoption or amendment of neighborhood plans and similar area plans must be found to be consistent with the Comprehensive Plan, the Urban Growth Management Functional Plan, and with the Statewide Planning Goals.

**371. Finding:** The Montgomery Park Area Plan amends the Guild’s Lake Industrial Sanctuary Plan (2001) and the Northwest District Plan (2003). The amendments are technical in nature and are necessary to make the geographic boundaries of those two plans consistent with the geographic boundaries of the Montgomery Park Area Plan. The findings in this exhibit demonstrate how the MPAP amendments to the two neighborhood plans are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and the Statewide Planning Goals. Therefore, this criterion is met.

**D. Design guidelines.** Design guidelines must be found to both maintain and enhance the characteristics that distinguish the Design overlay zone or design district and be consistent with the reasons for establishing the overlay zone or design district.

**372. Finding:** The MPAP Plan’s provisions maintain and enhance the Design overlay zone within this expanded Northwest Town Center with the creation of a MPAP Character Statement, which when adopted will become part of the Citywide Design Guidelines. All area plans, including town center plans, must include a Character Statement to comply with the Citywide Design Guidelines. In accordance with this requirement the Montgomery Park Area Plan includes a Character Statement. As new buildings and public spaces in the expanded Northwest Town Center develop, the Character Statement will support the Guidelines in contributing to the area’s emerging character. The role of the Character Statement is to articulate the existing and emerging character, as directed by the community.

The MPAP Plan also includes expanding the application of the Design Overlay within the town center, which is in keeping with underlying policies of the 2035 Comprehensive Plan to implement the Urban Design Framework (UDF). The guidelines include provisions to ensure that development within the NW Town Center, contains a mix of uses, and provides amenities for residents, workers and visitors. and is applied the areas designated to receive the most growth and density. As shown through the findings for Chapters 3 and 4, the purpose of the Design overlay zone reflects the expanded application of this zone to focal areas of the city’s growth. This includes applying the Design Overlay zone to the Center’s new York Plan District and to two new transit streets on NW Wilson and NW Roosevelt. For these reasons, this criterion is met.

### **33.855.050 Approval Criteria for Base Zone Changes**

An amendment to the base zone designation on the Official Zoning Maps will be approved (either quasi-judicial or legislative) if the review body finds that the applicant has shown that all of the following approval criteria are met:

**A. Compliance with the Comprehensive Plan Map.** The zone change is to a corresponding zone of the Comprehensive Plan Map. When the Comprehensive Plan Map designation has more than one corresponding zone, it must be shown that the proposed zone is the most appropriate, taking into consideration the purposes or characteristics of each zone and the zoning pattern of surrounding land.

**373. Finding:** The Montgomery Park Area Plan includes comprehensive plan map and zoning map amendments—the proposed comprehensive plan designations are central employment and mixed employment, and the proposed zoning designations are EX and EG1. Both of the proposed zoning map designations correspond to their respective proposed comprehensive plan designations. In

the case of the proposed EX zoning, it is the only base zone that corresponds to the central employment comprehensive plan designation. The mixed employment comprehensive plan map designation has two corresponding base zones—the General Employment 1 zone (EG1) and the General Employment 2 zone (EG2). The EG1 base zone was selected for the MPAP area because it better reflects the urban location and desired future development pattern for the MPAP area than the EG2 zone would. The characteristics of the EG1 zone are described in the zoning code as areas generally having “smaller lots and a grid block pattern...with sites having high building coverages and buildings which are usually close to the street.” (33.140.030.A.1) The MPAP objectives include reestablishing the street grid within the plan area and the base zone regulations and proposed plan district regulations encourage high building coverage and buildings close to the street. For these reasons, this criterion is met.

**B. Adequate public services.**

1. Adequacy of services applies only to the specific zone change site.
2. Adequacy of services is determined based on performance standards established by the service bureaus. The burden of proof is on the applicant to provide the necessary analysis. Factors to consider include the projected service demands of the site, the ability of the existing and proposed public services to accommodate those demand numbers, and the characteristics of the site and development proposal, if any.

**374. Finding:** The Montgomery Park Area Plan includes comprehensive plan map and zoning map amendments—the proposed comprehensive plan designations are central employment and mixed employment, and the proposed zoning designations are EX and EG1. Based on the proposed zoning map amendments, the increase in projected growth for the next 20 to 30 years is 2,000 additional households and 2,000 new jobs.

The adopted 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017. The CSP includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects, consistent with the requirements of Statewide Planning Goal 11.

- a. Public services for water supply, and capacity, and police and fire protection are capable of supporting the uses allowed by the zone or will be capable by the time development is complete.

**375. Finding:**

Water supply and capacity:

The Portland Water Bureau (PWB) provides water to a variety of uses including households and businesses in Portland and beyond. The PWB assessed the increase in water demand that would result from the MPAP zoning map amendments and concludes that the system is capable of serving the plan area but will require extension of water lines to serve individual development parcels as streets are constructed and redevelopment occurs. Impacts to the existing water system infrastructure from construction of the streetcar extension and changes to the streetscapes in the MPAP area will need to be addressed.

Police and fire protection:

The Police and Fire Bureaus have not established any specific or quantifiable levels of service for new development.

As noted in the findings above, the Montgomery Park Area Plan amendments are consistent with Statewide Planning Goal 11 (Public Facilities and Services) and the applicable 2035 Comprehensive

Plan policies in Chapter 8 (Public Facilities and Services) and the findings in response to those goals and policies are incorporated by reference.

Therefore, the public services for water supply, and capacity, and police and fire protection are capable of supporting the proposed changes to zoning in the MPAP area, and this criterion is met.

- b. Proposed sanitary waste disposal and stormwater disposal systems are or will be made acceptable to the Bureau of Environmental Services. Performance standards must be applied to the specific site design. Limitations on development level, mitigation measures or discharge restrictions may be necessary in order to assure these services are adequate.

**376. Finding:** The Bureau of Environmental Services (BES) assessed sanitary sewer service and stormwater facilities in the plan area and determined that the existing system, while limited in capacity, could accommodate anticipated development with little additional risk, using best practices for stormwater management and a strategic approach for development.

Initial modeling of existing conditions identified localized capacity issues in NW Nicolai Street. Other combined pipes in the area also have limited remaining capacity to manage additional combined sanitary and stormwater flows. In addition, a storm sewer pipe within NW Nicolai Street has capacity issues, which could contribute to street flooding. If new development manages stormwater consistent with the [Stormwater Management Manual](#), these risks should not increase, however, to manage combined sewer capacity in NW Nicolai Street, BES may consider having future development connect sanitary services to combined pipes on NW Wardway or NW Wilson St.

The Stormwater Management Manual allows flexibility in the type of stormwater management facilities that developments can use, however, within this area, high densities, poorly infiltrating soils, and potential soil contaminants associated with historic industrial uses could limit those choices. Ecoroofs are stormwater facilities that are suited to these site conditions. They also provide public benefits, such as mitigating urban heat island impacts, attracting birds and pollinators, and improving air quality. BES modeling results indicate that having substantial ecoroof coverage in this area could also reduce the risk of summertime combined system overflows into the Willamette River.

In addition to complying with the Stormwater Management Manual, developers will be required to ensure that new development is adequately served by sanitary and stormwater infrastructure and may be required to make needed improvements. On large sites, BES is calling for developers to submit an infrastructure plan that demonstrates that new storm, sanitary, or combined systems are phased, sited, and sized to serve final build out of the site, and that their connections to existing infrastructure make effective use of existing system capacity. This requirement is called out in the public benefits agreement. Such a plan will demonstrate how transportation, water, sanitary, and storm infrastructure will be designed and implemented on the site in a coordinated manner.

Therefore, this criterion is met.

- c. Public services for transportation system facilities are capable of supporting the uses allowed by the zone or will be capable by the time development is complete. Transportation capacity must be capable of supporting the uses allowed by the zone by the time development is complete, and in the planning period defined by the Oregon Transportation Rule, which is 20 years from the date the

Transportation System Plan was adopted. Limitations on development level or mitigation measures may be necessary in order to assure transportation services are adequate.

**377. Finding:** Transportation facilities are addressed as part of the findings for Comprehensive Plan Chapter 9 (Transportation). Transportation findings in response to Statewide Planning Goal 12 also address transportation and are incorporated by reference.

The findings for Statewide Planning Goal 11 also address public facilities and are incorporated by reference. Therefore, this criterion is met.

- d. The school district within which the site is located has adequate enrollment capacity to accommodate any projected increase in student population over the number that would result from development in the existing zone. This criterion applies only to sites that are within a school district that has an adopted school facility plan that has been acknowledged by the City of Portland.

**378. Finding:** The Montgomery Park plan area is located within the boundaries of the Portland Public School District. The Portland Public School District does not have an adopted school facility plan that has been acknowledged by the City of Portland. Therefore, this criterion does not apply.

3. Services to a site that is requesting rezoning to IR Institutional Residential, will be considered adequate if the development proposed is mitigated through an approved impact mitigation plan or conditional use master plan for the institution.

**379. Finding:** The MPAP does not change any site to IR. Therefore, this criterion does not apply.

**C. When the requested zone is IR, Institutional Residential.** In addition to the criteria listed in subsections A. and B. of this Section, a site being rezoned to IR, Institutional Residential must be under the control of an institution that is a participant in an approved impact mitigation plan or conditional use master plan that includes the site. A site will be considered under an institution's control when it is owned by the institution or when the institution holds a lease for use of the site that covers the next 20 years or more.

**D. When the requested zone change is CI1 or CI2.** When the requested zone change is CI1 or CI2, a Transportation Impact Review is required as part of the zoning map amendment.

**380. Finding:** The MPAP does not change any site to IR, CI1 or CI2. Therefore, criteria C and D do not apply.

**E. Location.** The site must be within the City's boundary of incorporation.  
See Section 33.855.080.

**381. Finding:** All of the Montgomery Park area plan area is located within the boundary of the City of Portland. Therefore, this criterion is met.