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## MEMO

DATE: June 14, 2013  
TO: Community Involvement Committee  
FROM: Marty Stockton on behalf of the Comprehensive Plan Team  
SUBJECT: What We Heard from the Public

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### I. Introduction

This report summarizes public comments from the workshops, the Policy Survey and other public comments on the Working Draft Part 1 Goals and Policies received within the comment period of January 14 through May 6, 2013. The purpose of this report is to share with the public an organized summary of what staff heard. This report will also be used by staff to refine the goals and policies in Part 1 and guide the development of Part 2. An outline of the report is included below:

- I. Introduction
- II. Demographic Data
- III. Summary of Public Comments
- IV. Summary of Policy Survey Analysis
- V. Attachments

Public comments were collected through the following involvement opportunities:

- Eight workshops - Over 350 people signed in at the workshops, which included six district workshops and two topic-specific workshops on business and the environment.
- An online and paper survey - There were 427 surveys submitted.
- Sixty-five community presentations were held within the comment period in which approximately 1,400 people attended. From January 2012 through May 6, 2013, 175 community presentations were held in which approximately 3,500 people attended.
- Four community events where staff set up informational tables and talked to the public at in which approximately 100 people were reached, such as, the Fix-It Fairs and the Our 42<sup>nd</sup> Avenue Annual Celebration and Design. Since January 2012, 16 community events staff set up informational tables and talked to the public at in which approximately 500 people were reached.
- In addition to the survey, close to 290 public comments were collected online, at the workshops and at other community meetings.



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So how will this feedback be used?

All of the input from the survey, online comments, workshops, breakout groups, other meetings and community partners has been sorted by relevance to chapters in the plan, topic areas and geography. Staff reviewed each comment in light of all of the other comments received, as well as other internal analysis as they revise each chapter. In some cases, specific comments will lead to amendments, and in other cases they will not. Comments on Part 1 are summarized within this report.

The public comments will also guide the development of the Working Draft Part 2 maps and project lists, which will in turn guide further revisions to the Part 1 policies. The entire revised package – the proposed draft – will be submitted to the Planning and Sustainability Commission (PSC) in winter 2013-14. After public hearings and deliberations, the PSC will submit a Recommended Draft to City Council for consideration and adoption.

#### Upcoming Involvement Opportunities

In the meantime, staff have learned from the demographic data collected that low income residents, people of color and youth are under-represented in the group of respondents. Staff will work with the Community Involvement Committee (CIC) to target future outreach methods to more effectively engage these communities in the next phases of the project to ensure that participants better match the demographics of the city. Upcoming opportunities include:

- The Comprehensive Plan Update table at Good in the Hood, Sunday Parkways, National Night Out and other summer events.
- Continuation of mapping conversations with community groups that will help bridge the gap between Part 1 and Part 2 of the Comprehensive Plan Update.
- An online “Map App” to allow the public to see specific places and their physical characteristics, as well as, potential opportunities and constraints for development and change.
- Part 2 workshops in the Fall 2013.

## II. Demographic Data

Demographic data was requested from workshop participants and survey respondents to ensure that a representative cross section of Portlanders were participating in the Working Draft Part 1 process. In general, we received approximately 165 demographic data responses from workshop attendees (~47% of total attendees), and approximately 330 responses from survey respondents (~77% of total survey respondents). Detailed summary information is below for both datasets. Citywide data from the 2011 American Community Survey is included in selected tables for comparison.

The data indicate that we need to better include low income residents, people of color, renters and youth. Staff will work with the CIC to design future outreach methods to achieve this goal. Readers should keep in mind that, in all likelihood, this summary does not reflect the full diversity of Portland. People of color, younger and lower-income, etc. households may have different perspectives/concerns.

### Workshop Participant Demographic Data

#### How did you get to the workshop today?

	#	%
Bike	13	8%
Carpool	19	11%
Drove alone	87	51%
Mass transit	15	9%
Walk	35	21%
Total	169	100%

#### What is your age?

	#	%	Citywide 2011
Under 18	n/a	n/a	19%
18 to 24	1	1%	10%
25 to 34	20	6%	20%
35 to 44	26	15%	16%
45 to 54	30	19%	14%
55 to 64	52	34%	12%
65 and older	39	26%	10%
Total	168	100%	101%

#### What best describes your household income?

	#	%	Citywide 2011
Less than 10K	6	4%	9%
\$10,000-\$14,999	4	3%	6%
\$15,000-\$24,999	9	6%	11%
\$25,000-\$49,999	37	24%	24%
\$50,000-\$74,999	37	24%	19%
\$75,000-\$99,999	28	18%	11%
More than 100K	34	22%	20%
Total	155	100%	100%

#### What is your gender?

	#	%
Female	76	48%
Male	84	52%
Total	160	100%

#### What kind of home do you live in?

	#	%
Apartment	14	8%
Condo	8	5%
Duplex	1	1%
House	142	85%
townhome	2	1%
Total	167	100%

#### Does your family rent or own your home?

	#	%	Citywide 2011
Rent	29	17%	43%
Own	139	83%	57%
Total	168	100%	100%

#### Number of people in your household?

	#	%
One	38	22%
Two	86	51%
Three	21	12%
Four	16	9%
Five or more	8	5%
Total	169	100%

#### Where do you live (grouped by district)?

	#	%	Citywide 2011
West	9	6%	14%
Central City	9	6%	6%
North	11	7%	11%
Northeast	49	31%	16%
Southeast	53	35%	29%
East	23	15%	24%
Total	154	100%	100%

**What languages are spoken at home other than English?**

Nine responses indicated that another language is spoken at home. Languages include Arabic, Cayuse, Chinese, Chinook, Dutch, Indonesian, Shoshone, Spanish, Swahili, Thai Bahasa, and Urdu.

**How did you hear about the workshop?**

Wide range of responses including media, internet, friends, community organization and PEG members. Many responses indicated multiple methods.

**Policy Survey Respondent Demographic Data**

**What is your approximate household income?**

	#	%	Citywide 2011
Less than 10K	14	4%	9%
\$10,000-\$14,999	11	3%	6%
\$15,000-\$24,999	23	7%	11%
\$25,000-\$49,999	51	16%	24%
\$50,000-\$74,999	70	22%	19%
\$75,000-\$99,999	65	20%	11%
More than 100K	86	27%	20%
Total	319	99%	100%

**What is your age?**

	#	%	Citywide 2011
Under 18	0	0%	19%
18 to 24	18	5%	10%
25 to 34	74	22%	20%
35 to 44	74	22%	16%
45 to 54	65	19%	14%
55 to 64	76	23%	12%
65 and older	31	9%	10%
Total	337	100%	n/a

**Where do you live (grouped by district)?**

	#	%	Citywide 2011
West	77	27%	14%
Central City	27	9%	6%
North	31	11%	11%
Northeast	40	14%	16%
Southeast	17	6%	29%
East	93	33%	24%
Total	275	100%	100%

**How do you identify yourself?**

	#	%	Citywide 2011
Native American or Alaska Native	4	2%	1%
Asian	6	4%	7%
Black or African American	2	1%	6%
Hispanic or Latino	7	4%	9%
Native Hawaiian or Pacific Islander	0	0%	1%
White	147	88%	76%
Other	1	1%	n/a
Total	167	100%	100%

**What languages are spoken at home?**

	#	%
Chinese	3	1%
English	313	91%
Russian	4	1%
Somali	1	0%
Vietnamese	0	0%
Other	23	7%
Language other than English	31	9%
Total	337	109%

**How do you identify yourself?**

	#	%	Citywide 2011
Native American or Alaska Native	11	4%	1%
Asian	9	3%	7%
Black or African American	10	3%	6%
Hispanic or Latino	17	5%	9%
Native Hawaiian or Pacific Islander	4	1%	1%
White	267	85%	76%
Other	34	11%	n/a
Total	316	112%	100%

**What is your gender?**

	#	%
Female	155	47%
Male	175	53%
Total	330	100%

### III. Summary of Public Comments

Between January 14 and May 6, 2013, staff received close to 290 comments that were collected online, at the workshops and at other community meetings. There was a wide array of comments, ranging from general observations on the project process to suggestions for specific edits to language in the Working Draft Part 1 Goals and Policies. Staff reviewed all comments and identified major themes. Those themes are outlined below, organized by the following topics and chapters:

- Comprehensive Plan Process
- Plan Organization, Style and Approach
- Introduction
- Urban Design Framework
- Chapter 1. Community Involvement
- Chapter 2. Housing
- Chapter 3. Economic Development
- Chapter 4. Watershed Health and Environment
- Chapter 5. Urban Design and Development
- Chapter 6. Public Facilities and Services
- Chapter 7. Transportation
- Chapter 8. Administration and Implementation

In addition to the close to 290 comments mention above, official agency, bureau and City commission comment letters were received. These comment letters are provided in Attachment A: Agency Comment Letters, Attachment B: City Bureau Comment Letters, and Attachment C: City Commission Comment Letters.

#### Comprehensive Plan Process

- Commenters requested clarification about various aspects of the Comprehensive Plan Update process, such as what components of the draft will be officially adopted by Council [e.g. commentary], what products will be available for review this summer and how will the public be involved in the development of future Comp Plan products.
- In order to provide more meaningful feedback on the draft goals and policies, commenters felt that they needed more information about the content in the draft document, how the goals and policies relate to other City documents, and how the goals and policies will be used in the future. Commenters also requested more time to review the document and provide feedback.
- Commenters suggested that the outreach methods need to be adjusted in future project phases to involve a more diverse cross-section of participants that better represents Portland's residents. Advisory groups must also better represent a more diverse population.
- Many comments commended staff for the process so far, particularly the interactive components of the workshops and the Policy Expert Group model that brings together "experts", staff and community members to collectively discuss and provide feedback on draft goals and policies.
- Several comments recommended outreach techniques to use in future project phases, including more interactive methods and activities that are targeted to specific geographies, audiences or topics.

#### Plan Organization, Style and Approach

The information provided below summarizes public comment on the organization and approach put forward in the Working Draft Part 1 Goals and Policies. These comments apply to multiple chapters and parts of the Working Draft Part 1.

1. **Broad Language and Verb Choice.** Many individuals, organizations and commissions noted that the document included weak verbs and very broad language. Those who commented expressed concerns about the ability to direct specific actions based on this broad and soft language; and another commenter questioned the City's commitment to achieving the stated goals for the same reason. Recommendations included using more assertive words, such as "ensure" and "require" in place of "strive," and adding "shall" to policies to emphasize commitment to the goals and policies in the document. Others also asked for definitions of words such as "adequate", "efficient" and "compatible", because they could be interpreted very broadly.
2. **References to Approved Plans.** Multiple members of the public asked why other plans, such as the Watershed Management Plan and the Columbia Corridor Plan were not specifically addressed in the text of the document.
3. **Decision-making, Conflict Resolution and Implementation.** A variety of comments were directed toward how decisions would be made, conflicts resolved and how the plan would be implemented. Many of the comments on these topics overlapped, which is why they are grouped together. Comments included the following (summarized):
  - a. Provide a description or framework for implementing the plan, including tying implementation to the Integrated Goals.
  - b. Clear policies on decision-making will make the document more accessible and useful to stakeholders over time and promote more transparent and effective communication among public decision makers, staff, and stakeholders.
  - c. Clarify how decisions will be made and how conflicts between goals and policies will be resolved.
  - d. This would be a much clearer document if the policies were broken into two parts - the aspirational part and the "what it really means on the ground" part. Images and models would help explain zoning potential.
  - e. Include a more realistic, centralized message about why these policies are important to everyone.
  - f. Enhance description of how coordination with other jurisdictional partners and community stakeholders will occur.
  - g. Include a broader range of implementation tools.
  - h. Address how projects and programs will be funded.

## Introduction

1. **Rhetoric and Language**
  - a. Enhance the language about environmental health and address environmental issues in more topics.
  - b. Lessen the rhetoric about how much has been done in the name of environmental health; there is a significant amount of work to be done to improve environmental and ecological health and resiliency, particularly in light of climate change.

## 2. Integrated Goals

- a. Expressing a commitment to align implementation with the integrated goals will be critical to establishing an overall framework for the plan, and for cultivating buy-in and support from stakeholders who have invested in developing the principles behind the integrated goals.
- b. Create a tighter relationship between the Integrated Goals and the Key Directions.

## 3. Key Directions

- a. Create a tighter relationship between the Integrated Goals and the Key Directions.
- b. Create a tighter relationship between the policies that relate to the key directions which can be found in more chapters than those listed in the introduction. Provide more detailed references to related policies and chapters, particularly administration and implementation.
- c. Incorporate natural resource issues into more key directions and use the term, “natural resource conservation,” not “conservation.”

### Urban Design Framework

No major themes or categories of comments on Section II Urban Design Framework emerged from the review of the series of comment reports. There were several single, focused comments on aspects of the 30% Urban Design Framework map or the associated narrative content, as well as several specific language edits comments on related policies in Chapter 5. While the focused map and narrative specific edits are recorded below, the specific edits would not change any content substantively, and so are not listed. In addition, there were many comments that targeted implementation of one or more of the framework components and/or related policies. These are also not listed.

#### 1. Comments on the 30% Urban Design Framework map.

- a. Lents center - move to include/reflect activity on SE 92<sup>nd</sup>.
- b. 122<sup>nd</sup>/Division Center - move to include center around Powell and Division.
- c. Civic corridor on West Hayden Island should align with LRT on new bridge.
- d. Include Sullivan’s Gulch as a major natural feature in the Comp Plan - it connects river to areas east.
- e. Cesar Chavez north of Sandy cannot be considered as a main corridor.
- f. Need more north-south habitat corridors.
- g. Designation of NW Skyline as a greenway should be reconsidered.
- h. Concern about greenway designation on SE 7<sup>th</sup> in Central Eastside Industrial District.

## 2. Comments on other content in Section II.

- a. The decision to build light rail along freeways precludes this [an activity center that surrounds the station on all sides] at Gateway and Lents, which will be a permanent barrier to their development as centers.
- b. The city is developed (inner NE and SE) along corridors - need a better explanation for how this transitions to center.
- c. The section on Connections leaves out entirely the transportation of freight and goods, only focusing on people and wildlife.
- d. Page II-4 includes a box that states that the West Portland Town Center does not meet the characteristics of a Town Center. This language needs to be deleted in favor of language that the City Council recently approved in the Barbur Concept Plan.
- e. Industrial and River is not an appropriate phrase. It elevates industrial above other river values. A more appropriate phrasing would be "River - Habitat, Industry and Recreation." Also the paragraph on II-3 elevates industrial above other uses. Add a line that says, "This area also serves as critical habitat for fish, wildlife and migratory birds and is an essential link in the greater Columbia River and Willamette River systems."
- f. The design framework should more explicitly reference the role of trees, the urban forest and other natural elements, and strive to connect habitat corridors to provide better functionality.

### Chapter 1. Community Involvement

In addition to the feedback received during the comment period, the Community Involvement Survey (October 2012 through December 2012) and its 192 responses were also reflected in this review. As a whole comments focused on accountability, transparency, broad and effective outreach, communities, improving accessibility of information, and notice and review of by-right projects. These comments were grouped into ongoing community involvement efforts and involvement within a specific project. There appears to be overall support for many community involvement policies, but a general concern with how these policies fit with the rest of the Comprehensive Plan. Following are the high level themes within the community involvement related comments:

1. **Integration of community involvement with the rest of the Comprehensive Plan chapters.** Expand on the policies that describe the purpose and implementation of the Community Involvement Program.
2. **Broaden involvement.** Multiple comments expressed the need to improve outreach to disproportionately-impacted groups, especially communities of color and people who are low income. Involvement needs to include and, in addition, be expanded beyond neighborhood associations in all processes/projects that affect groups and individuals.
3. **Acknowledgement and support of our civic infrastructure.** Many comments identified a gap in acknowledging the "civic infrastructure" - the neighborhoods, nonprofits and other civic organizations that routinely and actively participate in the creation and implementation of City policies. Support includes capacity building, financial and other resources.



4. **Authentic involvement.** Many comments emphasized that processes should be genuine and not for show. City staff need to listen and then act. Community input should have an impact and lead to results.
5. **Improvement of the notification system.** Many comments identified the need to improve the system of both informal and formal notification to use more innovative communication tools and strategies. Content needs to be easy to understand and must include relevant information to affected and interested community members, with enough lead time to allow them to respond effectively.
6. **Build capacity within City government.** Feedback called for providing professional development opportunities to ensure that City staff have the skills and experience needed to design and implement processes that engage a broad diversity of affected and interested communities, including historically underrepresented groups.
7. **Build capacity with the community.** Several comments called for strengthening community capacity to participate effectively with education efforts on both the content and process and how these tie to overarching policy, planning principles and conversation.
8. **Process documentation.** Several comments highlighted the need for and/or improvement to community involvement processes and community input to be documented, preserved and that the public has easy access to information about what happened during processes.

## Chapter 2. Housing

Collectively, public comments (from various sources) on housing policies broadly cover concerns regarding *housing affordability, accessible housing, gentrification/displacement, housing design/neighborhood compatibility, parking issues* and *housing variety*. Multiple comments offer support for the idea of focusing affordable housing in high opportunity areas and for the creation of additional high opportunity areas. There appears overall support for various other housing policies including fair housing, sustainable housing, healthful housing etc. Following is a distilled list of high level themes that summarizes the universe of comments:

1. **Areas of concentrated poverty.** Multiple comments weigh in on prioritizing the needs of low income households that find themselves concentrated in specific geographic areas. It is highly likely that such an area is not just lacking in opportunities (jobs, services, good schools, open spaces) but that the housing units may be substandard. The Opportunity areas (2.5) policy calls for bringing opportunities to areas which already have plenty affordable housing; however, the comments suggest the need for a more specific policy that can speak to poverty alleviation.
2. **Accessible Housing.** Multiple comments elaborate upon the challenges and need for accessible housing. While housing policy (2.3) directs the City to build a robust supply of accessible units, there are suggestions to further strengthen the policy by calling for a “variety” of accessible units preferably at really close proximities (1/4 mile radius) from transit access and other amenities. Comments call out the fact that many single family units are not accessible and that automatically creates a supply shortage for the older adults and people with disabilities.
3. **Gentrification/Displacement.** Multiple comments express an overall concern for gentrification. While there is less agreement on strategies to address displacement, the survey responses offer strong support for involving community members who can be potentially affected by various triggers of gentrification and also for encouraging the use of Community Benefit Agreements

(CBAs) between developers and neighbors; strong support to pursue legislative action regarding Inclusionary Zoning (IZ).

4. Broaden the fair housing polices to consider the impacts of City actions. The Fair Housing policy (2.4) should require analysis of the disparate impacts of land use planning, regulations, and infrastructure improvements on protected classes. The Fair Housing policies should have a connection to the Plan for Fair Housing Choice and should include policy language about avoiding segregation.
5. Residential Capture Rate. Specific comments offer refinements to the housing supply (2.1); while current policy language calls for maintaining adequate housing capacity to accommodate growth, an additional sub policy that calls for monitoring housing production (over a multiple year period) is being suggested. A similar capture rate has been included in the employment chapter and so a companion target in the residential side is conceivable.
6. Apartments with no-parking. Multiple comments cover the issue of parking issues with multi-family developments built without any parking. There is both support and opposition to the City's parking policies/regulations. Connections are made to "quality of life" vs. affordability when discussing parking.
7. Housing Variety. Specific comments discuss the difficulty associated with supporting all housing types. In particular supporting "floating homes" and "mobile home parks" is being called out (policies 2.2.a. & 2.6.b); there is also a related concern whether a shift towards multi-family means a shift away from family friendliness.
8. Impact of Regulatory Costs/Fees on Development Cost. Multiple comments highlight the fact that it is the private market that provides most of the development. So, if Portland is to be an affordable city, then a policy framework to track/mitigate the impacts of various regulations/fees (SDCs, Design Review etc) on housing production should be evaluated. Currently, there is no such policy in the housing chapter. However, the implementation chapter has a policy that speaks to this issue.
9. Housing Design/Neighborhood Compatibility. Multiple comments bring up the issue of good design and neighborhood compatibility. There is also a desire to see appropriate transitions as we move from one form of development to another. Such policies are covered in the 'Neighborhood Centers' chapter but the comments suggests that readers of the housing chapter see that as a gap in existing set of draft policies in Chapter 2.
10. Implementation Strategies. Multiple comments offer strategies to create affordable rental and homeownership opportunities. Suggestions include but are not limited to: fixing property code, state operated banking, fostering innovating unit types etc.

While the above list captures the "dominant themes" there are stand alone comments that offer differing views of single family residential areas, urban density, quality of schools, cost of transportation etc. Dissatisfaction with Trimet services has been voiced as they relate to the "Housing+ Transportation" cost burden. Finally, the "pure" nature of each chapter is being questioned- for example: "What good is maintaining housing affordability if we do not have household prosperity?"

## Chapter 3. Economic Development

1. **Business retention and business climate.** “Business climate” issues were a focus of discussion at the business workshop on the Working Draft, including fees, regulatory processes, and concerns cited below in other themes. Business climate improvements are widely seen as a critical step to move beyond recent trends of declining real incomes and flat job growth in Portland, and many commenters noted that the plan did not go far enough to reverse these trends. A variety of suggestions came up for specific directions to make the city more business friendly, such as faster responsiveness and resolution of economic development issues, more detail on the “nimble development review” goal, and making impacts of city actions that inhibit job growth more transparent. An explicit goal on business retention was suggested, noting that businesses in Portland commonly face high costs, regulatory barriers, congestion, and other challenges which exceed that in alternative business locations in the region.
2. **Support for economic equity policies.** General support was expressed for the plan’s attention to improving economic equity, building on the Portland Plan’s Equity Framework. More detailed economic equity direction was suggested in a few areas. Creating more available jobs should be a clear focus, especially widely accessible middle-class jobs. Commenters suggested doing more to align land use and other city actions with poverty reduction and economic self-sufficiency goals. Create conditions where East Portland can compete more effectively with the suburbs as a business destination, such as along I-205. Growth should enable current residents to build household capital, rather than pushing them out as local living costs exceed wage gains.
3. **Balancing framework across chapters.** Business associations and others pointed out that the plan lacks a framework for prioritization and resolving major conflicts among chapters, such as a “triple bottom line” accounting of social, environmental, and economic performance. Without it, business responders expressed skepticism that economic development policies would be followed. New directions in the environmental and urban design chapters are seen as adding to regulatory burdens, and new directions in the transportation and urban design chapters appear to shift investment priorities away from economic development. Widely divergent views have been expressed on this issue. For example, an Audubon Society comment letter states that, “The path the city has put itself on represents a steady erosion of natural resource functions that clean our air and water, protect our wildlife, allow access to nature and provide resiliency in the face of climate change.” In contrast, a Portland Business Alliance comment letter characterizes “a pervasive bias in the plan toward resource protection, while in our view, giving short shrift to creating a thriving Portland economy and specifically the need for private sector job protection and creation.”
4. **Tension between new economic paradigms.** Some commenters suggested new economic paradigms to stop accommodating industrial growth and export growth generally. Some suggest a clearer focus of economic development objectives on livability and encouraging growth in “creative class” sectors. In contrast, general support was also expressed for draft policies supporting export growth, traded sector competitiveness, and improvement in economic equity, which rely largely on industrial growth prospects.
5. **Economic diversity and desired business types.** General support was expressed for economic diversity policies and setting the stage for all types of businesses to thrive. Some people also called for more support of specific business types. Examples of desired business types identified by commenters include small, locally owned businesses, alternative energy manufacturing, waterfront commercial recreation, and others.

6. **Integrated industrial land and environmental approaches.** Comments generally supported “integrated approaches” to implement industrial land and environmental policies. Questions 2 and 3 of the Working Draft Survey queried support for 9 types of integrated approaches (e.g., subsidize brownfield redevelopment). Overall numeric survey results showed support for 7 of 9 approaches and mixed responses on the other 2 (golf course reuse and off-site mitigation). However, written comments cited common objections to all 9 approaches, reflecting the divergent stakeholder perspectives on this topic. Some commenters also called for more attention to neighborhood/industrial compatibility in transition areas.
7. **Campus institutions and neighborhood livability.** Neighborhood associations and some others expressed skepticism or uncertainty about the draft campus institutional policies, commenting that campus development can have significant impacts on neighborhood livability. Livability concerns focused on transportation and parking. Some responders are looking for more detail in implementation approaches. Some cited positive results from good neighbor agreements. Interest was also expressed to provide for smaller, growing institutions not on the current map and corporate campuses such as Adidas.
8. **Freight mobility and the green/active transportation hierarchy.** Many comments suggested elevation of Portland’s multimodal freight hub role in transportation policies, coordinated with economic development objectives. In particular, commenters objected that the draft green and active transportation hierarchy should not include freight (multiple modes) or should be based on land use instead. The issue of freight access and delivery of goods to neighborhood business districts also came up in the district workshops and submitted comments. There is a common desire to balance active transportation investments in neighborhood business districts with freight access to ensure safe and efficient delivery of goods to businesses.
9. **Economic development and tax base.** A variety of comments suggest adding policies that better link economic development and tax base objectives. For example, some suggested that economic development should be supported more explicitly to create a stronger tax base. The issue of unfunded liabilities implicit in many policies was also cited as a source of high fee costs for businesses in Portland that inhibits job growth relative to the region.
10. **Neighborhood commercial corridors.** Broad support was expressed for policies that preserve and/or require space for commercial activity in commercial zones located in centers and neighborhood business districts. Many supported incorporating diverse employment uses in neighborhood centers to provide neighborhood economic development and entrepreneurship opportunities as well as to increase daytime population to support other businesses. Another issue cited at the business workshop was to avoid unintended negative impacts on business by the plan, such as the non-conforming status of many corridor businesses that resulted from map amendments in the 1980 plan. Many of these businesses are still in place today, hampered by expansion restrictions, while the corridors have taken on a more mixed-use character.

#### Chapter 4. Watershed Health and the Environment

1. **Balanced policies.** Many people commented on the perceived differences between the strength of the language and verbs used in the Watershed Health and Environment chapter (Chapter 4) versus the language in Economic Development chapter (Chapter 3). Several people commented that the chapters are imbalanced. However, there is definite divergence in opinion about the relative strength of environmental compared to the economic policies. Some commenters described the environmental goals and policies as being “more aspirational” while economic development goals and policies were felt to be “more concrete.” On the other hand, many commenters expressed

exactly the opposite sentiment by pointing out phrasing that they believe implies that the economic policies are not as high a priority as the environmental policies. Regardless of which position is taken, in both cases commenters are concerned that the Working Draft reads as if the City intends for one set of goals and policies to take precedence over the other. Examples of aspirational language in both chapters include verbs such as “maintain” and “create.” Conditional language pointed out includes words such as “encourage” or “strive”, and terms such as “where practical”.

2. **Decision-making.** Many of the comments recommend that the Comprehensive Plan include a framework or methodology for resolving conflicts or making tradeoffs between goals and policies. This request came up several times in combination with comments on the clarity and strength of the policy language. The concern is that there is inherent conflict between some goals and policies and without a clear prioritization it will be difficult to implement the Comprehensive Plan going forward. Some described the draft plan as compartmentalized and lacking in direction for how City bureaus will work together to make tradeoffs such as more sidewalks and bikelanes vs. impacts on stormwater, trees, and habitat, trees and solar, building height and solar, etc.
3. **Specific actions and targets.** Following on the themes of balancing and prioritizing, some of the comments called for including more specific direction in the Comprehensive Plan in terms of implementation actions and targets for the City to meet. Examples of this type of suggestion include adding tree canopy targets, watershed specific restoration or enhancement actions, and specifics on follow-up zoning projects to implement the Comprehensive Plan.
4. **Environment and Economy.** There is a wide range of public comments on the relationship between the environment and the economy. The bulk of these comments focus on industrial land and watershed health. Most of the comments are supportive of policies, goals, and strategies that advance both watershed health and economic growth. There is less agreement about how to do that effectively. Many of the comments support strategies to address the industrial land shortfall, however not all of the strategies are supported equally. Several of the comments reflect concerns that increasing the supply of industrial land will have negative impacts on watershed and human health. Others are concerned that strategies focusing on reuse of underutilized or contaminated industrial sites are unrealistic and will cost too much money. Many of the comments on the economy and watershed health theme are similar to comments on theme #1 (balanced policies). The comments in both categories generally suggest that the Working Draft policies don’t adequately emphasize either topic—watershed health or economic health. This perspective is captured in comments such as “...the Draft Comprehensive Plan does not adequately plan for business prosperity, job growth and a healthy economic environment”, and “the comprehensive plan needs a business lens”. From the environmental perspective, there are comments such as “the draft Comprehensive Plan perpetuates an unrealistic and unsustainable assumption that Portland can continue to find significant new acreage of industrial land without seriously compromising the health and livability of our communities and the environment”.

In addition to the comments on the intersection between industrial land supply and watershed health, several of the public comments do not support public subsidy of contaminated site clean-up, and more than a few commenters are anti-coal.

5. **Design with Nature.** The comments on the design with nature policies are predominately supportive, but call for more explicit mention of green infrastructure as important for ecological health and resiliency. Some of the comments describe reasons to support the integration of nature into the built environment (e.g. being able to see and interact with nature is important for children; rooftop gardens are a good and important idea). Other comments are supportive of specific design-

with-nature strategies such as planting trees and flowers, reducing impervious area, eco-industrial development and ecoroofs. In the survey results, nearly 60% of respondents agree or strongly agree that the City should promote ecologically friendly industrial site design, and nearly 77% of respondents agree or strongly agree that the City should encourage habitat-friendly site design. Several comments suggested the City conduct more outreach and education about design with nature techniques.

6. **Equity.** Equity was a recurring theme in the public comments. The comments related to equity ranged from concerns about gentrification (property taxes and property values) to improving access to trees and nature. At least two of the equity-related comments raised questions about the meaning of the term “historically underserved communities”.
7. **Trees and vegetation.** The comments related to trees and vegetation are predominately supportive of the draft policies, or call for stronger language to protect and improve the distribution of the urban forest. Several of the comments specifically call out and support policies related to biodiversity, including support for pollinators and other beneficial insects, and the management of invasive species. A couple of the comments suggest that the policies should emphasize native vegetation in critical wildlife areas. The comments also include calls for more attention to trees and green along rights of way and in the public realm.

The comments specific to trees and the urban forest call out the tension between tree preservation and solar access, and tree preservation and density (i.e. trees block solar access, and infill often results in tree removal). A few comments also point out the danger of tall trees near buildings, and question requiring trees on all sites (e.g., river industrial sites). Several comments suggest that, with the City’s help, community groups could be organized to help manage invasive species in natural areas and on other City owned property.

8. **Habitat corridors.** Many of the comments related to habitat corridors support protection and improvement of existing habitat connectivity, and call for the creation of new habitat connections where necessary. Several of the comments highlight specific habitat corridors that need to be protected or improved, such as between Forest Park and the Coast Range, and along Sullivan’s Gulch. Other comments focus on tools the City should use for protection including land use policies, acquisition, tax deferral and other incentive programs.
9. **Hazard preparedness and climate change.** There is support for policies related to hazard preparedness coupled with concern that the plan doesn’t address climate change explicitly enough. This concern can be summed up in this comment: “In general the plan could do a better job of calling out climate change. It appears here and there but it seems cursory. It should be a dominant theme.”
10. **Relationship to other City, regional and state plan.** Several of the comments raised questioned how other City, regional or state plans will be referred to, or incorporated into, the Comprehensive Plan. Some of the comments specifically call for the City’s Urban Forestry Management Plan and Portland Watershed Management Plan to be incorporated into, and implemented by, the Comprehensive Plan. Others suggested that regional and state plans (e.g. Metro’s Title 13) should be referenced in the Comprehensive Plan.
11. **Partnerships.** Partnerships with the community and other jurisdictions emerged as a theme in the public comments. Several comments suggest that the City could partner with community and neighborhood groups to implement policies in the Comprehensive Plan. Primarily the policies noted were related to invasive species management and habitat corridor protection. Other comments support policies calling for a regional conservation strategy and coordination with other jurisdictions

## Chapter 5. Urban Design and Development

Public comments received through May 2013 on Chapter 5 addressed a broad range of topics and included very wide-ranging suggestions for policy refinements and implementation approaches. The majority of the comments (about 83 percent) expressed general support for the policy direction in Chapter 5, suggested specific refinements to policy language, sought greater emphasis for particular topics, or were about implementation of the policies. No particular policies or suggestions for refinement received a preponderance of comments, but some of the more common themes are summarized below.

1. **Support for centers, design with nature and greenways.** Policy topics that public comments most frequently expressed support for were:
  - a. Cultivating centers as places with neighborhood businesses, community services, and gathering places.
  - b. Including gardens, trees and other green elements in urban areas.
  - c. Creating a citywide network of greenways providing active transportation connections.
  
2. **Implementation is key.** The most frequently received type of comment (42 percent of all comments) was not about the policies themselves, but was about implementation of the policies. Frequently-received comments regarding implementation were about:
  - a. Local implementation, including specific suggestions on where centers, corridors, and greenways were needed and how they should be implemented.
  - b. The importance of sidewalks, street design, and pedestrian safety in successful centers and corridors, and concerns about how the City will follow-through in making these improvements.
  - c. Concern about development scale and transitions to lower-density areas and desire for greater clarity about the specifics of implementation and the need for design standards or design review.
  - d. A wide range of comments about regulations and incentives, and concerns about government subsidy of new development.
  - e. Comments about parking requirements, often about the need to require more parking, but also comments supportive of not requiring parking.
  
3. **Emphasis needed.** Many comments supported the draft policy direction, but asked for greater emphasis on particular topics, in terms of stronger language and more frequent policy reference. Topics frequently suggested as meriting greater emphasis included:
  - a. Trees and native plants, and the preservation of natural resources.
  - b. The physical accessibility of the built environment to accommodate people with disabilities and older adults.
  - c. Preservation of historic resources and the desire for more explicit guidance on implementation, especially in relation to the growth anticipated in centers and corridors and potential impacts on historic resources.

The public comments included a smaller number of requests for policy direction that was not explicit in the draft policies. The most frequently recurring of these requests were:

4. **Prioritization of East Portland improvements.** East Portland should be prioritized for sidewalk construction, parks, and commercial and community services. Comments frequently cited that it was unacceptable that East Portland was receiving urban levels of housing density, but lacked urban infrastructure, with the area's large numbers of low-income households and other disadvantaged populations raising equity issues. Comments ranged from opinions that dense development should not be allowed until sidewalks and other urban infrastructure is in place, to calls for the City to prioritize improving infrastructure and services in the area.
5. **Pedestrianized streets.** Need policies that more clearly support allowing some car-free streets providing pedestrian and bicycle connections and that support improvement of unused right-of-way for community purposes.
6. **Neighborhood input into project design.** Policies are needed that call for providing opportunities for neighborhood input in the design of new development.
7. **Solar access.** Policies should seek to preserve solar access, for livability and to provide opportunities for solar energy.
8. **Neighborhood compatibility.** Policies should more strongly call for new development to respect existing neighborhood scale and to avoid density impacts. Some comments requested that compatibility with neighborhood scale and character be a priority in mixed-use areas such as neighborhood centers, civic corridors and main streets. However, other comments supported the idea that centers and corridors should be where growth is concentrated, with compatibility being more of a priority in lower-density areas outside those locations.

#### Chapter 6. Public Facilities and Services

Public feedback focused on transportation, transit, park, and school infrastructure. There were few comments on water, sewer or stormwater facilities or services. In general, commenters:

1. Supported a balanced infrastructure investment approach, with priority on:
  - a. **Maintaining existing infrastructure, particularly roads.** Some commenters identified a desire to maintain the infrastructure we already have prior to building new facilities or providing new services. Others saw an important link between better maintenance and the city's ability to protect public safety and provide basic services.
  - b. **Providing basic services equitably throughout the city.** A number of commenters expressed a desire to prioritize basic services - particularly improved and connected streets, pedestrian and bicyclist networks, and parks and green spaces - in areas that currently lack such services. East Portland was identified as lacking basic services. Some commenters supported prioritizing public funds to provide such services before making other infrastructure improvements. When it comes to addressing service deficiencies and gaps, some commenters felt it was important to prioritize those areas where residents have fewer options and/or a greater need. For example, sidewalk improvements could be prioritized in low-income communities that may be more dependent on transit.
  - c. **Protecting and improving safety.** Some commenters prioritized investments to protect and improve both actual and perceived safety, such as traffic safety improvements, lighting on sidewalks and in parks, and police services. Some commenters also saw a link between safety improvements and maintenance (for example, a pothole in a road could be both a safety and maintenance issue), as well as between safety and providing basic services (for example, lack of a sidewalk could be both a service and safety issue).



2. Commenters also recognized the need to upgrade infrastructure systems and serve new residents as the city grows; and encouraged pursuing investments that meet or balance multiple goals.
3. Supported coordinating infrastructure planning and improvements with new development and other infrastructure services to more strategically address infrastructure deficiencies and needs. Some commenters expressed concern that public and private infrastructure investment do not always occur in lock-step with new development and growth. When this occurs, residents and businesses can be left without sufficient infrastructure services. Some commenters called for increased coordination of infrastructure planning and construction between city agencies and between the City and partner agencies (such as schools).
4. Recognized the City's significant infrastructure funding challenges and expressed interest in thinking "outside the box" to find solutions. Some commenters recognized the City's funding challenges, particularly for transportation and transit, and are concerned that such limitations are negatively impacting levels of services. To address such funding gaps, some encouraged the City to explore new funding sources, public-private and community partnerships, and other tools to improve fiscal sustainability. Others proposed recognizing the limitations of finding new revenues and encouraged setting clearer priorities for providing basic services within existing resources. In addition, some commenters expressed a desire to examine whether current funding models have an inequitable negative impact on some residents and businesses.
5. Identified a need for additional policy language that supports considering, planning for, and improving infrastructure to be able to withstand and respond to a major natural disaster, such as a subduction zone earthquake. Comments cited seismic and redundancy improvements, as well as a need for processes, plans and equipment to support disaster response and recovery.
6. Recommended additional policy language to explicitly tie public facility design and operation choices to climate change adaptation and mitigation. Some commenters felt that while the chapter included policies to mitigate and adapt to climate change, the connection was often left unstated.
7. Regarding specific infrastructure systems, commenters:
  - a. Called out street, bike and pedestrian connectivity and safety as a critical basic service. Some commenters identified a particular need to improve safe connections to key destinations, such as schools and colleges, employment areas, parks and natural areas, and along civic corridors. Substandard and unimproved streets, which often lack pavement and sidewalks, were identified as a key issue, particularly in southwest and outer east neighborhoods.
  - b. Supported policies that allow and encourage flexible street designs. Many commenters were open to rethinking street standards to improve access and mobility. However, some commenters expressed a desire to resolve potential issues related to 'non-traditional' street designs, such as responsibilities for and levels of maintenance, mobility and access for various modes, and delineation between public and private space. In addition, some commenters stressed that any flexible standards should be defined - in part - by the local community's needs and goals.
  - c. Supported policies that encourage "designing with nature" and green infrastructure, including natural areas, trees, parks, gardens, and green streets - to address infrastructure, ecosystem and resiliency goals. Some commenters expressed a need to further consider long term maintenance needs and costs, appropriateness to the level and

type of adjacent development, the need for additional community education regarding the purpose and stewardship of green infrastructure. Commenters also identified a need to carry the 'design with nature' idea throughout the plan. A number of commenters also suggested ways to improve the environmental impact of the City's infrastructure, including using non-fossil fuels for transit and city fleet vehicles, building green streets, and using native plants in parks and streets.

- d. Identified the quality and capacity of schools as a key issue. Some commenters expressed concern about maintenance and safety needs at public K-12 schools, as well as a need to address large class size. They also expressed an interest in considering school capacity needs as the city plans for new development.
- e. Identified a need for additional policy language to more specifically acknowledge floodplain protection and the role of levees and other flood control infrastructure.

## Chapter 7. Transportation

### 1. Overall

- a. Strong support overall for the goals and policies although several of the goals are redundant and overly complex - keep it simple. Also, many terms need definition (e.g. complete streets, sustainable, vulnerable, active, green, etc.).
- b. Perceived conflict between goals and policies. Need a better explanation of how goals are intended to interact with other goals and policies.

### 3. Green and Active Transportation Hierarchy

- a. Strong support for concept of providing policy guidance on the best use of limited right-of-way, but many expressed concerns about how it would be implemented. For example, there was support for prioritizing pedestrians and bike, but not if it is at the expense of transit. Overall, there was concern that the hierarchy concept will elevate one mode over another without consideration of the context.
- b. Concern about including freight into the hierarchy because freight is not really a mode. Freight should be separate consideration.

### 4. Civic Corridors

- a. Similar to the hierarchy, there was support for the concept but more definition is needed. Many were intrigued by the concept of networks designed to facilitate wildlife movement, not just people and goods. The primary concern was how mobility needs (i.e. freight, oversized dimensional, and emergency vehicles) would be addressed on Civic Corridors.

### 5. System Management Policies

- a. Many comments suggested investing to reduce disparities by providing a basic level of service and level of infrastructure. The needs vary depending on the geography of the city (e.g. local streets in SW don't all need sidewalks) but there should be a strong emphasis

on maintaining what we have and ensuring safety. Only then consider investing in perceived amenities.

- b. Many expressed concern about the transportation system being financially feasible. The process of prioritizing infrastructure projects must:
  - 1) Utilize a range of processes and tools to assess many of the cities priorities (equity, health, maintenance, safety, etc.). Many of the priorities overlap and are not mutually exclusive.
  - 2) Link priorities to the importance of achieving the goals of the Climate Action Plan. These benefits are lost when the reasons are not fully described.

#### Chapter 8. Administration and Implementation

Compared to some of the other chapters, the Administration and Implementation Chapter got relatively few comments from the public. However, there are some significant themes and concerns. These are listed below, in no particular order.

1. We need to be clear about the decision-making process that will be used when applying the goals and policies. People want to know how we will resolve conflicts among goals and policies, how we will consider balancing and trade-offs.
2. Goal 8.E, Cost of regulations, should also include the benefits of regulations, such as quality of life, enhanced environmental protection, better urban design, and so on.
3. We should have a more descriptive, clear, and complete description of how we will implement the Comprehensive Plan, including the relationship to existing plans, ranging from Watershed Plans to area plans to neighborhood plans.
4. We need to emphasize that we will continue to coordinate with other jurisdictions, and describe how that coordination will happen.
5. More implementation tools should be listed.

#### Implementation

Many comments received on the Working Draft Part 1 related to future implementation of the new Comprehensive Plan and the regulating and/or incentive structures needed for implementation. This section summarizes those comments. The high-level themes among the comments regarding this topic were:

1. **Institutions (including schools).** Feedback called for better integration of institutions into surrounding neighborhoods and making institutions community assets. Other comments called for review of parking and traffic considerations during the conditional use review. Greater flexibility in zoning regulations to better enable upgrades to school facilities was also a theme.
2. **Neighborhood Involvement/Associations.** Most comments related to increasing involvement of Neighborhood Associations in area planning and in the development review process. Examples include whether Associations should have standing during development review, standards regarding the Associations themselves, and earlier involvement during development review.
3. **Housing.** Issues include reconsideration of Portland's housing density policies, preservation of existing housing stock (including a call for updating the Historic Resources Inventory), better design of new construction, and ensuring affordability and accessibility.

4. **Urban Renewal / Financing.** Issues include better using financing assistance to achieve social goals and infrastructure. Other comments were about fees, both permit and System Development Charges (SDCs).
5. **Public/Transportation Investment Needs.** Highlights include providing better links between private growth and public infrastructure, planning infrastructure investments in centers, the need to emphasize freight movement, providing infrastructure improvements through non-traditional means (such as non-profits or job programs), and targeting of infrastructure to green and equity goals.
6. **Commercial Areas.** Key issues include need to ensure commercial uses within commercial areas, better compatibility of new development in existing commercial areas, and desire to encourage locally-owned businesses.
7. **Transition Areas.** Key issue is to develop transition plans between higher and lower intensity areas. Some reoccurring themes include transitions, between commercial and residential zones, multi-family and single-family development, and between institutions and residential areas. Several comments called for a finer degree of attention than is currently provided.
8. **Urban Design Tools.** Key issues include designing for compatibility and geographic context and ensuring quality materials.
9. **Mapping Comments.** Comments included the desire to not create non-conforming uses through map change and the cost to property owners to requesting zoning map changes. Several comments were about rezoning specific properties.
10. **General Zoning Comments.** Comments included allowing fewer “by-right” development and greater discretion to better integrate new development. Another theme was to consider form-based zoning.
11. **Programs/Tools/Strategies.** Many comments called for new programs, tools or strategies, ranging from toolkits for hiring diverse populations to brownfield clean-up, to implement the new Comprehensive Plan.

#### IV. Summary of Policy Survey Analysis

The policy survey was conducted from February 14 to May 1, 2013. The survey was available online and was also distributed workshops to community, neighborhood and business groups. There were 427 surveys submitted of which 381 were completed online and 46 were mailed in or filled out at an outreach event. Respondents weighed in on strategies covering several topic areas, including infrastructure investments, industrial lands, watershed health and the environment, and housing. Overall, there was strong support for most strategies, particularly for those to preserve and protect the environment and watershed health, promote affordable housing linked with access to transit and services, and involve community members most likely affected by changes in the decision-making process. Support was also very strong for investing in maintenance of existing infrastructure.

A detailed demographic breakdown is included in Section 2 of this report. As noted, the percentage of respondents to the survey who are people of color is disproportionately low given the demographics of Portland today (and in particular, doesn't match the project population of Portland over the plan period). Eighty-five percent of respondents identified as white, compared with 76% of all Portlanders. With a relatively small survey sample size, People of Color<sup>1</sup> only represent 85 survey respondents.

Survey respondents' incomes tended to be higher than the citywide average, with 69% coming from households that make over \$50,000 annually, compared with 50% of households citywide. Survey responses from low income<sup>2</sup> households total 11%, less than the corresponding 25% of Portland households that fall into that category. Forty-eight respondents fell into the Low Income category.

The Southeast and Northeast districts saw the highest response rates, with 21% of all respondents from Southeast and 18% from Northeast. The East district saw the lowest response rate, with just 4% of respondents identified as living in that district. An additional 31% of all respondents did not provide zip code information. Due to the large number of blank responses and the small sample size from several districts (only 17 total responses from the East District), the survey data is not presented with the district breakdowns.

The survey is not being used as a scientifically valid data collection tool. It was intended to stimulate and encourage public involvement in policy-related decision-making. It was used as a discussion guide in public open houses, informal community meetings, or in advisory committee meetings. It was also used to educate the public about the kind of issues the city faces, and the informal questionnaire was intended as a tool to summarize some of those choices. Staff also used this as a tool to collect demographic data about the people the project is reaching through the different channels of its outreach efforts.

While staff compiled the results, and is considering the results along with other input, it is not being used to directly determine the bureau's Comprehensive Plan policy recommendations. Those recommendations are much more directly influenced by more in-depth advisory committee discussions, direct dialog with the public, the background research, and best professional judgment.

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<sup>1</sup> "People of Color" are respondents other than "White" or "No Response"

<sup>2</sup> "Low Income" represents respondents earning less than \$25,000 per year, based on the poverty level of \$23,550 for a family of four in Oregon in 2012.

## SURVEY QUESTIONS

### Question 1. Infrastructure

Q.1: If you had \$100 to make infrastructure improvements, how would you spend that money?

	All Results
Maintain what we have	42%
Reduce longstanding inequities	18%
Improve the safety of facilities	15%
Upgrade existing infrastructure	14%
Focus on existing and growing opportunity areas	12%
Total	100%

#### Observations

Respondents were asked to prioritize the above options if given \$100 to spend in \$10 increments. Funding maintenance of existing investments was by far the highest priority, with 42% of all possible funds spent on that category. Respondents were least supportive of the option to “focus spending in areas with existing and growing concentrations of housing and job opportunities to benefit the greatest number of people and businesses,” with only 12% of funding. Though reducing longstanding inequities was the second highest priority for all response groups, low-income respondents were more supportive of that strategy than all responses, with 25% of spending by that group allocated to reduce inequities. People of color were more likely to prioritize maintenance of existing infrastructures than other groups.

#### Comment Summary

Please refer to Chapter 6: Public Facilities and Services for the summary of open-ended responses.

## Question 2. Investing in a Healthy Economy and a Healthy Environment

**Q.2: How should the City of Portland invest to support a healthy economy and a healthy environment in and around industrial areas?**

		Agree Strongly					Disagree Strongly		
Subsidize the clean-up and redevelopment of contaminated properties (brownfields).	All Results	26%	19%	19%	10%	10%	5%	12%	
Increase funding to build infrastructure to help industrial businesses function more efficiently.	All Results	17%	22%	22%	16%	8%	6%	8%	
Continue to spend public money to restore natural resources in industrial areas.	All Results	28%	20%	16%	12%	9%	6%	9%	
Promote “ecologically-friendly” industrial site design through monetary incentives and technical assistance.	All Results	28%	18%	14%	12%	6%	8%	14%	

### Observations

Overall, respondents showed relatively strong support for all strategies dealing with the delicate balancing of investments that support protection of environmentally sensitive areas and also those for industrial needs and a healthy economy. More than 60% of all respondents were in agreement with the strategies, with strongest support for the strategy to “continue to spend public money to restore natural resources in industrial areas.” For most strategies, low-income respondents were even more supportive than for all responses, averaging a support rate of over 75%. The exception was the strategy to “increase funding to build infrastructure to help industrial businesses function more efficiently,” which saw only 48% agreement from low-income respondents. The results for people of color were mixed, with weaker support for most strategies, the exception being the strategy to “increase funding to build infrastructure to help industrial businesses function more efficiently,” which saw 63% agreement.

### Comment Summary

Questions 2 and 3 of the Working Draft Survey queried support for 9 types of integrated approaches intended to help meet both economic and environmental goals. While overall the numeric survey results showed general support for 7 of 9 approaches and mixed responses on the other 2 (golf course reuse and off-site mitigation), the written comments focused more on commonly held objections to the approaches, rather than providing reasons for support shown in the numeric results.

Respondents expressed diverse perspectives with regard to this question. However, the comments illustrated a common concern about how public dollars are used. Notably, the largest number of

comments on a single topic expressed opposition to public subsidies for brownfield remediation, and repeated statements that industry or polluters should pay for clean up. This comment reflects a common theme: “Hold industrial polluters (past and present) accountable for the clean-up of contaminated properties.” And while several respondents expressed support for promotion of ecologically friendly development, several respondents also expressed opposition or advised caution toward spending public money for such efforts. While a several of the respondents supported “expanding road capacity or investing in rail system upgrades”, it was also suggested that there be no additional spending on rail or on roads if this led to more large freeway interchanges. One respondent noted that every choice listed involved spending more money, and suggested “...try making do with what you have first.”

Several respondents suggested that there are significant economic benefits associated with sustaining a healthy environment. For example, one respondent supported pursuit of innovation in environmental protection, noting that “environmental protection is good business.” Another recommended incentivizing “reuse, deconstruction, and projects that RESTORE - going beyond protection and keeping PDX at the forefront of environment meeting economics.” Yet, comments also indicated skepticism regarding the effectiveness of such efforts and government in general. One respondent suggested that too many eco-friendly projects are “feel good projects” without substantial ecological gain, and that future incentives focus on attaining measurable environmental benefits. Several comments focused specifically on concern about government effectiveness and wastefulness. One respondent suggested “get your own house in order and demonstrate your ideas are financially sustainable....”

It is also notable that the extent of concern about or opposition to public investment seems to diverge from statistical responses, where in contrast roughly 70 to 80 percent of the respondents agreed with or were neutral toward subsidizing brownfield clean up, increasing investments in infrastructure and natural resource restoration, and promoting eco-friendly development through financial incentives or technical assistance.



### Question 3. Regulating a Healthy Economy and a Healthy Environment

**Q.3: How should the City regulate development to support a healthy economy and a healthy environment in and around industrial areas?**

		Agree Strongly						Disagree Strongly	
Protect existing industrially zoned land by prohibiting retail and other non-industrial businesses on industrial land.	All Results	25%	18%	18%	16%	11%	7%	6%	
Protect higher quality natural resource areas and allow new industrial development in lower quality natural resource areas.	All Results	28%	21%	20%	10%	7%	6%	8%	
Allow developers to make up for the negative environmental impacts of industrial development by improving environmental conditions at designated nearby locations.	All Results	13%	18%	22%	13%	9%	8%	17%	
Zone more land for industrial development	All Results	9%	15%	21%	18%	11%	10%	16%	
Increase the use of “ecologically friendly” industrial site design through regulatory incentives.	All Results	30%	23%	11%	11%	5%	6%	14%	

#### Observations

Respondents were generally supportive of regulatory strategies that protect high quality environmental resources, with 69% agreeing that the City should “protect higher quality natural resource areas and allow new industrial development in lower quality resource areas.” Support was also strong for regulations that encourage environmentally sensitive site design, at 64%. Fewer respondents agreed with policies that allow developers to mitigate environmental impacts off-site, with only 53% agreement. The only strategy that did not see majority support (45%) was “zoning more land for industrial development.” The low-income group was more supportive of strategies to protect high quality natural resources (75%) and promote ecologically friendly site design (83%) than all respondents, and even less supportive of zoning more land for industrial development (33%). People of color tended to show similar level of agreement with the strategies as did all respondents, though at somewhat lower levels.

#### Comment Summary

Comments on Question 3 continued to reflect a diversity of opinions about the role of regulations in helping meet goals for industrial development and watershed health. For example, a number of respondents suggested reducing or relaxing regulations, finding ways to “make Portland more attractive to private investment capital,” shrinking government, and ceasing to “strongly discourage industry.”

Others supported “reasonable” rules and regulations, and approaches that “do not allow negative impact.” Several respondents recommended more flexible regulations including allowing some retail and commercial uses in industrial zones, allowing some industrial uses in non-industrial zones, creating more categories of industrial zoning, and shifting the thinking on what is “industrial” to a broader concept of “employment.” It was suggested that regulations allow for consideration of site-specific issues and discretionary decision-making.

Several respondents called for approaches that would prevent harm to neighborhoods, residents, and natural resources. Several responses expressed concern about the impacts of industrial development such as toxics, pollution, and air quality. One respondent suggested wide buffers between residential and commercial properties and industrial property. Some cautioned against reliance on mitigation of environmental impacts and recommended avoiding impacts in the first place. Comments both recognized the importance of proximity to rivers for industry and expressed concern about the impacts of industry on rivers. Several expressed resistance to developing more industrial land, suggesting that this be done “only if absolutely necessary,” and if land “is already being used wisely.” Several comments expressed opposition or reluctance regarding potential conversion of golf courses to a mix of industrial land and open space. One respondent suggested that any newly designated industrial land be connected to job creation.

## Question 4. Housing and Transportation Costs

**Q.4: What should the City of Portland do to keep the combined costs of housing and transportation reasonably low?**

		Agree Strongly						Disagree Strongly
Focus affordable housing in areas with good transit access, businesses and services through public investments in housing and market incentives for developers, even though the cost of development is higher in those areas.	All Results	30%	24%	11%	9%	5%	4%	17%
Build affordable housing where land is less expensive to maximize the number of new affordable housing units, even though access to services and transportation may be limited.	All Results	4%	9%	10%	15%	17%	15%	30%
Expand transit, bicycle and pedestrian options in areas with existing affordable housing/lower income residents to reduce the amount of money households spend on transportation.	All Results	34%	22%	13%	7%	4%	4%	17%
Encourage developers to construct mixed-income and/or high-quality affordable housing through technical assistance, density bonuses and other incentives.	All Results	26%	24%	15%	10%	4%	4%	18%

### Observations

Strategies that focus on providing high-quality affordable housing with access to services and low-cost transportation options saw strong support from respondents. Expansion of bicycle and pedestrian options in areas with affordable housing was an idea supported by 69% of respondents, with similarly high support for strategies that encourage developers to build more affordable housing and locate housing in areas with good transit and service access. Most respondents disagreed with the strategy to “build affordable housing where land is less expensive to maximize the number of new affordable housing units...,” with only 23% agreement and 62% disagreeing with that statement.

Low-income respondents tended to be more supportive of affordable housing strategies than all respondents combined, with 84% agreeing with the strategy to focus affordable housing in transit and service-rich areas. Overall, responses from people of color were similar to the total survey sample, though generally with less strong agreement. However, people of color also tended to be more polarized on some of these issues. For example, 56% agreed with the strategy to encourage developers to construct

affordable housing (compared to 65% for all survey respondents), but 31% “strongly disagreed” with the strategy.

**Comment Summary**

Please refer to Chapter 2: Housing for the summary of open-ended responses.

**Question 5. Residential and Business Displacement**

**Q.5: What should the City do to minimize and mitigate residential and neighborhood business displacement?**

		Agree Strongly						Disagree Strongly	
Involvement of community members most likely to be affected by public investment decisions in the decision-making process to better understand the social implications and avoid negative outcomes.	All Results	54%	21%	11%	4%	3%	1%	5%	
Encourage the use of community benefit agreements.	All Results	40%	22%	15%	9%	4%	2%	8%	
Create financing programs, like lease-to-own agreements, which help renters become homeowners.	All Results	23%	20%	20%	11%	6%	3%	16%	
Explore tools, like property tax relief, to help residents and businesses stay in their neighborhoods as their neighborhoods become more expensive.	All Results	28%	26%	15%	8%	6%	4%	13%	
When making major infrastructure investments, make corresponding investments in affordable housing.	All Results	26%	23%	11%	10%	7%	5%	17%	

**Observations**

Overall, respondents showed strong agreement with these strategies, most notably to involve community members most likely to be affected by decisions, with 86% of all respondents in agreement (and 92% of low-income respondents). The strategy to link infrastructure investments with affordable housing investments saw the weakest support, though 60% of all respondents were in agreement with that policy idea. Low-income respondents showed stronger support for the strategies proposed in this question, while people of color tended to show slightly lower support levels as the overall sample, though again some polarization was noted, with a larger share of people of color strongly disagreeing with many of the strategies in this section.

**Comment Summary**

Please refer to Chapter 2: Housing for the summary of open-ended responses.

**Question 6. Environment and Watershed Health**

**Question 6. How should the City of Portland restore natural resources, reconnect habitat and improve access to nature?**

		Agree Strongly						Disagree Strongly	
Change zoning to limit future development in areas prone to landslides and flooding and/or in areas with high quality natural resources.	All Results	50%	27%	9%	5%	2%	2%	4%	
Regulate the size, design and/or location of development in environmentally sensitive areas to reduce impacts to these areas.	All Results	46%	26%	13%	5%	3%	1%	5%	
Encourage environmental stewardship and habitat-friendly site and building design through education and incentives.	All Results	43%	21%	14%	7%	2%	3%	10%	
Invest in stormwater swales, green streets, eco-roofs and other projects that help improve watershed health.	All Results	38%	19%	13%	6%	4%	3%	17%	
Buy land to protect habitat areas.	All Results	35%	19%	13%	10%	4%	4%	16%	

**Observations**

The strategies to restore natural resources and promote watershed health all saw a high level of support. Changing zoning to protect sensitive lands was supported by 86% of respondents. The strategy to purchase land for protection of habitat areas saw the least amount of support, with 67% agreeing with that strategy. Responses from people of color and those with lower incomes tended to follow similar patterns as other survey questions, with stronger support for most strategies from low-income respondents (95% agreed with the strategy to regulate development in sensitive areas) and weaker support from people of color.

**Comment Summary**

Please refer to Chapter 4: Watershed Health and Environment for the summary of open-ended responses.

## V. Attachments

Attachment A: Government Agency Comment Letters

Attachment B: Bureau Comment Letters

Attachment C: City Commission Comment Letters



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Executive Director  
**Reed Wagner**

District Engineer  
**Byron Woltersdorf**

## Memorandum

March 6, 2013

**To:** Portland Planning and Sustainability Commission

**From:** Reed Wagner, Executive Director Multnomah Drainage District No 1  
Peninsula Drainage District No 1  
Peninsula Drainage District No 2

**Subject:** **Proposed Additions to the City of *Portland Comprehensive Plan Working Draft 1* (January 2013)**

### Introduction

Thank you for the opportunity to comment on the January 2013 *Draft Comprehensive Plan Working Draft*. It is apparent that much time and effort has gone into the document, and that it will provide a good base for the final Plan.

As you know, the Multnomah County Drainage District No. 1, Peninsula Drainage District No. 1, and Peninsula Drainage District No. 2 provide stormwater conveyance and flood management functions for much of the Columbia Corridor. Within the Corridor lie a significant portion of Portland's industrial land, the Portland International Airport, portions of two interstate freeways, and the City of Portland's domestic water well field as well as regional recreation facilities and the Bridgeton and East Columbia residential neighborhoods. These developments represent much of the economic base of the City and critical elements in the regional transportation network.

Drainage district operations and facilities must meet Federal and State regulations. Without compliance with Federal and State standards the Federal Emergency Management Agency may remove the area from the National Flood Insurance Program, the City may not be able to issue building permits, and businesses may be forced to close or move out of the area because they can no longer obtain flood insurance. It is of the highest priority, therefore, that the drainage districts be allowed to conduct their Federal and State mandated operations in a timely fashion and with minimal additional regulations imposed by the City.

Representatives of the drainage districts have met with Bureau of Planning and Sustainability staff to discuss ways in which the Comprehensive Plan can be amended to support drainage district mandates while not compromising City development goals and policies. The Working Draft has incorporated some goals and policies that recognize the role of the drainage districts in providing stormwater drainage and flood management. However, some portions of the drainage district functions and operations have been overlooked. Below are proposed additions that we believe are necessary to allow the continued functioning of the drainage districts in a manner that complies with Federal and State requirements while supporting the City's vision of continued growth and prosperity.

## Comprehensive Plan Policies and Objectives

Policy 4.21 (p. 4-11) recognizes that each watershed has multiple characteristics and functions, and needs to be addressed in a manner that balances its unique characteristics in a manner that optimizes the overall benefits while minimizing adverse impacts. We believe that this should be a guiding principal in setting goals and policies that apply to the Columbia Corridor. To that end we would suggest the following (additions are *italicized and underlined*):

1. Acknowledge the difference between controlled drainageways and other drainageways and waterways.

Land within Multnomah Drainage District No 1 and Peninsula Drainage Districts Nos 1 and 2 are protected from flooding by the Columbia and Willamette Rivers by a series of levees constructed and maintained by the districts. Stormwater and groundwater are drained from the protected areas through a series of maintained drainageways. These drainageways, including the Upper Columbia Slough, are unique in the City in that water level and flow is completely controlled by artificial means, i.e. through the pumping and tide gate systems maintained by these three drainage districts, to keep the water level within the protected areas at an elevation range to prevent flooding within the managed floodplain. Although there are other benefits of these water bodies such as aesthetics, recreation, and natural resources, flood control remains the primary purpose. In order to acknowledge the primary purpose of controlled drainageways, the following additions are suggested:

- **Add the following definition of Controlled Drainageway to the Glossary:**

*Controlled Drainageway: A Controlled Drainageway is one that is physically isolated from a free-flowing water body by a levee or similar feature, and water elevations are controlled by artificial means such as pumps and/or flood gates, for the primary purpose of flood control. A Controlled Drainageway consists of a channel for the free passage of water, and may also include a benched area adjacent to the channel for floodwater storage during periods of high water flow.*

- **Add the following definition of Managed Floodplain to the Glossary:**

*Managed Floodplain: A Managed Floodplain is an area with an established base flood elevation mapped by the Federal Emergency Management Agency on the Federal Insurance Rate Map that is physically isolated from a free-flowing water body by a levee or similar feature. Drainage of a Managed Floodplain is through Controlled Drainageways.*

- **Amend Policy 4.7, Habitat Corridors (p. 4-7) to read:**

*4.7 Habitat Corridors. Create a connected system of functioning Habitat Corridors while balancing environmental health with other needs such as flood control in controlled drainageways.*

- **Add Policy 4.25.g (p. 4-17):**

*4.25.g Encourage and support waterway maintenance activities that minimize environmental impacts while recognizing the need to retain adequate drainage and flood control functions of controlled drainageways.*

- **Add Policy 5.47.e (p.5-51):**

*5.47.e Recognize stormwater drainage and flood control are the primary functions of controlled drainageways.*



- **Add Goal 6.M, Flood Protection (p.6-9):**

**GOAL 6.M Flood Protection.**

Support maintenance, repair, removal, and upgrading of flood control and flood protection facilities, including levees, controlled drainageways, culverts, detention areas, and pumping facilities to Federal and State standards and requirements.

- **Add Policy 6.44.b (p. 6-27):**

6.44.b Recognize stormwater conveyance and flood control as the primary functions of controlled drainageways.

- **Add Policy 6.84, Flood Protection, Mitigation, and Control (p. 6-39), and renumber policies that follow:**

6.84 Flood Protection, Mitigation, and Control. Support maintenance, repair, removal, and upgrading of flood control and flood protection facilities, including levees, controlled drainageways, culverts, detention areas, and pumping facilities to Federal and State standards and requirements.

2. Recognize the multiple benefits of the infrastructure built, maintained, and operated by the drainage districts while acknowledging the main functions and priorities being flood control and protection, and stormwater conveyance.

In addition to flood protection and control, and stormwater conveyance, the infrastructure built, maintained, and operated by the drainage districts provides aesthetic, recreation, and natural resource benefits to the City. Acknowledgement for activities of the drainage districts that provide these additional benefits should be given in the form of financial or in-kind support, and future mitigation or mitigation banking credits should be given. In order to recognize the additional benefits provided by drainage district activities the following additions are suggested:

- **Add Policy 6.44.c (p.6-27):**

6.44.c Active support should be given in the form of financial aid or in-kind support for activities of drainage districts that provide benefits beyond flood protection and stormwater conveyance responsibilities.

- **Add Policies 4.25.i and 4.25.j (p.4-17):**

4.25.i Recognize and encourage the multiple benefits of drainage district activities, including:

- Conveyance System Activities
  - Drainageway bank stabilization
  - Benching adjacent to drainageways
  - Drainageway dredging
  - Drainageway bank repairs
  - Bankside vegetation control or removal, including selective tree removal, through mowing, herbicide application, hand thinning and removal, and other means
  - Culvert maintenance, repair, replacement, or removal
  - Drainageway vegetation removal, including trees, within the hydraulic cross section
  - Riprap maintenance, repair, and replacement
  - Bankside and bench revegetation with appropriate species
- Levee Activities
  - Slope repair, including appropriate revegetation

- Slope replacement and relocation back to the original footprint
- Riprap maintenance, repair, and replacement
- Vegetation control or removal within the Federal levee footprint, including selective tree removal, through mowing, herbicide application, hand thinning and removal, and other means
- Restoration of disturbed levee surface areas such as illegal parking sites and eroded areas
- Levee and adjacent area revegetation with appropriate species
- Pump Station Activities
  - Repair and maintenance to pump stations, tide gates, and all associated components

4.25.j Recognize the beneficial impacts of drainage district control of water levels, including:

- Flood control
  - Pre-storm drawdown
  - Recreation
  - Macrophyte management
  - Scheduled day/night pumping to reduce electrical costs to ratepayers
  - Natural resource quality and health
  - Low flow agreement with the City (Bureau of Environmental Services) to maintain a low water elevation in the Upper and Middle Columbia Slough system (usually May through September) to allow groundwater to enter into the slough for improved water quality
  - High flow agreement with the Port of Portland and Oregon Department of Environmental Quality to maintain a high water elevation in the Upper and Middle Columbia Slough system with a constant flow of 100 cubic feet per second to dilute deicing agents
3. Identify the levee system, drainageways, detention areas, pump stations, pollution reduction facilities, erosion control and soil stabilization features, and other related support facilities within the Drainage Districts' boundaries as critical elements for stormwater conveyance and flood control.

Much of Portland's industrial area, secondary domestic water supply, and interstate/international transportation network is located within drainage district boundaries. It is critical that flood protection and control take precedence for the optimal functioning of the City as the regional population center, transportation hub, and employment center. Although the levee systems and controlled drainageways of the drainage districts have multiple functions and values, flood control should be of highest priority. In order to acknowledge the value and priority of flood control measures the following additions are suggested:

- **Add Policy 5.52 (p.5-55):**

**5.52 Flood protection.** Recognize the difference between managed and natural floodplains and support upgrading, maintenance, and repair of levees, drainageways, pumping facilities, and other flood protection infrastructure.

- **Add Goal 6.M, Coordination of Flood Protection Regulations (p.6-9):**

**GOAL 6.M Coordination of Flood Protection Regulations**

Support maintenance, repair, and upgrading of flood control and flood protection facilities, including levees, controlled drainageways, detention areas, and pumping facilities to Federal and State standards and requirements.

- **Add Goal 6N, Flood Protection (p.6-9):**

- **GOAL 6.N Flood Protection**

- Identify levee systems, drainageways, detention areas, pump stations, and other related flood protection facilities within the Drainage Districts' boundaries as critical elements for flood control, and acknowledge their repair, maintenance, and upgrading including armoring, vegetation removal or replacement, and structure and facilities addition, modification or removal as a priority.

- 4. Recognize the Drainage Districts as the utility provider for maintaining and repairing the levee system and controlled drainageways within Drainage District boundaries.

Drainage district operations are financed primarily by property assessments collected from landowners within the district. However, they are also responsible for collecting and disposing of stormwater that flows from upland areas outside of the district, including significant portions of North and Northeast Portland. The drainage districts coordinate their efforts with the Bureau of Environmental Services, but believe that operational costs, particularly that of pumping and conveyance capacities, and sediment control, are born inequitably by the district. In order to address the issue of balanced cost sharing for district operations influenced by upland areas, the following additions are suggested:

- **Amend Policy 1.4.a (p. 1-9) to read:**

- 1.4.a Establish clear roles, rights, responsibilities, and degree of accountability of participants, including the City, other governmental entities and utility providers, community leadership, business organizations, and individuals in creating, developing, and implementing policies and programs.

- **Amend Policy 6.2, Service Delivery (p.6-11) to read:**

- **6.2 Service Delivery.** Establish, maintain and improve the following public facilities and services within the City's boundaries of incorporation:

- ...

- Flood protection

- **Amend Policy 6.3, Interagency Coordination (p.6-13) to read:**

- **6.3 Interagency Coordination.** Maintain interagency coordination agreements with the following jurisdictions and agencies that provide public facilities and services within the City of Portland to ensure effective and efficient service delivery:

- ...

- 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.

- **Add Policy 6.10.a (p. 6-15):**

- 6.10.a Provide coordination and support between the City and Drainage Districts in constructing, repairing, operating, and financing facilities for flood management, and stormwater collection and conveyance.

- 5. Acknowledge Federal and State standards and regulations for stormwater drainageway and levee construction, maintenance and upgrading, and that City regulations be designed to allow

compliance with State and Federal regulations without undue hindrance of either City Code standards or procedures.

Federal and State regulations require drainage districts to meet numerous standards for construction, maintenance, repair, and ongoing operations for stormwater control and flood protection. The City needs to recognize that these regulations must be met, often with limited or no flexibility to accommodate other functions or values of the district facility or adjacent land. To recognize conformance with Federal and State regulations as a priority that may adversely impact other functions and values of natural resources, the following additions are suggested:

- **Add Policy 6.15.c (p. 6-15) to read:**

*6.15.c Make safety, property protection, and security a priority in infrastructure development, upgrading, and repair.*

- **Add Policy 6.84.a after the new Policy 6.84, Flood Protection, Mitigation, and Control (p. 6-39):**

*6.84.a Recognize compliance with Federal and State requirements for flood control, maintenance, and protection as mandatory measures that supercede other functions and values of controlled drainageways, levees, and other flood protection facilities. Replace discretionary reviews for compliance with State and Federal requirements with standards.*

6. Recognize the need for immediate response to flooding, including levee reinforcement, repairs, or emergency vegetation risk removal to maintain levee integrity, and allow for such measures in City land use regulations.

When a flooding event occurs there may be damage to the levee system or drainageways that requires immediate response with little regard for normal permitting procedures, or adverse impacts to other functions and values of the surrounding area. Threat of a levee breach may require vegetation removal, riprap, or other stabilization actions. Drainageway blockage may require use of shore-based equipment instead of the normal in-water maintenance dredging operations and immediate bank stabilization. After the emergency event, repair and restoration may take a longer than normal period of time because of financing, meeting new regulations, need for long-term design solutions, or other unforeseen circumstances. To recognize the need for immediate response to emergency events, and possible time delays in restoration, the following additions are suggested:

- **Add Policy 6.15.c (p. 6-15):**

*6.15.c Make safety, property protection, and security a priority in infrastructure development, upgrading, and repair.*

- **Add Policy 6.85 (p. 6-39):**

*6.85 Emergency Response to Flood Events. Recognize the need for emergency repairs, reinforcement, and procedures for flood events and allow such measures to remain until permanent rebuilding, repairing, or upgrading can occur.*

7. Support and encourage Drainage District operations that also protect, maintain, or enhance significant environmental resources.

The levee systems, pump stations, controlled drainageways, detention areas and other drainage district features are almost totally within riparian and other environmentally-sensitive areas. Recognition must be made that the primary function of drainage district facilities and features is



stormwater drainage and flood protection. However, the drainage districts also recognize the natural resource values of these areas and strive to minimize adverse impacts through responsible maintenance operations, repair, construction, and operation of their facilities. Where appropriate, these activities are designed to enhance aesthetic and environmental benefits, often at additional cost. An example of this is the recent tree planting along the NE Elrod Drive drainageway, providing emergent wetland, future shade and cooling of the water, stabilizing the slough bank, providing habitat and structural diversity, and removing invasive shrubs and groundcover. In order to acknowledge the primary function of stormwater drainage and flood protection as a priority but encourage the incorporation of multiple benefits in environmentally sensitive areas, the following additions are suggested:

- **Add Policies 4.25.g and 4.25.h (p. 4-17):**

*4.25.g Encourage and support waterway maintenance activities that minimize environmental impacts while recognizing the need to retain adequate drainage and flood control functions of controlled drainageways.*

*4.25.h Provide for and support a program for banking of mitigation credits for enhancement of environmentally protected areas above and beyond the basic City requirements.*

## Conclusion

With modifications and additions to the Comprehensive Plan goals and policies described in this memorandum we believe that the needs of the drainage districts can be accommodated with minimal impact to other City functions and values. They can serve as the basis and provide direction for developing programs and City Code amendments that will allow optimal protection of the Columbia Corridor from flood events, thereby fostering and encouraging economic growth for a significant portion of the Portland industrial areas and transportation network.

If there are any questions or you would like to discuss the material contained in this memorandum, please feel free to contact us. Thank you for your time and consideration.

Sincerely,



Reed Wagner

Executive Director

Multnomah County Drainage District #1

(503) 281-5675



Health Department  
Policy and Planning

## **MULTNOMAH COUNTY OREGON**

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**Diane McKeel** – District 4 Commissioner

May 1, 2013

Susan Anderson, Director of Planning and Sustainability  
City of Portland  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201

Dear Ms. Anderson,

Multnomah County Health Department would like to thank the Bureau of Planning and Sustainability for the opportunity to comment on the Comprehensive Plan Working Draft. Multnomah County is a proud partner of the Portland Plan, a project that provided an opportunity to align our disciplines' shared vision, values, and goals for a healthy community. We commend BPS for engaging a diverse group of stakeholders in the Policy Expert Groups, continuing to build partnerships and helping to ensure Portland grows and develops as a prosperous, educated, healthy, equitable and resilient community.

We are pleased to see that the Working Draft includes many goals and policies that address the "upstream" factors that contribute to significant public health issues, including obesity and the increase in chronic illnesses. These shared priorities include access to clean air and water, safe and affordable housing, living wage jobs, healthy food, greenspace, and safe places to play and travel by foot, bicycle and wheelchair. We recognize that successful land use and community planning has direct impacts on public health outcomes, and can play an instrumental role in reducing and eliminating health inequities experienced by low-income populations and communities of color. We thank the City for recognizing and including policy strategies that will ensure all residents can meet their essential health needs and achieve their full potential.

As the Comprehensive Plan goals and policies are implemented, we encourage the City to use tools to assess health equity impacts that lead to informed decisions and result in improved health outcomes for our most vulnerable community members. We strongly support implementation of policies (i.e. 6.16) that call for the consideration of cumulative health impacts, equity outcomes, and environmental justice, as well as infrastructure designs that avoid or reduce negative impacts on historically underserved communities. Integrating such policies throughout all Chapters, will strengthen the City's capacity to protect and improve social and built environment conditions that impact health outcomes.

We commit to maintaining a robust partnership with City of Portland and have a vested interest in a Comprehensive Plan that uses the best available data, innovative tools for analysis, and engages diverse stakeholders in the implementation of policy. The Health Department is prepared to share our public health expertise and data as the City explores tools and methodologies for assessing health equity impacts of land use and transportation decisions.

Again, we thank you for the opportunity to comment on the Draft plan, and we are proud to have participated in an effort to improve community health and livability.

Sincerely,

Sonia Manhas, Director of Policy & Planning  
Multnomah County Health Department

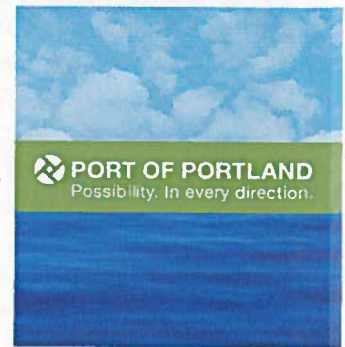


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May 1, 2013

Eric Engstrom, Principal Planner  
 City of Portland Bureau of Planning & Sustainability  
 1900 SW 4<sup>th</sup> Avenue, Suite 7100  
 Portland, Oregon 97201

Re: City of Portland Comprehensive Plan Update Working Draft - Part 1

Dear Eric:

Thank you for the opportunity to comment on the *City of Portland Comprehensive Plan Update Working Draft - Part 1*, dated January 2013 (Draft Comprehensive Plan). The Port of Portland (Port) has been a partner in this process with the Bureau of Planning and Sustainability and appreciates the challenge of creating focus around the diverse interests in our city.

As reflected in our written testimony to the Planning & Sustainability Commission in November 2011, the primary area of focus in the Portland Plan for the Port was centered on the Economic Prosperity and Affordability strategy. This strategy addresses the lack of jobs, relative decline in personal income, decline in tax and other public revenue and the lack of business investment in Portland. Unless these issues are addressed, the City's aspirations cannot be successfully implemented.

With that same focus in mind applied to the Draft Comprehensive Plan, we describe five key issues, followed by a table with section-specific comments.

## KEY ISSUES

**Trade and Freight Hub.** As noted in the Introduction, the Comprehensive Plan is intended to codify the priorities outlined in the Portland Plan. However, the Portland Plan's recognition of the importance of Portland as a trade and freight hub and its competitive market access could be more specifically identified in the Draft Comprehensive Plan policies. As an example, the City of Portland, the Brookings Institution and other local partners developed the Greater Portland Export Plan to double the Portland region's exports in five years, adding \$21 billion in foreign sales and potentially 100,000 jobs. This also dovetails with the current U.S. National Export Initiative goal to double national exports between 2009 and 2014.

**Economic Development Integration.** The Port is very supportive of the inclusion of an Economic Development Element which recognizes the importance of job growth for the health of the City; however, to be consistent with the Portland Plan, there should be better integration of these economic policies in the other elements of the Comprehensive Plan as well.

**Industrial Smart Growth.** The Port supports “Industrial Smart Growth”, which emphasizes the importance of focusing industrial development in proximity to essential infrastructure. This approach relies on maintaining facilities for freight movement and ensuring sufficient industrial land adjacent to critical infrastructure investments. The Draft Urban Design Framework does not identify a “freight” or “industrial” corridor type. The Port is concerned that the Civic Corridors and Greenways designations will conflict with the modal designations for freight identified in the City of Portland Transportation System Plan and Freight Master Plan.

**Transportation Hierarchy.** The new policies in support of a green and active transportation hierarchy in Chapter 7 of the Working Draft were borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people are combined in a single hierarchy in the Working Draft. This has the effect of relegating freight to a lower level than walking, cycling and transit. It also fails to acknowledge the value of the efficient movement of goods to the city’s economy and quality of life. The Vancouver Plan establishes a hierarchy for “Moving People”, but provides a separate set of policies for “Moving Goods and Delivering Services”. Vancouver’s overall goal for Moving Goods and Delivering Services states that “The efficient movement of goods and services is critical to city, regional, and national well-being.” This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft be amended to reflect the approach taken in the City of Vancouver’s Transportation 2040 Plan.

**Previously Adopted Plans.** While the commentary notes that some plans are being updated as a part of the Comprehensive Plan (e.g., the Transportation System Plan), the status of a number of other adopted plans, including Airport Futures and the Freight Master Plan, is unclear. The Port recommends the Working Draft be amended to reflect the policies adopted from Airport Futures with broad community support two years ago. Specific adopted policies from Airport Futures are described in the subsequent table.

The Port looks forward to continuing to work with the City to resolve these issues and the issues outlined in the attached table prior to adoption of Comprehensive Plan Update.

Sincerely,



Susie Lahsene,  
Regional Transportation & Land Use Policy Manager

c: Tom Armstrong, Portland Bureau of Planning and Sustainability  
Tom Bouillion  
Lise Glancy



**A. DRAFT ECONOMIC DEVELOPMENT GOALS AND POLICIES (CHAPTER 3)**

<b>Draft Goals and Policies</b>	<b>Comments</b>
Goal 3.A Prosperity	The Port recognizes the importance of this goal and appreciates the acknowledgement of the region and the state as part of the diverse population served by the City. The commentary to this goal states that "In addition, Goal 3.A creates a multidisciplinary framework for economic development that incorporates land use and infrastructure with business development, workforce development, seaport and airport services, affordable housing, and social services." This important concept should be better reflected in the goals themselves.
Policy 3.3 Economic center.	The Port appreciates the recognition of the important role of the multimodal transportation infrastructure in the economic health of the City.
Policy 3.5 Economic role of livability and ecosystem services.	While ecosystem services do have an economic value, this policy would be more appropriately located in Chapter 4.
Policy 3.9 Land efficiency.	The linkage between industrial land efficiency and viable multi-modal freight infrastructure is key to economic development. The suggested modification below is intended to address that concern.  Modify the draft policy language to state (w/new language underlined): "Encourage infill, redevelopment, <u>and intensification and throughput of</u> on scarce urban land."
Policy 3.10 Brownfield redevelopment.	The Port strongly supports this policy and the City's goals for brownfield redevelopment.
Policy 3.18 Trade and freight hub.	Given the importance of Portland's role as a trade and freight hub, and the emphasis put on this role in the Portland Plan, the proposed "maintain and plan" language should be further strengthened as suggested below.  Modify the draft policy language to state (w/new language underlined): " <u>Maintain and plan for</u> <u>improve</u> transportation systems and services that will retain and expand Portland's competitive market access as a West Coast trade gateway and freight distribution hub and <u>realize the Greater Portland Export Plan to double the Portland region's exports in five years.</u> "

<b>Draft Goals and Policies</b>	<b>Comments</b>
Policy 3.28 Freight-oriented development.	<p>As noted above, given the importance of Portland's role as a trade and freight hub and the emphasis put on this role in the Portland Plan, there is a need to prioritize investments in industrial areas. This policy should be modified as suggested below.</p> <p>Modify the draft policy language to state (w/new language underlined): "Coordinate land use planning and <u>prioritize</u> transportation investments in industrial districts to encourage freight mobility and industrial development."</p>
Policy 3.29 Marine, rail, and airport facilities.	The Port strongly supports this policy which reflects the Portland Plan's emphasis on maintaining and expanding Portland's role as a West Coast trade gateway and freight distribution hub.
Policy 3.34 Prime industrial land and freight hub.	<p>While the Port supports this policy, freight hubs by definition cannot function without viable freight infrastructure serving the hubs. This policy should be modified as suggested below to better acknowledge that relationship.</p> <p>Modify the draft policy language to state (w/new language underlined): "Protect the multimodal freight-hub industrial districts, <u>as well as the freight infrastructure to serve the freight hubs</u>, at Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land."</p>
Policy 3.35 Industrial land retention.	The Port strongly supports this policy and the City's goals for the retention of industrial land. However, it is unclear under this policy what (if any) protection "non-prime" industrial land would receive.
Policy 3.36 Harbor access.	The Port strongly supports this policy and the City's intention to prioritize river-dependent and river-related uses on harbor access lands. However, some clarification may be needed with regard to the definition of "harbor access lands". Presumably this is meant to refer to those lands with direct access to marine facilities.
Policy 3.39 Dispersed industrial areas. Provide for small, dispersed industrial areas.	The purpose of this policy is unclear. Large, concentrated industrial areas tend to have fewer neighbors (and therefore fewer conflicts) and more efficiently provide transportation and other infrastructure. Are "dispersed industrial areas" intended to be an alternative to the "prime industrial lands" cited earlier?
Policy 3.40 Brownfield	As noted in Policy 3.10, there is a need to prioritize investments in these areas. The proposed

Draft Goals and Policies	Comments
<p>redevelopment.</p>	<p>modification below is intended to clarify this point.</p> <p>Modify the draft policy language to state (w/new language underlined): “Prioritize investment in brownfield sites <del>redevelopment resources and approaches</del> to encourage remediation and redevelopment for industrial use and accommodate industrial growth.”</p>
<p>Policy 3.41 Industrial land intensification.</p>	<p>As noted previously, the linkage between industrial land efficiency and viable freight infrastructure is key to economic development. Intensification should therefore include greater “throughput” and should be tied to transportation infrastructure investments referred to in Chapter 7.</p> <p>Modify the draft policy language to state (w/new language underlined): “Promote public investments and business climate enhancements that encourage industrial reinvestment and increase land efficiency for industrial output <u>and throughput</u>.”</p>
<p>Policy 3.42 District expansion.</p>	<p>While the Port supports the expansion of industrial areas where appropriate, this policy might benefit from some further clarification of when and where this expansion should occur.</p> <p>Modify the draft policy language to state (w/new language underlined): “Provide opportunities for expansion of industrial areas <u>through voluntary conversion of underutilized non-industrial land</u>.”</p>
<p>Policy 3.43 Neighborhood buffers.</p>	<p>While the Port recognizes the benefits of using major natural areas and open spaces as buffers, this policy should clarify that these are not within the industrial areas themselves, but are typically designated as Open Space.</p> <p>Modify the draft policy language to state (w/new language underlined): “Maintain and enhance major natural areas, <u>or</u> open spaces <u>outside of prime industrial areas</u>, or constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas.”</p>

**B. DRAFT WATERSHED HEALTH AND THE ENVIRONMENT GOALS AND POLICIES (CHAPTER 4)**

<i>Draft Goals and Policies</i>	<i>Comments</i>
Policies 4.1 through 4.6	These policies use the phrase, "protect, enhance and restore...." While this may reflect a desired outcome, within an urban setting, these policies should address the need to balance environmental protection with conflicting land uses and policies. .
Policy 4.5 At-risk habitats.	In addition to the broader comment above, because "grassland" is not well defined habitat type (e.g., grassland could include a golf course, play field, or barren weedy fill), categorizing it as an "at-risk habitat" that presumably would become a regulated feature is problematic. The addition of the word " <u>native</u> " grassland would help address this concern.
Policy 4.6 Biodiversity.	In addition to the broader comment above, as written, this policy suggests protecting bridges, man-made detention pond or other similar feature as a habitat for wildlife. This would be problematic and could compromise the primary function of the structure (for transportation, stormwater retention, etc.). Some clarification is needed regarding the intent of this policy as it relates to manmade structures.
Policy 4.7 Habitat corridors.	The Conceptual map of potential habitat corridors appears to identify West Hayden Island as a Habitat Corridor. While a portion of West Hayden Island functions as a habitat patch, in this location the Columbia River functions as the primary corridor for wildlife movement. In addition, the definition of Habitat Corridor is so broad that it could potentially apply to the entire City, but appears to have been applied selectively based on other criteria that are not explicit in the definition. For example, a portion of the narrative suggests corridors could be established by "...incorporating naturesscaping into yards and landscaped areas..." . Further clarification of this designation is needed.
Policy 4.11a (Consider the condition of, and potential cumulative impacts on, natural resources when creating land use and infrastructure plans.)	This policy suggests considering cumulative impacts when creating land use and infrastructure plans. However, the term "cumulative impacts" is not defined and it's unclear how this would work in the context of balancing statewide planning goals.

<b>Draft Goals and Policies</b>	<b>Comments</b>
Policy 4.11.b. (Strive to sustain the carrying capacity of air, land, and water resources by enhancing natural resource quality and function.)	The term "carrying capacity" is not defined, so it is unclear how this policy would be implemented. It would be helpful to provide additional guidance as to the intent.
Policy 4.12 Impact mitigation.	<p>The commentary associated with this policy notes that the City "allows for different approaches where appropriate." However, this concept is not made clear in the policy itself. The proposed modification is intended to clarify this point. Further, the Port would recommend putting the emphasis on the quality of the mitigation rather than its location. If better mitigation can be accomplished off-site then that should be encouraged over lower quality opportunities available onsite.</p> <p>Modify the draft policy language to state (w/new language underlined): "Require that negative impacts from development impacts that cannot be avoided be minimized and fully mitigated. <u>Generally, prioritize onsite mitigation or mitigation in the same watershed within the city over mitigation in another watershed or outside of the city, but encourage alternative approaches which will provide better mitigation opportunities.</u>"</p>
Policy 4.15 Efficient use of land.	The term "natural resources" is not defined and is not listed in the "Special Habitat" designation protocol used in the City natural resource inventory. Given this, as written, this policy would appear to suggest that any location could be considered a regulated "natural resource" requiring review, alternatives analysis, mitigation, etc. Further, the portion of the policy which states "...when doing so does not negatively affect historically underserved communities" is unclear. For example, what is the intention if historically underserved communities are negatively impacted? Is it then appropriate to disturb "natural resources"? Finally, this policy should be better aligned with other policies in Chapter 3 related to land efficiency (policy 3.9 for example).
Policy 4.24 Willamette River Watershed.	The relationship between this policy and those in Chapter 3 should be better defined. The proposed modification below is intended to address that issue.

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<p>Modify the draft policy language to state (w/new language underlined): <u>“Manage the riverfront and uplands areas to enhance the corridor’s habitat quality and connectivity for migratory species and integrate nature and natural hydrologic function into urban environments consistent with draft policy 3.36 which prioritizes river-dependent and river-related industrial use over other land uses on harbor access lands”</u>.</p>
<p>4.24.e. (Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.)</p>	<p>While more a natural river bank condition is desirable, it may not be consistent with high intensity urban development (e.g., the Central City) or some marine industrial activities. The proposed modification below is intended to address that issue.</p> <p>Modify the draft policy language to state (w/new language underlined): <u>“Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions where appropriate given adjacent land uses.</u></p>
<p>Policy 4.24.f. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.)</p>	<p>As noted above, while the phrase, “protect and enhance...” may reflect a desired outcome, within an urban setting, environmental policies should address the need to balance environmental protection with conflicting land uses and policies.</p> <p>Also, as noted previously, the Port is concerned about the use of the term “grasslands”. This should be clarified as <u>“native grasslands”</u>.</p>
<p>Policy 4.25 Columbia Slough Watershed Policy 4.25.d. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.)</p>	<p>As noted above, while the phrase, “protect, enhance and restore....” may reflect a desired outcome within an urban setting, environmental policies should address the need to balance environmental protection with conflicting land uses and policies.</p> <p>Also, as noted previously, the Port is concerned about the use of the term “grasslands”. This should be clarified as <u>“native grasslands”</u>.</p>
<p>Comment: Policy 4.25.f. (Protect and maintain the functions of remaining open</p>	<p>As written, this policy could be understood to limit development on all remaining vacant (i.e., “open”) parcels. Presumably, the intention is to protect designated significant Goal 5 resources rather than all</p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
spaces and anchor upland habitats).	<p>remaining open spaces. The suggested modifications are intended to clarify this point.</p> <p>Modify the draft policy language to state (w/new language underlined): "Protect and maintain the functions of <u>remaining designated open spaces</u> and anchor upland habitats <u>outside of prime industrial areas.</u>"</p>
4.26 Columbia River Watershed	<p>The commentary for this section states that "However, West Hayden Island and the northern portion of Portland Harbor provide some of the best shoreline, shallow-water, wetland, and floodplain habitat in Portland's urban services boundary." The Port is concerned about the scientific basis for this claim especially given the hydrologic controls (dams) on the Columbia River. Also, the term "floodplain habitat" appears to be used inappropriately since floodplain is a river function across a range of habitat types. "Floodplain" is not a habitat in and of itself.</p>
4.26.b. (Enhance grassland, beach, and wetland habitats and improve other ecological functions, while continuing to provide flood control.)	<p>It is unclear what is intended by "improve other ecological functions". Some further clarification should be provided.</p> <p>Also as noted previously, the Port is concerned about the use of the term "grasslands". This should be clarified as "<u>native grasslands</u>".</p>



**C. DRAFT URBAN DESIGN AND DEVELOPMENT GOALS AND POLICIES (CHAPTER 5)**

<b>Draft Goals and Policies</b>	<b>Comments</b>
<p>Commentary (p. 5-3)</p>	<p>The Portland Plan recognizes the importance of a strong economy and job creation to a healthy city and individual well-being. While this is acknowledged in Chapter 3, the linkage is not made in the other chapters. The commentary addresses wildlife habitat connections and environmental health, but does not address the economy or industry. Metro 2040 Design types such as employment and RSIA are not mentioned. While the identification of the Industrial and River area as a discrete geography is helpful, more should be done to recognize the importance of those areas outside of centers.</p>
<p>GOAL 5.A. A city designed for people</p>	<p>This goal should include a reference to a built environment that promotes economic development and job creation as well as health, resilience and equity. In addition, the importance of the City as a regional and statewide hub is not addressed. Alternatively, a new goal named "A City designed to work", as well as a corresponding policy emphasizing Industrial Smart Growth, could be added to address these concerns.</p>
<p>Goal 5.B. Context-sensitive design and development</p>	<p>The Port supports identification of the Industrial and River area as a discrete geography.</p>
<p>GOAL 5.C. Portland's system of centers</p>	<p>As noted above, while the identification of the Industrial and River area as a discrete geography is helpful, more should be done to recognize the importance of those areas outside of centers.</p>
<p>Policy 5.16 Industrial and River</p>	<p>While combining the industrial and river areas together results in a rather inconsistent set of policies, there are several issues which could be addressed by additional sub policies:</p> <ul style="list-style-type: none"> <li>▪ The need to design and construct new residential to be compatible with existing industrial uses and freight infrastructure (such as found in proposed Policy 5.33 d).</li> <li>▪ The need to prioritize public investment in freight infrastructure in this geography, consistent with Policy 5.16a.</li> </ul>
<p>5.16.a. (Maintain and enhance the area's</p>	<p>The Port supports this policy which recognizes the importance of the air port and marine facilities and</p>



<b>Draft Goals and Policies</b>	<b>Comments</b>
regionally significant nexus of Oregon's largest seaport and largest airport; unique multimodal freight, rail, and harbor access; and proximity to anchor manufacturing and distribution facilities.)	related uses.
Policy 5.16.c. (Enhance and complete the area's system of riverside trails and strengthen active transportation connections to Portland's neighborhoods)	This policy appears to be contradictory to the broader policy contained in Policy 5.16 to support the area's prime industrial lands. As an example, completing a trail along the river through Albina Yard would likely diminish the ability of that key freight hub to operate.
5.16.d. (Enhance the strong river orientation of the area's residential areas.)	Because river frontage should be reserved for river-related and dependent uses, this policy should be modified to limit enhancement to existing residential areas only.  Modify the draft policy language to state (w/new language underlined): "Enhance the strong river orientation of the area's <u>existing</u> residential areas."
Policy 5.19 Focused investments	The Portland Plan recognizes that Portland's advantages as a trade and freight hub warrant strategic investments to maintain and grow our competitive position. This policy prioritizes investment in centers, but fails to consider other "pattern areas", in particular Policy 5.16 Industrial and River.
Policy 5.23 Corridors and connections.	The City's Transportation System Plan and Freight Master Plan designate freight routes. These routes are critical for Portland to retain its competitive market access as a West Coast trade gateway as outlined in the Portland Plan. Freight routes, which are not mentioned in the discussion of corridors and connections, should be explicitly mentioned as a key organizing element in the design and structure of the city.
Policy 5.24 Civic Corridors	The conceptual map of potential Civic Corridors coincides with several designated priority freight routes (such as I-5 and US Highway 30, both not owned by the City of Portland). The description of Civic Corridors under this policy does not seem to be compatible with freight or other modal designations.

<b>Draft Goals and Policies</b>	<b>Comments</b>
<p>Policy 5.26 Greenways</p>	<p>The conceptual map of potential Greenways coincides with several designated priority freight routes. The description of Greenways under this policy does not seem to be compatible with freight or other modal designations. In addition, West Hayden Island is shown as designated as Habitat Corridor. As mentioned previously, West Hayden Island functions as a habitat patch within the larger context of the Columbia River corridor. Also, West Hayden Island should be shown as unincorporated Multnomah County.</p> <p>Finally, the term "Greenways", although adopted in the Portland Plan, is confusing since it sounds similar to the "Willamette River Greenway" identified in Statewide Planning Goal 15 and in some cases is identified in the same physical location as the Willamette River Greenway Trail alignment</p>
<p>Policy 5.27.b. (Consider both the place and transportation functions when designing and programming each street)</p>	<p>The Port supports the policy approach of considering both the place and transportation functions when designing and programming each street.</p>
<p>5.29.b. Encourage development to be designed to enhance the pedestrian experience, with windows, entrances, pathways, and other features that provide connections to the street environment.</p>	<p>In some circumstances, such as industrial campuses, privacy and security may be of critical importance. This policy should recognize that connections to the street may not be appropriate in all situations.</p>
<p>Proposed Policy 5.33.c. (Protect non-industrial lands from the potential adverse impacts of industrial activities and development)</p>	<p>This policy should be modified in order to be more consistent with Policy 5.33 d.</p> <p>Modify the draft policy language to state (w/new language underlined): "<u>Protect existing non-industrial lands development from potential demonstrated adverse impacts of new industrial activities and development</u>"</p>
<p>5.33.d. (Ensure that new residential and high-density development adjacent to industrial sanctuaries incorporates design elements that soften the transition in land</p>	<p>The Port supports this policy which is intended to protect the viability of industrial operations from new adjacent development.</p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
use and protects the viability of long-term industrial operations.)	
Policy 5.37 Resource-efficient development.	This policy should be further expanded to include sub policies that relate to brownfield clean-up and that encourage access to industrial sites with energy efficient transportation modes including rail, barge and ship.
Policy 5.42 Hydrologic function.	As worded this policy would appear to prevent or limit development within the floodplain. While impacts can be mitigated, most water dependent uses must be located within the floodplain.
Policy 5.47.a. (Limit development in or near areas prone to natural hazards, where practicable, using the most current hazard information and maps available.)	<p>This policy suggests limiting development in areas subject to natural hazards, including the floodplain. This is inconsistent with the current policy approach provided by Metro's Title 3 which calls in part for hazard minimization in the floodplain through techniques such as balanced cut and fill, but not limiting development per se.</p> <p>As an example, this policy could limit development on one of the largest brownfield sites in the City of Portland, the Time Oil site, contrary to other policies encouraging redevelopment of brownfields.</p>
Policy 5.51 Offsite impacts.	As written, this policy primarily addresses impacts to residential areas; however, similar to proposed policy 5.33.d, new residential and high-density development adjacent to industrial areas should incorporate design elements that soften the transition in land use and protects the viability of long-term industrial operations. A good example of this are proposed changes to the St. Johns/Lombard Plan contained in the River Plan North Reach.
Policy 5.51.a - Aircraft noise impacts [NEW]	<p>A new section is appropriate to reflect the policy adopted as a part of Airport Futures to creatively address aircraft noise impacts.</p> <p>Add language as follows: <u>"Require compatible land use designations and development within the noise-affected area of Portland International Airport while providing public notice of the level of aircraft noise and mitigating the potential impact of that noise within the area. Partner with the Port of Portland to explore creative new ways to address noise impacts."</u></p>

**D. DRAFT PUBLIC FACILITIES AND SERVICES GOALS AND POLICIES (CHAPTER 6)**

<b>Draft Goals and Policies</b>	<b>Comments</b>
<p>Commentary (p. 6-12)</p>	<p>There are several factual errors in the commentary section:</p> <ul style="list-style-type: none"> <li>• (2nd bullet) It seems likely that the Port of Portland should be included under the list of local “transportation facilities and services” providers.</li> <li>• (4<sup>th</sup> bullet) This item suggests that rail facilities are provided by “the Burlington Northern Railroad”. The official name for this company is BNSF Railway. In addition, there are several other railroads operating in Portland including the Union Pacific Railroad, Portland and Western Railroad, Portland Terminal Railroad and Peninsula Terminal Railroad.</li> <li>• (10<sup>th</sup> bullet) As noted later in this chapter, the Port of Portland provides both police and fire services, in addition to other non-City of Portland agencies.</li> <li>• (12<sup>th</sup> bullet) Qwest has not existed since 2011 and is now called Century Link. Also, the last sentence seems to suggest that “various small fuel companies” provide gas and electricity. This sentence should be reworded for clarity.</li> </ul>
<p>Policy 6.3 Interagency coordination.</p>	<p>While the Port fully supports the need for interagency coordination, this policy describes a list of services as “public facilities and services”. Later in this chapter the terms “urban services”, “urban public services”, “community services”, “City services”, “capital improvements” and “infrastructure” are used. Only the term “infrastructure” appears to be defined in the Glossary. Some clarity and consistency in the use of terms would be helpful in order to better understand which policies apply, especially in cases where the public facilities and services or infrastructure are not provided by the City.</p>
<p>Policy 6.4 Orderly service extension</p>	<p>In order to support Policy 3.7 (Land development) which emphasizes the need for an adequate supply of land, this proposed policy should be amended (or possibly a new policy created) to address the City’s interest in annexation. The proposed language below is intended to address this issue.</p> <p>Add draft policy language to state (w/new language underlined): <u>“The City should encourage annexation of lands within its urban services boundary in order to meet an identified need in the City</u></p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<u>buildable lands inventory and other adopted documents.</u>
6.4.b. Coordinate provision of urban public services so that provision of City's ability to provide other urban services.	It is unclear what is meant by "other urban services" in this policy.
Policy 6.20 Environmental carrying capacity.	"Carrying Capacity" is not defined. In addition, if non-City owned facilities are defined as "public facilities and services", then it is unclear (and potentially concerning) what requirements might result from this policy which requires that the carrying capacity of air, land, and water resources be considered when developing plans.
6.20.a. Prevent or limit further impacts from infrastructure on natural hydrologic cycles, especially in areas with poorly infiltrating soils and limited public stormwater discharge points.	The phrase "natural hydrologic cycles" is broad. As written, this policy could be interpreted as limiting infrastructure in the floodplain. Port infrastructure by necessity must be located within the floodplain as do bridges and other essential infrastructure. If the intent of this policy is to address stormwater management, it should be revised to be more specific.
Policy 6.26 Civic corridors and Greenways	As also noted in the Chapter 5 comments above, proposed Civic Corridors and Greenways have not considered modal designations such as priority freight routes. This policy should explicitly note that modal designations should dictate the infrastructure for those rights of way.
Policy 6.39 Rates.	As written, this policy would appear to allow for rate increases without consideration of the cost to users. The proposed modification below is intended to address this concern.  Modify the draft policy language to state (w/new language underlined): "Establish and collect rates and charges for sewer service to recover the cost of developing and maintaining the system <u>while limiting the rates and charges to the minimum necessary to meet permit requirements, to minimize impact to cost burdened households, small businesses and other users.</u> "
Policy 6.48 Rates.	As written, this policy would appear to allow for rate increases without consideration of the cost to

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<p>users. The proposed modification below is intended to address this concern.</p> <p>Modify the draft policy language to state (w/new language underlined): <u>“Establish and collect rates and charges for stormwater services to recover the cost of developing and maintaining the system while limiting the rates and charges to the minimum necessary to meet permit requirements, to minimize impact to cost burdened households, small businesses and other users.”</u></p>
<p>Policy 6.66 Natural areas</p>	<p>The term “natural areas” is not defined. As written, this policy could be understood to apply to a wide range of land within the City. The proposed modification is intended to clarify that this policy only applies to City-owned natural areas.</p> <p>Modify the draft policy language to state (w/new language underlined): <u>“Preserve and manage City owned natural areas to protect their ecological health and provide appropriate public access, in accordance with the natural area acquisition and restoration strategies.”</u></p>
<p>Policies 6.71 through 6.83 Public safety and emergency response</p>	<p>The Port of Portland provides both police and fire services within the City of Portland as do other agencies. An acknowledgement of these agencies within the commentary and an additional policy under Policy 6.82 Coordination, which addresses partnerships and coordination with other police and fire agencies within the City, as well as existing mutual aid agreements allowing fire departments from adjoining jurisdictions to respond to emergencies in the City of Portland in certain cases, should be added.</p>
<p>Policies 6.99 through 6.102 PDX Airport Futures [NEW]</p>	<p>New sections are appropriate to reflect the policies agreed to by the City, Port and community and adopted as a part of Airport Futures:</p> <p><u>Portland International Airport</u></p> <p><u>6.99 Promote a sustainable airport (PDX) by meeting the region’s air transportation needs without compromising livability and quality of life for future generations.</u></p> <p><u>6.100 Regulations</u>  <u>Implement the Airport Futures Plan through the implementation of the Portland International Airport Plan District and by including the Airport Futures Plan as part of this Comprehensive Plan.</u></p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<p>A. <u>Prohibit the development of a potential third parallel runway at PDX. Ensure a transparent, thorough, and regional planning process if the Port of Portland demonstrates a need for its construction.</u></p> <p>B. <u>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.</u></p> <p>C. <u>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.</u></p> <p><u>6.101 Partnerships</u>  <u>Partner with the Port of Portland and the regional community to address the critical interconnection between economic development, environmental stewardship, and social responsibility.</u></p> <p>to:</p> <p>A. <u>Support an ongoing public advisory committee for Portland International Airport (PDX)</u></p> <ol style="list-style-type: none"> <li>1. <u>Support meaningful and collaborative public dialogue and engagement on airport related planning and development;</u></li> <li>2. <u>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; and</u></li> <li>3. <u>Raise public knowledge about the airport and impacted communities.</u></li> </ol> <p><u>6.102 Investments</u>  <u>Ensure that new development and redevelopment of airport facilities supports the City's</u></p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<p><u>and the Port's sustainability goals and policies and is in accordance with Map 11.64.1.</u></p> <p>A. <u>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.</u></p>



**E. DRAFT TRANSPORTATION GOALS AND POLICIES (CHAPTER 7)**

<i>Draft Goals and Policies</i>	<i>Comments</i>
Commentary (p. 7-3)	The relationship of this element of the Comprehensive Plan to other existing Plan documents such as the Airport Futures and Freight Master Plan would be helpful. In addition, as noted earlier, the Comprehensive Plan was amended only two years ago to reflect Airport Futures. These goals and policies, which were the result of a significant planning effort, are included in Airport Futures as proposed amendments to the Comprehensive Plan. If they are no longer included in the Comprehensive Plan itself it is unclear what their status would be in terms of adopted policy.
GOAL 7.B	The Portland Plan recognizes the importance of Portland's advantages as a trade and freight hub and West Coast trade gateway. While Goal 7.A does refer to "economic prosperity" as a benefit of the transportation system, Goal 7.B does not include prosperity as an important factor in "quality of life". This seems to be inconsistent with the Portland Plan.
GOAL 7.E	As noted above, while the Portland Plan recognizes the importance of freight movement to Portland's economy, this is the only overall transportation goal that acknowledges freight. However, the current wording ("by providing efficient multimodal access to employment areas, educational institutions, and enhanced freight access to industrial areas.") is too limited in scope. Freight mobility should address Portland's role as a West Coast trade gateway and should recognize need for robust multi-modal freight (air, marine, rail) as well as the role that the transportation system plays in supporting prosperity.
Policy 7.1 Street design	The Port supports the overall policy which states that street design will be based on street classification (e.g., freight). However, the sub-policies could conflict with the general policy. For example, sub-policy 7.1.a. implies that all streets be made comfortable for all users; however, it may not be possible to design a major freight route to be a "comfortable" bicycle route for all cyclists
Policy 7.4 Classifications for Civic Corridors and Greenways.	As noted in the comments on Chapter 5, the conceptual maps of potential Civic Corridors and Greenways coincide with several designated priority freight routes. The description of Civic Corridors and Greenways do not seem to be compatible with freight or other modal designations. These freight routes are critical for Portland to retain its competitive market access as a West Coast trade gateway as outlined in the Portland Plan.

<b>Draft Goals and Policies</b>	<b>Comments</b>
<p>Policy 7.6 Green and active transportation hierarchy</p>	<p>This policy was excerpted from the City of Vancouver, B.C. Transportation 2040 Plan and then modified. However, proposed modifications are problematic because they require a trade-off between the movement of goods and the movement of people. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". The overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port supports the approach taken in the City of Vancouver's Transportation 2040 Plan. However, as currently written, policy 7.6 would appear to conflict with the need to preserve freight mobility.</p>
<p>Policy 7.10 Public transportation.</p>	<p>The use of the term "public transportation" may be overly broad as it can include air travel. These policies are clearly intended for bus, street car and light rail, so some clarification or use of a different term may be appropriate. In addition, there is no mention of services for visitors and the benefits to the tourist sector of Portland's economy. In addition, rather than simply emphasizing the current policy of enhancing access to the Central City, consider enhancing access to employment areas as well.</p>
<p>Policy 7.11 Multimodal passenger service.</p>	<p>The Portland Plan notes that "...only 12 U.S. cities have direct air service to both Europe and Asia, and Portland is the smallest among them. The region must continue to support these direct services or risk seeing them disappear...." However, these policies do not mention air travel as a mode.</p>
<p>Policy 7.13 Multimodal freight system.</p>	<p>While the Port supports this policy which addresses the freight system; overall, these policies should be stronger and more consistent with policies and actions in Portland Plan which speak to "...strengthening our freight transportation network, which connects us to global markets..."</p> <p>The Port supports Portland's Sustainable Freight Strategy; however, it is also unclear what is intended by "sustainable global and regional freight movement" in this context. Portland Plan Objective #13 does not use this modifier when describing the importance of maintaining Portland as a hub. Finally, there is no mention of air freight which is essential to important traded sectors.</p>
<p>7.34.a. Truck Mobility</p>	<p>Numbering appears to be mislabeled, in keeping w/ the sequence, should be labeled "7.13.a".</p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
7.13.b. Truck Accessibility.	The Port supports improving truck access to and from intermodal freight facilities, industrial and commercial districts, and the regional freight system.
7.13.c. Freight Rail	<p>The proposed language is too passive and does not ask the City to take any action beyond coordination. By comparison, Vancouver BC focuses on protecting rail corridors and prioritizing grade separation projects. The proposed language is intended to address this issue.</p> <p>Modify the draft policy language to state (w/new language underlined): “Coordinate with private stakeholders and regional partners to support continued reinvestment in and modernization of the freight rail network. <u>Prioritize public investment in grade separation and whistle-free zone projects to promote freight rail throughput, public safety and neighborhood livability.</u>”</p>
7.13.d. Marine Terminals.	<p>While the Port supports this policy, as worded, marine facilities on the Columbia River are not included. The proposed modification is intended to address this concern.</p> <p>Modify the draft policy language to state (w/new language underlined): “Coordinate with the Port of Portland, private stakeholders, and regional partners to support continued reinvestment in and modernization of marine terminals in <u>Portland Harbor and the Columbia River</u>. Ensure access to marine terminals and related river-dependant uses in <u>Portland Harbor and the Columbia River</u>.”</p>
7.13.e Shipping Channels.	<p>The Port supports coordination and continued maintenance of the shipping channels in Portland Harbor and the Columbia River. However, the title be changed to “<u>Navigation Channels</u>” to reflect the federal designation and to acknowledge the variety of watercraft that use the river. In addition, as proposed, the language is too passive and does not ask the City to take any action beyond coordination. The proposed language is intended to address this issue.</p> <p>Modify the draft policy language to state (w/new language underlined): “<u>Shipping-Navigation Channels</u>. Coordinate with the Port of Portland, private stakeholders, and regional partners to facilitate continued maintenance of the navigation channels in Portland Harbor and the Columbia River. <u>Facilitate the establishment of upland dredge material management sites and encourage the in-water placement of clean dredge material in sediment-starved rivers including the Willamette and Columbia. Encourage maintenance of ship berths to match the</u></p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<p><u>approved depth of the navigation channels."</u></p>
<p>7.13.f.Air Cargo [NEW]</p>	<p>A new section is appropriate given the importance of high value air cargo to the local and regional economy.</p> <p>Add the new policy language to state (w/new language underlined): <u>"Coordinate with the Port of Portland, private stakeholders, and regional partners to support expanded domestic and international air cargo service at Portland International Airport (PDX). Prioritize local road access to air cargo facilities and provide adequate land suitable for projected air cargo need in and around PDX."</u></p>
<p>Policy 7.15 Performance measures/level of service.</p>	<p>The Portland Plan Guiding Policy P-13 states "Prioritize freight movement over single-occupancy vehicle travel on truck routes. Increase the freight movement share of our limited transportation system capacity." While multimodal levels of service may be appropriate in the Central City and other Centers, the resulting increase in vehicle congestion would impact freight mobility as well as private automobiles. Ensuring a reasonable level of service on freight routes is important to the economy and consistent with the Portland Plan.</p>
<p>Policy 7.21 System management.</p>	<p>This policy suggests giving preference to transportation improvements that use existing roadway capacity efficiently and improve the safety of the system. However, not all "transportation improvements" will use "roadway capacity". Comprehensive Plan policies should be more consistent with the Portland Plan, which emphasizes the importance of Portland role as a trade and freight hub.</p>
<p>Policy 7.24 Project prioritization.</p>	<p>As written, freight system improvements would not be prioritized in the capital improvement program. This is inconsistent with the guidance provided in the Portland Plan which recognizes the need for investments in Portland's multi-modal freight hub infrastructure. It is unclear why all priority projects must reduce vehicle miles traveled per capita or increase active transportation mode share versus other metrics stemming from the Portland Plan such as increasing exports or providing access to employment.</p>
<p>Policy 7.30 Portland International Airport.</p>	<p>This is the only policy addressing Portland International Airport. There is no mention of the economic benefits of the airport. For example, to air freight (especially to the traded sectors) or to tourism. As the Portland Plan notes "...Only 12 U.S. cities have direct air service to both Europe and Asia, and Portland is the smallest among them. The region must continue to support these direct services or risk</p>

<b>Draft Goals and Policies</b>	<b>Comments</b>
	<p>seeing them disappear..." Overall, this policy should be strengthened and sub-policies addressing the importance of the airport should be included. Also, as noted earlier, the Comprehensive Plan was amended only two years ago to reflect Airport Futures. These policies need to be included.</p>







Marty Stockton  
 City of Portland  
 Bureau of Planning and Sustainability  
 1900 SW 4<sup>th</sup> Ave., #7100  
 Portland, OR 97201-5380

1 May 2013

**Re: Portland Community College Comments – Working Draft of the City of Portland Comprehensive Plan Update**

Dear Marty,

Thank you for providing Portland Community College (PCC) the opportunity to comment on the Working Draft of the Comprehensive Plan update. This update is important work and we hope our comments are useful to the City. PCC may be in something of a unique vantage point because of the breadth of our presence across the City, which includes three of our four campuses and two workforce training centers. Specifically, the suggestion that the area around our Southeast Campus become a neighborhood center is appropriate, as is the suggestion that the Interstate/Killingsworth area could be a future town center.

We believe that the nexus of transportation, education, and economic/workforce development deserves strategic thinking and we see that suggested in the update. For example, the Barbur “vision” suggested, which includes high capacity transit, could be catalytic to the future development of the Sylvania Campus (PCC’s largest) as a part of the Hillsdale neighborhood corridor suggested in The Portland Plan. More concretely, our students’ access is enabled by effective transportation systems and is motivated by a city that provides rich opportunities for employment and the benefits of a healthy city aspired to in this update.

Our “major” comment is that this update is an incredibly thorough and well-done (for a working draft) body of work. It is obvious that a lot of thought has gone into the product so far. It is well-organized, it reads well, and it seems broadly responsive to The Portland Plan. While we do identify thoughts where we think it could be improved, or where critical needs are missed, we want you to know that the update is really well done at this stage and we don’t want our more specific comments to overshadow that.

**District President**

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 Opportunity Institution

Marty Stockton

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That said, PCC's additional comments are:

1. The update could be improved by being a little more tangible. As it is, in many cases the policy expressions seem less like policy and more like vision. In that respect, it seems like an addendum to The Portland Plan, rather than providing a body of thought that's a layer down (more specific) than the Plan.
2. We believe the Campus Institutions concept is a strong positive and that the update does a good job of recognizing the critical impact of institutions on the City. We believe the language can be improved by greater recognition of the value that development predictability has for institutions in their strategic investment decisions. We also believe that the language must be clarified (for example, in policies 3.46 and 3.47) because, as written it could be interpreted that solely the institutions have these responsibilities and on their property.
3. We believe that the Transportation commentary and policy needs to be broader and more substantive than the draft has it currently. As written, it appears generally to suggest "keeping on with keeping on." It does not seem to deal in-depth with the reality that there will continue to be SOV's and on-road commerce/freight transportation needs. We certainly applaud and support the "keeping on," but are also painfully familiar with the accelerating deficiency of the commerce corridors.
4. We believe that more substance needs to be included around emergency planning and preparedness. The draft certainly emphasizes "resilience." The text seems to suggest that resilience deals with "recovery." We hope that the update can provided more emphasis on education and citizen preparedness and also provide more expressions that the City sees itself in a leadership role in this area. If the City does agree with that role, then we hope the update can include some stronger policy suggestions about how that role will play out.
5. Section II. C should include specific mention of commercial corridors, other than the rivers.
6. We wonder about broadening the title of Chapter 4 from "Economic Development" to "Education and Workforce and Economic Development" or similar in view of the linkages we see between the three. The citing of declining incomes on parg 2-3 would seem to justify this.



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7. In many cases, policy statements include the word “encourage.” That word is wide enough to drive a truck through and as such does not relay any notion of what the policy bounds are in the City’s eyes. Portlanders could reasonably wonder if the word really means “require” (and if it does, there’s nothing wrong with saying that, which could include a richer and more useful discussion of the actual policy).
8. We appreciate the recognition in 2.8.g of the importance of convenient multimodal transportation in providing Portlanders’ access to education and employment.
9. We believe 2.13.e should include the idea of enforcing existing housing codes.
10. We believe the specificity of “encouraging communal kitchens” (Policy 2.13.f) is out of place and raises a question as to how an idea so uncharacteristically specific appears at this point a policy.
11. We suggest that Policy 5.15 (Eastern Neighborhoods) include a policy statement to reflect a policy goal to develop basic infrastructure, such as paved roads, curbs, and sidewalks.
12. Chapter 5 (Urban Design and Development) seems, in general, to be really well done from a conceptual perspective. The draft would be improved by reducing the use of “Encourage ....” and replace it with language that better illustrates the policy thinking.
13. We believe the sense of Goal 6.C (Reliability and resiliency) should include the idea of **withstanding** catastrophic events, in addition to recovering from them. The recent Oregon DOGAMI report on Portland energy infrastructure should provide sufficient rationale.
14. Goal 6.I (Solid Waste Management) seems to lack aspirations that might include ideas like “Portland deals with its waste within its own boundaries.” Absent that, it seems we’re left with trucking waste down the Gorge or to North Plains. Surely we can aspire to do more. The same perspective should be reflected in Policy 6.32, which suggests it’s OK with Portlanders to have combined sewer overflows, so long as they are limited to permitted frequency.

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15. The text for Policy 6.38 (“Control pollution at its source”) does not seem to fit with the title (“Pollution Prevention”). We note also the incongruity between this policy and Policy 6.32.
16. The commentary on Water (page 6-28) notes new policies on Customer Service and Outages, but we were not able to find those.
17. The statement in 6.63.a. strikes us as a really good expression of what the City intends as its priorities. The update would be improved by other areas including such crisp, “tangible” statements.
18. The recognition of emergency preparedness in Public Safety and Emergency Response (page 6-36) is appropriate and, as noted earlier, should be reflected in other sections of the update. We would also suggest consideration be given to crafting a Policy statement that would reflect the City’s intent to be a leader in regional emergency planning and preparedness.
19. We are not quite sure of the intentions of the goals and policies in the School Facilities section (pages 6-42 and 6-43). It would seem that local school districts have more authority in these arenas than the City. Nor do we see in this section the policy-level thoughts for continued City investment in Portland Public Schools.
20. In the Energy Infrastructure section (pages 6-46 and 6-47) every policy statement begins with “Encourage... .” Further policy thinking as to “how” needs to be included.
21. We suggest that another bullet be added to the list under Policy 7.6 (page 7-8) to “reflect transportation system’s importance in regional emergency planning, preparedness, response, and recovery.”
22. It would be useful to articulate how community, area, and neighborhood plans (Policy 8.6) fit with the types of “areas” suggested elsewhere in the update (such as Town Centers, for example).

Again, we think that the update working draft is a really good start toward the updated Comprehensive Plan. We hope that our comments are helpful to the objective of having a really great update.

Marty Stockton

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Portland Community College appreciates the opportunity to comment on the update. We hope to participate further as the opportunity arise.

Sincerely,

A handwritten signature in black ink that reads "Randy McEwen". The signature is written in a cursive style with a large, stylized "R" and "M".

Randy McEwen  
PCC Vice President



**C.J. Sylvester**  
Chief Operating Officer

**PORTLAND PUBLIC SCHOOLS**  
**Operations**  
501 North Dixon Street o Portland, OR 97227  
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May 1, 2013

Susan Anderson  
Director  
City of Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, Suite 7100  
Portland, OR 97201

Dear Susan,

RE: Portland Public Schools Response to the City of Portland Comprehensive Plan Update Working Draft Part I

Portland Public Schools (PPS) welcomes the opportunity to provide a response to the City of Portland Comprehensive Plan Update Working Draft Part I (Draft Comp Plan Update).

The attached response cites Draft Comp Plan Update policy clusters relevant to PPS; how policies in the working draft align with our Mission, Racial Equity Policy, and Long Range Facility Plan; and PPS comments.

PPS are considered part of Public Facilities and Services in Chapter 6 of the City of Portland Comprehensive Plan Update Working Draft Part I (Draft Comp Plan Update). A number of policy goals in the Draft Comp Plan Update promote schools as multi-functional service hubs, as neighborhood anchors, and as basic public facilities essential for community vitality and prosperity.

Existing Intergovernmental Agreements (IGAs) with Multnomah County, Portland Parks and Recreation (PPR) and the Portland Bureau of Transportation provide for the use of school sites for health care, social services, child care, early childhood education, community gardens, recreation, and active transportation.

The PPS Civic Use of Buildings program (CUB) allows individuals and community groups use of district facilities on a non-interference basis with school activities. In their role as community centers, schools encourage community and non-profit groups to use school buildings for athletic and special events as well as meetings.

The current zoning code, while helpful in recognizing that school site enrollment levels vary from year to year and school sites are regularly programmed by PPR, remains inadequate for school sites to become multi-functional hubs. Furthermore, the current zoning code does not fully account for existing uses at PPS school sites, many of which are tied to IGAs and the CUB program.



PPS Response to PDX Draft Comp Plan  
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PPS therefore includes in our response a White Paper advocating for a new Public Facility Overlay Zone.

The purpose of the Public Facility Overlay Zone is to encourage co-location of essential public services and to recognize the important role that public facilities play as centers of community while mitigating potential impacts to residential neighborhoods. Properties owned by public agencies, the city, school districts, and nonprofits share a common purpose in serving the needs of the Portland neighborhoods and the community at-large. The concept for the zone is to recognize that public facilities are a historical part of Portland neighborhood development, to support repurposing or redevelopment of existing public facilities to meet community needs, and ensure that limited expansions of public facilities meet minimum development standards to mitigate potential impacts on the livability of nearby residential zoned lands.

The Public Facility Overlay Zone White Paper is intended to initiate a dialogue with the City of Portland Bureau of Planning and Sustainability. PPS recognizes that developing PF Overlay Zone code language will require a systemic review of Title 33 in consultation with all institutional use stakeholders located adjacent to or within open space and residential zones, neighborhood associations and other interested parties.

PPS looks forward to being an active partner in the Comprehensive Plan Update and we believe the new plan will afford opportunities to strengthen our partnership with the City of Portland and its citizens.

Very Truly Yours,



C.J. Sylvester  
Chief Operating Officer  
Portland Public Schools

CC: Carole Smith, Superintendent  
Jollee Patterson, General Counsel  
Tony Magliano, Deputy Chief Operating Officer

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 1: Community Involvement

<p>RELEVANT POLICIES</p>	<p>Policy 1.1 Community involvement program. Require and implement a Community Involvement Program to provide an active, ongoing, and systematic process for community participation throughout planning and decision making. Enable community members to identify, consider, and act upon a broad range of issues within land use, transportation, parks, sewer and water systems, natural resources, and implementing measures.</p> <p>Policy 1.4 Partners in decision making. Enhance community involvement in planning processes based on a model of shared governance.</p> <p>Policy 1.6 Early involvement. Improve opportunities for interested and affected community members to participate early in planning and decision making. This includes participating in process design, identifying issues and opportunities, and recommending and prioritizing projects and/or other types of implementation.</p> <p>Policy 1.14. Capacity building. Build capacity for community members to effectively participate in planning and decision making.</p> <p>1.14.c. Recruit, train, and appoint people from currently or historically underrepresented communities to City boards and committees that oversee or advise planning processes, to ensure accurate representation of Portland's diverse population.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFPP</li> </ul>	<p>PPS RACIAL EDUCATIONAL EQUITY POLICY</p> <p>C. The District shall recruit, employ, support and retain racially and linguistically diverse and culturally competent administrative, instructional and support personnel....</p> <p>F. The District shall welcome and empower families, including underrepresented families of color (including those whose first language may not be English) as essential partners in their student's education, school planning and District decision-making. The District shall create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community. In addition, the District will include other partners who have demonstrated culturally specific expertise -- including government agencies, non-profit organizations, businesses, and the community in general -- in meeting our educational outcomes.</p> <p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <p>Schools will thrive when our entire community is invested in their success. Every citizen of Portland is a stakeholder in schools. It is critical to promote a seamless, integrated relationship among stakeholders to support schools. School facilities and grounds will be inclusive and central to the communities and neighborhoods they serve and open and accessible to all for community use.</p> <p>C. Demonstrate fiscal responsibility</p> <ul style="list-style-type: none"> <li>• Solicit input from individual school communities in determining improvement plans.</li> </ul> <p>D: Practice inclusivity</p> <ul style="list-style-type: none"> <li>• Create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community.</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• Implementation of these policies will require administrative coordination that brings together staff from school districts and the city to maintain an ongoing understanding of respective operations and initiatives.</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 2: Housing

<p>RELEVANT POLICIES</p>	<p>Policy 2.1 Adequate housing supply. 2.1.b. Housing Potential: Consider the impact of potential loss of housing capacity through legislative actions, particularly the potential to develop housing units that can serve low- and moderate-income households.</p> <p>Policy 2.2 Housing variety. 2.2.d. Ensure that areas in and around centers include a diversity of housing that can accommodate a broad range of households, including multi-generational households and families with children.</p> <p>Policy 2.5 Opportunity areas. Strive to create housing in livable mixed-income neighborhoods throughout Portland that have the qualities important for economic prosperity and healthy living.</p> <p>2.5.a Prioritize new affordable and accessible housing in areas that offer good access to active transportation, jobs, open spaces, high-quality schools, and various services and amenities.</p> <p>2.5.b. Improve equitable access to active transportation, jobs, open spaces, high quality schools, and various services and amenities in areas with an existing supply of affordable housing.</p> <p>2.5.c. Prioritize new higher density housing, including units that are affordable and accessible for all Portlanders, in and around centers that offer good access to active transportation, jobs, open spaces, schools, and various services and amenities.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFP</li> </ul>	<p>PPS MISSION</p> <p>By the end of elementary, middle and high school, every student will meet or exceed academic standards and will be fully prepared to make productive life decisions. Portland Public Schools is an equal opportunity educator and employer.</p> <p>PPS RACIAL EDUCATIONAL EQUITY POLICY</p> <p>A. The District shall provide every student with equitable access to high quality and culturally relevant instruction, curriculum, support, facilities and other educational resources, even when this means differentiating resources to accomplish this goal.</p> <p>B. The District shall create multiple pathways to success in order to meet the needs of our diverse students, and shall actively encourage, support and expect high academic achievement for students from all racial groups.</p> <p>F. The District shall welcome and empower families, including underrepresented families of color (including those whose first language may not be English) as essential partners in their student’s education, school planning and District decision-making. The District shall create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community. In addition, the District will include other partners who have demonstrated culturally specific expertise -- including government agencies, non-profit organizations, businesses, and the community in general -- in meeting our educational outcomes.</p> <p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Develop community assets that support life-long learning and wellness, and help to knit our community together.</li> <li>• Work with partners to provide safe and accessible paths of travel to every school.</li> </ul> <p>D: Practice inclusivity</p> <ul style="list-style-type: none"> <li>• Provide facilities that accommodate a greater degree of wraparound social services in schools with the highest needs.</li> <li>• Create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community.</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• Not all schools are or will be located in centers. This presumes a neighborhood school model; however the state funding model for schools will trend toward larger consolidated models that are able to provide greater options for educational program delivery.</li> <li>• Why are schools the only amenity described as “high quality”? The quality of other amenities and services are not referred to.</li> <li>• From schools perspective housing needs to be affordable for all income levels within school capture areas; delivery of educational programming is improved with stable/predictable enrollment.</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 3: Economic Development

<p>RELEVANT POLICIES</p>	<p>Policy 3.7 Land development. Maintain supplies of land that:</p> <ul style="list-style-type: none"> <li>• Are available and practical for development.</li> <li>• Includes adequate amounts and types of sites to support economic vitality.</li> <li>• Are enough to meet the long-term and short-term growth forecasts in Portland’s Central City and its industrial, institutional, and neighborhood business districts.</li> </ul> <p>Policy 3.15 Development impacts. Protect historically underrepresented communities from disparities in adverse development impacts.</p> <p>Policy 3.25 Poverty reduction. Strive for more effective poverty reduction by aligning major public programs responsible for employment, land use and development, transportation, housing, social services, community development, and workforce development.</p> <p>Policy 3.26 Disparity reduction. Reduce racial, ethnic, and disability-related disparities in income and employment opportunity.</p> <p>Policy 3.44 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 employer.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFP</li> </ul>	<p>PPS RACIAL EDUCATIONAL EQUITY POLICY</p> <p>A. The District shall provide every student with equitable access to high quality and culturally relevant instruction, curriculum, support, facilities and other educational resources, even when this means differentiating resources to accomplish this goal.</p> <p>B. The District shall create multiple pathways to success in order to meet the needs of our diverse students, and shall actively encourage, support and expect high academic achievement for students from all racial groups.</p> <p>D. The District shall remedy the practices, including assessment, that lead to the over-representation of students of color in areas such as special education and discipline, and the under-representation in programs such as talented and gifted and Advanced Placement.</p> <p>F. The District shall welcome and empower families, including underrepresented families of color (including those whose first language may not be English) as essential partners in their student’s education, school planning and District decision-making. The District shall create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community. In addition, the District will include other partners who have demonstrated culturally specific expertise -- including government agencies, non-profit organizations, businesses, and the community in general -- in meeting our educational outcomes.</p> <p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Develop community assets that support life-long learning and wellness, and help to knit our community together.</li> </ul> <p>D: Practice inclusivity</p> <ul style="list-style-type: none"> <li>• Provide facilities that accommodate a greater degree of wraparound social services in schools with the highest needs.</li> <li>• Create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community.</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• Housing affordability should also be a reason for maintaining an adequate land supply. Support for housing that is affordable to all families within school catchment areas will help decrease student mobility and increase the stability of enrollment in neighborhood schools.</li> <li>• The policies listed above do not mention the need to differentiate resources to address past disinvestment.</li> <li>• PK-12 schools operate differently and have a different type and intensity of impact to surrounding neighborhoods than to college and health care campuses. PK-12 schools should not be considered a comparable land use for the purposes of future land use regulation. For example High School sites in the IR zone are grouped with Colleges and Medical Centers but the development expansion pattern and intensity of use are clearly less by comparison. <i>See additional response in Policy Cluster 8: Administration and Implementation.</i></li> </ul>



## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 4: Watershed Health and Environment

RELEVANT POLICIES	<p>Policy 4.9 Air, land, and water quality. Prevent toxic pollutants from contaminating air, land, and water.</p> <p>Policy 4.10 Sustaining the soil. Prevent human-induced soil loss, erosion, and impairment of soil quality and function.</p> <p>Policy 4.16 Impervious surface impacts. Reduce and offset the impacts of impervious surfaces where practicable.</p> <p>Policy 4.27 Scenic resources. Project and enhance significant scenic views, sites, and drives.</p> <p>Policy 4.30 Scenic resource planning. Ensure master plans and other planning efforts include preservation and enhancement of significant scenic resources.</p>
ALIGNMENT W/ PPS <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFPP</li> </ul>	PPS LONG RANGE FACILITY PLAN B: Embrace sustainability The Portland Public Schools portfolio of facilities is the City of Portland’s sustainability frontier. Opportunities abound to reduce operating expenses by saving energy, conserving water, and reducing and recycling waste while maintaining the well-built structures that have served generations of Portland students. The District will seek to implement high-performance systems to achieve cost effective energy, water and waste solutions .... <ul style="list-style-type: none"> <li>• Use practices such as reuse of existing buildings, construction waste management, air quality, proper recycling of building materials, and water-conserving and waste-reducing infrastructure to achieve PPS sustainability goals.</li> <li>• Whenever feasible, incorporate space for potential community gardens, learning gardens or surface storm water facilities/rain gardens in any major renovations.</li> </ul>
RESPONSE	<ul style="list-style-type: none"> <li>• Most of these policies seem to be addressed by current comp plan policies and/or the current federal/state/city regulatory environment.</li> <li>• Land use review/planning efforts should afford the opportunity to reexamine currently identified scenic resources and views and provide ability to mitigate, under certain circumstances, for the loss or diminishment of these resources.</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 5: Urban Design and Development

RELEVANT POLICIES	<p>Policy 5.3 Equitable development. Strive for development and design that avoids or reduces negative impacts and supports positive outcomes for communities of color, historically underserved communities, and other vulnerable populations.</p> <p>Policy 5.8 Innovation. Encourage the design of the built environment to foster local creativity, experimentation, and innovative design solutions.</p> <p>Policy 5.19 Focused investments. Prioritize and encourage public and private investment in infrastructure, community amenities, and community and commercial services in centers. Use strategic investments in centers to shape growth, balancing that with needed investments in areas that are deficient in infrastructure and services.</p>
ALIGNMENT W/ PPS <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFPP</li> </ul>	PPS RACIAL EDUCATIONAL EQUITY POLICY <p>B. The District shall create multiple pathways to success in order to meet the needs of our diverse students, and shall actively encourage, support and expect high academic achievement for students from all racial groups.</p> <p>D. The District shall remedy the practices, including assessment, that lead to the over-representation of students of color in areas such as special education and discipline, and the under-representation in programs such as talented and gifted and Advanced Placement.</p> <p>F. The District shall welcome and empower families, including underrepresented families of color (including those whose first language may not be English) as essential partners in their student’s education, school planning and District decision-making. The District shall create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community. In addition, the District will include other partners who have demonstrated culturally specific expertise -- including government agencies, non-profit organizations, businesses, and the community in general -- in meeting our educational outcomes.</p> PPS LONG RANGE FACILITY PLAN <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Develop community assets that support life-long learning and wellness, and help to knit our community together.</li> <li>• Support enhanced community/school dual use areas and the resulting increased use and ownership of the schools by the community, including financial partnerships.</li> <li>• Pursue partnerships with other public and/or private entities that leverage public resources to maximize efficiency, economies of scale and innovation.</li> </ul> <p>C: Demonstrate fiscal responsibility</p> <ul style="list-style-type: none"> <li>• Communicate the benefits that facilities investments provide to students and the community.</li> <li>• Solicit input from individual school communities in determining improvement plans.</li> <li>• Leverage potential partnerships that maximize resources (e.g. wraparound services, leasing, business partners, etc.).</li> </ul> <p>D: Practice inclusivity</p> <ul style="list-style-type: none"> <li>• Prioritize work based on the District’s current equity policy.</li> <li>• Provide facilities that accommodate a greater degree of wraparound social services in schools with the highest needs.</li> </ul>
RESPONSE	<ul style="list-style-type: none"> <li>• Chapter 8 Administration and Implementation needs to better account for equity in development, investments, and resource allocation to achieve Policies 5.3, 5.8. and 5.19.</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 5: Urban Design and Development (Continued)

<p>RELEVANT POLICIES</p>	<p>Policy 5.26 Greenways. Create a citywide network of Greenways that provide distinctive and attractive pedestrian- and bike-friendly green streets and trails that link centers, parks, schools, rivers, natural areas, and other key community destinations.</p> <p>Policy 5.29 Pedestrians and accessibility. Enhance Portland as a place that is experienced most intimately by pedestrians, including all those who walk, use wheelchairs, or otherwise experience the city from its sidewalks.</p> <p>5.29.a. Strive for a built environment designed to provide a safe, comfortable, and attractive environment for pedestrians of all ages and abilities</p> <p>Policy 5.35 Historic and cultural resource protection. Protect and restore old and historic buildings and places that contribute to the distinctive character and history of Portland's evolving urban environment.</p> <p>Policy 5.38 Rehabilitation and adaptive reuse. Encourage rehabilitation and adaptive reuse of culturally and architecturally significant historic buildings to conserve natural resources, reduce waste, and model stewardship of the built environment.</p> <p>5.38.a. Enhance the long-term viability of historic structures and improve public safety through seismic and energy efficiency retrofits.</p> <p>5.38.b. Encourage maintenance and rehabilitation of viable buildings over demolition and new construction.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFPP</li> </ul>	<p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Work with partners to provide safe and accessible paths of travel to every school.</li> <li>• PPS historic buildings help to define our communities, make them more livable and instill civic pride and a sense of place. Evaluate retaining historically significant buildings and/or their significant building features.</li> </ul> <p>B: Embrace sustainability</p> <ul style="list-style-type: none"> <li>• Building design will maximize and integrate the surrounding natural features, natural light, air flow and other environmental factors that support wellness and conditions for optimal learning.</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• City's historic resource inventory should be updated and include references to professionally produced historic assessments completed by property owners.</li> <li>• There should be policy level direction to provide dedicated resources for the installation of greenways, sidewalks, and other improvements. Reliance on property owners to install these improvements will not alone complete the vision of a complete pedestrian and greenway network.</li> <li>• There should be policy level direction to update the City's Historic Resources Inventory on a regular basis and allow flexibility in the zoning code for owners of historically significant properties to provide professionally prepared historic assessment of properties as part of land use review of properties under the City's zoning code regulation of historic properties.</li> <li>• What incentives can the City offer to encourage maintenance and rehabilitation of viable buildings over demolition and new construction?</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 6: Public Facilities and Services

<p>RELEVANT POLICIES</p>	<p>Policy 6.3 Interagency coordination. Maintain interagency coordination agreements with the following jurisdictions and agencies that provide public facilities and services within the city of Portland to ensure effective and efficient service delivery: Portland Public Schools and the David Douglas, Parkrose, Reynolds, Centennial, and Riverdale School Districts for public education and recreational facilities.</p> <p>Policy 6.7 Community services. Coordinate with the planning efforts of agencies providing public education; health services; community centers, library services, and justice services, as appropriate.</p> <p>6.7.a. Encourage the placement of such services in centers.</p> <p>Policy 6.8 Co-location. Encourage co-location of public facilities and services across providers where co-location improves service delivery.</p> <p>Policy 6.14 Shared costs. Costs of providing public facilities and services should be shared by those who benefit from the provision of those facilities and services.</p> <p>6.14.a. Require those whose development and redevelopment actions necessitate public facility improvement, extension, or construction to bear the costs.</p> <p>6.14.b. Consider opportunities to equitably share costs of resolving service deficiencies where significant existing service deficiencies exist.</p> <p>6.14.c. Consider shared responsibility between all parties that are served or benefit from the costs of constructing and providing public facilities and services when the facilities or services provide a shared benefit.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITYPOLICY</li> <li>• LRFP</li> </ul>	<p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Develop community assets that support life-long learning and wellness, and help to knit our community together.</li> <li>• Encourage and support facilities solutions that enhance community use of school facilities. School spaces (gym, cafeteria, commons, library, performance) should be easily accessible to the community.</li> <li>• Support enhanced community/school dual use areas and the resulting increased use and ownership of the schools by the community, including financial partnerships.</li> <li>• Pursue partnerships with other public and/or private entities that leverage public resources to maximize efficiency, economies of scale and innovation.</li> </ul> <p>C: Demonstrate fiscal responsibility</p> <ul style="list-style-type: none"> <li>• Communicate the benefits that facilities investments provide to students and the community.</li> <li>• Leverage potential partnerships that maximize resources (e.g. wraparound services, leasing, business partners, etc.).</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• Need for interagency coordination is vital and should extend beyond intergovernmental agreements for operations and to programmatic or site level capital bond work by school districts to craft agreements that able to truly harness the community service, co-location and shared cost aspirations of this chapter.</li> <li>• Very few new schools buildings will be built by school districts in Portland in the years to come (compared to the current building portfolio).</li> <li>• Comp Plan policies that steer public amenities and facilities to neighborhood centers. The Portland Plan desires school sites to become centers of community. The City should provide amenities and resources to support schools not centrally located in neighborhood centers to become multi-functional hubs for community services.</li> <li>• Need policy level direction to identify how costs for public facilities can be shared and provide resources to fully implement a cost sharing plan.</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 6: Public Facilities and Services (Continued)

<p>RELEVANT POLICIES</p>	<p>Policy 6.70 Public/private opportunities and partnerships. Encourage private development and operation of recreational facilities that meet identified public need and the City's recreational objectives.</p> <p>Policy 6.88 Co-location. Encourage school districts, public and private institutions, Multnomah County, and the City of Portland to co-locate facilities and programs in a way that optimizes intergenerational and intercultural use.</p> <p>Policy 6.89 Shared use. Encourage public use of school grounds for community purposes, while meeting educational and student safety needs.</p> <p>6.89.a. Encourage community use of school grounds for recreational use and as green spaces, community gardens, playgrounds, and other means of physical activity, particularly in neighborhoods with limited access to green spaces.</p> <p>6.89.b. Consider use of school facilities as gathering and aid distribution locations during natural disasters and other emergencies.</p> <p>Policy 6.90 Facility adaptability. Ensure that schools may be upgraded to flexibly accommodate multiple community-serving uses and adapt to changes in educational approaches, technology, and student needs over time.</p> <p>Policy 6.91 Leveraging public investment. Prioritize City infrastructure investments that complement and leverage local school districts' major capital investments.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITYPOLICY</li> <li>• LRFPP</li> </ul>	<p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Develop community assets that support life-long learning and wellness, and help to knit our community together.</li> <li>• Encourage and support facilities solutions that enhance community use of school facilities. School spaces (gym, cafeteria, commons, library, performance) should be easily accessible to the community.</li> <li>• Support enhanced community/school dual use areas and the resulting increased use and ownership of the schools by the community, including financial partnerships.</li> <li>• Pursue partnerships with other public and/or private entities that leverage public resources to maximize efficiency, economies of scale and innovation.</li> </ul> <p>B: Embrace sustainability</p> <ul style="list-style-type: none"> <li>• Design facilities that are flexible, adaptable and resilient to accommodate changing needs and purposes that extend the useful and effective life of the building.</li> </ul> <p>C: Demonstrate fiscal responsibility</p> <ul style="list-style-type: none"> <li>• Communicate the benefits that facilities investments provide to students and the community.</li> <li>• Leverage potential partnerships that maximize resources (e.g. wraparound services, leasing, business partners, etc.).</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• Policy level direction is needed to remove the current regulatory barriers to co-location opportunities. <i>See additional response in Policy Cluster 8: Administration and Implementation.</i></li> <li>• Policy level direction is needed to pursue a funding and resource structure/strategy to fund co-location and shared uses identified in these policies. <i>See additional response in Policy Cluster 8: Administration and Implementation.</i></li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 7: Transportation

<p>RELEVANT POLICIES</p>	<p>Policy 7.1 Street design. Design improvements to new and existing transportation facilities to implement transportation and land use goals and objectives and in accordance with designated street design classifications.</p> <p>7.1.a. Design and improve streets to provide safe, convenient, and comfortable access in an attractive environment for all Portlanders regardless of age, ability, and mode of transportation.</p> <p>Policy 7.7 Transportation affordability. Improve and maintain a transportation system that increases access to affordable transportation options for all Portlanders, especially youth, older adults, people of color, and people with disabilities.</p> <p>Policy 7.8 Pedestrian transportation. Create conditions that make walking more attractive as the mode of choice for short trips of 1 mile or less and for accessing transit.</p> <p>7.8.a. Increase the opportunities to choose walking as a mode of transportation by completing a network of pedestrian infrastructure and improving the quality of the pedestrian environment.</p> <p>7.8.b. Enhance the pedestrian environment by increasing pedestrian safety, accessibility, and convenience for people of all ages and abilities.</p> <p>7.8.c. Increase opportunities for walking within and to centers, corridors, significant locations, and transit.</p> <p>Policy 7.9 Bicycle transportation. Create conditions that make bicycling more attractive than driving for trips of 3 miles or less.</p> <p>7.9.a. Ensure that the bicycle transportation system is accessible to Portlanders of all ages and abilities.</p> <p>7.9.b. Develop and implement classifications that emphasize the movement of bicycles on a citywide network of designated streets.</p>
<p>ALIGNMENT W/ PPS</p> <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFP</li> </ul>	<p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Work with partners to provide safe and accessible paths of travel to every school.</li> </ul>
<p>RESPONSE</p>	<ul style="list-style-type: none"> <li>• City needs comprehensive analysis of transportation system that acts as basis for judging the relative impacts of new development.</li> <li>• Portland Plan discussed differentiated investment based on historical disinvestment. How is that translated into these policies?</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

## Policy Cluster 8: Administration and Implementation

RELEVANT POLICIES	<p>Policy 8.1 Intergovernmental coordination. The Comprehensive Plan is implemented in a manner that complements the efforts of and fiscal health of partner agencies, including school districts, the counties, and region.</p> <p>Policy 8.4 Public facilities plan. Maintain a coordinated public facilities plan for the provision of urban public facilities and services, within Portland’s urban services boundary.</p> <p>Policy 8.9 Overlay zones. Overlay zones are applied where a situation exists in multiple locations and several base zones, such as the need to protect natural or historic resources. 8.9.d. <i>Placeholder for a subpolicy related to additional overlay zones. To be developed.</i></p> <p>Policy 8.15 Service Agreements. Maintain interagency coordination agreements with jurisdictions and agencies that provide public facilities and services within the city. (See Policy 6.3)</p>
ALIGNMENT W/ PPS <ul style="list-style-type: none"> <li>• MISSION</li> <li>• EQUITY POLICY</li> <li>• LRFPP</li> </ul>	<p>PPS LONG RANGE FACILITY PLAN</p> <p>A: Develop partnerships</p> <ul style="list-style-type: none"> <li>• Develop community assets that support life-long learning and wellness, and help to knit our community together.</li> <li>• Support enhanced community/school dual use areas and the resulting increased use and ownership of the schools by the community, including financial partnerships.</li> <li>• Pursue partnerships with other public and/or private entities that leverage public resources to maximize efficiency, economies of scale and innovation.</li> </ul> <p>C: Demonstrate fiscal responsibility</p> <ul style="list-style-type: none"> <li>• Leverage potential partnerships that maximize resources (e.g. wraparound services, leasing, business partners, etc.).</li> </ul>
RESPONSE	<ul style="list-style-type: none"> <li>• Support development of Public Facility Overlay Zone that includes PK-12 schools.</li> <li>• The overlay zone language needs to be accompanied by prefatory statement recognizing the long standing nature of schools in neighborhoods and the use of processes/procedures that will engage neighbors and schools more directly in operational positive outcomes to neighborhoods.</li> <li>• The Public Facility Overlay Zone should allow additional and auxiliary uses supportive of students, families, and community.</li> </ul>

## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

**PPS POLICY ALIGNMENT REFERENCES****PPS MISSION**

By the end of elementary, middle and high school, every student will meet or exceed academic standards and will be fully prepared to make productive life decisions. Portland Public Schools is an equal opportunity educator and employer.

**PPS RACIAL EDUCATIONAL EQUITY POLICY**

A. The District shall provide every student with equitable access to high quality and culturally relevant instruction, curriculum, support, facilities and other educational resources, even when this means differentiating resources to accomplish this goal.

B. The District shall create multiple pathways to success in order to meet the needs of our diverse students, and shall actively encourage, support and expect high academic achievement for students from all racial groups.

C. The District shall recruit, employ, support and retain racially and linguistically diverse and culturally competent administrative, instructional and support personnel, and shall provide professional development to strengthen employees' knowledge and skills for eliminating racial and ethnic disparities in achievement. Additionally, in alignment with the Oregon Minority Teacher Act, the District shall actively strive to have our teacher and administrator workforce reflect the diversity of our student body.

D. The District shall remedy the practices, including assessment, that lead to the over-representation of students of color in areas such as special education and discipline, and the under-representation in programs such as talented and gifted and Advanced Placement.

E. All staff and students shall be given the opportunity to understand racial identity, and the impact of their own racial identity on themselves and others.

F. The District shall welcome and empower families, including underrepresented families of color (including those whose first language may not be English) as essential partners in their student's education, school planning and District decision-making. The District shall create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community. In addition, the District will include other partners who have demonstrated culturally specific expertise -- including government agencies, non-profit organizations, businesses, and the community in general -- in meeting our educational outcomes.



## PPS Response to City of Portland Comprehensive Plan Update: Working Draft Part 1

### PPS LONG RANGE FACILITY PLAN

#### Facility Goals

Goal One: Every PPS school shall provide an equitable and effective learning environment that maximizes the achievement of every student.

Facilities will support student success equitably. Portland Public Schools will create effective, accessible and inclusive learning environments that help all students achieve. School buildings and grounds will nurture and inspire learning while challenging and supporting students, teachers, parents and community who together will encourage learning beyond building walls—into the community and around the world. All students are included regardless of national origin, race, gender, economic background, sexual orientation, disabilities, first language or other distinguishing characteristics.

Goal Two: Every PPS school shall be safe, healthy, accessible and designed to meet students' essential needs.

Facilities reflect the importance of education in the community. Portland Public Schools will provide buildings where the quality of the building environment contributes to positive relationships and productive learning. Essential needs for use of school buildings include safety and security, full access and protection from fire, seismic hazards and toxins. Essential needs for learning include reasonable building temperature and adequate light, air and water quality, sanitation and acoustics.

Goal Three: PPS shall optimize utilization of all schools while taking the academic program needs of each school into account.

The physical size of schools should reflect the academic program needs of each school. When enrollment exceeds or falls below optimal student capacity or program size, Portland Public Schools will engage in an enrollment balancing process including but not limited to transfer limitation, attendance boundary changes and grade reconfiguration before implementing school consolidation and facility changes.

#### Guiding Principles

In every facilities planning and capital investment decision, PPS will:

##### A: Develop partnerships

Schools will thrive when our entire community is invested in their success. Every citizen of Portland is a stakeholder in schools. It is critical to promote a seamless, integrated relationship among stakeholders to support schools. School facilities and grounds will be inclusive and central to the communities and neighborhoods they serve and open and accessible to all for community use.

#### Methodology

- Increase engagement by developing a sense of connection between society as a whole and schools.
- Develop partnerships and relationships to increase engagement, ownership, and student and teacher success.
- Develop community assets that support life-long learning and wellness, and help to knit our community together.
- Balance the needs of neighborhood schools and the needs of focus option schools to best serve the larger PPS student population.
- Provide program support for strong enrollment in response to the desire for small neighborhood schools.
- Encourage and support facilities solutions that enhance community use of school facilities. School spaces (gym, cafeteria, commons, library, performance) should be easily accessible to the community.
- Support enhanced community/school dual use areas and the resulting increased use and ownership of the schools by the community, including financial partnerships.
- Pursue partnerships with other public and/or private entities that leverage public resources to maximize efficiency, economies of scale and innovation.
- Work with partners to provide safe and accessible paths of travel to every school.
- PPS historic buildings help to define our communities, make them more livable and instill civic pride and a sense of place. Evaluate retaining historically significant buildings and/or their significant building features.

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### B: Embrace sustainability

The Portland Public Schools portfolio of facilities is the City of Portland's sustainability frontier. Opportunities abound to reduce operating expenses by saving energy, conserving water, and reducing and recycling waste while maintaining the well-built structures that have served generations of Portland students. The District will seek to implement high-performance systems to achieve cost effective energy, water and waste solutions that provide flexible, adaptive learning environments (both indoor and outdoor) to support student achievement. In renovations of existing buildings and school grounds and in new construction, the District will aim to meet or exceed national and international sustainability performance benchmarks and to advance the state of the art in sustainability management for K-12 educational facilities.

#### Methodology

- Life cycle cost. More efficient building systems should be implemented during initial construction and remodeling/modernization/retrofitting efforts that have a payback in keeping with the anticipated life of the asset, rather than just considering the lowest first cost for the asset.
- Prioritize procurement of local materials, local contractors, subcontractors, sourcing and suppliers, and make every effort to encourage local manufacturing of critical components.
- Use practices such as reuse of existing buildings, construction waste management, air quality, proper recycling of building materials, and water-conserving and waste-reducing infrastructure to achieve PPS sustainability goals.
- Engage students, staff and community in ongoing responsible operation of building systems.
- Building design will maximize and integrate the surrounding natural features, natural light, air flow and other environmental factors that support wellness and conditions for optimal learning.
- Whenever feasible, incorporate space for potential community gardens, learning gardens or surface storm water facilities/rain gardens in any major renovations.
- Design facilities that are flexible, adaptable and resilient to accommodate changing needs and purposes that extend the useful and effective life of the building.

### C: Demonstrate fiscal responsibility

Fiscal prudence entails fully funding the cost of school facilities and their operations, staying current with preventive maintenance, and budgeting for the total costs of ownership. Best fiscal practices include credible forecasts, rigorous cost-benefit analysis, transparent budgets, responsible expenditures and audited financial statements.

#### Methodology

- Communicate the benefits that facilities investments provide to students and the community.
- Solicit input from individual school communities in determining improvement plans.
- Leverage potential partnerships that maximize resources (e.g. wraparound services, leasing, business partners, etc.).
- Whenever possible, evaluate the cost to students and families of relocation against the cost savings of phased work; accomplish the work all at one time when possible. The impacts on students, families, staff and community should be considered in the evaluation.
- Assess the physical condition of District facilities on an ongoing basis.
- Utilize best practices to ensure that significant improvements, renovations or new construction will last 50-75 years with ongoing preventive maintenance.
- Use the facility condition index (FCI) as one metric when determining the need for facility repair, improvement and/or replacement.
- Stay current on funding a Capital Asset Replacement (CAR) Plan.
- Complement normal maintenance with volunteer projects that create and maintain landscaping and facilities.

### D: Practice inclusivity

Provide facilities that support effective, accessible, inclusive learning environments for all students.

#### Methodology

- Prioritize work based on the District's current equity policy.
- Ensure that school campus designs are inclusive and culturally relevant.
- Provide facilities that accommodate a greater degree of wraparound social services in schools with the highest needs.
- Provide students with an environment that inspires them and is joyful, unique and engaging.
- Provide flexibility for changing curriculum and changing learning needs over time.
- Provide ubiquitous technology support for learning media, networks, and District and personal devices.
- Create welcoming environments that reflect and support the racial and ethnic diversity of the student population and community.
- Renovated facilities will meet Universal Design guidelines and be fully accessible and ADA compliant.
- Provide acoustic enhancements.

PPS WHITE PAPER PUBLIC FACILITY OVERLAY ZONE  
Justin Fallon Dollard, PPS Planning and Asset Management

## **Premise**

This paper lays out Portland Public Schools' (PPS) arguments for the development of a Public Facilities (PF) Overlay Zone in the City's Zoning Code (Title 33) and the need to create a legislative framework for this overlay zone in the City's Comprehensive Plan update.

## **Public Policy Context**

Portland Public Schools are considered part of Public Facilities and Services in Chapter 6 of the City of Portland Comprehensive Plan Update Working Draft Part I (Draft Comp Plan Update). A number of policy goals in the Draft Comp Plan Update promote schools as multi-functional service hubs, as neighborhood anchors, and as basic public facilities essential for community vitality and prosperity.

Existing Intergovernmental Agreements (IGAs) with Multnomah County, Portland Parks and Recreation (PPR) and the Portland Bureau of Transportation (PBOT) provide for the use of school sites for health care, social services, child care, early childhood education, community gardens, recreation, and active transportation.

The PPS Civic Use of Building program (CUB) allows individuals and community groups use of district facilities on a non-interference basis with school activities. In their role as community centers, schools encourage community and non-profit groups to use school buildings for athletic and special events as well as meetings.

PPS leases vacant properties, and forms development partnerships with interested parties, to further the District's Mission, Equity Policy, Long Range Facility Plan and/or generate additional revenue. Tenants include a neighborhood association, nonprofit agencies, telecommunication companies, Head Start, and private schools. Development partners include the Native American Youth and Family Center, Concordia University, Youth Soccer and Baseball Clubs, and the City of Portland.

PPS school sites are typically located within single or multi-dwelling residential zones and often adjacent to open space zoning. A handful of sites are located within the Institutional Residential multi-use zone. Issues directly related to measurable, physical impacts such as traffic, noise, and air quality are appropriately addressed through the zoning code. The operation of a school on residentially zoned properties requires Conditional Use (CU) review by the City of Portland. Changes to grade level, expansions of existing development, new development, accessory uses, and interim uses of vacant school property are all regulated through Chapters 110 Single-Dwelling Zones, 120 Multi-Dwelling Zones, 279 Recreational Fields for Organized Sports, 281 Schools and School Sites, and 815 Conditional Use Reviews.

## **PPS Assumptions**

A number of assumptions provide context for this Public Facility Overlay Zone White Paper:

- Schools sites are key components of "complete neighborhoods" – a concept explored during the Portland Plan process, the Education and Youth Success Policy Expert Group, and reflected in the

## PPS WHITE PAPER PUBLIC FACILITY OVERLAY ZONE

Justin Fallon Dollard, PPS Planning and Asset Management

Draft Comp Plan Update. A neighborhood is complete when amenities and essential services are located within a 20-minute walk or bicycle ride from home.

- While there is a clear boundary between decisions that City government has jurisdiction over and decisions within school districts' purview, it is vital for school districts to retain flexibility in transforming school sites into multi-functional hubs while respecting impacts of these uses to surrounding neighborhoods.
- The current zoning code, while helpful in recognizing that school site enrollment levels vary from year to year and school sites are regularly programmed by PPR, remains inadequate for school sites to become multi-functional hubs. Furthermore the current zoning code does not fully account for existing uses at PPS school sites, many of which are tied to IGAs and the CUB program.
- The current zoning code places barriers toward creating mixed-use development in service of the normative prosperity, educational, and equity goals stated in the Draft Comp Plan Update. While PPS is exploring mixed-use use of its property, where feasible, for housing to serve low-income, racial/ethnic minorities displaced by changes in the rental / ownership markets, the current zoning code would require lengthy conditional use reviews that add cost and limit potential.
- Type III CU requirements are easily triggered under the code and appeals are made before City Council. While CU reviews are intended to assess and mitigate neighborhood impacts; the review process can shift jurisdiction of City government into educational and community development policy decisions undertaken by PPS. The level of review associated with any specific regulation should be commensurate with the potential impacts to the surrounding neighborhood based on new development or significant change in operation (e.g. addition of high school students). Renovations and expansions, changes in programming, and/or PPS sponsored community development that meets shared policy goals stated in the Draft Comp Plan Update should not require CU review. Given that PPS was established in 1851, the zoning code should recognize its school sites as basic public facilities which are an essential, historical part of Portland neighborhoods.
- As our population grows and ages new community services, housing and recreational facilities will be required to serve the City's needs. Constrained public resources, limited available land, and market competition, will present challenges to development required to meet these needs. PPS is the 2nd largest land owner behind PPR. Its network of school sites and student capture areas cover approximately 60% of the city's geography. PPS school sites can help overcome the development challenges to our neighborhoods with population growth and aging.
- The City of Portland Schools and Parks Conditional Use Code Refinement Project of 2010 identified a number of ideas such as a new zone(s) for schools, good neighbor agreements, and interagency agreements. A PF Overlay Zone can delineate development thresholds tied to the joint use, renovation or repurposing of existing public facility sites, consolidate development standards scattered across four chapters in the zoning code, and clearly define co-location use combinations that would trigger a CU review to assess potential impacts and assign mitigation requirements.

PPS WHITE PAPER PUBLIC FACILITY OVERLAY ZONE  
Justin Fallon Dollard, PPS Planning and Asset Management

## **Public Facility Overlay Zone Preliminary Outline**

### Introduction

The city's public facility systems provide water, sewer, transportation, parks, and civic and human services. Public facilities include the varied and extensive networks of streets and pipes, as well as parks and natural areas that provide places for recreation but also help manage stormwater and flooding. Public services include public transportation and police, fire, and emergency response. In addition, services such as access to broadband technology and comprehensive recycling and composting services are now also considered essential for households and businesses. It takes the collective and coordinated effort of multiple agencies to maintain and operate the complex systems used to manage and provide these necessities to Portlanders.

Public agencies aim to provide basic services to all Portlanders. However, because of past decisions and the history of annexations and development, services are not distributed equitably across the city. The agencies charged with managing public facility systems must balance the need to maintain existing services and infrastructure with the need to bring new or improved services to underserved communities and new residents and businesses.

Schools are essential public facilities in the city, and they serve a wide variety of functions in the community beyond their educational mission and mandate. The City of Portland and the six public school districts with facilities inside Portland's city limits have a number of mutual interests related to the interplay between schools, community and a thriving city.

Public facilities in the city are located across the entire range of base zones. Repurposing or redevelopment of public facilities to meet community needs in residential zones typically requires CU review approval. The CU review process focuses on net negative impacts rather than net positive outcomes in better meeting public needs and shared policy goals. The Type III CU review process often privileges narrow interests over normative concerns and can shift opportunities for collaboration to contests of political will during the appeal process. The City then becomes an arbiter of disputes rather than facilitator of dialog between school districts and neighbors. The current zoning code discourages co-location of public facilities thereby limiting the potential of public properties, where appropriate, to become multi-functional service hubs, neighborhood anchors, and available land resources to sustain community vitality and prosperity.

In Portland's zoning code, *overlay zones* are applied where a situation exists in multiple locations and several base zones. Public facilities exist across multiple locations and several base zones in the city as Institutional Use properties. Institutional Use properties owned by public agencies, the city, school districts, and nonprofits share a common purpose in serving the basic needs of the community at-large. A new PF Overlay Zone can best leverage Institutional Use properties to meet community needs while balancing potential impacts on adjacent properties. A new PF Overlay Zone that sets standards for new development and use combinations will be less cumbersome and more focused than that allowed under

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CU reviews. A new PF Overlay Zone will delineate use and development thresholds, within a single code chapter, that trigger a CU review to assess potential impacts and assign mitigation requirements.

The preliminary outline below is intended to initiate a dialogue with the City of Portland Bureau of Planning and Sustainability and to encourage legislative authority for the development of a PF Overlay Zone in the update of the City's Comprehensive Plan. PPS recognizes that developing PF Overlay Zone code language will require a systemic review of Title 33 in consultation with all institutional use stakeholders located adjacent to or within open space and residential zones, neighborhood associations and other interested parties. Table 1 at the end of this preliminary outline provides some guidance to likely changes required in Title 33 for a PF Overlay Zone.

PPS staff reviewed Community and Public Facility zoning in Belvedere, CA, Perris, CA; Rexburg, MA; Centerville, Utah; Duvall, WA; Richland, WA; University Place, WA, and Seattle, WA. The City of Seattle Land Use Code focuses on development standards for Schools, Institutions, and Essential Public Facilities. Draft language for PF Overlay Zone use thresholds and development standards could be modeled in part on the following Seattle Land Use Code chapters: 23.51A Public Facilities in Residential Zones, 23.51B Public Schools in Residential Zones, 23.69 Major Institution Overlay District, 23.78 Joint Use or Reuse of Schools, 23.79 Establishment of Development Standard Departure for Schools, and 23.80 Essential Public Facilities.

Chapter 33.475 Public Facility Overlay Zone  
Sections

General

- 33.475.010 Purpose
- 33.475.020 Short Name Map Symbol
- 33.475.030 Applying the Public Facility Overlay Zone
- 33.475.040 Relationship to Base Zone and Conditional Use Regulations
- Review Thresholds for Institutional Uses in OS and R Zones
- 33.475.050 Review Thresholds for Institutional Uses in the OS Zone
- 33.475.060 Review Thresholds for Institutional Uses in the R Zones
- Review Thresholds for Development
- 33.475.070 When Conditional Use Review is Required
- 33.475.080 Exempt from Conditional Use Review
- Development Standards for Institutional Uses in OS and R Zones
- 33.475.090 Standards for Basic Utilities
- 33.475.100 Standards for Colleges
- 33.475.110 Standards for Community Services
- 33.475.120 Standards for Daycare
- 33.475.130 Standards for Medical Centers
- 33.475.140 Standards for Parks and Open Spaces
- 33.475.150 Standards for Religious Institutions
- 33.920.160 Standards for Schools

PPS WHITE PAPER PUBLIC FACILITY OVERLAY ZONE  
Justin Fallon Dollard, PPS Planning and Asset Management

## General

### **33.475.010 Purpose**

The purpose of the Public Facility Overlay Zone is to allow outright the development of public facilities, to encourage co-location of essential public services, and to recognize the important role that public facilities play as centers of community while mitigating potential impacts to residential neighborhoods. Properties owned by public agencies, the city, school districts, and nonprofits share a common purpose in serving the needs of the Portland neighborhoods and the community at-large. The concept for the zone is to recognize that public facilities are a historical part of Portland neighborhood development, to support repurposing or redevelopment of existing public facilities to meet community needs, and ensure that limited expansions of public facilities meet minimum development standards to mitigate potential impacts on the livability of nearby residential zoned lands.

### **33.475.020 Short Name and Map Symbol**

The Public Facility Overlay Zone is shown on the Official Zoning Maps with a letter 'z' map symbol.

### **33.475.030 Applying the Public Facility Overlay Zone**

The Public Facility Overlay Zone is applied to areas where Institutional Uses are located adjacent to or within open space and residential zoned lands.

### **33.475.040 Relationship to Base Zones and Conditional Use Regulations**

The OS and R base zone chapters indicate whether Institutional Uses located are allowed by right, are conditional uses, or are prohibited. This chapter provides supplemental information and regulations specific to Institutional Uses located adjacent to or within OS and R zones. The requirements of the base zone apply unless superseded by the regulations in this chapter. In situations where the use is regulated as a conditional use, the regulations that apply are located in this chapter, except for the conditional use approval criteria, which are in Chapter 33.815. If a Public Facility zoned site has previous conditions of approval, the specific conditions take precedence over the threshold levels of review in this chapter.

## **Review Thresholds for Institutional Uses in OS and R Zones**

### **33.475.050 Review Thresholds for Institutional Uses in the OS Zone**

- A. New uses.
- B. Modifying an existing use.
- C. Joint uses in existing development.
- D. Accessory uses.

### **33.475.060 Review Thresholds for Institutional Uses in the R Zones**

- A. New uses.
- B. Modifying an existing use.
- C. Joint uses in existing development.
- D. Accessory uses.

PPS WHITE PAPER PUBLIC FACILITY OVERLAY ZONE  
Justin Fallon Dollard, PPS Planning and Asset Management

### Review Thresholds for Development

#### **33.475.070 When Conditional Use Review is Required**

Conditional use review is required for all new Institutional Use development proposals, for expansions of existing Institutional Use development that exceed the maximum limits stated in Table 475-1, and for those expansions of existing Institutional Use development that cannot meet applicable Development Standards stated in Sections 33.475.090 thru 33.475.160.

#### **33.475.080 Exempt from Conditional Use Review**

Expansions of existing Institutional Use development that do not exceed the maximum limits stated in Table 475-1 and meet applicable Development Standards stated in Sections 33.475.090 thru 33.475.160 are exempt from Chapter 33.815 Conditional Uses.

<b>Table 475-1 Maximum Limits for Use of Public Facility Development Standards</b>	
<b>Institutional Use</b>	<b>Maximum Limit of New Floor Area or Site Area</b>
Basic Utilities	
Colleges	
Community Services	
Day Care	
Medical Centers	
Parks and Open Space	
Religious Institutions	
Schools	

### Development Standards for Institutional Uses in OS and R Zones

- 33.475.090 Standards for Basic Utilities
- 33.475.100 Standards for Colleges
- 33.475.110 Standards for Community Services
- 33.475.120 Standards for Daycare
- 33.475.130 Standards for Medical Centers
- 33.475.140 Standards for Parks and Open Spaces
- 33.475.150 Standards for Religious Institutions
- 33.920.160 Standards for Schools



PPS WHITE PAPER PUBLIC FACILITY OVERLAY ZONE  
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Table 1- Like Changes Required in Title 33 for PF Overlay Zone Chapter 33.475

Base Zone Chapter	Changes to Chapter	Public Facility Overlay Zone Replacement
33.100 Open Space Zones	<del>33.100.100.B.2.f. Recreational fields for organized sports. Recreational fields used for organized sports are subject to the regulations of Chapter 33.279, Recreational Fields for Organized Sports.</del>	33.475.050 Review Thresholds for Institutional Uses in the OS Zone 33.475.070 When Conditional Use Review is Required 33.475.080 Exempt from Conditional Use Review 33.475.140 Standards for Parks and Open Spaces
33.110 Single-Dwelling Zones	<del>33.110.245 Institutional Development Standards</del>	33.475.060 Review Thresholds for Institutional Uses in the R Zones 33.475.070 When Conditional Use Review is Required 33.475.080 Exempt from Conditional Use Review 33.475.090 Standards for Basic Utilities 33.475.100 Standards for Colleges 33.475.110 Standards for Community Services 33.475.120 Standards for Daycare 33.475.130 Standards for Medical Centers 33.475.140 Standards for Parks and Open Spaces 33.475.150 Standards for Religious Institutions 33.920.160 Standards for Schools
33.120 Multi-Dwelling Zones	<del>33.120.100.10 Retail Sales and Services and Office uses in the IR zone. Table 120-1 number 10 remains. See 33.120.100.10. Institutional Campuses.</del>	33.120.100.10. Institutional Campuses in the IR Zone. This regulation applies to all parts of Table 120-1 that have note [10]. As an alternative to conditional use review, the applicant may choose to meet the requirements of Chapter 33.475 Public Facility Overlay Zone, or do a Conditional Use Master Plan or an Impact Mitigation Plan.
33.120 Multi-Dwelling Zones	<del>33.120.100.11. Schools, Colleges, and Medical Centers in the IR zone. Table 120-1 renumber note 11 to note 10. See 33.120.100.10. Institutional Campuses.</del>	33.120.100.10. Institutional Campuses in the IR Zone. This regulation applies to all parts of Table 120-1 that have note [10]. As an alternative to conditional use review, the applicant may choose to meet the requirements of Chapter 33.475 Public Facility Overlay Zone, or do a Conditional Use Master Plan or an Impact Mitigation Plan.
33.120 Multi-Dwelling Zones	<del>33.120.100.12 Daycare in the IR zone. Renumber to note 8 in Table 120-1. Daycare uses are allowed by right if located within existing IR zoned buildings currently used for Colleges, Community Services, Medical Centers, Religious Institutions, or Schools.</del>	
33.120 Multi-Dwelling Zones	33.120.100.13 Basic Utilities Renumber to note 11. 33.120.100.13.c. In all RX and IR zones....As an alternative to conditional use review, the applicant may choose to <u>meet the requirements of Chapter 33.475 Public Facility Overlay Zone, or</u> do a Conditional Use Master Plan or an Impact Mitigation Plan.	
33.120 Multi-Dwelling Zones	<del>33.120.275 Development Standards for Institutions</del> <del>33.120.277 Development Standards for Institutional Campuses in the IR Zone</del>	33.475.060 Review Thresholds for Institutional Uses in the R Zones 33.475.070 When Conditional Use Review is Required 33.475.080 Exempt from Conditional Use Review 33.475.090 Standards for Basic Utilities 33.475.100 Standards for Colleges 33.475.110 Standards for Community Services 33.475.120 Standards for Daycare 33.475.130 Standards for Medical Centers 33.475.140 Standards for Parks and Open Spaces 33.475.150 Standards for Religious Institutions 33.920.160 Standards for Schools
33.279 Recreational Fields for Organized Sports	<i>This chapter is deleted.</i>	
33.281 Schools and School Sites	<i>This chapter is deleted.</i>	



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Land Use Services**

FROM CONCEPT TO CONSTRUCTION

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**MEMORANDUM**

Date: May 1, 2013  
To: Sandra Wood  
From: Kristin Cooper  
Re: BDS Comments on Working Draft Comprehensive Plan

Please find attached comments from BDS on the January 2013 Working Draft of the Comprehensive Plan.

Thank you for the opportunity to participate in the Comp Plan process through these comments and being part of Policy Expert Groups. This is truly a daunting, but worthwhile, endeavor and we look forward to continuing to be a part of the development of the document.

I know you are going to be busy in the coming months sifting through the comments you have received from all sources. We would appreciate the opportunity to meet with your staff as needed to discuss our feedback.

Thank you and good luck!

**BDS Comments on Working Draft Comprehensive Plan**

May 2013

Page	Policy	Comment	Reviewer
	General	Many of the policies include sentences that have too many components and could be read in multiple ways. Be clear about what part of the policy is the prominent idea and what are supporting details.	
	General	<p>We understood one of the intents in updating the Comprehensive Plan was to reduce the number of goals and policies. Has this been successful? More time should be spent auditing the proposed policies and subpolicies for redundancies and conflicts.</p> <p>At the same time, if there is a policy about everything, the policy direction of the Comprehensive Plan is lost. Editing is needed to produce a plan that is comprehensive in how it covers many integrated topics, but not so comprehensive that it lacks focus or direction related to the vision.</p>	
	General	Continue to edit out policies that are outside the stated scope of the Comprehensive Plan, e.g. programs, funding (unless related to services plan) and policies not related to land use. There may be policies that have a land use component, but they should be rewritten if they are presented without a land use focus.	
	General	<p>The Comprehensive Plan should provide clearer policy guidance on ongoing issues, such as treatment of nonconforming uses.</p> <p>It should also provide direct policy guidance on critical neighborhood livability issues we know we will need to address within the lifetime of the plan:</p> <ul style="list-style-type: none"> <li>• transitional/temporary uses like vending carts and residential campgrounds,</li> <li>• requirements for on-site versus street parking along corridors addressing the car</li> </ul>	

		<p>storage issue, and</p> <ul style="list-style-type: none"> <li>expanding the scope of home occupations and allowing households to gain income through vacation rentals or parking space rentals.</li> </ul>	
11	Introduction, Build a Resilient Economy, first paragraph	Needs to be reviewed for grammar. There appear to be several typos and, because of the excessive use of the word “and”, it is not possible to tell if the list of economic assets is supposed to be a numbered list. Change “and” to “an” after (1). Third sentence specifically does not make sense.	
1-1	Community Involvement	Overall OK!	Feuersanger
1-3	Community Involvement	<p>The intro paragraph mentions that a new model is needed for involvement focused on diversity, equity, etc., and that this new model will pair with the existing neighborhood association system.</p> <p>None of the policies specifically address how this coordination will occur.</p> <p>A placeholder has been created for existing neighborhood plans, future Comprehensive Plan updates, under Policy 8.6, to be developed . . . .</p>	Feuersanger
1-9	1.3	Specific mention should be made of reaching out to tenants and not just property owners in legislative processes.	Cooper
1-9	1.5.a and b	This policy might be expanded or another subpolicy added here or somewhere under this goal that talks about the role of the planner in the process. The public has a role and the decision-makers have a role, but the planner also brings professional expertise to the process that should be clarified. The planner should not just be a gatherer of information to give to the decision-makers.	Cooper
1.11	1.9	Include efforts to reach out to underrepresented groups through their own events and networks instead of asking them to come to our events.	Cooper

2-1	Housing	Overall: It is good to see this chapter reflecting the work that was done by the Housing TAG during the Portland Plan development. However, the policies, and especially the policy titles, need to be re-adjusted to reflect that this is a land use Comprehensive Plan, and not an all encompassing plan like the Portland Plan. Policies should relate directly to land use, or, if a programmatic spending objective is referenced, it should be reflected in the List of Significant Projects portion of the Comprehensive Plan. Not all instances of policies that seem out of scope are listed below (though some are). We encourage another broad audit of the policies to ensure they are within the stated scope in the Introduction.	Sandy
2-7	2.2	Is the word “create” the appropriate verb? Since the City does not act as developers (except in rare circumstances), but fosters an environment, a less direct action word would be appropriate, like “encourage” or “foster” or “enable”. It would also help make a distinction between Policies in 2.2 and those in 2.8 which refer to the direct actions of the City.	Sandy
2-7	2.2.a	Suggest removing mention of floating homes since new floating homes are prohibited, so they are not “encouraged”.	Cooper
2-7	2.2.d	There should be a clearer statement here about single dwelling development and centers since many areas in and near centers are developed this way. Are we willing to accommodate single dwelling detached development here to be friendly to families with children and avoid displacement or do we need more intense development?	Cooper
2-9	2.3	Is there a way that Policy 2.3 can be incorporated into Policy 2.2 to avoid having an entire policy with just one sub-policy?	Sandy
2-9	“Housing Discrimination”	This appears to be the section that most directly deals with the Equity component of this Goal. However, the header “Housing Discrimination” seems too narrow of a phrase to encompass the meaning of all of the policies under that header. A softer, positive, and more encompassing header might be more appropriate.	Sandy

2-11	2.7.b	The way this policy is worded leads to the conclusion that we should not provide substantial new public investments in areas of low and moderate income as gentrification will occur, or that a way to avoid gentrification is to not plan for significant new public investments in the area. The potential outcomes of this policy as written should be reconsidered. Rather than discouraging new public investments in underserved area, our policies should be encouraging them.	Hardy
2-13	2.8	This entire policy should be reexamined for its applicability within the scope of the Comprehensive Plan. It is almost verbatim what was developed through the Portland Plan, which is much larger in scope. Reevaluate the sub-policies to remove references to programs.	Sandy
2-13	2.9.a	The terms “workforce housing” and “Live/Work” may be viewed with political connotations and/or may become an outdated term over the life of the plan. Reconsider the title of this policy and reference to Live/Work.  Expanded allowances for home occupations in residential zones were contemplated with the recent 122 <sup>nd</sup> Avenue project. The policy should be written broadly and generically enough to provide direction on this concept.	Cooper Sandy
2-13	2.9.b	This policy appears to be out of the scope of the Comprehensive Plan.	Sandy
2-15	2.10	The description of the policy and some of the sub-policies move beyond the scope of the Comprehensive Plan. The intent of the policies, from a land use standpoint, appears to be to accommodate a variety of housing types and remove regulatory barriers to different ownership models. It seems like this intent could be incorporated into Policy 2.2.	Sandy
2-15	2.11	Again, the description of the policy moves beyond the scope of the Comprehensive Plan. The Comprehensive Plan cannot prevent homelessness by itself, but it can provide a multitude of living environments beyond the traditional household definition. A suggested title	Sandy

		could be “Accommodate a variety of housing opportunities for people who are homeless or near homeless.”	
2-15	2.11	Please include some policy direction places like Dignity Village and 4 <sup>th</sup> and Burnside. Are they part of the continuum? Are they to be welcomed as transitional opportunities or are they alternatives to more permanent housing? Are they appropriate in proximity to services or in areas that do not impact surrounding property owners? The policy should also be broad enough to encompass the ordinance to allow living in cars in church parking lots or other ideas that might come up over the life of the plan.	Cooper
2-15	2.11.b	This policy does not seem to relate to the scope of the Comprehensive Plan.	Sandy
3-3	Economic Development, last paragraph	In the second to last sentence of this paragraph, the concept of encouraging a more efficient use of existing commercial and industrial lands should be included. This could be accomplished through a variety of development standards that allow/require such sites to be more fully developed.	Hardy
3-9	3.7	In addition to Policy 3.7 that seeks to maintain supplies of land, we should also be seeking opportunities where appropriate to increase the amount of land that could be developed for commercial, industrial and institutional uses. The way the Land Development policies read now is that the zoning designations are static and will not change. Through the Comprehensive Plan Mapping process, we should be looking at changing the designation to allow increased economic development.	Hardy
3-15	3.35	This policy requires conversion of prime industrial land to be fully mitigated. Please provide some examples or guidance on how such conversions could potentially be mitigated.	Hardy
3-17	3.38	There should really be clearer policy direction for how the Central Eastside Industrial District is meant to evolve. What kind of employment is envisioned? How much service-oriented employment is to be tolerated? This policy is a bit	Cooper/Hardy

		<p>schizophrenic in calling for these industrial properties to be preserved, yet allowing for high employment densities that would allow commercial uses that are typically not allowed in industrial zones. If this goal is seeking mixed-use in these areas, shouldn't the Comprehensive Plan be looking at mapping or creating a zone other than industrial?</p> <p>Subpolicies would really be better to specify different directions for the Central Eastside Industrial District and the Northwest Industrial District.</p>	
3-17	3.39	<p>This policy encourages providing for small, dispersed industrial areas. Concerned that such a statement precludes changing the zone of isolated industrially zoned sites that may not be served by infrastructure suitable for industrial uses, or industrially zoned parcels that are now located proximate to more sensitive zones (i.e., residential or low intensity commercial zones). Potentially expand on this policy to state what type of small dispersed industrial areas should be maintained.</p>	Hardy
3-23	3.51	<p>What is meant by "economic equity" in this sentence? "Provide for economic equity of neighborhood business districts." Perhaps the concept could be fleshed out in the list instead of the buzzwords.</p>	Cooper
3-23	3.54	<p>This policy advocating for business districts in areas between centers appears to conflict with Policy 3.59 that advocates for encouraging concentrations of commercial and employment opportunities in centers. Maybe add additional language to clarify how these two policies work with one another.</p>	Hardy
3-23	3.55	<p>The commercial revitalization investments should also target the goods and services that are lacking (not just coffee shops).</p>	Cooper
3-23	3.56	<p>This policy might well include a reference to avoiding the rezoning of existing commercial businesses to residential zones through legislative projects. It could also include reference to the concept of allowing a range of uses along</p>	Cooper



		corridors without being tied to site-specific zoning.	
3-23	3.57	This could be a place to talk about whether we are promoting transitional incubator businesses like food carts or dress shops in buses. There should also be some mention of the shared incubator facilities that are popping up like shared manufacturing space or shared commercial kitchens or shared office space. Also need to mention the role of home occupations and whether these should be more permissive.	Cooper
3-21	3.59.d	This policy reads as an explicit standard regarding ground floor commercial uses. Unless the Zoning Code is to be amended to include this as a standard, it should not be written as a standard in the Comprehensive Plan. Even then, it would be more appropriate to begin the policy as “Promote” instead of “Require.”  The issue of accessibility has also been raised where ground floor units are more accessible. How does this work with requiring ground floor retail?	Hardy  Cooper
4-7	4.11	This policy has been completely rewritten since the last draft, but much of the commentary has been removed. There should be specific commentary added that speaks to subpolicies 4.11.a & b.	Whiteside
4-9	4.14	Adaptive Management is a new term and a big departure from a code that relies strictly on a set of sorely outdated preservation plans. The commentary should expand on how adaptive management may translate to the zoning code.	Whiteside
4-9	4.15	It is hard to imagine how the piece regarding “historically underserved communities” will translate to code or standards.	Whiteside
4-9-4-11	Watershed-Specific Policies	These watershed policies need to be more specific about where along the water bodies the policies should apply. Should they apply to entire properties that front the water body regardless of how deep the property is, or only to the portion of these properties that are mapped with an environmental, greenway or other natural	Whiteside

		resource overlay? The current Comprehensive Plan advocates the latter, thereby providing better guidance on how to implement these polices.	
4-19	4.27, 4.27-4.31	These policies regarding scenic resources should be more specific to state that “designated public” views, sites and drives should be protected. When reviewing building permits and land use reviews, BDS often hears neighbors state that their views should be protected from the proposed development. The BDS response is that only “designated” resources require protection. We just want to make sure that this distinction isn’t lost in the proposed Comprehensive Plan.	Whiteside
4-19	4.30-4.32	Aggregate Resources defined?	Whiteside
5-5	5.A	This proposal has the merit of being comprehensive and can be built upon (in the logical sense of that term). Note the adjectives employed by the proposed policy are all over the map – health, resilience, equity, healthy, connected – but not vibrant? This goal seems to exclude visitors by the way, or are visitors “its people”?	
5-7	5.1	It would be nice to see a policy that more explicitly encourages cooperative design, design BY community, where natural/overlapping project partners are encouraged to work together in order to achieve better design.	Caruso (for Design/Historic Team)
5.9 and 5.15	5.11.a and 5.15.a	What is meant by “mid-block open space patterns”? Is that a pattern somewhere? Is it a pocket park or open front setback?	Cooper
5-13	5.14	It seems appropriate to add something to the Western Neighborhoods that seeks to increase opportunities for connectivity in an inter and intra neighborhood, be it vehicular pedestrian or bicycle.	Hardy
5.15	5.15	One of the clear development patterns in Eastern Neighborhoods is accommodation of cars. The Comprehensive Plan points to providing more infrastructure and employment to reduce the need for cars in these areas, but it seems unrealistic to expect that they will disappear or	Cooper

		not be an issue over the life of the plan.	
5-17	5.17	Towards creating complete centers, institutions should be added to the list.	Hardy
5-19	5.20.b	In addition to encouraging building scale sufficient to accommodate desired growth and activity in centers, we should also be mapping commercial zones at an appropriate scale (and depth) to accommodate desired growth and activity in centers. Too many of our commercial zones are mapped at only half a block depth which places severe restrictions on what can be built, particularly when combined with the need for buffering between commercial and residential uses.	Hardy
5-23	5.22.a	For more specificity, the end of the sentence should read, "...to support a broad range of commercial and community services now and in the future."	Hardy
5-31	5.24	Towards focusing also on enhancing the aesthetics of these corridors, include at the end of this sentence, "and are models of ecological <u>and urban</u> design."	Hardy
5-41	5.32 and 5.33	In line with comments made on Policy 5.20.b, above, in order for many of these transition policies to be successful, we have to be thinking about the need to map deeper commercial zones along some of our larger, more traffic/transit intensive corridors. Accomplishing an appropriate and successful transition while also allowing economically viable development along these corridors in many cases will require more than half-block zoning.	Hardy
5.41	5.33.a	Include more information about tools here to be clear that we are not recommending the "b" overlay is a good idea.	Cooper
5.43	5.35.c	Include mention of the role of cultural resources, even ones that have been lost, in defining the identity of civic corridors – also ties to subpolicy 5.24.c.	Cooper
5-45	5.37.a	Maybe this policy should go beyond just "encouraging" densities that maximize	Hardy

		infrastructure capacity and in some case “require” minimum densities. Too frequently we are getting development proposals even in Central City that are so far below the FAR and height allowances and there is no tool we have to encourage or require more. As we do with multi-dwelling residential zones, maybe we should be considering establishing minimum densities for non-residential uses?	
5.49	5.45.a	Change the verb in this subpolicy. This cannot be the top priority for centers if we are also trying to have the most intense development and make the most of already developed land.	Cooper
6-13	6.7.a	This policy includes health clinics in the category of community services. BDS has been treating health clinics no differently than medical offices, and classifying them as an Office use. This is reflected by most (if not all) of the existing public health clinics being located in Commercial zones. If classifying health clinics as a community service, current zoning regulations would allow them in residential zones if approved as a conditional use. It is one thing for health clinics to be accessory to a main use on the site, and another to allow a health clinic as the primary use in a residential zone. Is this the type of use we should be encouraging in residential zones, and if so, how is a health clinic any different than a medical office (which would not be allowed in such zones) in terms of their characteristics and potential impacts on the surrounding neighborhood? If it is a matter of one being a public, non-profit entity versus a private one, what difference does that make from a “zoning impact” perspective?	Hardy
6-15	6.15	The language and commentary in this policy is very clear that infrastructure improvements should be context-sensitive. The commentary in Chapter 7 alludes to this issue, but doesn’t include any language as clear and straight-forward as Policy 6.15. It may be beneficial to strengthen the language in Chapter 7 or refer back to this policy.	Whiteside
6-17	6.16.a	Will impacts to historically underserved	Whiteside

		communities (equity) be given priority over environmental resource impacts? Looking back to Policy 4.15, it appears this may be the case.	
6-19	6.22	Is this a place to speak to the role of the right-of-way for providing on-street parking and loading or car storage?	Cooper
6-19	6.23	There is still no policy statement regarding funding for public rights-of-way. Sewer, stormwater, and water all including policies on rates. There must be some sort of policy support for ongoing transportation funding.	Whiteside
6-19	6.25	Avoid use of “appropriate” twice in one sentence.	Cooper
6-25	6.35	Should this be referring to Policy 6.34 instead of 6.33?	Whiteside
6-27	6.45	Is there a reason Policy 6.45 can’t be combined with Policy 6.30? They state the same thing and Policy 6.30 is already under the heading “sanitary and stormwater system”. Same is true for Policies 6.48 and 6.39. Maybe the heading for policies 6.30-6.39 should be limited to sanitary sewer system.	Whiteside
6-28	Commentary	Typo in commentary. Should be Policy 6.49 Primary supply source.	Whiteside
6-35	6.67	The term “full-service community center” should be defined in the Appendix A Glossary of the proposed Comprehensive Plan, not just in the commentary.	Whiteside
6-35	6.69	Typo in numbering of subpolicies. What is a “special” recreational facility? Should be defined in the Appendix A Glossary of the proposed Comprehensive Plan, including examples of such facilities.	Whiteside
6-43	6.88 and 6.90	Regarding the co-location of different activities within schools, it would be good to add something along the lines of “while minimizing impacts on adjacent residential neighborhoods.”	Hardy
6-43	6.89	Consider including use of school buildings for evening classes, meeting spaces and recreational use of gymnasiums.	Cooper

6-45	6.92-6.94	Does this provide enough policy basis for a code amendment package that would change the code to only regulate aspects of the facilities under local control?	Hardy
7-5	7.B and 7.D	Both refer to reducing air pollution. While an extremely important goal, this seems redundant.	Whiteside
7-17	7.22a	Given the recent Code amendments requiring additional parking for multi-dwelling development, this policy should be rewritten to acknowledge the need for a minimum amount of parking in order to address neighborhood livability.	Hardy
7-17	7.22	This should include a subpolicy to address car storage and shared parking facilities on corridors and in centers to provide some policy direction on the parking discussion.	Cooper
7-19	7.32	Technology is not the barrier to telecommuting, it lack of or weak policies that employers fail to support. This seems like a strange location for a policy on telecommuting when the language is about promoting technology.	Whiteside/Cooper
7-11	7.9	Should this policy mention bike sharing facilities since the car one mentions carshare?	Cooper
7-17	7.22	Is this a place to differentiate about expectations for provision of off-street parking in centers and corridors? If not here, should those expectations be more explicit in the Goal 5 policies?	Cooper
8-3	Introduction	Briefly mention that while there are multiple tools to realize the Comprehensive Plan's goals and policies, the Zoning Code is a significant regulatory implementation tool. When and how regulations are updated and created is important to the city's economic, cultural and natural environment. Something along those lines . . . .	Feuersanger
8-7	8.2	Is this policy making a definitive statement that the Comprehensive Plan <u>is</u> consistent with Metro's Functional Plan, or is it saying that it is the intent to have the goals and policies of the plan be consistent with those of the Functional Plan? If in fact this policy is saying it has been determined that the plan is consistent with the	Hardy

		Functional Plan, when BDS does quasi-judicial Comprehensive Plan Map Amendments, conformance with the goals and policies of the Comprehensive Plan would demonstrate conformance with the Functional Plan, and we would not need to address each title of the Functional Plan.	
8-7	8.3	This should imply a broader brush stroke since the designations are most certainly not applied to each parcel on a case-by-case basis.  There also needs to be some mention of why designations are applied that are at odds with existing uses or development – when is that appropriate and what are the considerations and expectations?	Cooper
8-11	8.9.a	Change “historic design review” to “historic resource review”.	Feuersanger
8.11	8.9.d	There should be direction here to avoid applying overlay zones to discrete areas with unique conditions or specific development standards. The main street overlays are well-intentioned, but have resulted in mini-plan districts, which is not the stated goal of overlay zones.	Cooper
8-15	8.12	If the Comprehensive Plan is used in part to determine whether a proposed overlay is suitable for a property (see Zoning Map Amendment Approval Criterion 33.855.060.B), language has to be included in the Comprehensive Plan that provides guidance for when it is appropriate to map (or remove) all overlays, not just design, historic design and environmental.	Hardy
8-15	8.12.a	This is an example of a subpolicy with redundant pieces. The first bullet seems similar to the 5 <sup>th</sup> bullet and the third bullet seems similar to the fourth bullet. The header for this whole subpolicy might be changed. In a global sense, this is a very incomplete list of ways to promote good planning through code amendments. Perhaps the second bullet could be expanded to talk about neighborhood livability.	Cooper
8.15	8.12.b	Describe better the objection of “avoiding overlapping reviews.” Does it mean, for example,	Feuersanger

		<p>avoiding a situation where an environmental and scenic review are both required on a site, and where both reviews require tree preservation?</p> <p>Suggest adding statement about <u>preventing duplication of standards</u>. For example, avoiding a situation where both an overlay zone and a base zone contain identical or similar regulations – this can occur with maximum setbacks and main entrance standards.</p> <p>Suggest adding statement about <u>importance of purpose statements</u> – Assuring that the regulations are well-connected with the stated purpose/meaning of the regulations.</p>	
8-15	8.12.b	<p>Include a desire to balance directing development with creating nit-picky standards for every little thing. Perhaps introduce the concept of the 80 percent code (or is it 90 percent?).</p>	Cooper
8.15	8.12.c	<p>Strive to <u>continually</u> improve.</p>	Feuersanger





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## INTEROFFICE MEMORANDUM

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**TO:** BUREAU OF PLANNING AND SUSTAINABILITY COMPREHENSIVE PLAN TEAM  
**FROM:** PORTLAND BUREAU OF EMERGENCY MANAGEMENT  
**SUBJECT:** COMMENTS ON JANUARY DRAFT PLAN  
**DATE:** APRIL 30, 2013

Thank you for the opportunity to provide comments on the *City of Portland Comprehensive Plan Working Draft Part 1* (January 2013). This plan reflects thoughtful staff work and engagement of the broader Portland community. It does an admirable job of applying the values of the Portland Plan to the comprehensive plan framework.

This memo addresses some broad topics within the overall document, then follows each topic with a few specific suggestions for incorporating changes into the text of the document. I would welcome the opportunity to discuss these comments with you as well.

I look forward to continuing to participate in the comprehensive planning process and working together to build a more healthy, equitable, and resilient Portland.

### ***Recovery Planning***

Portland is vulnerable to a catastrophic earthquake, one that will someday profoundly affect developed areas of the City prone to landslides and soil liquefaction. Portland is also susceptible to flooding, and a 500-year flood could also have a catastrophic effect on some developed areas of the city. Following such a disaster, the City would undergo a years-long recovery process.

Many elements of this comprehensive plan would serve Portland in disaster recovery; goals and policies related to community involvement, housing, economic development,

urban design, transportation, public facilities, and watershed health would be vital during a period of rebuilding. The culture of civic engagement that this plan reflects and fosters would also be a tremendous asset during recovery.

A disaster would not change the City's fundamental goals, but it could change the frame of reference for the policies that implement those goals. An event that severely damaged a hazard-prone area of the city would invite reconsideration of those historic development patterns; land uses that this document necessarily takes as a given could change following a major disaster. Similarly, the City might revise or add to policies related to economic development, since natural disasters often diminish economic activity for a time. A housing shortage could also impact the City's ability to recover, and would call for new policies in this realm. Additional public consultation would be called for in the long-term recovery process following a catastrophe.

Given the stakeholder involvement and staff expertise reflected here, the Comprehensive Plan would be the starting point for any recovery plan, and the Bureau of Planning and Sustainability would serve as a lead agency in that planning effort. I think the Comprehensive Plan should assert its role in recovery planning, and also call out some of the policies that should be reviewed in a recovery effort.

Consider adding policy 1.15 "Recovery": Develop a framework now, based on the Comprehensive Plan process, to engage the community in recovery planning following a major natural disaster that harms the City's physical infrastructure, economy, and civic institutions.

Consider adding policy 2.15 "Recovery": Following a major natural disaster where residences are destroyed, consider avoidance and mitigation strategies including a shift away from residential uses in hazard-affected areas.

Consider adding policy 4.17 "Recovery": Following a major natural disaster that destroys a developed area, consider changes to land use that would return disaster-affected areas to open space or to less-intensive uses.

### ***Seismic Risk***

A large subduction zone runs along the coast of Oregon, and our entire region is vulnerable to a massive Pacific Subduction Zone earthquake similar to the devastating quake that rocked Japan two years ago. Three crustal faults also run underneath the city proper, each capable of causing a moderately severe earthquake centered directly below Portland. The city's earthquake risk was not well-understood until the 1980s, and state seismic building codes were not updated until 1993. Therefore, the majority of the City's structures and much of its essential infrastructure predate modern seismic; most have not been retrofitted. In a large or moderate earthquake, our physical infrastructure would be severely damaged and many buildings across the City would collapse.

Any discussion of healthy homes or schools should promote seismic retrofitting. Likewise a discussion of infrastructure service disruptions or improved network connectivity should reflect the possibility that an earthquake could disrupt those networks.

Policy 2.13 “Healthful housing” (page 2-17)

Consider adding goals to:

- require housing to be constructed, rehabilitated, and maintained in a manner that protects people from harm in earthquakes
- Encourage property owners and managers to retrofit seismically unsafe buildings.

Policy 2.14 “Existing housing resources” (page 2-17)

Consider adding a goal to encourage and support the seismic retrofitting of existing housing stock. Portland has a relatively large stock of unreinforced masonry buildings, which are particularly vulnerable to collapse; consider emphasizing the retrofit of multi-family unreinforced masonry structures.

Policy 6.60 “Service Interruptions” (page 6-31)

An earthquake could significantly disrupt water service for some time. Consider related goals to:

- Strengthen seismic resilience of the water system and
- Develop plans for emergency water distribution following a major disaster that creates long-term water service interruptions.

Policy 6.89 “Shared use” (page 6-43)

Schools will make good public assistance centers during disasters—if they are seismically retrofitted. Consider modifying 6.89b to state that *seismically retrofitted* school facilities will serve this purpose. Also consider adding a goal to encourage seismic retrofitting of schools.

Policy 7.9 “Bicycle transportation” (page 7-11)

Among the many reasons to promote bicycle transportation is the fact that after an earthquake, bicycles may be a primary means of transportation until the street grid has been cleared and repaired and the fuel storage and distribution network is restored.

Consider adding goals to:

- Ensure that bicycles can be used as a primary means of transportation in Portland, and
- Consider the emergency transportation needs that bicycles may serve when expanding the bicycle transportation network.

## ***Climate Change***

Portland should continue and strengthen efforts to reduce the magnitude of climate change. However, our globe is already warming; climate models for Oregon predict that average summer temperatures could increase by up to 10 degrees Fahrenheit in 2080. At the same time, winter rainfall could increase by 20%. Floods, heat waves, and wildfires are all hazards that are likely to increase in Portland as a result of climate change. It is worth stating in the plan or commentary that these specific hazards are likely to increase in the future.

Wise infrastructure investments can mitigate the effects of climate change. The City's *Natural Hazards Mitigation Plan* (2011) reflects the City's current efforts in this regard. Many of the policies described in the current draft of the comprehensive plan also work to mitigate the natural hazards intensified by climate change.

One policy that addresses two of the major risks of climate change, and for that reason deserves additional emphasis in the Comprehensive Plan, is a systematic effort to increase the City's stock of heat-tolerant street trees. Trees that shade pavement reduce daytime temperatures on the street and in adjacent buildings and allow the air to cool more at night. Trees over pavement also intercept rain and reduce the rapid runoff that contributes to localized urban flooding. A recent study commissioned by the Portland Bureau of Environmental Services stated that street trees can intercept and convert to stream flow up to 13% of precipitation that falls on them (Entrix, Inc. *Portland's Green Infrastructure: Quantifying the Health, Energy, and Community Livability Benefits*. Portland Bureau of Environmental Services: February 2010.) According to the Entrix study, which also cites other research, street trees can increase community resilience in another way; they increase social cohesion.

Unfortunately, climate change also threatens the health of street trees, which are stressed by heat and are at increased risk of insect infestations as temperatures rise. Therefore, systematic efforts to protect and increase street tree canopy, and to invest in street trees as urban infrastructure are needed. This goal is also in accord with the City's *Urban Forestry Plan*, which is referenced in the Comprehensive Plan.

### Policy 5.2 "Design resilience" (page 5-6)

This policy should also reference Portland's *Natural Hazard Mitigation Plan*, which was adopted in 2011.

### Policy 5.47 "Hazard-resilient design" (page 5-51)

Consider adding specific references to flood, heat wave, and wild land fire hazards, similar to the reference to geologic hazards. Specifically:

- Limit development in floodplains, considering that flood plains may expand as climate changes.

- Encourage fire-safe designs for houses and residential landscapes abutting natural areas that are historically prone to wildfire.
- Increase street tree canopy to mitigate the impacts of heat waves and urban flooding, which are expected to increase with climate change.

Policy 6.80 “Natural Disaster Preparedness” (page 6-37)

Consider modifying this policy or adding a similar policy to enhance the community’s capacity to respond to and recover from natural disasters that will be exacerbated by climate change, including floods, wildfires, and severe weather events.

***Emergency Management Best Practices***

In addition to the specific areas of climate change, seismic risk, and recovery planning mentioned above, there are some changes to the current draft that would better reflect the practices that the City’s emergency managers and regional partners currently employ.

The most significant of these changes would be to systematically crosswalk the City’s adopted *2011 Natural Hazard Mitigation Plan (NHMP)* and the policies in the Comprehensive Plan. Although the NHMP is listed as a document that was consulted in the planning process, it is not otherwise mentioned in the current draft. The NHMP reflects significant work and investment by PBEM and other bureaus engaged in mitigation, particularly the Bureau of Environmental Services. Planning staff from PBEM could assist in a systematic comparison if that would be helpful.

In addition to integrating NHMP efforts into the Comprehensive Plan, the following changes would better reflect emergency management language and practice:

Integrated Goal 6. Resilience (page I-1)

Consider making specific reference to anthropogenic disasters along with natural ones, such as “rebound rapidly from natural disasters, *manmade disruptions*, changes in the climate, and economic shifts.”

Policy 6.82 “Coordination” (page 6-39)

The City needs to establish and maintain emergency coordination centers including the ECC on the east side, the alternate ECC on the west side (Sears Center), and a mobile communications trailer. Consider specifying these facilities.

Regionally coordinated disaster response is important not only for disaster debris removal, but for most disaster response activities; the City, the county, the state and Metro each provide complimentary but unique services, and each will need the other in a disaster. Consider simplifying goal 6.82b to include coordinated response on all issues of regional significance, not just debris.

Policy 7.31 “Emergency response” (page 7-19)

Regional coordination is essential in debris clearance and restoration of emergency transportation routes; consider expanding this policy (or policy 7.26 “coordination”) to call out the need for regionally coordinated clearance activities to maintain the network of accessible emergency response routes.




# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Charlie Hales, Mayor ■ Dean Marriott, Director

May 3, 2013

To: Susan Anderson

From: Dean Marriott 

Copies to: Comprehensive Plan Management Team

RE: Comprehensive Plan – January 2013 Working Draft

Thank you for the opportunity to comment on the Working Draft. As you know, BES provided extensive comments on the P&D Director's Draft. Most of my concerns were not addressed, so they are repeated in this memo. As in November, a separate set of more detailed comments will be provided by BES staff.

### Overall Organization

In general, I would like to acknowledge the extensive effort required by your staff to pull this draft together - it is a major undertaking. We are aware of the fact that each chapter has its own author; unfortunately, this has resulted in a draft does not read as a unified document. It reflects its multiple authors and lacks clear focus or coherent organizing structure. I am particularly concerned that the draft contains conflicting policies. In its current organization, some key concepts from the Portland Plan have been segmented into different chapters in such a way that it is difficult to recognize the original concept.

### Economic Development

I do not support some of the policies in this chapter as currently drafted— in particular 3.11, 3.12, 3.35, and 3.36. We cannot trade the environment for industrial land. It does not have to be an either or – we must allow for both. Not only must we allow for both, but it is in the best interests of the city to do so. PDC's Economic Development Strategy highlights Portland's livability and leadership in sustainability as one of our competitive advantages. And speaking of PDC's work, it highlights four employment clusters, yet the Comprehensive Plan appears to be responsive to only one of those clusters (Advanced Manufacturing). The shortfall analysis appears to be based on that same cluster. As I pointed out in my November 2012 memo, the basis for the industrial land shortfall is built upon erroneous analysis.

I am appreciative of the policies focused on Brownfield remediation and more efficient use of existing industrial sites. The concept of dispersed industrial land should be expanded to address employment land sites for the other three clusters (Clean Tech, Activewear, Software) identified by PDC.

### Green Infrastructure Network (City Green Ways)

While elements of the City GreenWays are included in the Comp Plan, the document does not show how the elements work together to form the spine of an integrated green infrastructure network. The Habitat Corridors are separated from Neighborhood Greenways and Civic Corridors. This fails to explain and reinforce what is already happening – that the City's Planning and Development bureaus are increasingly coordinating their efforts to maximize the

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benefits of public investments. At a time when funding is tight and the public is rightfully concerned about the yield on its investments, it is critical that we demonstrate that the City has a method, the means and the know-how to meet what can seem like a daunting array of challenges.

#### **Community Involvement**

The draft Comp Plan is missing an opportunity to highlight the importance of community activism, public education and public/private partnerships. Many public services are enhanced by the activities of community members, "friends" organizations and nonprofits. In addition, the City invests in public education around a variety of topics – water conservation, recycling, bicycling, environmental resources, to name a few. During the Portland Plan and Comp Plan processes, the public has asked for more education and technical assistance, to support their efforts. The Comp Plan should acknowledge and support public education and stewardship to enhance the effectiveness of efforts to achieve the desired outcomes outlined in the other Comp Plan policies.

#### **Finalizing the Document**

The Comprehensive Plan is a plan for the entire city. I strongly urge that we discuss issues such as the ones I have raised today at the Planning and Development Directors meetings to resolve inter-bureau issues. If the plan is to be meaningful for the next decades, we must ensure that the policies are well thought out, effective, and sufficiently forward thinking. I look forward to working with you to address these issues.





# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Charlie Hales, Mayor ■ Dean Marriott, Director

Date: May 7, 2013

To: Comprehensive Plan Management Team

CC: Dean Marriott, Jane Bacchieri

From: Susan Aldrich, Alice Brawley-Chesworth, Ivy Dunlap, Elisabeth Reese Cadigan, Marie Walkiewicz

RE: Comprehensive Plan January 2013 Working Draft – Staff Comments

Thank you for the opportunity to comment on the Working Draft. This memo is a follow-up to Dean Marriott's May 3, 2013 memo. As with our November 2012 submission, many of our comments are beyond the scope of the BES mission. However, as city staff, we feel they add value to the process and ask that they be considered in that light. Please note that we plan to forward updated language for the watershed specific policies (4.22 – 4.26) in time for inclusion in the revised draft. As noted in our comments below, we see they suffer from being the product of individual authors.

Once again, we would like to acknowledge all the work and hours of advisory group meetings and the extensive staff effort required to produce this draft. A full revision of the Comprehensive Plan is an enormous undertaking. It must be flexible enough to last for decades, but also specific enough to provide direction and inspiration for continuing to improve the livability for which Portland is known. Further clarification of the vision is important work to be documented prior to finalizing the Plan.

We look forward to working with you and other bureaus to resolve conflicts and work toward a final, integrated Comprehensive Plan. Below are some of our overall comments on the organization and structure of the plan, followed by comments specific to individual chapters.

### **Build on the Portland Plan**

The Portland Plan laid out a core set of priorities for the City to meet multiple goals, recognizing that a thriving City involves balancing many needs, without allowing any to trump the others. The Comprehensive Plan should echo and enhance the goals in the Portland Plan not change them. While many Portland Plan policies and actions are incorporated into the draft Comprehensive Plan, some have been moved into different sections, divorcing them from the organizing concepts in the Portland Plan. As a result, the Comprehensive Plan feels disjointed and is hard to follow.

At a more fundamental level, key ideas are lost in this reorganization. For example Element 3 of the Healthy Connected City goal in the Portland Plan is titled "Connections for people, places, water and wildlife." But in the Comprehensive Plan, the Key Direction is to "Connect people and places." Water and wildlife has been separated out, losing the concept that these should all work together in an integrated way.

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### **Align Key Directions, Integrated Goals, Goals, and Policies**

The Introduction does a good job of listing which Chapters to look for Goals & Policies related to the Key Directions. However, this seems to be where the cross-referencing stops. It is unclear how the Integrated Goals on page I-1 related to the Key Directions, and how these Key Directions further relate to the Goals & Policies. Within each chapter, Goals are listed at the beginning, but it is unclear how the individual policies roll up to the goals. Are there policies to support each goal? Does each policy support at least one of the goals? Are there policies that support goals contained within a different chapter? Are the goals and policies of the various chapters compatible with each other, and do they promote integrated solutions? These questions are all unanswered, and would take much time and effort to answer in the current organization of the document.

### **Remove Conflicts Between Policies**

We are concerned with the incompatibility of some of the policies. It is evident that the chapters are written by different people with differing viewpoints and specialties, who therefore have different priorities. This is especially apparent in the Economic Development chapter and in the sections dealing with green infrastructure. Below are a few examples:

- |   |     |   |
|---|-----|---|
| <p><b>Policy 3.11 Site constraints.</b> Reduce site development constraints and enhance the competitiveness in regional development markets of sites located in Portland employment areas.</p>  | vs. | <p><b>Policy 4.1 Watershed quality and functions.</b> Protect, enhance, and restore the quantity, quality, connectivity, complexity, and ecological functions of rivers and streams, other open drainageways, wetlands, seeps and springs, riparian corridors, floodplains, and terrestrial habitats.</p> |
| <p><b>Policy 3.35 Industrial land retention.</b> Require that conversion of prime industrial land be avoided when practicable. If it cannot be avoided, minimize the loss of industrial functions and fully mitigate the lost development capacity.</p> | vs. | <p><b>Policy 5.2 Design resilience.</b> Design Portland's neighborhoods, streets, open spaces, and centers to ensure long-term resilience, allowing for shifts in changing demographics, climate, and economy.</p>  |
| <p><b>Policy 3.36 Harbor access.</b> Prioritize river-dependent and river-related industrial use over other land uses on harbor access lands.</p>   | vs. | <p><b>Policy 4.24.e.</b> Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.</p>  |

Conflicting policies will lead to confusion and inconsistent implementation, exactly what the Comprehensive Plan is designed to prevent. A full comparison of all policies should be done to eliminate conflicts. In this spirit, BES staff attempted to review all the places in the document that address stormwater, particularly Chapters 4, 5, and 6. We think it might make sense to use Chapter 4 for policies protecting and enhancing watershed health. (We note that we have the same issue of individual authors for the watershed policies. We will review this group of policies over the next couple weeks and suggest revised language that is consistent between watersheds or unique to a specific watershed, as appropriate.) Chapter 5 should include stormwater policies that are design related. Consistent with this idea, we suggest that 4.16 be moved to

5.42. Finally, Chapter 6 should address system needs. A similar review should be done by staff for other concepts. That should help address the conflicts between policies.

### **Introduction**

p.8 – Invest to reduce disparities: suggest including language about also investing to maintain what we have/to be good stewards.

p. 13 – Connect people and places: The text does a good job of pointing out the three types of connections here (civic corridors, neighborhood greenways, and habitat connections), but these concepts are not as clearly emphasized in the policies themselves. Also, why is the title “connect people and places” rather than the Portland Plan’s “Connect people, places, water and wildlife”?

p. 14 - “Designing with Nature” is the only one on the list using this word structure (passive verb). Change to “Design with Nature” to be consistent. The discussion here is good, but seems to be in conflict with the industrial land policies in Chapter 3.

### **Section II: Urban Design Framework**

How is this section used in implementation? Is it overarching and applicable to all goals and policies? Is it just information with no implementation function?

The concepts of center and corridors is first introduced here, but not clearly described in an introductory manner that would be useful for the rest of the document. Regarding centers, it feels like there are too many types with little clear differentiation. Obviously, a neighborhood center is different from the central city, but mostly in scale and depth of functions. Nowhere in the document does there seem to be a compelling need to further differentiate “Transit Station Areas.”

Unlike centers, the three types of corridors introduced here have very different functions. This section uses different names than in the Introduction (Greenway vs. Neighborhood Greenway, Habitat connections vs. Habitat Corridors). Habitat corridors are mentioned, but not described. Later in the document there is yet another corridor type: “high density transit” which is not mentioned here. Although similar to Transit Station Areas, there doesn’t seem to be a compelling reason to call these out as anything different than a scale of center.

In various places in this Section, there are references to maps in the policy chapters. Will the maps be in the final document or are they considered part of the Commentary?

p. II-3 – Industrial and River: This section claims that this is the primary area for jobs. Are you sure there aren’t more jobs in the central city?

p. II-5 – Neither Neighborhood Corridors nor High-Capacity Transit corridors are well defined. Additional typologies for transit station areas don’t seem useful. Why not just different scale centers?

p. II-7 – Industrial: What is meant by “widely accessible”?

p. II-8 - The graphic does not read in black and white. If you want meaningful feedback from the community, the next draft will need to be color or revised to be readable in black and white.

### **Section III Introduction**

The list of chapters includes Chapter 1 “Universal Goals”, which now appear to be replaced with Section I: Vision and Integrated Goals. Please correct this list of chapters.

### Chapter 1 - Community Involvement

The public asked for more education and technical assistance during the comment periods and public meetings for both the Portland Plan and Comprehensive Plan. The Comprehensive Plan should acknowledge and support public investments in education (water conservation, recycling, bicycling, environmental resources, etc. ) as a way to garner support for other Comprehensive Plan policies. In addition, community activism, public education and public/private partnerships, including the activities of community members, "friends" organizations, and nonprofits, are not adequately included in the Comprehensive Plan.

### Chapter 2 - Housing

Goal 2.B and 2.D – Can these be combined into one? Seem to be overlapping.

Policy 2.1.b – This is not clear. Talks about loss of housing capacity and development potential in one sentence? What is the point of the goal?

Policy 2.5.a and 2.5.c – How are these different? Combine.

Policy 2.6.b – Clarify intent. Consider pressures and then what?

Policy 2.6.c – How will the City be involved in this? What tools are available to achieve this?

### Chapter 3 – Economic Development

Although there have been changes to this chapter from the P&D Directors' review, it does not appear to incorporate any of the changes requested by Environmental Services. The policies are narrowly focused on industrial lands and fail to call attention to other issues of economic importance over the next few decades. The content of the policies imply that Portland's economy is unlikely to shift significantly, when in reality it has already shifted from its historic manufacturing base.

Environmental Services continues to have serious concerns about this chapter and recommends a shift in its fundamental assumptions:

- ***Broaden the emphasis on livability to recognize the importance of all three elements of sustainability – economic, social and environmental.*** (See chapter introduction, page 3-3.) As it is written, the chapter states that the economy is the foundation of a livable city, implying that economy and industry are the only or most important part of the City's and neighborhoods' livability. Portlanders value a strong economic base; however, it is not the sole requirement for health and wellbeing.
- ***Incorporate Portland Plan policies that support the link between economic and environmental vitality.*** (See Policies 3.35 and 3.36.) It's time to move beyond outdated "either-or" thinking and to further demonstrate Portland's continued leadership in sustainability. We can do this by promoting industrial development that is also environmentally sound. Already Portland business districts like Mississippi Street and urban communities like South Waterfront are reaping benefits from incorporating green infrastructure into site and street design. The Portland Plan calls for environmentally-sensitive development of industrial sites. The Comprehensive Plan policies should provide guidance for these kinds of actions. Meeting City obligations to protect water quality,

restore ESA-listed fish populations, and manage stormwater require the protection and enhancement of natural resources, even in industrial areas.

- **Better incorporate the priorities of PDC's Economic Strategy and the Portland Plan.** (See Goals 3.A-3.C and Policies 3.1-3.6. and <http://pdxeconomicdevelopment.com/strategy.html>) While the Working Draft Comprehensive Plan policies reflect some of the economic strategy, they take a narrower perspective. PDC's strategy recognizes the importance of four business clusters; Clean Tech, Sustainability, Activewear, and Advanced Manufacturing. The first three are located in Portland in part because of our exceptional quality of life. The Portland Plan also acknowledges the importance of these sectors and the need to improve local expertise in green practices to support economic development, yet they are virtually missing from the Comprehensive Plan.
- **Recognize that there are limits to industrial land expansion.** (See Policies 3.7, 3.42.) Portland is land locked. At some point, if the industrial-based portion of Portland's economy continues to grow, we will run out of room for industrial expansion. Developing on remnant natural areas is not the answer as they too will eventually run out, leaving the City with a lower quality of life, and not solving the problem of there being a limited amount of land in the City for industrial development.
- **Acknowledge that projections are approximate.** The future can't be predicted with certainty. (See Commentary and Employment Land Needs Table, page 3-8.) The Economic Opportunities Analysis projects that Portland will experience a shortage of industrial land to meet the anticipated need over the next 20 years, but the Comprehensive Plan implies that a shortage already exists, and is guaranteed to exist in the future.

Specific comments on the text are below:

p. 3-3 Commentary – Change to: “A healthy economy is the a foundation of a livable city”. This is a repeat comment. We understand that the Economic Development chapter is focused on the economy, but it is very important that the Comprehensive Plan consistently recognizes the importance of all aspects of livability.

Goal 3.B – Expand to include language about livability and environmental quality (consistent with PDC's Economic Development Strategy). Add “industrial office” or similar term to list.

Goal 3.B. Commentary – Change to: “Portland has **projected** shortfalls in the 25-year development capacity . . .”

Policy 3.2 – 25% is an unrealistic capture rate, given recent history. This policy sets up the supposed shortfall. This issue needs to be resolved by a broader group of decision makers, not just BPS staff.

Policy 3.3 – Add “**emerging global green economy**” per PDC's Economic Development Strategy.

Policy 3.6. Commentary – There is lots of commercial, but insufficient incubator/office industrial – this could be easily addressed through performance-based zoning.

Policy 3.8 through 3.13 Commentary – Clarify the statement about the tax base; industrial tends to pay low property tax. Regarding the table, does it include brownfield sites?

Policies 3.11 & 3.12 – These policies need to recognize the important role of regulations. How does “reduce site development constraints” play out? Does it allow wetlands to be filled in? Change Policy 3.12 to: “Create a regulatory climate that **appropriately achieves regulatory goals in a manner that is compatible with** attracting business investment and encouraging business retention.”

Policy 3.27 Commentary – The references are incorrect in the second paragraph (subpolicy 3.5.a, etc.).

Policy 3.33 Commentary – Third paragraph, change to: “. . . there is a significant **projected** shortfall of industrial land in Portland. Current zoning will meet only 57 percent of **projected** demand . . .”.

Policy 3.30 and 3.31 – Are both of these policies needed? How do these differ from transit-oriented development discussions in other policies? Are these just another scale of “center”?

p.3-14 – in response to boxed question: (1) Encourage more dispersed industrial, particularly for small, clean industries that can be compatible with commercial or even higher density residential; (2) consider performance based zoning rather than allowing/prohibiting specific uses. Keep in mind initial purpose of zoning to segregate noxious uses, not to separate every use type.

Policy 3.33 – How does this get interpreted in Central Eastside with its growth in office-industrial like software, which is one of PDC’s target clusters?

Policy 3.35 – Is this practical? How would one mitigate development capacity on a project by project basis? How is this compatible with the concept of shifting economic conditions contained in Policy 5.2?

Policy 3.36 – BES objects to industrial uses trumping “other land uses” along the river. The river is very important for water quality, habitat and recreation. This policy inappropriately ignores many other important Portland priorities, and conflicts with policies in Chapter 4.

Policy 3.43 – This is the only mention of natural areas and open spaces in the chapter, there needs to be a policy that recognizes the importance of these features within industrial areas as well as along the margins. This ties to Design with Nature.

Policy 3.44 Commentary – Incorrect reference to Policy 3.7.

Policy 3.52 – Change to: “Enhance the function of neighborhood business districts as the a foundation of neighborhood livability” (see our comments on the introductory commentary for this chapter).

Policy 3.59.e. – This seems to be an opportunity to address some industrial land demands.

#### **Chapter 4 – Watershed Health and the Environment**

Please see the comments for Chapter 5 about integrating Habitat Corridors and Neighborhood Greenways.

Policy 4.6 – By giving examples of specific constructed features, they seems to have more weight than unengineered natural features.

Policy 4.16 – Delete from this chapter, but include in chapters 5 & 6.

Policy 4.20 – Define equitable distribution of tree canopy.

Policy 4.26 – Does this mean Hayden Island? Is there anything else in the Columbia Watershed? There is mention of the commercial/industrial, what about the housing- encourage or discourage?

### Chapter 5 – Urban Design and Development

While elements of the City GreenWays are included in the Comprehensive Plan, the document does not show how the elements work together to form the spine of an integrated green infrastructure network. The Habitat Corridors are separated from Neighborhood Greenways and Civic Corridors. This fails to explain and reinforce what is already happening – bureaus are increasingly coordinating their efforts to maximize the benefits of public investments. Some examples include: Parks trails networks are used by bike commuters; PBOT's bikeway enhancements are used as recreational facilities (i.e. Sunday Parkways); Environmental Service's environmental restoration projects protect water quality and provide natural areas for people to enjoy. All of these elements address climate change and promote public health and safety. Together, they form the framework for providing Portlanders a high quality of life and a pleasing and highly functional urban form. At a time when funding is tight and the public is rightfully concerned about the yield on its investments, it is critical that we demonstrate that the City is committed to finding integrated, multiple-benefit solutions to the many challenges we face.

The Portland Plan's City GreenWays network and Vibrant Neighborhood Hubs (or 20-minute neighborhoods) concepts provide a strong construct to communicate how that will happen. These ideas are already enthusiastically endorsed by the public and City leadership and should be highlighted in the Comprehensive Plan in a highly visible and clear way. To that end, we recommend the following:

- **Use and build upon Portland Plan greenway concepts to the greatest extent possible.** (See Draft Comp Plan pages 7-15.) This helps explain the key shifts in public policy and shows the reader how the Comprehensive Plan builds on the Portland Plan effort.
- **Use the same terminology and descriptions as the Portland Plan.** Rename Greenways to "Neighborhood Greenways". Use the definitions from the Portland Plan. Include the graphic that shows the multiple benefits that these neighborhood greenways provide.
- **Reconnect the three corridors concepts in the document.** Revise the Urban Design Framework Map so that the Habitat Corridors, Neighborhood Greenways and Civic Corridors are grouped together and are shown in the same color palate, so that the reader can intuit their connections and possibilities. Revise the Corridors and Connections section of Chapter 5 to group the three types of corridors in this section. Use the Portland Plan terminology, descriptions and policy language.

Specific comments on the text are below:

Goal 5.C. Suggest changing "employment density" to "**economic vibrancy**" or similar

Goal 5.D. Change to: "... This network also connects the experience of being in Portland to its larger context of the **Willamette and Columbia Rivers**, Willamette Valley, and Cascade region. .  
."

Policy 5.4 – Why is this needed?

Policy 5.5 – This policy mentions "station areas" – inconsistent use of terms.

Policy 5.7 – Change to: "... through high-quality **sustainable or low-impact** design and development ..."

Policy 5.10.a. – What are “smaller areas of distinct identities”? centers?

Policy 5.15 – Recommend encouraging employment centers.

Policy 5.15.e – What does this mean? What are landscaped edges? Are they in building setbacks? How large? For multifamily or single family?

Policy 5.16 – These seem much more balance than similar policies in Chapter 3. Support this language and recommend resolving conflicts with chapter 3.

Policy 5.18 – What are “station communities”? Inconsistent use of terms. How is this different from a center?

Policy 5.19 – It is not clear where the investment priority is, existing centers or deficient areas? The phrase “balance that with needed investment in area that are deficient . . .” makes deficient areas sound like an after thought and lower priority.

Policy 5.19 - Add other employment uses.

5.20.a. – Centers and station communities: See previous comments.

5.20.b – What building scale is sufficient? How would one know? What is the intended growth? This is vague and undefined.

Policy 5.20 – Add a sub-policy **“Include nature as an essential component of centers throughout Portland.”** It is important to have a Centers policy to tie it to the Design with Nature policies.

Add the following commentary for this policy. “Nature includes green infrastructure; for example trees, stormwater management, native plants, ecoroofs, green walls. These features provide habitat for birds and pollinators, bringing nature to the city and neighborhoods. This enhances the opportunities that Portlanders already enjoy for birding and enjoying nature close to home. Additionally, green infrastructure makes urban areas healthier for the residence and visitors by mitigating for heat island effect and improving air quality.”

Policy 5.22 – Typology of centers: There are too many levels. Define a center and then discuss what happens at different scales.

Policy 5.23 – There is no follow up to High-Capacity Transit. It seems like these corridors are either also a civic corridor or they are simply a string of centers (since the in between spaces along MAX do not have value as corridors; you can’t access the corridor)

Policy 5.25 – Transit station areas are not part of corridors, they are a small-scale center.

Policy 5.26 – Greenways: Is this supposed to be the policy covering all three types of corridors discussed in the page 13 and the Urban Design Framework? If so, the wording needs to change to include all three, not just greenways. If this is just the neighborhood greenways policy, then change to: “Create a citywide network of Neighborhood Greenways that provide distinctive and attractive pedestrian-friendly, bike-friendly, green streets, trails, **and habitat corridors** that link centers, parks, schools, rivers, natural areas, and other key community destinations.” Add a sub-policy, or alter existing sub-policies that acknowledges the importance of habitat in Neighborhood Greenways.



p. 5-37 - Public realm and the street environment: How do these policies relate to ROW in Chapter 6 and Transportation in Chapter 7? Consider adding sidewalk cafes as a function.

p. 5-45 - It seems odd to have Sustainable Design and Development a separate category than Design with Nature. Is the Sustainable D and D more about energy efficiency?

Policy 5.38/5.39 – Sub policies are mis-numbered.

Policy 5.38 (second instance) – Rename policy to “**Energy efficiency and district energy**”. This policy implies that ecodistricts are only about energy efficiency. What about water efficiency, habitat, etc? The sub-policies listed can also apply to non-ecodistrict areas, but the title implies that it is only for ecodistricts.

Consider adding a policy to chapter 5 “**Ecodistricts. Encourage the development of ecodistricts as models of energy and resource efficiency, multi-modal transportation, and integrating nature into the built environment.**”

Policy 5.41 – Define “area”. Are these centers, neighborhoods, ecodistricts, and central city?

Policies 5.42 – 5.44 – Make sure these are consistent with Chapter 6.

Policy 5.45 – Why just in centers?

Policy 5.50.b – Add: “.....**and access to nature.**”

#### **Chapter 6 – Public Facilities and Services**

Goals: The goals all read differently. Are they supposed to be statements of a future desired state or action statements beginning with an active verb? All the goals should read in a consistent format.

Goal 6.E – Change to: “... and complies with federal, state, and local ~~clean water~~ requirements.”

p. 6-23 - The heading “sanitary and stormwater system” conflicts with the table of contents at the beginning of the chapter

Policies 6.1 – 6.3 Commentary – (6th bullet) Change to: “Private property **and natural systems (such as streams and wetlands)** plays a key roles in the management of stormwater.”

Policy 6.1.a – The statement “should be consistent with” is vague. Are we saying the service boundary should not extend beyond the UGB? It should be expanded out to the UGB boundary? Something else?

Policy 6.15 – Consider using the term “**design**” instead of “establish”

Policy 6.15.b – Consider using the term “**standards**” instead of “requirements”

Policy 6.22 Commentary – There are also stormwater management facilities (not just conveyance) within the rights-of-way.

Policy 6.29.d – Change to: “When considering vacation of any right-of-way, consider its appropriateness for use as public park, ~~or~~ open space, **or habitat corridor.**”

p. 6-23 - The policies should be preceded by the heading "**Sanitary System Policies**"

p. 6-24 - Stormwater system policies commentary – (2nd paragraph) Change to: "The current Comprehensive Plan has one stormwater planning policy." (last paragraph) Change to: "The Stormwater Management Manual (2008) implements the program for new **and re-development.**" (p. 6-26, 1st paragraph) Change to: "Many areas have limited infiltration **capacity...**"

Policy 6.35 – Incorrect reference, should be 6.34?

Policy 6.43 – Retitle to Stormwater **Infrastructure** and add wording from 4.16.

Policy 6.44.a – Change to: "Incorporate green infrastructure, such as large canopy trees and **landscaped vegetated** stormwater facilities..."

### **Chapter 7 – Transportation**

Use of the term "green and active transportation" is confusing. All other instances of the word "green" in the Comprehensive Plan refer literally to the presence of green plants. Using "green" here is both unnecessary and inconsistent with the rest of the document. Use "active transportation."

Goal 7.A – Define sustainable. Fiscally, environmentally?

Goal 7.B and 7.D – Could be combined. Define "vulnerable" residence.

Goal 7.F. – This is not realistic, even as an aspiration

Policy 7.4 – Change to: "... to connect Portland's centers, **trails, schools, and open spaces.**"

Policy 7.6 – What is the end goal of this hierarchy? This needs more work, as stated in the commentary

Policy 7.6.b – Define "complete streets." This policy is vague and unclear.

Policy 7.6.c – Add at the end "... to maintain mobility, **access and safety.**"

### **Chapter 8 – Administration and Implementation**

Policy 8.12.a – Consider combining bullets one and five for clarity.

p. 8-17 - Other Implementation Tools, Policies 8-16 through 8.20: This doesn't seem like an exhaustive/all-inclusive list of implementation tools. For example, the Stormwater Management Manual and many programmatic tools are missing. How was this set of policies chosen? If it is not intended to be comprehensive, there should be an explanation of what it is (and isn't) in the commentary.

### **Appendix A: Glossary**

Ecodistricts – this definition is missing green infrastructure, waste, and natural systems, etc. For example from the Lloyd Ecodistrict Report, "The Lloyd EcoDistrict Roadmap focuses on the following performance areas:

- Energy
- Water

- Materials Management
- Access + Mobility
- Habitat + Ecosystem Function
- Return on Investment
- Job Growth

p. A-2 - Please define "campus institution" (see policy 3.44).

p. A-3 – Please revise or add a new definition of "clusters". The current definition refers only to housing and services, not business (see policy 3.17).

p. A-4 - Add definition for "Effective Impervious Area", used in the Low Impact Development definition.

p. A-6 - Low Impact Development: Change to: "...the use of vegetated stormwater management **techniques** to mimic pre-development..."





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CITY OF  
**PORTLAND, OREGON**

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PORTLAND HOUSING BUREAU

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Traci Manning, Director  
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April 30, 2013

Susan Anderson  
Director  
Bureau of Planning and Sustainability  
1900 SW 4th Ave Room 7100  
Portland, OR 97209

Dear Susan,

I'm pleased to acknowledge the efforts of your staff, the Planning and Sustainability Commission, and many community partners that are reflected in the Working Draft Part 1 of Portland's Comprehensive Plan Update, released for review earlier this year. The document creates a clear linkage from the vision we articulated in the Portland Plan, of a city that is Prosperous, Educated, Healthy and Equitable, to the Goals and Policies that will get us there as we grow over the next 20 years.

Portland Housing Bureau (PHB) staff has been extensively engaged through the process that has produced this Working Draft with a greater focus on the housing needs of low-income and very vulnerable Portlanders inclusive of those who have experienced historic and current inequities in access to housing and the opportunities they need to advance their well-being and achieve their full potential. In addition to staffing various housing working groups, PHB was invited to provide review and input to a November rough draft of Chapter 2: Housing, and staff's substantial and detailed comments were considered and, in many cases, included.

This level of collaboration means that as the City's lead bureau charged with meeting the affordable housing and safety net needs of our most vulnerable citizens, the Comprehensive Plan Update creates a framework in which our work, creating housing opportunities for those whose needs are not by the market, can be aligned with the comprehensive housing needs and growth patterns of the City.

Further, this collaborative approach is reflected in PHB's work to create a comprehensive housing location policy through the Portland Housing Growth and Opportunity Analysis project. Our process has and will continue to leverage the excellent work of Bureau of Planning and Sustainability (BPS) staff to ensure that Portland's Planning policies and our implementation strategies equitably address the housing needs of vulnerable Portlanders.

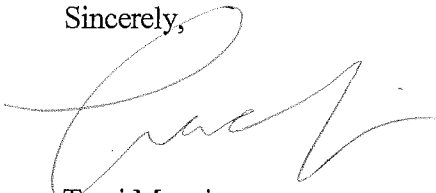
As the process to complete Goals and Policies, and further define the Urban Design Framework and Comprehensive Plan Map moves forward over this spring and summer, we will continue to bring a particular commitment to:

- Strengthening our tools to anticipate and mitigate the displacement of vulnerable populations when planning and implementing significant new public investments
- Improving Housing Access for vulnerable populations through both Fair Housing policies and attention to preserving and creating affordable and accessible housing in Opportunity Areas that offer good access to transportation, jobs, high-quality schools, parks and recreation and other services and amenities
- Prioritizing infrastructure and other investments in areas with an existing supply of affordable housing that increase the qualities important for economic prosperity and healthy living

We look forward to continuing our work with BPS, and the other Planning and Development Bureaus towards alignment across *all* City bureaus to create a Comprehensive Plan that reflects our values, and linked implementation strategies that achieve our vision.

Keep up the good work!

Sincerely,

A handwritten signature in black ink, appearing to read 'Traci Manning', written in a cursive style.

Traci Manning  
Director  
Portland Housing Bureau

cc: Joe Zehnder, BPS  
Tom Armstrong, BPS  
Daniel Ledezma, PHB



Charlie  
Hales  
Mayor

John  
Widmer  
Interim  
Director

## MEMORANDUM

Date: May 16, 2013

To: Eric Engstrom and Sandra Wood, Bureau of Planning and Sustainability

From: Paul Smith, Transportation Planning Group Manager  
Courtney Duke, Senior Transportation Planner  
Patricia Neighbor, Transportation Planning Intern

Subject: Bureau of Transportation Comments on Working Draft Part 1

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The following are the Portland Bureau of Transportation comments and suggested changes to the Working Draft, Part 1 of the Portland Comprehensive Plan. These suggested changes apply to all Comprehensive Plan chapters, including *Chapter 7: Transportation*, and the Plan as a whole. PBOT staff expects that, if applied, these amendments will strengthen the Plan, increasing its consistency and the potential for it to reach its goals.

### Introduction

The Plan Introduction needs to include references to walking, bicycling and transit, especially in "Connect people and places." "Connect people and places" needs to mention all motivations for increasing active modes, not just pedestrians.

### Chapter 1: Community Involvement

Community involvement is not integrated consistently in the chapters of the Comprehensive Plan. It should be integrated consistently.

### Chapter 2: Housing

Policy 2.6.d states: Consider the effect of housing investments on school enrollment and student mobility.

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An Equal  
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To ensure equal access, the Portland Bureau of Transportation will make accommodations in full compliance with Title VI of the Civil Rights Act of 1964, the ADA Title II, and related statutes and regulations in all programs and activities. For accommodations and additional information, and complaints, contact the Title II and Title VI Coordinator at Room 1204, 1120 SW Fifth Ave., Portland, OR 97204, or by telephone 503-823-5185, City TTY 503-823-6868, or use Oregon Relay Service: 711.

There should be a similar policy statement regarding transportation investments such as, "Consider the effects of housing and transportation investments on school enrollment and students ability to walk and bike to school."

### **Chapter 3: Economic Development**

Policy 3.30, Transit-oriented development. Change to: "Encourage employment growth in areas accessible to housing and transportation networks for pedestrians, bicycles, and transit."

### **Chapter 4: Watershed Health and Environment**

4.23.d, is a very specific policy related to ecologically sensitive redevelopment along SW Barbur and SW Beaverton Hillsdale Highway. How is this consistent with the vision and proposed infrastructure improvements in the Barbur Concept Plan and Metro's SW Corridor Plan?

4.27, 4.29, Modify to add an emphasis on pedestrian and bicycle routes.

### **Chapter 5: Urban Design and Development**

Modify: Policy 5.15.c., Encourage development and right-of-way design that preserves and incorporates Douglas fir trees and groves, where feasible and sensible.

#### ***Civic Corridors***

The concept of Civic Corridors emphasizes urban design qualities, rather than growth and it is vague. The concept needs to be articulated in further detail in Chapter 5 and in other chapters of the Plan. Policy that emphasizes urban design is not sufficient considering the purpose of the Comprehensive Plan is to guide the future growth and development of the city. If civic corridors are to be implemented in Portland, the Plan must include policy that demonstrates a clear guiding framework for the function of these corridors within the city, including for growth and mobility. Civic corridor policies need to be included in the Plan to describe how civic corridors serve as a location for increased residential and employment density. Current policy focuses on amenities and design rather than serving the growing demand for housing and transportation.



Existing policies that emphasize the urban design functions of civic corridors, are also vague. These policies emphasize civic corridors as unifying, organizing elements of the city, but do not adequately describe how corridors serve This function. These policies should be expanded and clarified. An urban design example is 'livable environments' which is referenced in 5.24.b, but is not further defined.

There is concern that as currently mapped and described, all civic corridors are the same and treated equally. A process to create different typologies for corridors that reflect land use and transportation improvements would be useful.

### *Centers*

The concept of centers is unclear in the Plan, especially in policy 5.17 "Role of centers." The policy focuses on amenities provided within centers and the urban design components rather than their useful function within the context of land use, housing, transportation, and community development. The Plan needs additional details that articulate how centers serve a role within the land use, housing, transportation, and community development of the city.

The Plan also needs to articulate the purpose of and relationship between centers, and between centers and corridors. Policy 5.17 "Role of centers," in particular needs to articulate why centers are important and how they shape planning outcomes for the City. The description of centers in the policy "Typology of centers" needs to be more specific as to what types of centers will be created. The language in the policies describing centers is unclear and can be edited to provide more clarity regarding the concept. The existing policies about connecting centers to each other and about centers being walkable are useful, but there needs to be emphasis on pedestrian and bicycle access to the centers for these policies to be effective.

Policy 5.C, System of centers. They provide increased access to local services, amenities, transit, pedestrians, bicycles networks, and major infrastructure...

Policy 5.17. c. Role of centers. Move "and quality pedestrian and bicycle networks" to 17.d.

Policy 5.17. d. Foster a safe, comfortable, and attractive environment for pedestrian and people on bicycles for all ages and abilities.

One way to address this is to add the following to all center types (on pages 5-9, 5-13 and 5-17):

- High quality pedestrian and bicycle facilities within the center to accommodate greater volumes of pedestrian and cycling traffic.
- Good pedestrian and bicycle access to centers from adjacent neighborhoods to better facilitate short pedestrian and bicycle trips to the center.

### *Typology of centers*

Level of transit access is the only transportation feature used to define the different types of centers. Broaden the “components” distinguishing different centers beyond level of transit service to include pedestrian and bicycle access (density/connectivity) and level of parking management.

Policy 5.22.e. Neighborhood Centers. These centers “primarily serve adjacent neighborhoods” which translates into shorter trip distances. Shorter distances are outlined by the transportation chapter of the Plan as served by pedestrian and bicycle access. The opportunity to emphasize active transportation in this policy should not be missed, since the distance from home is generally more walkable/bikeable.

The distinction between centers in different pattern areas should be more clearly spelled out. Current policy does not adequately address existing centers that may be more auto oriented. It is unclear if these types of centers are less important and if policies lead us to rework these centers. Or does policy support providing services and infrastructure that will continue to support their current growth patterns? The distinction between centers in different pattern areas should be more clearly spelled out.

### *Active Transportation*

All modes of transportation, especially walking and bicycling, need to be integrated into Chapter 5 (as noted above). Walking and bicycling are to serve as the primary modes for short trips of less than three miles and should be emphasized in Chapter 5. Transit should be emphasized for trips of over three miles. The presence of multimodal transportation should be an integral component of policies addressing civic corridors and centers.

Goal 5.C refers to Portland’s interconnected centers and increased access. Policies within the Plan currently do not reference the multi-modal access for pedestrians, bicycles, and

transit that are necessary for interconnectedness and access from the broader area served by each center.

### *Greenways*

The definition of 'greenway' within Chapter 7 differs from the definition of 'greenway' in Chapter 5. This causes confusion and concern. Greenway policies need to articulate more clearly the difference between greenways that serve a purpose for natural corridors (an emphasis in the plan) and greenways that serve a purpose for bicycle and pedestrian transportation mobility. Metro's regional greenways are corridors that may or may not provide public access. The focus of PBOT's neighborhood greenway program are pedestrian and bicycle improvements on low-traffic streets. The greenway policies in the comprehensive plan should clearly define the relationship to these and provide guidance for implementation.

Greenways are the only place within Chapter 5 in which bicycle transportation is included as a significant component. This is an issue since it is the aim of the City to make bicycling a fundamental pillar of the transportation system which will require a complete, diverse network of bikeways to attract people of all abilities to ride to all types of destinations.

Policy 5.9, Significant Places. To reflect the equity goals of the Portland Plan and the Comprehensive Plan, the discussion of significant places should be more community and context based.

Policy 5.13, Inner Neighborhood. Need to emphasize the important role inner neighborhoods have in active transportation especially bicycling for meeting our mode split goals.

### **Chapter 6: Facilities**

Policy 6.15, Context sensitive infrastructure. This is positive direction related to community context. There should be a stronger emphasis on the five pattern areas.

#### Policy 6.22 Uses of rights-of-way

There is no explicit policy that suggests the right of way can be used for commercial purposes (street cart vending, sidewalk café, Street Seats). Suggest 'Neighborhood

Vitality or Economic Function'? Example: "Allow for commercial uses of the rights-of-way for the purposes of enhancing a commercial corridor, encouraging street vitality and small business."

Need to emphasize that public right-of-way is first and foremost for public access by people and the transport of goods. Transportation has a higher priority than utilities, storm water, and community uses.

A policy related to permanent uses in the right of way should be explored.

Policy 6.23 and 6.29. Interconnected Network. Edit policy language or add a policy to emphasize the importance of street connectivity for all modes and reference connectivity policy (7.16). This applies to acquiring new rights-of-way, and maintaining existing considerations for vacating right-of-way. Example: "Establish and improve a connected right-of-way system that provides infrastructure services throughout the city across modes in compliance with regional street connectivity policy."

6.22 Policy should reflect functional and functions, not just services.

Policy 6.25 Flexible Design. Edit policy language to include multi-modal access. Allow flexibility in the design and development of rights-of-way to appropriately accommodate local physical and environmental context as well as community needs, as appropriate.

6.44 Green Infrastructure. There needs to be more information as to when and where green infrastructure will be incorporated. The term 'large canopy trees' is too specific for the comprehensive plan. Specific tree types should be addressed based on the context in more detailed area or corridor plans or during design.

6.64 Parks, Improvements. 6.64 b should have discussion about trails and pedestrian and bicycle access to and through parks and natural areas.

## **Chapter 7: Transportation**

### *Goals*

The goals need clarification and there are redundancies. For example Goals 7B and 7D are very similar and could possibly be combined. Definition needs to be added where ideas are unclear. The order of the goals should be considered and possibly reworked, as the order implies level of importance. Goals are very aspirational (even for a 20 year plan) and a number of them we at PBOT know are not attainable in that time period. Should the goals be more realistic?

#### ***7.6 Green and active transportation hierarchy***

The green and active transportation hierarchy policy, currently ambiguous, needs to be revised to clarify how it is applied to transportation projects. The policy and/or the sub-policies and objectives in the Transportation System Plan need to convey how broadly or specifically the hierarchy will be applied. The policy and sub-policy or objectives need to explain in what locations it will or will not be applied. Currently the green hierarchy is not context specific; it needs to provide clarification as to whether it is context specific. For example, how will the hierarchy apply to pedestrian districts, freight districts, and varied land uses? The policy needs to articulate how conflicts between modes will be resolved at the policy, as well as project level. It also needs to clarify whether the hierarchy is implemented through the mobility corridor concept, and if so, how. The policy needs to address how it will be applied at all levels of transportation improvement, from planning to design and implementation.

The Portland Freight Committee voiced significant concern about whether freight will be addressed effectively if retained within the green hierarchy or removed from it. To consider the overall function of the transportation system and the outcomes for the freight transportation system, we must consider whether freight is retained or removed from the hierarchy policy.

Editing language in the policy will provide more clarity. The phrase "all other considerations being equal" is unclear and needs revision or removal. Sub-policy b is vague and needs rewriting. The policy should be renamed 'Transportation Hierarchy.'

#### ***Civic Corridors***

In transportation policy content, in the Comprehensive Plan or the Transportation System Plan (TSP), the development of 2-3 typologies for civic corridors will improve clarity concerning corridor function and will lay out a better framework for corridor function. If civic corridors are addressed in the transportation policy content, the policy

needs to clarify whether civic corridors are single streets, or pairs/trios of parallel networks serving all modes. The policy needs to clarify how PBOT will determine which modes will be accommodated on the primary street.

#### ***7.24 Project Prioritization***

Project prioritization criteria need to be developed through a stakeholder process, assessed through that process, and incorporated into the 'Project Prioritization' policy. Project prioritization policies need to be applied by the Bureau to project list development and grant applications. 'System Management' and 'Life-Cycle Costs' policies are also project prioritization policies and should be included within the Project Prioritization policy. Equity should be incorporated as a component of the project prioritization policy.

#### ***7.7 Transportation Affordability***

Affordability should not come at the expense of providing service. Perhaps include links between housing and income-accessible transportation to emphasize this.

#### ***7.8, 7.9, 7.10 Pedestrian, Bicycle, and Transit***

The modal policies were constructed to be parallel. They need to be revised to be different from one another and to be accurate about trip distances that are appropriate for each mode of transportation.

#### ***7.13, 7.30 Freight transportation, including air transportation***

The policy could focus on the underlying motivations of the freight transportation system to clarify priorities for access and mobility. It could elevate references to non-truck freight (e.g. air, marine). References to air transportation need to be strengthened to recognize the growing importance of this mode in the global economy.

### **Chapter 8: Administration and Implementation**

The other chapters of the Comprehensive Plan exceed the requirements of the State of Oregon related to land use, yet the implementation chapter does not. This chapter needs to provide a roadmap of how the concepts within other chapters of the Plan are to be implemented by city bureaus, while maintaining consistency with other Plan chapters by exceeding state requirements. This chapter does not specify how the Plan will be

understood and applied by all city bureaus. The Plan will be stronger if a framework for this is outlined in the chapter.

### **General Comments**

#### ***Active transportation into all sections of the plan***

If the green hierarchy is to be effective in providing for a hierarchy of modes and support city goals, all modes of transportation including walking and bicycling need to be incorporated into all sections of the Plan. Walking and bicycling need to be incorporated as viable modes of transportation to reach all types of destinations, not only as modes to access green spaces and recreational destinations as currently emphasized in Chapter 5.

The Plan, especially the Introduction and Chapter 5: Urban Design and Development, need to support the policies of walking and bicycling for short trips by referencing bicycling and walking in sections of the Plan that reference trips of three miles or less. To meet a variety of City plans and goals, walking and bicycling must be comprehensively integrated throughout the Comprehensive Plan.

#### ***Bicycling***

Strengthen the presence in the plan of Portland as a world class bicycling city. A goal for the city is to make bicycling a major component of the transportation system by increasing bicycle use to 25% of trips. Portland has achieved growth in bicycle traffic among major U.S. cities, giving us a significant advantage to reduce our reliance on the automobile. To achieve this goal, bicycle infrastructure needs to be emphasized throughout the Comprehensive Plan, in particular in the Introduction, Chapter 5, and Chapter 7. Policies should be amended to include bicycling as well as walking. The plan should be reviewed in areas that reference transit; bicycling should be included in these places for references to overall trips or short trips.

#### ***Five Neighborhood Pattern Areas***

Chapter 5 does an excellent job of describing and articulating the five different pattern areas. This needs to be further developed and integrated into all of the chapters, including Chapter 7. The pattern areas can be used more effectively to distinguish the development of different types of civic corridors or centers. The Plan should also

include references to the Portland Plan 24 pattern areas. It should include policy that guides how these areas will be implemented.

***Equity***

Equity is not integrated consistently into the Comprehensive Plan.

***Affordability***

The current Plan does not emphasize providing city services and amenities in a way that is affordable to city residents. Affordability should be reflected in policy as a priority for infrastructure and city services, facilities, and programs.

***Project Prioritization***

Chapter 7 is the only Comprehensive Plan chapter that currently includes project prioritization. Public input supports the incorporation of project prioritization policies in each of the chapters of the Plan.

***Funding Policy***

Chapter 7 is the only Comprehensive Plan chapter that currently includes a funding policy (7.25). A funding policy should be incorporated into other chapters of the plan.





City of Portland  
**Bureau of Development Services**  
Land Use Services Division

Attachment C - City Commission Comment Letters  
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## MEMORANDUM

**Date:** March 25, 2013  
**To:** Bill Cunningham, Tom Armstrong, Lora Lillard, Mark Raggett - Bureau of Planning and Sustainability  
**From:** Chris Caruso, Land Use Review  
503-823-5747  
**Re:** Briefing on the Comprehensive Plan Working Draft Chapter 5 and Urban Planning Framework

Thank you for taking advantage of the opportunity to present the Comprehensive Plan Working Draft to the Design Commission. I hope you find it informative and valuable as you continue with your project development. Attached is a summary of the comments provided by the Design Commission at the March 14<sup>th</sup> meeting. This summary was generated from notes taken at the public meeting, a subsequent review of the public meeting recording, and a final review by the Design Commissioners. To review the meeting recordings, please visit:

[http://efiles.portlandoregon.gov/webdrawer.dll/webdrawer/search/rec&sm\\_clastext=historic%20landmarks%20commission&sm\\_recnbr=\\*/eb/\\*&bool=and&sort1=rs\\_datecreated&count&rows=50](http://efiles.portlandoregon.gov/webdrawer.dll/webdrawer/search/rec&sm_clastext=historic%20landmarks%20commission&sm_recnbr=*/eb/*&bool=and&sort1=rs_datecreated&count&rows=50)

These Design Commission comments are intended to guide you in further development of your project. These comments may also inform City staff when giving guidance over the course of future related documents. It should be understood that these comments address the project as presented on March 14, 2013. As the document evolves, the comments may also evolve or may no longer be pertinent.

Please continue to coordinate with me as you refine the Comprehensive Plan so that additional briefings can be presented to the Design Commission as appropriate.

*Encl:* Summary Memo

*cc:* Design Commission

This memo summarizes the direction of the Design Commission provided at the March 14, 2013 meeting:

General Comments:

- There were questions about why the language used in the document was so very broad and not specific toward actions.
- There were questions about the timeline for how this document leads to actual changes to the zoning code and design guidelines.
- There were questions about how economic development informs the Policy language, specifically whether or not the disparity in development costs and paybacks between the Central City and places in east Portland such as Gateway were being addressed.
- There were questions about how Urban Renewal Areas are designated and that some of the existing ones seem to no longer be relevant to their areas.
- The overhead wires should be removed as part of development requirements. While these are controlled by two power companies, they should be required to underground the wires as new development happens. This is the elephant in the room. The cluttered and unattractive views shown in BPS's own photos make it clear that removing overhead lines will dramatically improve neighborhoods.
- Parking counts in new apartment buildings has become the hot topic at Commission hearings. When these Policies are adopted, they should be very clear and take a strong stand about what we want to see as a City. The danger is that if neighborhoods are required to have infill that is contextual, the current context is that everyone can currently park in front of their own house. Is that what we want to protect as context? Or do we want a Policy about protecting the desired ways of life within neighborhoods, and what are those?
- Need options for parking solutions around the City, such as permitted zones.
- If we can keep the core affordable, we will have to spend less on building new infrastructure in the outer areas as we do now when people are priced out of inner neighborhoods. Make sure we are not creating a new problem while trying to solve another one.
- 20 minute neighborhoods seemed to exist more around the city when Portland was a rougher place, not so pristine and precious.
- How do we design mid-rise buildings with transitions and setbacks at inner lot lines or light wells that create livable spaces? Do we codify solar access setbacks in all areas?
- The Design Commission often sees the clash between goals and policies and implementation. There is nothing about the intentions of these Policies. What is the overall desire of these Policies? Are changes to the City staged over time, incremental, or is it all at once in areas?
- Design guidelines and zoning target are not linked now. They often contradict each other with the guidelines asking for infill that matches the current neighborhood while the zoning allows for a much bigger development. Zoning needs to make sense and work with the design guidelines or the guidelines need to be revised to reflect desired zoning potential.
- There needs to be much more outreach about the possible outcomes of various zoning designations. Compatibility is a very troublesome issue when it runs up against the Policy aspirations for density.
- What is the Policy about maintaining quality of life?
- "Character" and "compatibility" must be clearly defined.
- This would be a much clearer document if the Policies were broken into 2 parts – the aspirational part and the "what it really means on the ground" part. Images and models would help explain zoning potential.
- Really need a Policy that explains the City's desired density.
- This needs a more realistic, centralized message about why these Policies are important to everyone. Must have community buy-in or we will still battle over things like parking and infill.

Policy 5.1 Design for People.

- Why do we say this and what does it really mean? The supporting statement does not seem to be tied to the Policy title. "Design for People" is not that useful of a phrase. This effort seems to be more about designing for context and may not be humanistic enough.

Page 6-16 Transit modes.

- What does this percentage mean? What infrastructure are we providing to achieve this? The Commission is not confident that Tri-Met will be able to keep up with development transit demands so the City needs to make sure things are in place to support this Policy.
- Create a Policy that requires integration of housing, transit, and public outreach, and that zoning potential should be required to be divulged when people are buying houses.

Policy 5.20c

- This Policy seems contradictory between wanting taller buildings along wider streets vs. protecting privacy and solar access through setbacks and building height transitions.
- How are these buildings “local” or responding to the existing context if you want taller things where they are currently not the norm?
- This language and the actual Policy desire needs to be clarified here.

The Bureau of Planning and Sustainability will coordinate additional briefings with BDS staff as the Comprehensive Plan is further developed.

### **Exhibit List**

- A. Bureau of Planning and Sustainability Submittals
  1. Comprehensive Plan Date Summary
  2. Comprehensive Plan Update: Working Draft Chapter 5: Urban Design and Development, January 2013
  3. Section II - Urban Design Framework Draft, January 2013
- B. Other
  1. Memo to Commission with BPS introduction, March 4, 2013
  2. Chapter 2: Housing Draft, January 2013

Comment submitted via the website comment form

From: Jewls Harris, Portland Commission on Disabilities, Livability & Wellness  
Subcommittee Chair

Date Received: 05/01/2013

Comment: Regarding Policy 6.73, 6.74 and 6.76 -- I would like to see a provision for improved communication between police and "all members" of the community. In light of the Dept. of Justice settlement and historically poor relationship with individuals with mental disabilities, it seems a provision for improved education and training is merited. Perhaps stating: "Police and other personnel will receive training that reflects all measures of diversity including age and ability."

**Language from Bureau of Planning and Sustainability's Website:**

Please use the ~~form below to submit a comment~~ on the Working Draft.

If your comment is related to a specific goal, policy, or section of the Working Draft, please include the policy or page number for reference. Your comment will be used by staff to revise the Working Draft. There will be opportunities for formal comments in later stages of the project. Thank you for your comment!

**Names/Organizations:** Alan DeLaTorre (Institute on Aging, Portland State University and Portland Commission on Disability); Margaret Neal (Institute on Aging, Portland State University); Portland Commission on Disability/Accessibility and the Built Environment Subcommittee; and Age-friendly Portland Advisory Council.

**Comments:**

The following comments have been written based on a review of the Comprehensive Plan draft and feedback gathered from members of the Portland community. They are intended to bolster the Comprehensive Plan by offering considerations pertaining to the aging of Portland's population and our need to consider environments that are suitable for all ages and abilities. The Age-friendly Portland Advisory Council has offered advice on ways to heighten Portland's age friendliness. The Portland Commission on Disability's Accessibility and the Built Environment has offered additional recommendations that are reflected in these comments. Overall, it is critically important that the City of Portland and the Bureau of Planning and Sustainability carry forward the momentum of the Portland Plan's push for fostering equity and making Portland a community for all generations.

*\*Please note that words that are underlined e.g., "~~older adults and people with disabilities~~" are suggested additions to the Comprehensive plan.*

**General Comments: Person-first Language:**

The draft Comprehensive Plan has done a sufficient job in using language pertaining to older adults and persons with disabilities. However, several areas should be improved:

- Page 2-3, paragraph 3, second sentence uses the phrase "seniors on fixed incomes." This phrase should be changed to the more appropriate "~~older adults and people with disabilities~~ on fixed incomes."
- Policy 2.3. Physically accessible housing (page 2-8) explains that "the Portland Plan calls for increasing the stock of accessible housing to better serve the needs of aging and disabled populations." Changes to this language provide an opportunity for both improving language in the Comprehensive Plan if the sentence is changed to: "The Portland Plan calls for increasing the stock of accessible housing to better serve the needs of ~~older adults and people with disabilities~~." Also, an additional sentence could be added: "By providing physically accessible housing near services, we can facilitate aging in place while providing opportunities for civic engagement and social participation for those of all ages and abilities."

- Goal 2.B Equitable access (page 2-5) uses the term “seniors” which should be changed to “older adults.”
- Policy 2.7 on Gentrification/displacement (page 2-11) uses the term “elderly.” This should be changed to “older adults,” which will make it consistent with the other six times the term “older adult(s)” has been used throughout the document.
- Policy 2.11 Homelessness (page 2.14) uses the term “disabled veterans” which should be changed to “veterans with disabilities.”
- Page 3-3 (paragraph three, last sentence); replace “underserved” with “disadvantaged.”
- Page 3-9 (Policy 3.15 Development Impacts); replace “underrepresented” with “disadvantaged.”
- Page 3-10 (Policies 3.22 commentary); replace “underrepresented” with “disadvantaged.”
- Page 3-11 (Policy 3.24 Workforce development); replace “underserved” with “disadvantaged.”
- Page 3-23 (Policy 3.55 Development Impacts); replace “underserved” with “disadvantaged.”
- Page 6-17 (Policy 6.16.a Health and equity impacts); replace “underserved” with “disadvantaged.”
- Page 6-37 (Policy 6.74.a Community policing); replace “underserved” with “disadvantaged.”

Suggested changes to policies/content: Throughout the draft Plan several areas have emerged that can be improved in an effort to create a Portland for all generations:

## **Chapter 2: Housing**

- Policy 2.3 Physically accessible housing (pages 2-8 & 2-9) is a good start to an important issue. However, there is a need to explain in the commentary section and/or the policy that there is a hierarchy and classification system for accessible design. For example, we know that minimum requirements accompany aspects of the Americans with Disabilities Act and the resulting building code, as well as requirements that are in place such as Section 504 (re: HUD-funded buildings). Although Universal Design principles are used, it would be helpful to know what those principles are (e.g., reference needed in the commentary section). Should the City use the commonly defined “7 principles” (e.g., equitable use, flexibility in use...) or will there be additional guidelines detailed? Also, what about visitability/visitable design principles?
- Policy 2.3. Physically accessible housing (pages 2-8 & 2-9): add language encouraging housing to be located with 0.25 miles of services and transit (references were previously sent to BPS and PBOT from Alan DeLaTorre)
- Also, please note that efforts in Oregon are underway that will detail the various aspects of “Lifelong Housing.” AARP Oregon has been working on this and the document will be completed before the final version of the Comprehensive Plan is approved. The Institute on Aging at Portland State University and the Portland Commission on Disability should be consulted regarding implementation of the physically accessible housing policy in the future.
- Policies 2.4 Fair housing and 2.5 Opportunity areas (page 2-9) lacks specific language regarding the City requirement to affirmatively further fair housing, including the specific need to facilitate the “equitable distribution of affordable, accessible housing where high-quality built environments and access to transit exist.”
- Policies 2.8 and 2.9. Housing affordability and Workforce housing (pages 2-12 & 2-13) should provide explicit details about affordable housing “bandwidths” (e.g., 30% of monthly income; up to 50% AMI; up to 80% AMI; up to 100 or 120% AMI). This could be added to the commentary, as well as the appendix which has a very limited definition.

- Policy 2.13.e (page 17) should add the word “remedy” so that it reads “identify and remedy substandard housing issues.”
- Policy 2.13.g (page 17) should add the following to the end of the sentence “...and accessible design features.”
- Policy 2.13 Healthful housing (page 17) should add a sub policy (e.g., 2.13.i.) that reads “Encourage housing that facilitates independent living, allows for aging in one’s community, and reduces social isolation.”
- Policies 2.13 and 2.14 Healthful housing (pages 2-16 & 2-17) should highlight that cost and savings of energy upgrades/retrofits should not favor owners if the cost is passed along to renters. Specific reference to “maintaining affordability while increasing health aspects of housing” should be explicitly detailed.
- Additional suggestions for housing policies, in general:
  - An important issue as it pertains to equitable housing for older adults and people with disabilities is to ensure that a variety of accessible units are available; both older adults and people with disabilities who are in need of accessible and/or adaptable units (e.g., Type A and B adaptable units) may desire one-, two-, and even three-bedroom units, not just studio apartments. Currently, it seems as though accessible and adaptable units are frequently only built as studio and one-bedroom units.
  - Consideration should be given to creating a policy that encourages building of caregiving/companion units which aim to support older adults and people with disabilities. This may be an accessory dwelling unit and/or it may be adjacent multifamily units that provide easy access to one another (e.g., side by side, with the “double doors” that one might find in a hotel).
  - Additional language should be added pertaining to Oregon law that describes what happens if housing discrimination happens occurs; also, “institutional barriers to fair housing” should be described insofar as what happens when an agency has failed to account for the equitable distribution of housing based on race, class, income, etc.
  - Policy should consider encouraging or requiring a shift toward development of flats, rather than infill housing that has stairs.

### **Chapter 3: Economic Development**

- Page 3-3 (paragraph two, last sentence: “A healthy economy provides opportunities for people to achieve their potential”); suggestion: “A healthy economy provides opportunities for people of all ages and abilities to achieve their potential”).
- General suggestion regarding policy language and/or commentary: it is important that the economic development section explicitly detail that older adults and people with disabilities should be considered assets and resources to the City of Portland and should be provided opportunities to diversify the economy and expand the workforce and productivity in a meaningful way (page 3-7, as well as the household prosperity section, page 3-11).
- General suggestion to Chapter 3 Policies (re: household prosperity): “Establish/create training and re-careering opportunities to benefit economic development and household prosperity.”
- General suggestion regarding policy language and/or commentary (perhaps to page 3-7): It may be surprising that the 55-64 age group has the highest rate of entrepreneurial activity in the U.S.; we suggest that this be explicitly detailed in the economic development section (link to

reference: <http://ecopreneurist.com/2009/09/21/the-average-age-of-an-entrepreneur-is-older-than-you-might-think/>).

- Page 3-9 Land Development: With rise in e-commerce, the shopping mall concept (i.e., low-density strip mall developments) may fail moving forward; low-density areas should be looked at for rezoning for “higher and better use.”
- Page 3-11, Policy 3.26, add the word “age” so that the policy reads “Reduce racial, ethnic, age, and disability-related disparities in income and employment opportunity.”
- Response to question for community discussion (page 3-18): regarding medical institutions, Portland should consider encouraging the development of more neighborhood clinics and labs and not expanding hospital campuses (i.e., move away from monolithic campus settings and disperse services within the fabric of the community).
- Page 3-25 (Policy 3.59.c.): Add language covering people of “all ages and abilities” or “people with disabilities and older adults.”
- Page 3-25 (Policy 3.59.d.): Add language covering “age-friendly” or “accessible.”
- Page 3-25 (Policy 5.59 Centers): Consider adding “establish social spaces and gathering places that are accessible, flexible in use, and multi-use in nature.”

## Chapter 5: Urban Design & Development

- Page 5-5 (Goal 5.A. A city designed for people): strong recommendation to add “enhancing accessibility” to the following “...reducing disparities, enhancing accessibility, encouraging social interaction.”
- Page 5-17 (Policy 5.17.b): Modify the policy to read as follows: “Encourage the development of centers as compact and accessible places, where the street environment makes access by transit, walking, biking, and mobility devices/aids safe and attractive for those of all ages and abilities.”
- Page 5-19 (Policy 5.207.f): add the words “promote accessibility” to the following: “...provide a pedestrian-oriented environment, promote accessibility, and provide opportunities...”
- Page 5-21: Add new policy (5.21.c): “Establish gathering places as universally-designed places that strive to foster interaction and reduce isolation among those of all ages and abilities.”
- Suggested addition to commentary on page 5.21: Research from Portland State University has called for the need for social spaces in and near housing developments as needed to reduce isolation and foster healthy community interactions.
- Page 5-27 (Policy 5.22.e Neighborhood Centers): Add the following: “Accessible housing within 0.25 miles of frequent service transit stops, including those in neighborhood centers, town centers, and transit station areas.” (also see page 5-33, Policy 5.25 Transit Station Areas).
- Page 5-37 (Policy 5.27.b): add the following: “Consider both the place and transportation functions when designing and programming each street, including accessible design features.”
- Page 5-41 (Policy 5.34 Transitional Urbanism): Consider adding language pertaining people with disabilities/accessibility, such as: “Require one-time/temporary events to adhere to accessibility requirements that are facilitated by event coordinator;” (e.g., Homelessness and services provisions; Food carts; Farmers markets; and Saturday market )
- Page 5.51 Add new policy (Policy 5.47.e): “Create and promote access to emergency meeting locations and coordinate evacuation of frail older adults and people with disabilities, including evacuation plans for people with multifamily housing and commercial spaces.”



- Page 5-47 Ass new policy (Policy 5.38.d **Healthy materials**): “Require the use of materials that maximize human and community health, while restricting the use of toxic and unhealthy materials.”

## Chapter 6: Public Facilities and Service

- Page 6-5, last sentence, should be changed to: “...facilities and services to all Portlanders, including those in future generations.”
- Page 6.6 (commentary): Goal 6.D. Public rights-of-way should include language about “benches;” Goal 6.D Sanitary and stormwater should be changed to: “...protecting public and private property, and increasing visual appeal to encourage walking.” Page 6-7 (policy): Goal 6.D. Public rights-of-way should add the following: “...multi-purpose, connected, and visually appealing physical space...;” Goal 6.D Sanitary and stormwater should add the following: “and private property, increases visual appeal, and complies...”
- Page 6.9 (Policy 6.J School facilities should be changed to the following: “GOAL 6.J School and Library Facilities Public schools and libraries are honored places of learning for all, as well as multifunctional neighborhood anchors serving Portlanders of all ages, abilities, cultures, and incomes.”
- Page 6-13 (Policy 6.3): add “Libraries” to the list
- Page 6-13 (Policy 6.9): add “such as community gardens or pocket parks” to the sentence.
- Page 6-15 (Policy 6.12): add “...social, health, and environmental risk.”
- Page 6-15 (Policy 6.15): add “...environmental, social, cultural, and community context.”
- Page 6-19 (Policy 6.22): add “...transportation system, including pedestrian access.”
- Page 6-19 (Policy 6.22.c): add “...local physical, health, and environmental objectives.”
- Page 6-19 (Policy 6.25): add “...physical, social, cultural, and environmental context as well as community needs, as appropriate.
- Page 6-21 (Policy 6.29.b): add “...for a public walkway, including benches, and/or bikeway...”
- Pages 6-22 through 6-27 seem to need additional language pertaining to green streets, bio swales, and/or vegetation basins.
- Page 6-33 (Policy 6.63: include language regarding the “development of pocket parks.”
- Page 6.43 (Policy 6.89.a): add “Encourage community use of school grounds for educational activities and recreational use for those of all ages and abilities and as green spaces...”

## Chapter 7: Transportation

- Page 7-17 (Policy 7.22): General suggestion: loading zones are critically important for paratransit services and persons vehicles that are carrying passengers with disabilities; amendments to loading zone provisions must take this into account.
- The City of Portland must consider the cost of housing + transportation + utilities (i.e., 50% or below or gross income); Metro and HUD have adopted housing + transportation costs (see Metro’s true housing costs); the City needs to focus on cost of housing to person, rather than what HUD defines

## **Chapter 8: Administration on Implementation**

- General concern: As an advocate or as an ordinary citizen, it is important that we know how to keep track of whether a document/request is being implemented without having to track down each action in each individual bureau.

### **Additional comments:**

- Will mapping activities be coordinated/combined with Urban Renewal Areas and vacant land inventories as potential opportunities (re: PDC's neighborhood prosperity initiatives).
- Lands continue to lay vacant as there is not a cohesive plan to use these properties moving forward.
- The City's definition and operational approach to equity still feels overly focused on race and ethnicity and it should expand the term to include age and ability disability.
- It is not clear whether federal Title VI legislation included disabilities, but this is an area that should be explored by the City of Portland.
- The history of collecting data on accessible housing is not satisfactory in Portland. The City must be more inclusive moving forward and track when accessibility improvements have been made (e.g., whether accessible Accessory Dwelling Units have been built).



City of Portland  
**Bureau of Development Services**  
Land Use Services Division

Attachment C - City Commission Comment Letters  
1900 SW Fourth Ave., Suite 5000  
Portland, Oregon 97201  
Telephone: (503) 823-7300  
TDD: (503) 823-6868  
FAX: (503) 823-5630  
www.bds.ci.portland.or.us

## MEMORANDUM

**Date:** February 20, 2013  
**To:** Liza Mickle, Bill Cunningham, Tom Armstrong - Bureau of Planning and Sustainability  
**From:** Chris Caruso, Land Use Review  
503-823-5747  
**Re:** Briefing on the Comprehensive Plan Working Draft Chapter 5 excerpts  
Summary Memo of February 11, 2013 briefing

Thank you for taking advantage of the opportunity to present the Comprehensive Plan Working Draft to the Historic Landmarks Commission. I hope you find it informative and valuable as you continue with your project development. Attached is a summary of the comments provided by the Historic Landmarks Commission at the February 11<sup>th</sup> meeting. This summary was generated from notes taken at the public meeting, a subsequent review of the public meeting recording, and a final review by the Historic Landmarks Commissioners. To review the meeting recordings, please visit:

[http://efiles.portlandoregon.gov/webdrawer.dll/webdrawer/search/rec&sm\\_clastext=historic%20landmarks%20commission&sm\\_recnbr=\\*/eb/\\*&bool=and&sort1=rs\\_datecreated&count&rows=50](http://efiles.portlandoregon.gov/webdrawer.dll/webdrawer/search/rec&sm_clastext=historic%20landmarks%20commission&sm_recnbr=*/eb/*&bool=and&sort1=rs_datecreated&count&rows=50)

These Historic Landmarks Commission comments are intended to guide you in further development of your project. These comments may also inform City staff when giving guidance over the course of future related documents. It should be understood that these comments address the project as presented on February 11, 2013. As the document evolves, the comments, too, may evolve or may no longer be pertinent.

Please continue to coordinate with me as you refine the Comprehensive Plan so that additional briefings can be presented to the Historic Landmarks Commission as appropriate.

*Encl:*  
Summary Memo

*cc:* Historic Landmarks Commission

This memo summarizes the direction of the Historic Landmarks Commission provided at the February 11, 2013 meeting:

Policy 5.38 Rehabilitation and adaptive reuse.

- Broaden this to encourage rehab and reuse generally as well as specifically for historic and architecturally significant resources.
- Why is this in this section of the Comprehensive Plan and not under historic resources policies? How would someone know that this policy existed if they were only looking in the historic section?

Policy 5.35 Historic and cultural resource protection.

- How do we achieve the objectives of protecting “old” buildings that are not recognized as historic? What are the tools we have to meet this policy? An example was given of a 125 year old house that is being demolished because the new higher-density zoning allows more units.

Policy 5.9 Significant Places.

- There is no mention of historic or cultural resources in the list given in this policy.
- The list should include historic and cultural resources.
- How will the infill goals allow development around places without destroying the older buildings that are not protected? An example was given of the commercial buildings around SE 26<sup>th</sup> and Clinton.

Policy 5.35.b Historic and cultural resources.

- The “fill in the gaps” statement may not go far enough to require compatibility between existing and new development.
- The Commission wants to define and require compatibility.
- There could be ways to define compatibility that is not stylistically literal, such as using scale, materiality, setbacks, etc.
- Compatibility is an important piece of this work so that an 8 story building is not up against on old 2 story building.

General

- The Neighborhood Centers is a very important idea but will most likely consist of historic nexus places with older buildings in them.
- If we shift development to these areas, we risk losing their history.
- We need to find a balance between development and preservation.
- It seems like Chapter 5 is where the rubber hits the road for all future urban form.

The Commissioners will spend individual time outside of this meeting to review the provided Goals and Policies. Comments will be sent directly to Liza Mickle in BPS and Chris Caruso in BDS by May 1<sup>st</sup>. The Bureau of Planning and Sustainability will coordinate additional briefings with BDS staff as the Comprehensive Plan is further developed.

### **Exhibit List**

A. Bureau of Planning and Sustainability Submittals

1. Comprehensive Plan Update: Working Draft Chapter 5-Design and Development excerpt provided on February 1, 2013
- B. Other
1. Memo to Commission, February 1, 2013



**City of Portland**  
Historic Landmarks Commission

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April 30, 2013

**VIA E-MAIL**

Liza Mickle, Bill Cunningham and Tom Armstrong  
Bureau of Planning and Sustainability  
1900 SW Fourth Avenue # 7100  
Portland, Oregon 97201

Re: Comments on Draft Comprehensive Plan

Dear Colleagues,

This memorandum responds to your invitation to provide comments on the Comprehensive Plan Working Draft. Thank you for your report and thank you for allowing the Historic Landmarks Commission (HLC) members time to compile our thoughts. This memorandum is in addition to the February 20, 2013 memo from Chris Caruso summarizing our comments and will not restate those comments again. Overall, we are pleased with the draft but have identified a number of other areas that could benefit from additional clarity as it relates to the importance of historic preservation. In some cases, we have suggested particular language and in other areas, we will leave the drafting of code language to you.

Goal 5.(C.) Portland's System of Centers – One of the key characteristics of Portland's city centers is the significant extant historic fabric that remains. Therefore, we recommend adding the following to the second sentence of Goal 5.(C.): “These places of focused activity and growth provide places often rich with historic resources, employment density and residential diversity that contribute to Portland's high standard of livability.”

Policy 5.6 Energy and resource efficiency – Historic preservation and adaptive reuse should be a stated component within the City's energy efficiency and sustainability strategy. Revise Policy 5.6 to add the term “adaptive reuse” in the list of items that the City will support.

Policy 5.7 Leadership in Design – Although we understand that encouraging “high-quality design and development” does not preclude design decisions that result in preservation but this policy implies that only new construction enhances the quality of life and is cutting edge. This policy would be more inclusive if it was revised as follows: “Enhance the quality of life for all Portlanders by encouraging high-quality decisions with regard to design that demonstrates Portland's leadership in the design of the built environment.”

Policy 5.8 Innovation. – Again, design decisions regarding preservation can also be innovative and creative. Consider the following: “Encourage the design and preservation of the built environment to foster local creativity, experimentation, and innovative design solutions.”

Policy 5.9 Significant Places – Many of Portland’s most iconic neighborhood symbols are existing buildings such as schools, churches, theaters, and commercial centers. Historic resources should be added to the list of areas that make places significant.

Policies 5.13, 5.14 and 5.17 contain a number of policies relating to inner, Western and Eastern neighborhoods. Although these policies make reference to the importance of maintaining the streetcar-era strong street orientation and enhancing natural areas, they make no reference to how the existing built environment contributes to these values and is similarly suitable for protection and enhancement.


Policy 5.18 Focused growth. This policy directs a majority of neighborhood growth into city centers, civic corridors and station communities. The HLC would like this blanket statement tempered with an acknowledgment that growth incentives will not be pursued at the expense of historic resources.

Policy 5.19 Focused investment. This policy prioritizes and encourages public and private investment in city centers. Again, although HLC supports this objective, this policy should be expanded to prohibit the expenditure of public funds on the demolition of structures listed individually or as contributing to the historic character of the district. Further, it should contemplate the expenditure of public funds on preservation efforts as they are vital community amenities.

Policy 5.22.e Neighborhood Centers. Again, this policy should acknowledge that decisions regarding accommodating growth must be sensitive to the existing historic resources and encouraging adaptive reuse.

Thank you for your serious consideration of these additional comments.

Sincerely,



Carrie A. Richter

Chair, Portland Historic Landmarks Commission

cc: Chris Caruso  
Tim Heron

CITY OF PORTLAND

## URBAN FORESTRY COMMISSION



PORTLAND PARKS &amp; RECREATION

Healthy Parks, Healthy Portland



• Charlie Hales, Mayor • Mike Abbaté, Director

30 April, 2013

**To:** Director Susan Anderson  
 Bureau of Planning and Sustainability  
 1900 SW 4th Avenue, Suite 7100, Portland, OR 97201  
 Submitted by e-mail to [pdxcompplan@portlandoregon.gov](mailto:pdxcompplan@portlandoregon.gov)

**From:** Portland Urban Forestry Commission

**Re:** Comments on the Draft Comprehensive Plan Update

**CC:** Sallie Edmunds, Supervising Planner, Bureau of Planning and Sustainability  
 Marty Stockton, Community Outreach, Bureau of Planning and Sustainability

Dear Bureau of Planning and Sustainability,

On behalf of the Policy Committee and the entire Portland Urban Forestry Commission, I am submitting our comments and recommendations on the Draft Comprehensive Plan Update. Given the importance of the vibrant and healthy urban forest to the ecological health, economic prosperity, livability and sustainability of our city, we believe that the urban forest deserves a prominent place in the Comprehensive Plan; after all, much of what makes Portland unique is our notably leafy urban environment.

In the following paragraphs, the original *text of the Draft is in italics* (with the **headings in bold italic**), while our comments are in roman, and suggested (new) text is underlined.

We commend you on the drafting process and the document to date. It is indeed a thorough and far-reaching plan for the city and addresses nearly every aspect of what makes Portland a great place. We look forward to a continuing dialogue on the Comprehensive Plan Update, and appreciate the opportunity to comment. With sincere thanks for considering our comments,

Igor Lacan , Commissioner



### *Introduction*

**page 3, "Growth, Diversity and Equity"**

To relate population growth and city infrastructure, we suggest adding a sentence to the end of the first paragraph, such as

"Portland should ensure that City infrastructure such as roads and transportation networks, water supply and wastewater systems, the urban forest and natural features, and parks and green spaces will support this increased population density".

**page 5, "Healthy and Safe Environment"** section, last paragraph.

Add "and if we allow our urban forests to deteriorate" (to the first sentence)

**page 14, "Designing with nature"** section, last paragraph.

Add a sentence (to the end of paragraph) "It also means maintaining our existing urban nature, especially urban trees and forests which provide so many of the benefits described above."

**page 15, "Respect local context"** section.

Add "including trees" as follows:

*Different places are distinguished by the unique topographies, natural features such as trees, histories,...*

### **Section II: Urban Design Framework**

The following two comments refer to Section II in the overview:

- 1 We suggest that the design framework of the city should explicitly reference the role of trees, the urban forest and other natural elements, even in those locations where these will be subordinate to other characteristics. To that end, we recommend including intentions for trees, the urban forest, and natural elements in the descriptions of subsections A through H. (examples are provided below)
- 2 Habitat Corridors, especially on the east side, are isolated (as seen in the Urban Design Framework Map, page II-8), whereas habitat connectivity is integral to the function of habitat corridors and is a worthy goal for the City Comprehensive Plan. Opportunities and techniques for connecting the Habitat Corridors should be explored, and the results included in the next iteration of the Urban Design Framework.

page II-5, **D. Transit Station Areas** section, top of page

*Urban Residential Stations* provide access to a primarily residential area with high-density housing. Areas within 1/2 mile of the stations are the focus for housing development to expand opportunities for people to live close to high-quality transit, while also enjoying the large canopy planting strip trees that have historically defined streets with single-family homes.

pages II-4 and 5, **“C. Connections”** section, first sentence and following bullet points

Portland’s network of public rights-of-way (including undeveloped and developed corridors with paved streets, curbs, planting strips with street trees, and paved sidewalks, regional transit....

...

*\* Neighborhood Corridors* are public rights-of-way with developed streets and street trees that connect neighborhoods....

*\*High-Capacity Transit Corridors* form a regional system....They also connect people to the Portland International Airport and other regional transportation connections and because of their scale, could allow for plantings of large evergreen trees, e.g., native conifers.

### Section III: Goals and Policies.

#### Chapter 2: Housing

##### page 2-17 Policy 2.13 Healthful housing

2.13.f. Encourage housing that provides features supportive of health, such as useable open areas, recreation areas, community gardens, crime-preventive design, and communal kitchens.

Add after *useable open areas*, “trees and other vegetation elements,”

Add (to the end of the sentence): “and pleasant, walkable streets with substantial tree canopy”

2.13.h. Add information on trees to read as follows:

Educate property owners, managers, and developers...about how to build and maintain healthful housing that includes large canopy trees in public rights-of-way planting strips in scale with multi-story buildings.

**Policy 2.14. Existing housing resources**, add a new item

2.14.c. Maintain existing and develop currently undeveloped rights-of-way by paving the roadways, adding curbs, paving sidewalks, and planting large canopy trees in wide planting strips without overhead wires.

### **Chapter 3: Land Development**

**page 3-7, Economic role of livability and ecosystem services.**

Rephrase as to add text as follows: *Conserve and enhance...ecosystem assets and services, especially large street trees and the urban forest generally for its contribution to the local economy and to Portland's quality of life...*

The following is an overview comment on Chapter 3:

#### **Land Development (page 3-9)**

These policies promote maximizing development space. Such infill and intensification, however, could lead to loss of space for trees and other vegetation elements. Opportunities and techniques for intensified land development that also provide for on-site urban forest and other vegetation should be explored and addressed.

### **Chapter 4: Watershed Health and the Environment**

**page 4-3, Goals**

Consider adding a goal of maintaining the urban forest resources.

Can be phrased as "Protect, maintain, and enhance the city's urban forest resource, including street and park trees"

Also, revise the first bullet point:

*\*Sustain the quality of Portland's environment by preserving natural features and systems.*

Add a separate bullet point:

\*Focus development in already built areas while maintaining natural systems such as the urban forest canopy in those areas to avoid creating industrial or transportation "deserts".

Revise bullet point 6 *Advance good decisions...* replace with:

Practice adaptive management through better data collection, and in the case of the urban forest management, practice succession planning.

**page 4-3, *Why is this important?***

In the second paragraph, sentence “*Trees that provide wildlife habitat, trap carbon...*” insert “large trees” to read “*Trees, especially large trees, that provide wildlife habitat, trap carbon, etc...*”

**Urban forest**

***page 4-7 Policy 4.3 Vegetation.*** *Protect, enhance, and restore native and other beneficial vegetation in riparian corridors, wetlands, floodplains, and upland areas.*

We suggest acknowledging the importance of urban trees. Add (to the end of the sentence) “and preserve and enhance the capacity of urban canopy to support ecosystem functions.”

**page 4-11**

***Policy 4.17 Urban forest quantity.*** *Improve the total coverage of tree canopy and native forests.*

Suggestion: we recommend making this goal more specific.

Add (to the end of the sentence) “by focusing first on the areas that are currently lacking in canopy”

***Policy 4.18 Urban forest quality.*** *Protect healthy large trees, native trees, and native tree groves and forests.*

Suggestion: this policy is lacking a key term: maintenance. Rephrase as “Protect and maintain healthy large trees...”

***Policy 4.19 Urban forest diversity.*** *Improve the diversity of the trees and tree canopy.*

Suggestion: this is a bit vague; for example, what is meant by the “*diversity of tree canopy?*”

We suggest re-phrasing to read “Improve the diversity of the urban forest attributes, as by increasing tree species diversity, increasing tree age diversity, and increasing the diversity of tree forms”

***Policy 4.20 Urban forest equity.*** *Encourage an equitable distribution of trees, tree canopy, and associated benefits.*

We suggest clarifying this goal as follows: “Encourage an equitable distribution of trees, tree canopy, and associated benefits by identifying the neighborhoods deficient in canopy cover and investing in ways to plant and maintain trees for their associated benefits.”

We suggest adding a new policy (e.g., Policy 4.18b) **Urban forest protection during development**

This policy recognizes the vulnerability of trees during land development, and emphasizes the importance of implementation and enforcement of existing and newly developed regulations

(e.g., Tree Code) pertaining to the protection of the urban forest. The policy also stresses the need for adequate mitigation in cases where trees were lost during development.

***Commentary*** under ***Urban Forest 4.17-4.20***

**page 4-10** We suggest that you insert at some point in this paragraph the importance of maintenance or stewardship of the urban forest.

***Chapter 5: Urban Design and Development***

***Page 5-19 Policy 5.20 Design of Centers***

General suggestion for this policy: we note that the planning for, planting, and maintenance of appropriate street and other trees should be stated as an integral component in design of all new centers.

**Policy 5.20.d** *Protect and Enhance defining places and features...*

We suggest including “trees” (e.g., “...natural features such as trees...”)

**Policy 5.20.e** *Encourage... design elements*

We suggest that the design elements include “a diversity of shade trees” as part of encouraging distinct urban centers and streets and where people can sit, spend time and gather.

**Page 5-35 Policy 5.26 Greenways**

General suggestion for this policy: we note that it is unclear whether green streets include trees and other vegetation, and therefore suggest including “trees and other vegetation” (e.g., “...and bike-friendly, green streets and trails, with trees and other vegetation, that link...”)

***Public realm and the street environment***

**page 5-37, Policies 5.27-5.29** (*Streets as public spaces; Development and street design; Pedestrians and accessibility*)

We suggest adding the mention of street trees in these policies, like so:

**5.28.b** *Along busy streets that are primarily residential, encourage landscaped front setbacks, street trees, and other design approaches...*

**Policy 5.35** (*Historic and cultural resource protection*).

We suggest including a mention of Heritage trees in this policy; re-phrase the sentence to read:

**5.35.e** *Maintain active stewardship of City-owned historic resources and Heritage trees.*

#### Page 5-49 **Designing with Nature**

**Policy 5.45 Greening the built environment.** *Encourage the incorporation and preservation of large healthy trees, native trees, and other vegetation in development.*

**5.45.a** *Prioritize integrating natural elements and systems, including trees, green spaces, and vegetated stormwater management systems, into centers.*

Suggestion: add “and continued maintenance” (in the first sentence, to read “*incorporation, preservation, and continued maintenance of...*”)

### **Chapter 6: Public Facilities and Services**

#### **Stormwater system policies**

Page 6-27 **Policy 6.45 Maintenance.**

We suggest noting the importance of maintaining the green infrastructure elements of the stormwater system, like so:

*“Maintain and improve the existing stormwater sewer system and its complementary green infrastructure elements through preventive maintenance and ongoing monitoring.”*

#### **Parks and recreation**

Page 6-33 **Policy 6.61 Maintenance.**

We suggest noting the importance of maintenance of the urban forest, including park and other public trees, and natural areas to asset management, like so: “*...service delivery, including maintenance of trees and other urban forest and natural area green elements*”

### **Chapter 7: Transportation**

#### **General Policies**

Page 7-7 **Policy 7.1 Street Design.**

We suggest including street trees as an element of street designs, like so:

*“...transportation, land use and urban forest goals and objectives...”*

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