

November 4, 2014  
Bonny McKnight

To the Planning & Sustainability Commission,

Please consider these comments on the proposed update to the Comprehensive Plan:

One of the areas that needs to be more prominent in the Comprehensive Plan which will guide our future is the issue of **noise**. The current plan is essentially silent on this key livability and health issue and the noise code the city continues to use was written in 1976, when the city was far less dense and had about 1/5 of our current population in the same amount of land within our city boundaries.

There are many noise issues that are important but first there needs to be stipulation in the Comprehensive Plan of a noise policy upon which future code and/or development guidelines can be built.

Here are just a few Comprehensive Plan areas that need to be updated for this purpose:

## **HOUSING**

As development in Portland continues to become more dense, and neighbors are living in closer proximity to each other, and mixed uses are encouraged, I ask you to consider the impacts of noise. This is especially important in a number of situations, such as:

- \*The higher density Single-dwelling residential zones;

- \*Multi-dwelling zones;

- \*Mixed-use zones where residential uses abut or are in close proximity to more intense development patterns and uses that can result in noise impacts - for example, noise at times of the day that are at odds with what would be expected in a residential area (late night restaurant activity, night deliveries, etc.

- \*Residential uses along transit corridors and in town centers.

- \*The Comprehensive Plan will establish the policies, that might then be translated into zoning code regulations, guiding development in Portland. We need a policy that addresses noise and its impact on residential uses, quality of life, livability, etc. and acknowledges that as we become a more dense city, we need to take greater measures to mitigate these increasing impacts, in order to maintain our quality of life.

This policy could then be translated into zoning code requirements for sound insulation in the situations described above. Currently, the zoning code requires sound insulation in certain situations near the airport (33.470). With a new policy addressing noise and noise impacts and the importance of mitigating these impacts, we can potentially get some requirements for noise insulation, appropriate windows, etc. in the zoning code to address the noise impacts in these situations.

The noise issue also pertains to design and development of centers and corridors  
(See Goal 4).

Part of the purpose of zoning was to separate uses to prevent or reduce negative impacts, such as noise and activity. As we move more toward offering mixed-use zones, which provide a number of benefits, we can and should do a better job of mitigating the negative noise impacts that result from mixing what previously were considered conflicting uses. For example residential units above commercial space could and should be insulated well from the noise below. Also, commercial corridors that have residential development (or zoning) abutting them should be required to provide sound insulation in their buildings, not just visual screening at the lot line.

## **NOISE & HEALTH**

Studies have shown that there is a negative health impact on people who live in close proximity to high traffic streets, not only from air pollution but from noise. Recent research on this includes “Health Risks of Residents Living Near Major Roads or Freeways by Ann Spake; Health Effects from Noise (Wikipedia); and How The Street You Live On May Harm Your Health from Everydayhealth.com. New data is being gathered and published daily.

\*The Comprehensive Plan will establish the policies, that will then be translated into zoning code regulations, guiding development in Portland. Currently, the Zoning Code requires buildings along transit streets to be brought up close to the front lot line along the transit street.

If the proposal is for ground floor residential use, the building should not be brought up so close to the street due to impacts on the residents: a) noise; b) air pollution; and c) lack of privacy. Living in a ground floor unit set right at the front lot line along a transit street residents would not only lose privacy but would also be unable to leave their windows open for security considerations, air quality, and excessive noise reasons.

Essentially, it's a bad idea to have residential units at a zero-lot line along transit streets, or any busy street. Since most of these residents would likely be low income it also becomes an equity issue. These issues also need to be addressed in design and development of centers and corridors.