

COMMENTS FROM THE LINNTON NEIGHBORHOOD ASSOCIATION ON PORTLAND'S COMPREHENSIVE PLAN: November, 2014

This document is a refinement of the document filed by the Linnton Neighborhood Association as a comment on the Working Draft of Portland's Comprehensive Plan.

1. THE NEIGHBORHOOD ASSOCIATIONS HAVE BEEN LEFT OUT OF THE COMPREHENSIVE PLAN

The draft fails to acknowledge the contribution the neighborhood associations can make to the achievement of the Community Involvement Goals. Many of those goals could best be achieved by enhancing the role neighborhood associations play in the planning process. The neighborhood associations are the best path to creating positive relationships between the city government and local communities, the best path to engagement with the under-served and under-represented, and the best path to thoughtful consideration and meaningful participation by the public in the land use process. It should be an explicit goal of the plan to strengthen the neighborhood associations. Instead the plan seems to support an alternative process, and offers no more than a "tip of the hat" to the neighborhoods. A proclaimed "one size doesn't fit all" approach to planning demands an explicit commitment to neighborhood participation in planning, yet the draft makes no such commitment.

In particular, and just to start with, the plan needs to set realistic timelines for participation in the planning process by the neighborhood associations. The LNA has general membership meetings every other month, timelines which call for comments or appeals within 10 or 30 days are unworkable; they send a strong message that the city doesn't value what the neighborhoods bring to the process or care what the neighborhood associations think about the land use issues.

2. HILLSIDE DENSITY

Linnton was platted in an era when a twenty five by one hundred foot lot was considered spacious. Many residences in Linnton occupy multiple such lots and there are many other empty but buildable narrow lots available. The potential for infill is

substantial, and the number of homes that could be built far exceeds the infrastructure needed to support them. A first step towards resolution of this problem was taken when the Council approved the Linnton Hillside Plan which rejected higher density zoning, but the problem remains one which will become critical when a substantial upturn in the housing market occurs.

The plan does take some small steps towards addressing these long held Linnton concerns about appropriate hillside development by down zoning four large properties to Residential 20,000 (R20). Another 16 sites throughout the neighborhood are proposed to be rezoned as open space (OS) to acknowledge current or future open space use on existing publicly-owned land. In addition the Comp Plan Mapp App designation of Linnton as a "Stormwater Management Challenge Area" is a move in the right direction, but far from sufficient.

LNA supports controlling hillside development through management tools such as stormwater, landslide and habitat regulations. The draft moves in the right direction in acknowledging the constraints facing Linnton, including soil types and steep slopes that limit stormwater infiltration into the ground, lots that cannot easily connect to existing stormwater pipes, and landslide and wildfire hazards. Combined with the limitations on the existing infrastructure these natural hazards and drainage constraints make Linnton specific growth management a critical need.

3. THE LINNTON BUSINESS DISTRICT SHOULD BE A NEIGHBORHOOD CENTER

The LNA would like the Linnton Business District to be recognized as a "Neighborhood Center" even though it acknowledges that under the current definition of a neighborhood center our "center" doesn't qualify. The problem is with the definition rather than with the Linnton Business District. The LNA has long advocated for the long promised restoration of Linnton's business district, either on the highway or down on the riverfront and prior to the destruction of half of Linnton's downtown buildings (when the highway was widened back in 1960) Linnton would have qualified as a "Town Center" similar to St. Johns. Unfortunately for Linnton, under current rules, the business district rates as little more than a wide spot in the road. The plan needs to incorporate provisions encouraging the growth of the Linnton Business District, either as a Neighborhood Center or some newly

devised functional equivalent.

4. REZONING LINNTON'S BUSINESS DISTRICT TO STOREFRONT COMMERCIAL

Currently the narrow strip of business land along St. Helens Rd. from NW 107th to 112th is designated as general commercial (CG), a designation suited to car oriented shopping districts. The proposal is to changing this designation to "Urban Commercial/Storefront commercial" (UC/CS), a designation that would allow future mixed-used development. The LNA supports this small step towards the goal of rebuilding Linnton's downtown into a vibrant neighborhood center. Community questions remain, however, regarding the full implications of the proposed change in zoning.

5. ST. HELENS RD. SHOULD BE A CIVIC CORRIDOR IN LINNTON

At least in the area where it passes through Linnton's downtown, St. Helens Road needs to be recognized as a civic corridor. According to the draft language, civic corridor policies are intended to transform those areas into, "premier streets that are enjoyable places to live, work and gather; serve as safe mobility corridors for all types of transportation and pedestrians..."

Designation as a civic corridor would be another step in the slow but steady success achieved over the past 20 years in restoring a sense of place in Linnton's business district. Continued efforts at traffic calming and new improvements for pedestrians and business district customers are the next steps in the restoration of Linnton's downtown economic vitality and livability. The neighborhood would like to be considered for inclusion in the Main Street program, the civic corridor designation would be good step in that direction.

Currently the Mapp App lists St. Helens Road as a "Regional Truckway," which is defined in the Portland Transportation System Plan as primarily serving, "heavy freight activities for interregional and interstate freight movements." Linnton is happy to share the road with industrial users, but expects more from the highway and the city than truck traffic.

There is no reason St. Helens Rd can't carry the traffic it does and still be much

more pedestrian friendly than it is. Steps can be taken to visually narrow roadway with landscaping, pedestrian bulb outs, and extended medians.¹ These improvements would make the district safer and more inviting to pedestrians.

Designation as a neighborhood center and a civic corridor would assist in moving other traffic related projects forward. For example:

1. A local circulation study in the Linnton area to evaluate the potential for improving safe access to and from local streets to St. Helens Rd.
2. The implementation of a Whistle-Free zone in Linnton (perhaps in conjunction with the various North Portland neighborhoods facing this same issue), or other steps towards controlling intrusive nighttime switching by the railroads on both sides of the river.
3. Improving traffic flow by adding a left turn lane through the Willbridge area on St. Helens Rd.
5. Adding a traffic signal at NW 112th St.
6. Improving bike access to the St Johns Bridge (this is a list project, map ID#6004) and link that to a separated grade bike path alongside the existing rail tracks connecting the North Greenway Trail, across the BNSF rail bridge, and extending out to Sauvie Island. Both bikes and the greenway need to be separated from St. Helens Rd.

6. RIVER ACCESS IN LINNTON (POLICIES 3.54, 55, 56, 64 AND 65)

In the earliest days Linnton was a river focused town. Everything was tied to the river. In more recent years a string of industrial users have closed off the river almost entirely, the west side of the river in the North Reach is an uninterrupted row of no trespassing signs. The city ought to require, in the plan, that there be access points to the river (at least a viewpoint and ideally a spot where people can get their feet wet) every half mile, on the average. These access points could be along property lines and

¹ See PBOT project #60020, Transportation Investment Areas, Transportation Infrastructure Analysis, Draft Working Harbor Reinvestment Strategy, 2007. It calls for "Visually narrow roadway, including landscaping, pedestrian bulb outs, and median at various locations within Linnton."

not interfere with industrial activity. These access points would also provide habitat connections between the river and the upland forests as called for in Policies 3.54, 55 and 56. While human use of the access points has be controlled to insure that wildlife can also use them, the combination of human and wildlife access is both possible and useful. Political support over the long term is needed to preserve wildlife access, support is built by participation, which is created and encouraged by controlled public access.

Linnton provides an ideal location for such an access point. At the north end of the mill site, NW 107th almost extends to the river and could link up with an existing Greenway, if the city obtained public access across the mill site. The concept is already included in the currently stalled North Reach Plan and is identified in the Parks Investment Layer as a future improvement. Attached to this document (Exhibit A) is a 1976 letter from Linnton to then mayor Neil Goldschmidt. It advocates for precisely the river access that ultimately was included in the stalled North Reach Plan and which remains unachieved today, 40 years after the letter.

7. THE IMPACT OF PORTLAND'S INDUSTRIAL LAND POLICY ON LINNTON

Portland's industrial land policy, despite good intentions and reasonable success in other areas of the city, has not worked well in Linnton.

The Linnton waterfront was home to industrial activity long before zoning or comprehensive plans existed. Modern river related industrial activity, however, requires more than the Linnton waterfront provides and the land between the tank farms has remained underutilized by river related industrial activity for decades. Unfortunately the unsuitability of the site for modern industry has not been acknowledged in the planning or zoning process and the site remains frozen, not useful for industry and not available for other uses.

Particularly problematic for Linnton has been the incorporation of the notion of "industrial sanctuaries" into city wide planning. In 1996 the Northwest Industrial Sanctuary Working Group was created by City Council Resolution #35534. It included representatives from the LNA, and NINA, NWDA and PDNA, and achieved agreement about which neighborhood parcels of industrially zoned land should be provided long term sanctuary protection. As part of that agreement, the

various associations, the city, and the adjacent industrial stakeholders all agreed to make the northern boundary of the sanctuary the St. Johns Bridge (see discussion in Exhibit B). The agreements reached by the Working Group evolved into the Guild's Lake Industrial Sanctuary Plan which was approved by the city in 2001. The exclusion of land north of the bridge was intended to allow for further planning in Linnton. Unfortunately for Linnton, that planning has yet to be completed. It stalled after the city council rejected a proposal from the Planning Commission in 2006 and has not been restarted.

Whatever its value in other areas of the city the sanctuary policy has failed in Linnton, leaving only unused land and unhappy property owners. No investment has occurred and no jobs have been created. A project currently under development² will cut the available industrial land in Linnton more than by half, leaving only a small area technically available for industrial activity. The city should acknowledge the pointlessness of preserving the industrial designation of this remaining piece of the waterfront and open the area to other kinds of development.

The city should impose a standard for sanctuary protection for industrial property based on more than the property's history as an industrially zoned site and the raw number of acres of industrial land available within the city. Rather than just counting the acres, regardless of current usefulness, the city should measure the prospective usefulness of industrial property on a jobs per acre basis, imposing an obligation upon industrial users to maximize the density (in improvements and employment both) of their projects. This would assist in Linnton's redevelopment because it would reduce the concern that acknowledging that a particular parcel of land (for example, Linnton between the tank farms) was unsuited to industrial use might undermine industrial land policy city wide. The current system provides incentives for sprawl rather than incentives for density. The city doesn't subsidize residential sprawl and should not subsidize industrial sprawl. Density should be a concern for all.

In addition, the city needs to take a regional approach to supplying industrial land. Existing sites in Clark County and likely to be created sites in Columbia County need to be factored into the supply question. It may serve the Port of Portland's

² RestorCap has agreed to purchase the plywood mill site and convert it into habitat to address mitigation needs in the North Reach. The LNA supports this plan based on the promises of RestorCap to provide the long sought community access to the river.

interests to add to the stock of industrial land within Portland, but it may not be in the city's interest. Regional growth will bring benefits to Portland and those benefits will come with much smaller costs if development is financed by other jurisdictions.

The fear that higher income uses will drive industrial users off their land without a sanctuary policy to protect them is real. The policy should continue to forbid zoning changes that are justified merely by proof of a higher return on investment. But when allegedly marketable industrial land sits on the market for decades without a buyer, that message should be heard. Simply put, the Linnton waterfront hasn't been, isn't now and never will be useful industrial land. The failure of the land use process to acknowledge that reality has compromised the development of Linnton in particular and the city in general.

The city should have the courage to acknowledge that current industrial land policy fails to address the need for thoughtful evaluation of the suitability of specific parcels of land for industrial use. The need for regional growth should not be a bar to the wise use of the Linnton waterfront. Upzoning the Linnton waterfront would not compromise regional industrial land use goals and would better serve the needs of the city and the neighborhood.

8. SUPERFUND REMEDIATION SITES IN LINNTON

The Comp Plan needs to recommend sites along the Willamette River in the North Reach that are suitable as future mitigation sites as part of the Portland Harbor Superfund project. The Map App appears to recognize some of the above sites within Linnton but conspicuously leaves out the Linnton Plywood Mill site on the "Habitat Corridor" map layers.

The Portland Harbor Natural Resource Trustee Council released their recommendations for mitigation sites in April 2012 in their Portland Harbor Natural Resource Restoration Portfolio. Several of the Trustee Council's sites are within Linnton that would be ideal candidates for such corridors, several of which would "daylight" streams that were long ago piped underground due to industrial development.

Those sites include the former Linnton Plywood Mill site, Miller Creek confluence (near the floating home marinas), Doane Creek Railroad Corridor (where the BNSF rail bridge is), Owens Corning floodplain, and PGE site at the confluence

with the Multnomah Channel, and Powerline Corridor (where the high towers cross the Willamette.)

If the plan fails to take a more aggressive approach to the creation of these corridors another generation will pass and opportunities will be lost.

9. AIR, WATER QUALITY AND HEALTH

The superfund process focuses on the river, but the river is not the only source of industrial health risks. Linnton, like the larger North Portland area, has many sources of air, water and ground contamination and pollution which are not being monitored. Other north Portland neighborhoods seek a “health overlay” as part of the plan and the LNA supports the creation of such an overlay and the inclusion of Linnton within it. An overlay will provide some structure for efforts to evaluate the industrial impacts on health in our community.

As part of its commitment to improving community health the City should aggressively oppose the creation of a toxic waste dump, or confined disposal facility (CDF) at Terminal Four in North Portland. The proposal is inconsistent with the goals of the plan, imposes new burdens on a part of the city already host to more than its fair share of industrial pollution, and the project cannot be built with any assurance that it can withstand the expected major earthquakes and related flooding.

10. REMOVING IVY AND OTHER INVASIVE SPECIES FROM FOREST PARK

The Comp Plan should support the new Greater Forest Park Conservation Initiative, a 20 year plan covering 15,000 acres, with the goal of restoring a habitat corridor along Forest Park and the Tualitan Mountain range to the coast range improving wildlife and native plant diversity.

The Initiative is a collaboration including the Forest Park Conservancy, Metro, Audubon, West Multnomah Soil and Water Conservation District, Friends of Trees, City of Portland, and the Linnton and Forest Park Neighborhood Associations.

Investing in the removal of invasives needs to be called out as a priority for restoration programs in order to preserve Forest Park for future generations. The plan should state that the city will work with the parties to the Greater Forest Park

Conservation Initiative to control invasive species in Forest Park.

11. WILDLIFE IN LINNTON, FOREST PARK AND THE RIVER

Red legged frogs and their problems getting from the park to their breeding ponds near the river have become a recent issue in Linnton but are merely one example of the challenges faced by wildlife in the North Reach. Industrial and residential development has compromised the ability of wildlife to survive and the plan needs to commit to solving the problem. There is a regulatory gap between the park and the river which needs to be closed. A healthy park needs a healthy river and the health of both depends on the linkage between them. Access to the river is not needed merely for the human population; it must be provided for other creatures as well.

12. EARTHQUAKES AND OTHER NATURAL HAZARDS

Linnton is designated at high or moderate risk for earthquakes and landslide hazards, as is much of the Willamette River corridor. Linnton's oil tank farms are identified on the Mapp App as "High Potential Loss Facilities." While no amount of planning can eliminate all the risks associated with earthquakes and other natural hazards, those risks can be managed.. Given the concentration of energy related facilities in Linnton, risk reduction there is not merely a matter of local or even city concern; it is a matter of regional survival.

But instead of taking an aggressive position on risk reduction, the draft merely refers to the City's Natural Hazard Mitigation Plan (2010), which recommends mitigation strategies to address high risk assets such as the tank farms, but does so only in general terms, stating "resilient infrastructure must be adaptable to social and economic shifts as well as natural and climatic changes."

The plan should explicitly call for moving the tank farms and the pipelines to safer locations away from the river. If the draft isn't going to provide a long-term vision of moving Oregon's fuel storage and pipelines out of this high risk earthquake area it should, as an alternative, call for infrastructure investments to ensure existing facilities, including the Linnton tanks, are updated to survive the anticipated liquefaction of the ground they stand on during the expected major earthquake.

Nor is liquefaction the only unaddressed risk. Linnton's hillsides have a history of landslides, modern radar mapping has revealed the extent of that history, but little has been done to identify the risks attached to specific hillside properties. The plan needs to commit to identifying and addressing the landslide risk.

In addition to mitigating existing risks, the city should avoid creating new risks. The city should resist siting a toxic waste dump on the river bank at Terminal Four. Placing contaminated sediment dredged out of the river next to the river is an invitation to future problems.

13. CLIMATE CHANGE (POLICY 7.2)

There is no longer any doubt that climate change will have an impact on many of the issues contained in the plan. While the concept gets repeated mention in the draft, it does so mostly in the context of study or intergovernmental cooperation. The plan needs to take a more aggressive stance on managing climate change.

14. THE NORTH REACH PLAN

The LNA invested considerable time into the drafting of the North Reach Plan. Some of those efforts were devoted to pressing for the inclusion in the NRP certain non-controversial projects that had died with the Linnton Village Plan in 2006. Those items, with the rest of the NRP, now linger, victims of legal squabbles unrelated to the parts of the plan important to the Linnton neighborhood. The Comprehensive Plan needs to save those twice orphaned parts of the North Reach Plan and move them forward. In particular, the LNA wants to see the river access called for in the NRP appear in the new plan.

15. CONCLUSION

The Linnton neighborhood, sitting on a hillside, on a fault line, caught between Forest Park and the industrial waterfront, with rail and highway and pipeline corridors within it, presents unique challenges from a comprehensive plan perspective. Issues of minor import to other residential neighborhoods, such as industrial land policy, or the protection of frog populations, will directly shape

Linnton's future. On many issues, Linnton's situation makes it the exception that tests the rule.

The LNA therefore welcomes this opportunity to address concerns about the plan and hopes the city will take advantage of the insight gained by our examination of the draft as it applies to our neighborhood.

This document incorporates many Linnton neighborhood voices, past and present. The Board of Directors thanks all those whose work has contributed to growth of our neighborhood and the production of this document.

**THE LINNTON NEIGHBORHOOD ASSOCIATION
BOARD OF DIRECTORS**

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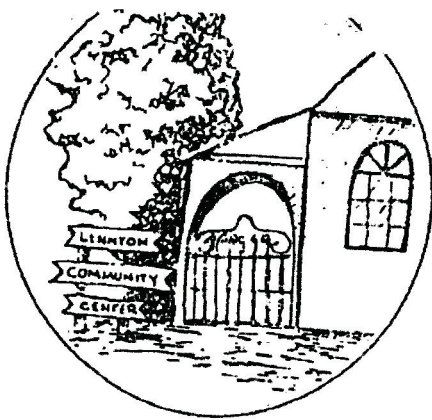
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LINNTON COMMUNITY CENTER

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Portland, Oregon 97231
Telephone (503) 286-1344

RECEIVED

MAY 17 1976

MAYOR'S OFFICE

Mayor Neil Goldschmidt
1220 SW 5th
Portland, Oregon

Dear Mayor Goldschmidt,

I am writing to you as a member of the Linnton Community Center, Community Action Committee.

We have in our area a parcel of undeveloped riverfront property which we would like to see developed into a park under the Greenway Program.

Below are listed some of the reasons the people of our community feel the project should be undertaken:

1. Linnton is one of the oldest and most historic communities as shown by the excerpt included with this letter.
2. There is very little public access to the west side of the Willamette River in the Portland area. The people of the area are in need of a place to be able to enjoy the river, walk at its edge, and wade in the water if they wish. The area requested would allow for this.
3. There is no public access to the west side of the Willamette River where the public may view, free of charge, the commercial commerce of the river. The people of Portland need a spot to be able to sit at their leisure and watch tugs busy at the grain elevator, ships docking and undocking, international cargo of all kinds being loaded and unloaded. The port is a vital part of Portland's economy, yet the people of Portland do not have many opportunities to view this industry. The area requested for a park, located directly opposite Terminal #4 would allow the public to see the port in action.
4. The site mentioned for a park would allow the many bicyclists on route to Sauvies Island, or the beach, a place to pull off the busy highway and rest.

EXHIBIT A-1

5. A park such as the one proposed would allow one of the few remaining pieces of riverbank in the Portland area to remain in its natural state, so that the people of the area might enjoy it as it was and enjoy it forever.

Also enclosed is a brief history of the area and, a letter from the Governor.

In past years our town's business district has been virtually wiped out by the widening of Highway 30 and traditionally Linnton has been low on Portlands list of priorities for basic services.

We feel it is time to put something back into our community.

The property in question is located at N. W. 107th and Front Avenue. If you have any questions, feel free to call me.

Sincerely,

Doug Adams

Doug Adams

10131 NW Wilark
Portland, Ore. 97231
286-2000

T. L. ...
See 2

NW Industrial Sanctuary Working Group

Joe Zehnder
Bureau of Planning
1900 SW Fourth Avenue
Portland, Oregon 97201

June 30, 2005

RE: 1999 NW Industrial Sanctuary Agreement

Dear Mr. Zehnder,

Pursuant to Resolution 35534 passed by the Portland City Council on July 3, 1996, presidents and other representatives of the four northwest neighborhood associations who had industrial zoned land within their boundaries met regularly as the Northwest Industrial Sanctuary Working Group (SWG) until 1999 when they achieved agreement as to which of their industrial zoned lands should be preserved for long term industrial sanctuary protection. This well defined area, its boundaries agreed upon by LNA, NINA, NWDA and PDNA, was designated as the Northwest Industrial Sanctuary Plan District.

At that time the Linnton Neighborhood Association was in the process of developing a neighborhood plan which would create a Linnton Plan District and establish "a zone designation" that would allow the property owners of industrial zoned land between the Arco Oil Terminal and the GATX Oil Terminal various options.

This element of the Linnton Plan District was developed with the input and agreement of the adjacent industrial stakeholders and with the advice of a senior planner from the BOP.

Since this area, the Linnton Plan District, was within the boundaries initially proposed by NINA for the new Northwest Industrial Sanctuary Plan District, the SWG coalition agreed that the northern (downriver) boundary for the NWIS Plan District would be redrawn to the St. John's Bridge.

Eventually, with continued input from the SWG coalition, the Northwest Industrial Sanctuary Plan District became the Guild's Lake Industrial Sanctuary Plan which was adopted by City Council on November 21, 2001.

As representatives of our neighborhood associations we understood that SWG's charge from the City was to define those industrial zoned lands within our neighborhoods that were to be preserved for long term industrial sanctuary protection. We further agreed that industrial zoned lands outside of the GLIS would be subject to options developed by our respective neighborhood plans.

We expected that neighborhood-developed options would receive support of other SWG coalition members in moving through the Planning Bureau, Planning Commission and City Council process. We expected the subsequent neighborhood plans would be adopted provided the SWG agreement was not contradicted.

We hope this clarifies the agreement reached by the SWG coalition. We ask you to acknowledge the value that the City of Portland places on the volunteer work of concerned citizens by honoring the agreement reached by the SWG coalition. You can do this by utilizing the agreement in assisting the Planning Commission and the City Council in adopting the Linnton Neighborhood Plan.

Sincerely,

Doug Polk, Kitsy Brown-Mahoney, Al Solheim, Frank Bird, Neilson Abeel
NW Industrial Sanctuary Working Group

Cc:
Mayor Tom Potter
Gil Kelley, Julia Gisler, BoP
NWDA, NINA, PDNA, LNA, NWNW

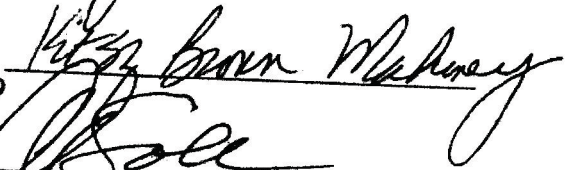
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Page 1 of 2

NW Industrial Sanctuary Working Group

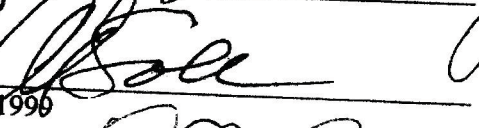
Doug Polk
Linnton Neighborhood Association President 1999



Kitsy Brown-Mahoney
NW Industrial Neighborhood Association President 1999



Al Solheim
Pearl District Neighborhood Association Vice-President 1999



Frank Bird
NW District Association President 1999



Neilson Abeel
Pearl District Neighborhood Association President 1999

