



January 13, 2014

Planning & Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97201-5380
psc@portlandoregon.gov

RE: Comprehensive Plan Testimony

(via postal and electronic mail)

Dear Planning & Sustainability Commission:

I write on behalf of the Concordia Neighborhood Association (“CNA”) to provide testimony regarding the proposed draft of the Portland Comprehensive Plan. The CNA appreciates the hard work by City staff and community stakeholders to create a thoughtful vision for Portland’s future. The draft Plan articulates a set of policies that point in a direction that may serve our community well through the coming years. However, we believe that the draft Plan could be improved in several ways, as discussed below.

OVERVIEW

The CNA values this comprehensive planning process as a once-in-a-generation opportunity to address concerns shared citywide by many neighborhood associations and individual citizens. Some specific concerns bear highlighting:

Residential Demolitions:

New planning guidelines should discourage unnecessary demolitions of single-family homes and encourage preservation of dwellings and other buildings where feasible. At present, demolitions in Concordia are typically no longer just replacing dilapidated dwellings or filling in previously-vacant full-size lots. Instead, new construction is replacing older, generally sound homes that tend to be affordable to median-income households, with much larger single-family homes that tend to be unaffordable to all but the highest-income households within our neighborhood. This trend is slowly chipping away at the historically affordable housing stock

within our neighborhood, is environmentally destructive, and does little or nothing to contribute to density.

The Plan should adopt policies to favor preservation and renovation over demolition where feasible. Demolition should be a tool of last resort, deployed only when the existing structure has reached the end of its useful lifespan.

“Flats” in Single-Family Zones Served by High-Quality Transit

To ensure that it is economically feasible to build new units affordable to median-income households, the Plan should allow for multiple dwelling units within structures that otherwise meet the form requirements for single family homes. The City should implement and enforce these policies through changes to its building and zoning codes.

Within the portions of the R5 and R2.5 zones served by high-quality transit service, a new overlay zone should be created, whose boundaries would be reviewed and edited by neighborhood associations prior to finalization. This overlay zone would allow for multiple residential units, up to two per floor, in structures that otherwise met the guidelines for single-family structures. This transition in the code, from a strict focus on density towards more of a form-based code, would place the emphasis on minimum lot size, maximum lot coverage, building setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability.

All new development should comply with Community Design Standards

To ensure that the character of our communities is maintained and respected, the City’s Community Design Standards should be required for all new projects, including all new construction and all remodels requiring permits; all such projects that are not able to comply with Community Design Standards shall be subject to Design Review. By-right development of projects that do not meet Community Design Standards should no longer be an option.

RECOMMENDATIONS ON SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:

Page GP3-14:

“Freight Corridors

Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade. ~~While the forms of These streets are not expected to change significantly, they are~~ integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries.” *In some cases, they may need to be upgraded to allow all modes to access destinations along the corridor, including employees and customers using bicycle and pedestrian modes or transit.*

CNA Concern: Freight Corridors must still allow employees and customers to access businesses and other destinations along the corridor safely using all modes, including bicycles and pedestrians, not just trucks and automobiles. This is an equity issue, and one that will become absolutely relevant if the city has any hope of meeting its future mode split targets.

- *CNA Recommendation:* One way to change the language to reflect this may be to strike the words “While the forms of” and “not expected to change significantly, they”, and to insert an additional sentence that acknowledges that these corridors may, in fact, have to change significantly in order to safely accommodate multi-modal access in the future. These suggested edits are shown above.

Page GP3-16:

“City Greenways

City Greenways are a network that includes the following types of infrastructure:

...

4. Neighborhood greenways are an extensive network of streets with low volumes of *local access only* motor vehicle traffic that are prioritized for bicycles and pedestrians, working in conjunction with the rest of the City Greenways system to extend the system into all neighborhoods.”

CNA Concern: The city needs to enact a specific policy for neighborhood greenways that specifies that motor vehicles are guests only on these streets, and indeed that they are open to motorized vehicles for local access only. This needs to be implemented by installing traffic diverters at intersections between greenways and arterials, as well as traffic diverters that are spaced between 2 and 10 blocks apart between arterials along neighborhood greenways (where the grid is intact). These diverters would allow bicycles & pedestrians to continue, but force motorized vehicles to turn and find another route (where a reasonable parallel route exists). Specific traffic diverter locations and styles should be chosen in a context-sensitive manner, in coordination with local neighborhood and business associations.

- *CNA Recommendation:* Add language to this policy statement that specifies that neighborhood greenways are open to motor vehicle traffic for local access only, as shown in the edits above.

Page GP3-17:

“Employment Areas

Industrial Districts – Industrial districts are in the low, flat areas along Portland Harbor and the Columbia Corridor, Oregon’s freight infrastructure hub. The manufacturing and distribution sectors concentrate here. *Though in the past* they typically *have* needed

one-story buildings, medium to large sites, and locations buffered from housing, *in the future these areas are expected to become more inclusive of multiple-story buildings containing a mix of complementary uses.* There is also an industrial district in the Central Eastside and smaller industrial areas scattered around the city, mostly adjacent to major transportation hubs.”

CNA Concern: Some language needs to be inserted to clarify that, while in the past (since World War 2), our industrial districts have been characterized by single-story buildings on large sites, in the future they will need to become more like industrial districts of the late 19th and early 20th century, with multiple-story buildings containing a mix of complementary uses. We have a shortage of industrial lands within city limits, so those lands that are already zoned for industrial should see an intensification of uses. Additionally, we should double down on our efforts to reclaim appropriate brownfield sites as future industrial land development opportunity areas.

- **CNA Recommendation:** Modify this policy statement to specifically state that industrial lands are expected to see an intensification of uses in the future. Potential language to accomplish this goal is shown above.

Page GP3-22:

“Policy 3.77: Inner Neighborhoods street patterns. Preserve the area’s urban fabric of compact blocks and its highly interconnected grid of streets, *including alleys where they exist. Where alleys do exist, do not allow new curb cuts on streets – require property auto access to off-street parking only from the alley, to protect the pedestrian environment on the sidewalk and preserve the neighborhood alley infrastructure.*”

CNA Concern: Alleys need special mention within these policies, as they have been neglected by City policy for too many years. New development must use alleys to provide auto access to properties where alleys exist, even if this means making modest improvements to the alleys.

- **CNA Recommendation:** Add language that requires all development on lots served by alleys, to provide auto access to the property from the alley. Potential language to accomplish this goal is shown in the edits above.

“Policy 3.79: Inner Neighborhoods infill. Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts’ historic development patterns.” *Ensure that development preserves and incorporates, rather than removes, mature trees.*

CNA Concern: Mature trees merit special consideration as something that new development should seek to preserve. The Concordia neighborhood has

lost over 20 mature, old-growth trees due to development in the past year alone. These century-old trees provide carbon sequestration and habitat benefits that are not included in development pro-formas. Their removal imposes negative externalities on the neighborhood, including its ecology. It is apparently too easy currently for a developer to remove mature trees without having to pay for the true cost, including quantified externalities, associated with their removal.

- *CNA Recommendation:* Add stronger language to protect mature trees. An example of potential language to accomplish this goal is shown in the edits above.

Page GP4-6:

“Policy 4.11: Alleys. ~~Encourage~~ **Require** the continued use of alleys for parking access, *where they exist*, and expand their use as the location of accessory dwelling units and as multi-purpose community space.”

CNA Concern: This policy is great, except that it needs to be mandatory in order to be effective where alleys do exist. What the City needs, at this point, is a concerted effort to revitalize its alleys, especially in areas where they have long experienced neglect, to allow them to become viable locations to construct accessory dwelling units and serve other community needs.

- *CNA Recommendation:* Insert stronger language into this policy statement, making it clear that development shall be required to use existing alleys, where they exist, to provide automobile access to properties. Potential language to accomplish this task is shown in the edits above.

“Policy 4.12: Adaptable neighborhoods. Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages. Allow adaptive reuse of existing buildings and the creation of *detached* accessory dwelling units to serve the changing needs of a household over time.” *Allow structures to be built in single family detached zones that meet height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise are visually similar to single-family homes), but that contain multiple units stacked vertically (“flats”), in zones served by high-quality transit.*

CNA Concern: Create a new policy to allow flats to be built in single-family neighborhoods. There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic. People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood,

neighbors would rather have the new larger structure that is built following a demolition be full of perhaps three flats, each affordable to a middle-income household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the UGB, increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

- *CNA Recommendation:* Insert language that allows structures in single-family zones in areas served by high-quality transit to contain multiple units, as long as the building envelope meets the requirements for those zones in terms of height, setbacks, lot coverage, etc. Some potential language to accomplish this goal is shown in the edits above.

Page GP4-7:

“Policy 4.13: Scale and patterns. Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.” *Remove strict restrictions on dwelling units per structure in transit zones.*

CNA Concern: Current zoning codes are too restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units. Rather than focusing on the number of dwelling units, codes should focus on the form of development, the height of the structure, treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building.

- *CNA Recommendation:* Insert language into Policy 4.13 that allows for the removal of restrictions on dwelling units per structure within transit zones. One possible way to do so is shown in the edits above. It may be preferable to use FAR, or simply height and lot coverage, as the mechanisms through which building size is regulated between different zones.

“Policy 4.16: Street environment. Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.” *Buildings should have awnings to provide shade and protection from the rain for pedestrians and other users of sidewalk space.*

CNA Concern: Awnings should be specifically called out as something that should be provided in pedestrian corridors. Too many buildings do not include awnings, probably because modern architecture often fails to recognize their functional value. The code must thus compensate for this architectural fad, and require buildings in centers and corridors to provide awnings.

- *CNA Recommendation:* Insert language requiring buildings to provide awnings within the pedestrian districts of centers and corridors. Some potential such language is shown in the edits to Policy 4.16, above.

“Policy 4.20: Residential uses on busy streets. Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic.” *Prevent new single-use single-family houses in commercial retail zones. Require a ground floor use that contributes to a retail-oriented pedestrian environment, such as ground-floor retail space.*

CNA Concern: There have been too many instances in recent years of new development on our neighborhood main streets, such as Alberta and Belmont streets, that is purely residential. This creates “dead zones” on these streets. New development should seek to prevent the production of more such “dead zones” by requiring ground-floor uses that are compatible with the intent of a retail mixed-use pedestrian environment.

- *CNA Recommendation:* Insert language requiring ground-floor retail or similar uses in development in the pedestrian zones of centers and corridors. Some potential language to accomplish this is shown in the edits to Policy 4.20, above.

Page GP4-8:

“Policy 4.21: Natural features and green infrastructure in centers and corridors. Integrate natural and green infrastructure, such as street trees, green spaces, ecoroofs, *living walls*, gardens, and vegetated stormwater management systems, into centers and corridors.”

CNA Concern: Living walls are quickly becoming popular as a way to provide greenery on buildings, to prevent graffiti, and to enhance livability. Living walls should be added to the list of green infrastructure to seek in centers and corridors.

- *CNA Recommendation:* Add living walls to the list of green infrastructure features recommended for centers and corridors, as shown in the edits to Policy 4.21, above.

Page GP4-9:

New Policy Suggested, Perhaps Policy 4.28h: Air Quality Impacts of Airports. Air quality emissions from airports, including Portland International Airport, shall be reduced, mitigated, and eventually eliminated.

CNA Concern: There appears to be no mention of the air quality impacts of the airport, yet maps of the air pollution plume from the airport show that it extends deep into Northeast Portland. The City thus needs to have a policy to reduce, mitigate, and eventually eliminate the air quality impacts from the airport, in order to protect the health of its residents, especially those most vulnerable to the impacts of air pollution. Certainly, by 2035, this should be an achievable goal. A new policy in this section might be the best way to address this need.

- *CNA Recommendation:* Add a new policy, perhaps 4.28h (as shown above), to specify that the City has a long-term goal of eliminating negative air quality impacts from airports on adjacent neighborhoods, and a short-term goal of reducing and mitigating those impacts.

“Policy 4.52: Water use efficiency. Encourage site and building designs that make efficient use of water and manage stormwater as a resource.” *Encourage the re-use of graywater from showers, sinks, kitchens, and laundry for landscape irrigation, especially for permaculture.*

CNA Concern: Graywater does not appear to be specifically addressed anywhere in this draft of the Comp Plan, so this may be the most appropriate place to insert a reference to it. Given our increasingly long summertime droughts in Portland, graywater makes sense as a way to re-use water to reduce water consumption for landscape irrigation purposes. It can be used untreated in completely underground applications, or it can be treated and re-used for other purposes.

- *CNA Recommendation:* Add a new sentence to Policy 4.52 that clarifies City support, as a matter of policy, for the re-use of graywater from showers, baths, sinks, kitchens, and laundry. Establish policies to encourage the responsible installation and use of graywater systems within the City.

Page GP4-14:

“Policy 4.63: Urban heat islands. Encourage development, building, *landscaping, tree planting,* and infrastructure design that reduces urban heat island effects.”

CNA Concern: This section on urban heat islands seems to read as if technological fixes are preferred to help reduce the urban heat island effect. The most cost-effective solutions may indeed be the simplest, however: plant more trees and perennial shrubs. At the very least, a nod in this direction could be added by inserting the word “landscaping” into this list.

- *CNA Recommendation:* Add the planting of trees and landscaping to the lists of solutions to reduce the urban heat island effect. Work to establish City policies that encourage wider adoption of permaculture practices that reduce the Urban Heat Island effect and sequester additional atmospheric carbon on a long-term basis. This could be done by modifying Policy 4.63, as shown above.

New Policy Suggested, perhaps 4.69? Organic Practices Within City Limits. *Within the City of Portland, all lands and buildings shall be managed under a standard that is equivalent to Oregon Tilth certification. This shall include banning within city limits and on all lands owned and/or managed by the city, all pesticides, herbicides, insecticides, fertilizers, etc. that are not approved for use by Oregon Tilth, except for in cases of extreme urgency (such as, if it were to be otherwise prohibited, to inoculate Dutch Elm trees against Dutch Elm Disease). Doing so will encourage the restoration of wildlife habitat, protect endangered fish and wildlife populations, protect threatened bee populations, and protect the health of human and other living inhabitants of the city.*

CNA Concern: To protect the health of humans and other inhabitants of our city, Portland should seek to be managed according to standards that could be certified as organic by Oregon Tilth. This policy is expected to save money for those following it, and to have positive impacts on the health and economy of the City and its residents and businesses. This policy should apply to all lands, public and private, within or controlled by the City of Portland.

- *CNA Recommendation:* A new policy should be created to this effect, based on language such as that above.

New Policy Suggested, perhaps inserted after 5.36? Multiple Dwelling Units in Single Family Zones. *Encourage the development of flats in single-family neighborhoods within high-quality transit zones, that is, vertically separated multiple housing units within buildings that otherwise resemble single-family homes and comply with single-family zone requirements related to height, setback, lot coverage, and minimum lot size.*

CNA Concern: A new policy should be created to specifically legalize “flats” in single-family neighborhoods (R5 and R2.5 zones), where multiple vertically separated housing units are housed within structures that otherwise appear to be single-family homes and meet all of the zoning regulations for single-family zones except those relating to number of units.

- *CNA Recommendation:* A new policy should be created to allow for multiple dwelling units within each dwelling structure in single-family zones, based on language such as that above. This policy should allow for a new overlay zone to be created and applied within the portions of the R5 and R2.5 zones that overlap with high-quality transit zones, as defined by the City for the purposes of allowing multifamily development with no or reduced off-street parking. The resulting

overlay zone map should be shown to neighborhoods prior to final adoption, for the purposes of collecting input and revising the boundaries of the overlay zone based on input from neighborhood associations. This policy could be written as shown in the suggested text above.

Page GP6-10:

“Policy 6.23: Trade and freight hub. Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub, *while transitioning towards a goal of net zero emissions in this sector.*”

CNA Concern: While it is good for the economy for Portland to be a trade and freight hub, it is bad for the environment and for the health of the population. As such, the City needs to establish a goal to move towards net zero emissions for the traded sectors and freight/goods movement. Setting this goal now will allow predictability for businesses in the future, so they can work with the City to achieve this goal over the course of multiple decades.

- *CNA Recommendation:* Adopt a policy goal of net zero emissions from the trade and freight sectors of the economy by the plan horizon year. This could be done by modifying Policy 6.23, as shown above.

Page GP6-17:

“Policy 6.59: Neighborhood business districts. Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3). *Eliminate “by right” single family development in commercial or mixed use zones; require all new development to provide ground-floor space for uses (such as retail) that support the retail-oriented pedestrian environment within neighborhood business districts.*”

CNA Concern: Some language should be inserted here to clarify that, indeed, for neighborhood business districts to survive and thrive, they must be districts for business. Space must thus be allocated specifically for supportive uses, and new single-family (or other) development that does not acknowledge the need to provide this space, especially on the ground floor, must be prohibited.

- *CNA Recommendation:* Adopt a policy requiring ground-floor commercial space (or others uses that support the retail-oriented pedestrian environment) in all new development in centers and corridors, eliminating “by right” single family development in these areas. This could be done by modifying Policy 6.59, as shown above.

Page GP7-14:

“Policy 7.48: Connected upland and river habitats. Enhance habitat quality and connectivity between the Willamette riverfront and upland natural resource areas.”
Daylight creeks through urban areas; use these creeks as the centers of habitat corridors.

CNA Concern: Daylighting can be an effective strategy to not just connect streams to rivers, but also to connect upland to lowland habitats along new (restored) habitat corridors.

- *CNA Recommendation:* Adopt a policy supportive of daylighting creeks that are currently in underground culverts. This could be done by modifying the test of Policy 7.48, as shown above.

Page GP8-13:

“Policy 8.29: Resource efficiency. Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses.” *Public facilities will have net zero carbon emissions from fleets, buildings, and other emissions sources.*

CNA Concern: The current language of Policy 8.29 is very vague, and needs to have stronger language with specific desired outcomes. An achievable policy goal would be net-zero carbon emissions from City vehicles and properties, especially by the plan’s horizon year of 2035. Setting such a goal would place Portland at the vanguard of cities willing to do something tangible about climate change; it would also come with a host of co-benefits for Portlanders, including better public health outcomes.

- *CNA Recommendation:* Adopt a policy requiring the City of Portland to produce net zero carbon emissions from public facilities by the Plan’s horizon year. This could be done by modifying the test of Policy 8.29, as shown above.

Page GP8-15:

“Policy 8.42: Undergrounding. ~~Encourage~~ *Require* undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in Centers and along corridors where multi-story development is allowed.” *Work with utilities to achieve undergrounding whenever the street is opened, and encourage further undergrounding in single-family neighborhoods.*

CNA Concern: The current language of Policy 8.42 is a bit vague and could have more teeth. For a variety of reasons, including resiliency, undergrounding would be a good citywide policy, but it won’t happen without effort. Requiring undergrounding, and having a policy to accomplish it block-by-block whenever the street is opened, would make it feasible to actually accomplish this goal within our lifetimes. New drilling and

installation technologies allow for undergrounding to occur at a cost far cheaper than was previously available. Whenever a street is opened, in Centers and Corridors overhead utilities on that block should be undergrounded as a matter of policy, and within other areas of the City the option to underground overhead utilities on that block should be offered to all property owners at the most economical cost achievable.

- *CNA Recommendation:* Adopt a policy encouraging or requiring the undergrounding of overhead utilities within the City of Portland, as appropriate, whenever other work requires the opening of the street. This could be done by modifying the test of Policy 8.42, as shown above.

“Policy 8.43: Right-of-way vacations. Adopt and maintain City code that identifies when street vacations are appropriate. That code should:

- Maintain existing rights-of-way unless there is no existing or future need for them.
- Require pedestrian or bicycle facilities, if ~~needed~~ *the ROW serves or could serve as a connection in the neighborhood pedestrian and/or bicycle network.”*

CNA Concern: Because the word “need” can be taken different ways by different people, it should be clarified: if a particular ROW does or could serve as a link in the local pedestrian/bicycle network, then pedestrian/bicycle facilities shall be required, and the ROW shall not be vacated.

- *CNA Recommendation:* Adopt a policy relating to street vacations that strongly favors not vacating any street that serves or could serve as a link in the surrounding area’s bicycle and/or pedestrian network, as shown in the above modifications to Policy 8.43.

Page GP8-16:

“Policy 8.49: Pollution prevention. Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical and that reduce the amount of pollution entering the sanitary system.” *Encourage the development of on-site graywater systems for landscape irrigation during the dry season (or for other re-use purposes if treated on-site).*

CNA Concern: Graywater, or the re-use of water from kitchen, laundry, sinks, showers, baths, and most other domestic wastewater sources except toilets, has a huge potential to reduce water consumption in Portland during the dry season. It should be specifically encouraged as City Policy, encoded in the Comprehensive Plan. The City should cooperate with other partners to develop a graywater program that educates property owners as to the

responsible installation, maintenance and operation of graywater systems, including what substances and products can and cannot be used in conjunction with an active graywater system.

- *CNA Recommendation:* Adopt a policy encouraging the use of graywater systems, where appropriate, within the City of Portland. The edits to Policy 8.49, as shown above, are intended to support the accomplishment of this goal.

Page GP8-18:

“Policy 8.66: Storage. Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability, *even during extended drought periods.*”

CNA Concern: Many residents are concerned that, with the closure and proposed closure of many of the City’s open-air water reservoirs, that the door is being closed on water storage capacity that could be crucial in the future as climate change brings longer, drier summertime drought conditions to our region. The City should, as a matter of policy, ensure that it has adequate water storage capacity to allow adequate supply even during the most long-lasting, extreme drought conditions, without having to resort to groundwater pumping (which should only be a strategy of very last resort).

- *CNA Recommendation:* Adopt a policy requiring the City of Portland to provide enough water storage capacity to allow the City to ensure supply reliability without needing to support to groundwater pumping, even during extended drought periods. The edits to Policy 8.66, as shown above, are intended to support the accomplishment of this goal.

Page GP8-23:

New Policy, perhaps 8.105? Sustainable Energy Production. *Maximize opportunities to produce sustainable energy within the city, especially on city-owned facilities, through solar, wind, hydro, geothermal and other renewable energy production technologies.*

CNA Concern: The City should be actively seeking to produce sustainable energy on buildings, facilities, and lands that it owns or controls. The current power portfolio of the City’s power sources is weighted currently very heavily to fossil fuels; one way to make this portfolio more renewable is for the City itself to begin generating more sustainable energy. Doing so could have direct financial, environmental, and economic benefits for the City.

- *CNA Recommendation:* Adopt a policy requiring the City of Portland to maximize the production of sustainable energy on lands and facilities that it owns or controls, while reasonably balancing this policy goal

against other competing needs and interests for those lands and facilities. Some potential policy language to accomplish this goal is shown above, as a suggested new Policy 8.105.

Page GP9-8:

“Policy 9.15: Repurposing street space. Encourage repurposing ~~street segments~~ *portions of street Rights-Of-Way* that are not critical for transportation connectivity to other community purposes.”

CNA Concern: The existing language in this policy seems to support removing links from the transportation network. Rarely, aside from cul-de-sacs that don’t actually front on properties with driveways, would it be possible to find links in the transportation network that couldn’t possibly be used, even by bicyclists or pedestrians. This language should thus not refer to street “segments” but instead to street “areas.” It is eminently practical to seek to shrink the transportation footprint by reducing the amount of street rights-of-way (ROW) that is paved and dedicated to vehicle movement. Portions of the ROW can easily be converted to use by non-auto modes, as greenspace, as bioswales, and/or as community space. This policy should support those sorts of activities, not the removal of potential links in the transportation network, especially those which may already by their nature be more suited to pedestrians and bicycles than other vehicles.

- *CNA Recommendation:* Modify Policy 9.15, as shown above, to clarify that the City seeks to re-purpose under-used portions of the street Right-Of-Way to allow them to find their highest and best use; but that the City has no interest in closing any existing or potential links in its pedestrian and/or bicycle networks.

Page GP9-9:

“Policy 9.21: Bicycle transportation. Create conditions that make bicycling more attractive than driving for most trips of approximately ~~three~~ *five* miles or less.”

CNA Concern: The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately *five* miles or less. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn’t seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the ROW to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.

- *CNA Recommendation:* Modify Policy 9.21, as shown above, to clarify that the City seeks to create conditions to make bicycling more

attractive than driving for most trips of approximately *five* miles or less.

Page GP9-10:

“Policy 9.29: Intercity passenger service. Coordinate planning and project development to *create/expand electric rail* intercity passenger transportation services in the Willamette Valley, ~~and~~ from Portland to Seattle and Vancouver, BC, *and from Portland to nearby cities including Hood River, The Dalles, Bend via Mt. Hood, and destinations on the Oregon Coast including Astoria to Tillamook.*”

CNA Concern: The City should seek stronger, carbon-neutral passenger transportation connections to more of its hinterlands. Electric interurban/intercity passenger rail service should be planned to connect Portland to Eugene (and points south), the Oregon Coast including Astoria to Tillamook (and possibly points south), the Columbia Gorge including Hood River and the Dalles (and possibly points east), Bend and Central Oregon via Mt. Hood, as well as points to the north, including Vancouver (WA), Olympia, Seattle, and Vancouver, BC.

- *CNA Recommendation:* Modify Policy 9.29, as shown above, to clarify that the City seeks to become the epicenter of an electric interurban passenger rail network that connects it via a rapid carbon-neutral mode of transportation (that offers better travel times than are available currently from road-based transportation modes) to the major population and destination centers of its hinterlands that it is currently connected to via the road network.

“Policy 9.32: Multimodal system and hub. Maintain Portland’s role as a multimodal hub for global and regional movement of goods. Enhance Portland’s network of multimodal freight corridors.” *Seek ways to achieve net zero emissions from freight movement.*

CNA Concern: While it is important for Portland to maintain its role as a multimodal freight hub, the technologies currently involved are some of the dirtiest sources of air pollution in the entire region, and their pollution plume extends deep into adjacent residential neighborhoods. The City, at the very least as a matter of risk management, should therefore seek to enforce a zero emission goal on the multimodal freight hub portions of the economy. This could involve electrifying the entire regional freight rail network, transitioning trucks to hybrid biodiesel/electric vehicles, and other technological paths that could not only lead to reduced emissions but also reduced operating costs and additional jobs in the local green economy.

- *CNA Recommendation:* Modify Policy 9.32, as shown above, to clarify that the City seeks to achieve net zero emissions from freight movement.

Page GP9-11:

“Policy 9.35: Freight rail network. Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network, *including electrification and double-tracking to accommodate passenger rail growth where feasible and eliminate emissions from freight rail activities.*”

CNA Concern: While growing and modernizing the regional freight rail network is certainly a laudable goal, the City should be more specific about the sought improvements: electrify the system, and create additional capacity to allow freight to peacefully co-operate with passenger rail expansion on the same corridors. Other goals may include seeking to move some freight rail yard operations away from the river, where they may no longer represent the best and highest use of those lands (as has already happened at the north end of the Pearl District.)

- *CNA Recommendation:* Modify Policy 9.35, as shown above, to clarify that the City seeks to electrify its regional rail network, and double-track it where necessary to allow for the co-existence of both freight and passenger rail operations in a manner that allows both to maintain their growing schedules.

“Policy 9.37: Portland International Airport. Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy.” *Seek ways to reduce airport air pollution emissions and to achieve net zero airport-area emissions by the Plan horizon year.*

CNA Concern: The air pollution plume from Portland International Airport currently extends deep into the residential neighborhoods of NE Portland, in a manner that is unacceptable for the long-term health of residents. The City should thus seek a long-term goal of zero emissions from the Portland Airport, and work with partners there to achieve that goal. Future technological advances, including hydrogen fueled aircraft, could allow this to become a reality within the life of the Comprehensive Plan.

- *CNA Recommendation:* Modify Policy 9.37, as shown above, to clarify that the City seeks to reduce emissions from Portland International Airport and surrounding, related facilities to a mitigated net of zero by 2035.

Page GP9-13:

“Policy 9.52: Share space and resources. Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space, *both on and off street.*”

CNA Concern: In order for the City to meet some of the goals mentioned elsewhere in this document, real estate that is currently dedicated to vehicle storage will need to find a higher and better use in the future, no matter where it is located – on street or off street. This policy should clarify that it applies to both situations.

- *CNA Recommendation:* Modify Policy 9.52, as shown above, to clarify that the City seeks to encouraged the shared use of both on- and off-street parking.

Page GP10-9:

“Policy 9.52: 6. Single-Dwelling — 5,000

This designation is Portland’s most common pattern of single-dwelling development, particularly in the city’s inner neighborhoods. It is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very limited development constraints. Single-dwelling *structure* residential will be the primary use. The maximum density is generally 8.7 units per acre, *except where an overlay zone allows up to 8.7 primary structures per acre, where each structure may have up to two dwelling units per floor.* The corresponding zone is R5.”

CNA Concern: While the R5 zone is intended for areas near, in, and along centers and corridors with access to frequent transit, this language focuses too much on density rather than form. Especially beginning with this zone and continuing into the higher-density residential zones, Portland should transition to more of a form-based code, one which focuses on minimum site size, maximum lot coverage, setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability. The code should transition away from a strict focus on density, which can often be counter-productive towards achieving other livability-related goals, including affordable housing and achieving the critical mass of neighborhood population required to support the services of commercial centers within a 20-minute walk.

- *CNA Recommendation:* Modify the definition of the R5 zone, as shown above, to clarify that the focus, especially within high-quality transit zones, is on primary structures per acre, rather than dwelling units per acre, and that up to two dwelling units are allowed per floor of the structure (including basements and attics) in these areas.

RECOMMENDATIONS NOT CORRESPONDING TO SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:

Community Design Standards Should Apply Everywhere. All new development, construction, or remodels requiring permits, shall comply with either Community Design Standards or be approved via the Design Review process.

CNA Concern: To ensure that the character of our communities is maintained and respected, the City's Community Design Standards should be required for all new projects, including all new construction and all remodels requiring permits; all such projects that are not able to comply with Community Design Standards shall be subject to Design Review. By-right development of projects that do not meet Community Design Standards should no longer be an option.

- ***CNA Recommendation:*** Modify the Zoning Code to clarify that all new construction requiring permits within the City shall either comply with Community Design Standards, or be approved via the Design Review process.

The CNA encourages the City to incorporate our recommendations into the Comprehensive Plan and to follow through with actionable and enforceable policies for future growth and development.

Please feel free to contact me, or the Chair of our Land Use & Transportation Committee, Garlynn Woodsong, at (503)-936-9873 or at garlynn@gmail.com, should you have any questions about any of the comments in this letter. Thank you very much for your thoughtful consideration of our input.

Sincerely,

Isaac Quintero
Chair, Concordia Neighborhood Association Board of Directors
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c/o NE Coalition of Neighborhoods
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