

To the Planning & Sustainability Commission:

We understand that the City of Portland is currently updating and implementing elements of the 20 year Comprehensive Plan, of which Zoning is a part. In light of this we would like to submit testimony concerning Environmental Overlays in North Portland. In particular we are concerned with the wooded bluff area between N Going Street and the residences on the north side of N Skidmore Court.

We would like to propose that the zoning for this currently undeveloped area be revised to Environmental Protection Zone status, rather than the current Environmental Conservation Zone status that allows for development. We argue that this area can not tolerate any development, even if considered “environmentally sensitive development”.

Our primary points of concern include:

- heightened landslide risk,
- increased traffic noise for residence,
- property damage from construction, and
- destruction of a nature corridor

Please see the attached testimony: *An appeal for Environmental Protection Zoning for the N Prescott Bluff*

Kind Regards,

Sharonne and Jeremy Broadhead, on behalf of the N Skidmore Court residence

## **An appeal for Environmental Protection Zoning for North Prescott Bluff.**

This testimony outlines the concerns of the residents of fifteen homes on the north side of N. Skidmore Court in the Overlook neighborhood in relation to the possible development of a steep grade forested bluff to the north of their properties.

The bluff runs along the south side of N. Going Street and to the north of N. Skidmore Court, with Interstate Boulevard and Greeley Avenue to the east and west respectively. The area falls into an R5c zone and contains tax map 1N1E21AC lot numbers 14300, 14400, 14500, 14600 and 14700. The area on the north side of N. Going Street between Interstate Boulevard and Greeley Avenue falls under OS and OSc zoning as does the area on the south side of N. Going Street to the west of the area in question (tax map 1N1E21DB lots 1800, 1900, 2000, 2100). The open space designation on the north side of N. Going Street came about as part of the city's N. Going Street noise mitigation project in the 1980's; the city demolished residences along N. Going Street to create some of the open space.

According to Portland Maps the bluff area is in a High Earthquake Hazard Zone and also falls under the following classifications:

- Steep Slope Area (25%), and
- Potential Landslide Area.

We would like to propose that this currently undeveloped area be assigned Environmental Protection Zone status, rather than the current Environmental Conservation Zone status that allows for development. We argue that this area can not tolerate any development, even if considered "environmentally sensitive development".

Our primary points of concern include: landslide risks, increased traffic noise, property damage from construction, and the destruction of a nature corridor.

### **Landslide risk:**

Over past decades a number of landslides have occurred along the bluffs close to the proposed development area.

In the late 1950's Union Pacific constructed a retaining wall along the lower portion of the Skidmore-Overlook bluff, above N. Greeley Avenue. The wall was reinforced with steel, seven feet thick at its base, over 50 feet tall, and over 500 feet long. It was either close to completion or finished in early April 1958 when an approximately 300 foot section of the wall failed, releasing tons of dirt from the bluff, knocking over electricity poles and lines on Greeley Avenue and covering a section of the railway yard in dirt and debris. In response, Union Pacific paid to have Greeley Avenue realigned 75 feet: the bluff over Greeley was graded, and two houses at the end of N. Skidmore Court and N. Skidmore Terrace were demolished to allow the grading for the new bluff profile. What is left of the lots of those houses is now the Mocks Crest Parklet --

the Skidmore Bluffs. Failure of this substantial retaining wall would suggest that the bluff is composed of unstable material that retaining walls may be insufficient to contain.

Further landslides took place some 16 years ago beyond the house at the end of N. Skidmore Court on the north side, closest to the Mocks Crest Property. Farther around the bluff, a landslide recently took place just south of the Overlook House on N. Melrose Drive. A City of Portland Public Works sign currently marks the site. Additionally, a number of trees at the base of the bluff next to N. Going Street are growing at odd angles, suggesting that earth on the slope has been moving.

Major factors contributing to landslide risk include cuts being made to a slope, tree removal, heavy rainfall and tectonic activity (see UN Food and Agriculture Organization '[Forests and Landslides](#)' publication). Development of properties on the bluff will necessitate cutting a roadway and removing trees and Portland is also susceptible to heavy and prolonged rainfall and tectonic activity. The geological structure of the bluff may contribute an additional risk factor since local knowledge suggests that the slopes are composed of landfill and were used as a dump.

A landslide or multiple landslides could affect the stability of the land on which the homes on the north side of N. Skidmore Court are now situated and deforestation resulting from development or a landslide would leave properties open to increased noise levels from N. Going Street (see below). Leaving the slope in its current state and managing the area to maintain an unevenly structured stand of natural vegetation containing a diverse range of trees and shrubs would help protect against landslide risk.

### **Noise levels:**

In 1978 the city of Portland began a study of truck noise along N. Going Street. Noise levels were found to be potentially damaging to health for occupants of homes at the side of the street. As a result, the city opted to relocate the residents and a number of homes were demolished. Noise reduction walls were erected and the small cross streets that opened onto N. Going Street were shut down. In all, seventeen houses and seven apartment buildings on both sides of N. Going Street were demolished. Remaining houses in the area were given the option of installing double-pane windows. By 1983, city and federal funds spent on the project totalled around \$3.4 million.

Currently this corridor has trees growing on both sides of the "canyon," providing a natural noise barrier between the local neighborhoods and the freight corridor of N. Going Street. At the time of the study, the sound level on N. Going Street was around 80 decibels. Traffic volumes are now considerably higher than 30+ years ago and noise levels are likely to have risen in accordance. Removal of trees on the forested bluff for housing development would increase noise levels in the homes along the north side of N. Skidmore Court and additional mitigation measures may be necessary to maintain a healthy environment for residents.

**Development damage:**

Although it is not clear what kind of engineering techniques will be used, development of residential properties and retaining walls along the bluff may have direct impacts on the the current residences aside from landslide risk. It is likely that anchors will be needed for retaining walls and these could affect the stability of ground beneath current residences. Changes to the hydrology of the land could also affect building foundations. No studies have been available to suggest that these risks are insubstantial.

**Natural habitat degradation:**

The natural strip of forest spanning the entire length of the Overlook bluffs provides a considerable contribution to nature preservation and habitat connectivity. The rest of the bluffs area to the north of N Going Street and along N. Greeley Avenue is zoned as an OS or OSc area and only the section proposed for development is zoned as R5c. The bluffs contain a diverse selection of native trees and plants including a Madrona tree at least 80 years old which has been nominated for Heritage Tree status. Animals that utilize this wildlife area include the usual raccoons and coyotes, but also deer and newts. Birds seen and heard here include flickers, varied thrushes, downy woodpeckers, Cooper's hawks, great horned owls, and even bald eagles. Development of the area would destroy much of the natural vegetation and reduce the area available for the birds, mammals, reptiles and insects that currently inhabit the area.

**Summary:**

The North Prescott Bluff with intact vegetation has value to the residences on the north side of N. Skidmore Court in terms of landslide prevention and noise mitigation. The Bluff is also of broader value as a natural corridor. Development of the area has the potential of substantially reducing these values and of posing risk to the continued stability of the residences N. Skidmore Court. Changing the status of the area to an Environmental Protection Zone will preserve the geological stability of the area, maintain noise reduction services provided by trees and other vegetation and contribute to biological conservation in Portland.