



**NORTHEAST COALITION  
OF NEIGHBORHOODS**

January 21, 2015

Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Subject: City of Portland Proposed Draft 2035 Comprehensive Plan

Dear Commissioners:

Following are comments and recommendations from the Northeast Coalition of Neighborhoods (NECN) on the Proposed Draft 2035 Comprehensive Plan. NECN serves to amplify the voices of community members from twelve inner North and Northeast Portland neighborhoods. The comments included in the testimony below were referred by our Land Use and Transportation Committee and were endorsed by the NECN Board of Directors on January 20, 2015.

In identifying Comprehensive Plan priorities and edits, the NECN Land Use and Transportation Committee considered several comments previously submitted to the Planning and Sustainability Commission. Please see the attached documents for additional reference.

### **1. Acknowledgement of the Legacy and Contributions of Neighborhoods**

We support the recommendations of the Public Involvement Advisory Council (PIAC) regarding Chapter 2, the goals and policies on community involvement, specifically:

- Adding language to the chapter introduction referencing the celebrated history of Portland's neighborhood system.
- Appointing an independent body, rather than the Planning and Sustainability Commission, to oversee the Community Involvement Program.
- Clarifying that neighborhood associations and coalitions are an integral and official part of the City's public involvement program, in addition to the other ways that the City seeks to involve the public that incorporates the work of under-represented and cultural communities. Employing a "both and" strategy, rather than an "either or" one will further strengthen this inclusionary effort.

### **2. Industrial development**

#### **A. In relationship to the protection of natural areas**

We support a change in the City's strategy to find new industrial lands to satisfy the requirements of Statewide Planning Goal 9, including the argument that the City to seek an exception to Goal 9. It is imperative that the rezoning and development of industrial lands does not result in the compromise of the health and well-being of our communities and furthermore does not overload the carrying capacity of the air, land, and water resources of our city. In this regard, the



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Comprehensive Plan must consider:

- Informing the state that the City cannot remedy its deficit of new industrial land without sacrificing its neighborhoods and its environment, and thus it will seek a Goal 9 exception.
- Increasing its goal of cleanup and redevelopment of existing brownfields, especially those in existing Industrial Zones, to greater than 70% over the next 20 years to maximize otherwise underutilized and/or vacant parcels.
- Removing the City's West Hayden Island Urban Services Area designation and instead retain its current designation as Farm Forest. The proposed zone change would be a step towards the eventual development of this important natural area, a direction our communities do not support. Instead of compromising the health and livability of nearby communities and further stressing the carrying capacity of the surrounding ecosystems, the City should take steps to permanently protect this important natural area.
- Putting our current and future industrial lands to better use by protecting existing industrially zoned land by making it difficult for industrial lands to be up-zoned
- Creating mechanisms that ensure higher densification of jobs on current and future industrial zoned lands, especially where there are public investments.
- Removing proposals to rezone and develop existing golf courses on the Columbia Corridor, as the loss of green space and the natural resources they provide to this highly developed area is of great concern to our Coalition.

### **B. In relation to neighborhood safety and livability**

The Woodlawn Neighborhood Association, whose northern border is Columbia Boulevard, holds deep concerns about volatile substances (including oil, coal, and propane) travelling along railroad tracks just blocks from Woodlawn Elementary School and neighborhood residences. We echo Woodlawn's concerns about the additional negative impacts of heavy industry-related transportation, including:

- The need to increase safety of train traffic and reduce risks to neighbors.
- Increasing transparency about types of freight, levels of emissions, and what steps are being taken to protect the community, including disaster preparedness.
- Allowing the city and other interest groups to lobby for our interests.
- Oil/coal trains: the proposed Kenton Rail Line project would add another line, and the Draft Comprehensive Plan indicates that this line might be used for higher-speed volatile cargos.
- Hazardous cargos are currently carried on trains whose tracks are adjacent or close to multiple propane and ethanol storage tanks and major natural gas pipelines.

### **3. Housing, development and neighborhood compatibility**

We support the comments submitted by several NECN neighborhood associations addressing various aspects of development in or adjacent to residential areas.

#### **a. Concordia Neighborhood Association "Flats" Proposal**

We support Concordia Neighborhood Association's proposal to address demolitions and the loss of middle-income housing stock by suggesting that a new overlay zone that allows multi-family dwelling units be introduced in R5- and R2.5-zoned areas, served by high-quality transit service, which offsets the need for parking. In order to help our neighborhood retain affordability in the midst of rapid infill and development, an



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overlay zone allowing for multi-family units would help achieve goals for increasing the supply of affordable housing and slowing gentrification, while reducing pressure on the Urban Growth Boundary. To maintain neighborhood character, such structures would be subject to all of the existing height, setback, lot coverage, and other requirements pertaining to the exterior form; however, the number of dwelling units on the interior would be raised to allow up to five dwelling units per structure in this overlay within R5 and R2.5 zones.

**b. Eliot Neighborhood Association Land Use and Transportation Committee Comments**

We support the Eliot neighborhood's recommendations related to protecting a residential part of the city that has been drastically impacted by urban renewal actions, specifically:

- Adopting, without delay, Eliot's plan to reduce the current medium density zoning (R2) to a low density zone (R2.5)
- Restricting Rx zoning to the Central City
- Directing infill away from historic districts, including conservation districts, and limiting additional density to existing centers and corridors through appropriate zoning.
- Incorporating the RH zone into the Mixed Use Zone process currently underway at the Planning Bureau to ensure that massing and bulk are compatible with adjacent low density residential parcels, with additional setback and/or step-down provisions for projects within 50 feet of historic buildings or districts (including conservation districts). It should be noted that RH zones have similar off-site impacts on residential sectors of our community with their inclusion of commercial operations. These operations, for instance, could be bars and restaurants with patios and outdoor late night activities until 2:30 a.m. or later which could be directly adjacent to a resident's bedroom.

**c. Sabin Community Association**

We support the Sabin Community Association's recommended changes to the policy language in chapters 3 and 4 of the Comprehensive Plan Draft, specifically:

- Promote the recognition, maintenance, and preservation of sound housing stock; discourage the demolition of sound housing stock.
- Provide greater protection for light, air, privacy, solar access in single family and Central City Pattern areas, while accommodating urban scale development in town and neighborhood centers and along civic and neighborhood corridors.
- Create and enforce scale and pattern policy, i.e., development that respects the scale, character and natural landscape features of neighborhoods.

d. Our Land Use and Transportation Committee elaborated on Sabin's concerns of equity as it relates to solar access, namely: we encourage the City Of Portland to return to a more scientifically valid and protective solar code. The attached language was carefully vetted in the late 1980's here in Portland to both encourage and to protect equitable access to solar resources for all residents and properties.

The current Portland City Code eliminated the attached language and Solar Access Amendments of the 1980's and does little to protect the rights of less affluent home-owners or renters to install new solar photovoltaic or



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solar water heating systems.

The current City Code also does nothing to protect existing solar access for already installed solar systems from the rapid development pattern currently impacting many neighborhoods in our City. This currently accounts for a “takings” in Planning nomenclature by removing solar access to existing homes and potentially ensuring only the most affluent and tallest buildings, and their owners, are able to draw from the resource of the sun in the future.

*Please see the attached excerpt from the 1987 City Council efforts to incorporate progressive environmental language into the City code in the form of “Solar Access Amendments” to City Code. The attached document was approved unanimously by City Council.)*

#### **4. Public Health and Safety**

We support the general arguments outlined by the North Portland Land Use Group (NPLUG) regarding a Health Overlay Zone, which would apply specific land use, design, and monitoring requirements on new development to mitigate negative health and safety impacts. However, we have the following comments on NPLUG’s arguments.

- Rather than an overlay, we feel that the health and safety goals outlined in NPLUG’s letter should be applied to the Comprehensive Plan citywide.
- Health and safety concerns must be integrated into codes related to freight and disaster response.
- We feel that the City and Multnomah County should coordinate on the development and implementation of health policies, specifically focusing on hiring and training city staff with expertise in science and public health.

The NECN Board of Directors and our Land Use and Transportation Committee members thank you for your important work for the future of our city, and we appreciate your consideration of our comments.

Sincerely,

Alan Silver  
Chair, NECN Board of Directors