



# Northwest District Association

April 22, 2022

## **Bureau of Planning and Sustainability**

1900 SW 4<sup>th</sup> Avenue  
Portland, Oregon 97201

**Attn: Barry Manning, Senior Planner**

**RE: MP2H Discussion Draft comments**

The NWDA Planning Committee has reviewed the *MP2H Discussion Draft* and has met with BPS staff to discuss its policies several times since November 2021. As a product of these discussions, and of our internal review over the last few years, we offer a few broad comments, in addition to the Goals and Policy Statements that follow. These are in addition to our comments that were submitted to the *Preview Draft* from November 2021:

*The potential redevelopment of the MP2H area presents unprecedented opportunities to envision a place in our city unlike other recent redevelopment examples, with a chance to directly address the currently pressing and ascendent issues of affordability and diversity, along with the potential of realizing a new, relevant expression of urban design and form.*

Our comments incorporate the goals that the NWDA identified in its November *Preview Draft* comments, and couple them with:

1. Policy statements implementing those goals, and tying them to objectives and desired outcomes;
2. 'Vision Diagrams' and illustrations representing a.) the existing leverageable site characteristics, b.) potential arrangements of new and existing infrastructure, c.) potential development density, and d.) the desired outcomes. The NWDA believes that this has been a missing element in the process to date, and that while we recognize that this is not a master planning effort, and the Perkins and Will Urban Design Concepts study from 2020 notwithstanding, the absence of a 'vision' for the area has constrained the ability of the stakeholders to actually discuss this *Discussion Draft*.

A few overview comments:

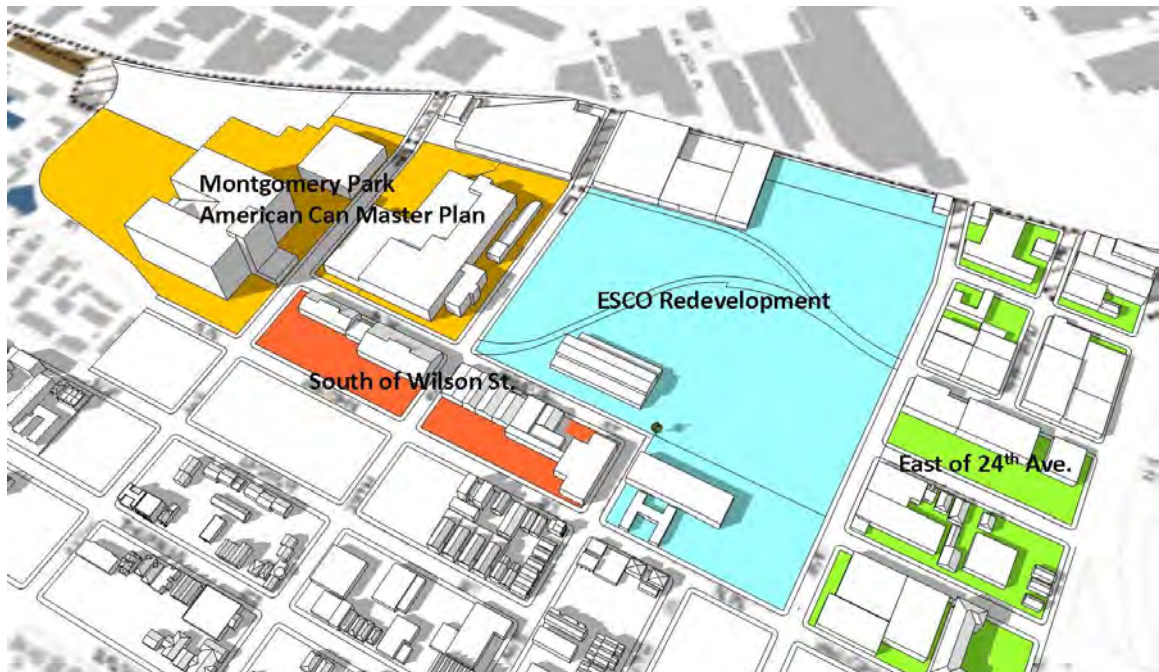
1. The proposals to potentially up-zone and significantly increase the allowable density and height in areas other than the ESCO redevelopment area appear to be counter-productive to stated equity and affordability goals;
2. The proposed maximum 6:1 FAR for the aggregated ESCO redevelopment area appears to be difficult to realistically accommodate; 3:1 FAR would be more achievable for reasonable development sites and allow for 'light and air' open space;
3. The MP2H area is insular geographically, and it is not a component in larger, continuous transportation networks. The proposed prescribed mode and special use street profiles in this area are unnecessary and should be reconsidered;
4. The NWDA asks that the creation of any new Plan District be coupled with the update of the corresponding policy plan documents.

*the Northwest District Association is a 501(3)c tax-exempt organization*

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## General

- **Subareas:** identify MP2H Study Area subareas, each with distinct existing characteristics and redevelopment potential.
  1. **Montgomery Park American Can Master Plan** subarea: its ownership has initiated a master planning process, area is currently adequately zoned for anticipated future uses;
  2. **South of Wilson St** subarea: recent renovation of modest industrial buildings into 'creative' office use, other imagable buildings on Wilson St, existing workshop and incubator uses, adequate existing zoning;
  3. **ESCO Redevelopment** subarea: foundry buildings have been demolished, site for potential redevelopment and master planning;
  4. **East of 24<sup>th</sup> Ave** subarea: concentration of affordable existing workshop and incubator uses, adequate existing zoning.



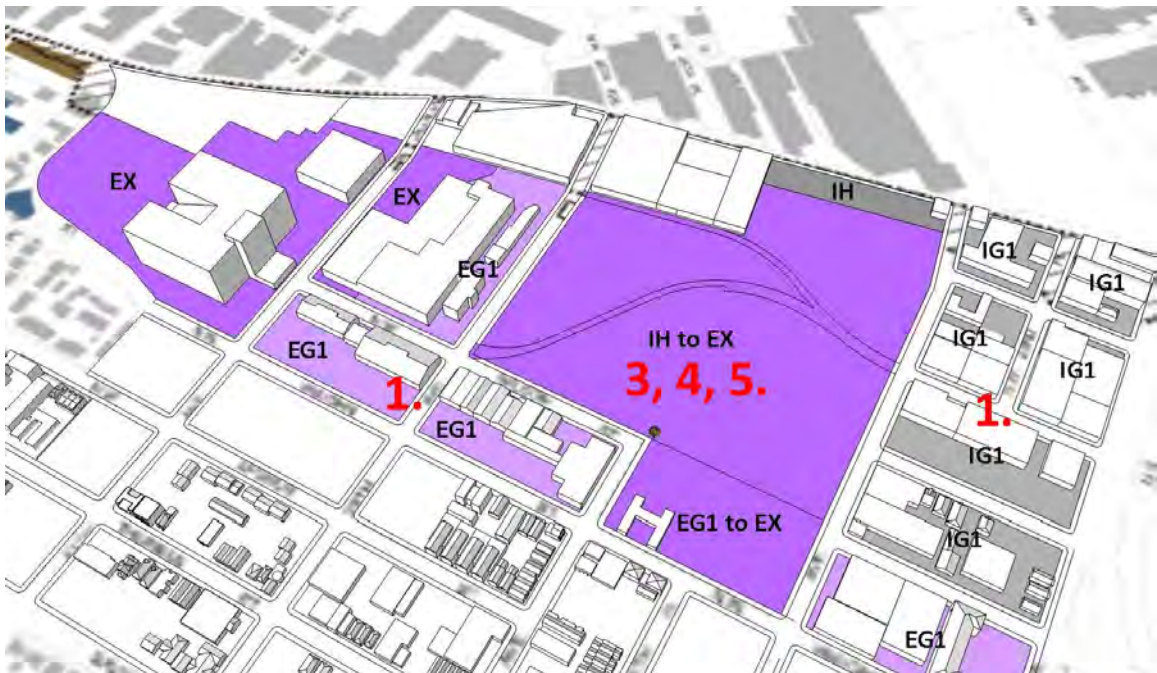
## Subareas

### Institutional and Infrastructure

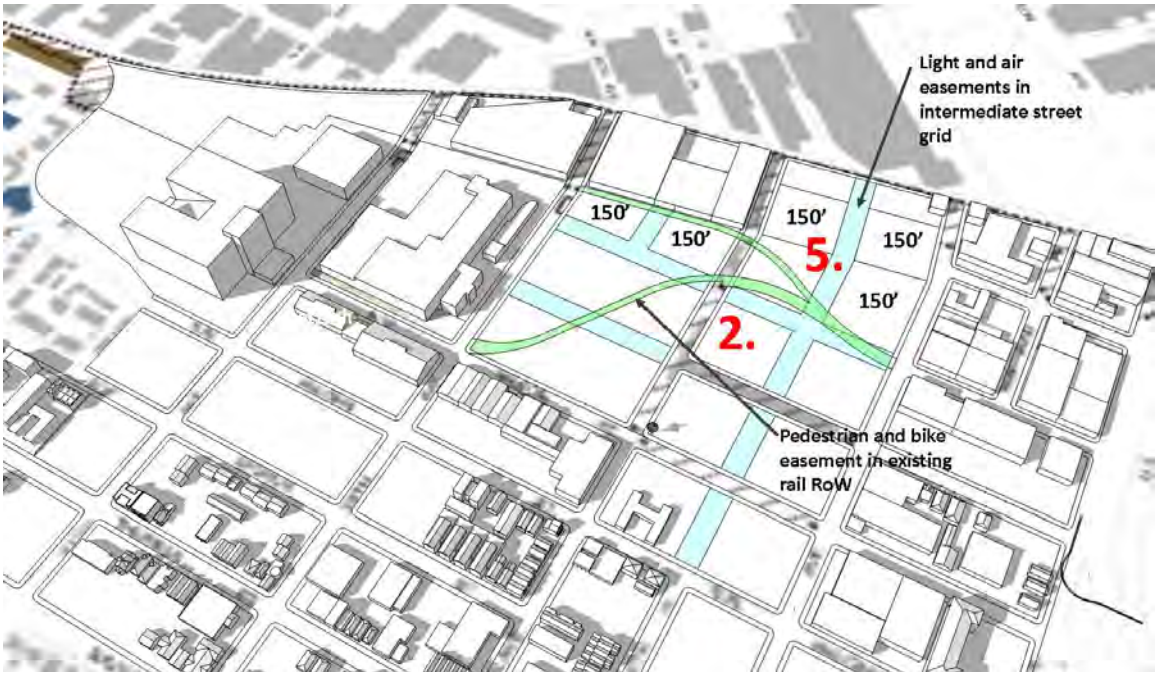
- **Public Infrastructure:** mitigate impacts on schools, parks;
- **Energy:** create a demonstration project for carbon neutral development, district energy generation systems, resilience and efficiency. Underground all utility distribution systems;
  1. Address the impact of the creation of 3-5k new housing units over the next decade:
    - a. Enrollment in neighborhood elementary, middle and secondary public schools;
    - b. Currently over-used neighborhood park facilities;
    - c. The absence of active recreation and community center facilities in NW Portland;
  2. Structure a development agreement to ensure net-zero carbon emissions for the entire redevelopment area;
  3. Provide infrastructure for district energy generation systems;
  4. Provide infrastructure to allow for coordination and cross-usage of any sub-grade parking facilities.

## Land Use

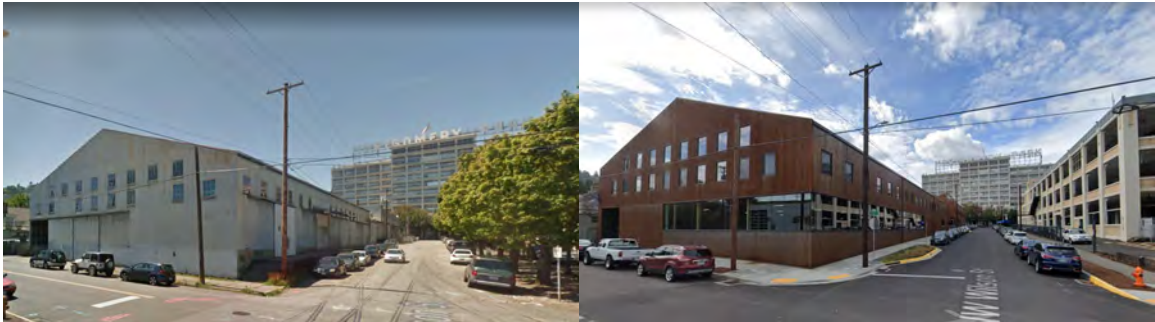
- **'Complete Neighborhoods':** create an urban district where people can recreate, live and work within affordable means;
  - **Mixed Uses:** expand the conception of 'mixed-use' beyond apartment buildings with retail shops and restaurants on the ground level, to include workshops, distribution facilities, etc., with a broad variety of residential types;
  - **Affordability:** conserve and expand the existing affordable commercial and workshop space in the area to support stated equity goals;
1. Retain existing uses and zoning at perimeter properties south of Wilson St. and east of 24<sup>th</sup> Ave. to provide unsubsidized, 'naturally-occurring' affordable commercial and 'incubator' space for light manufacturing and workshop uses;
  2. The proposed maximum aggregated density (6:1) in Subdistrict B in the ESCO property is infeasible if there is to be any provision for 'light and air' open space in the redeveloped area;
  3. Allow for the rezoning of the ESCO Redevelopment subarea to CM3 or EX with off-setting public benefits;
  4. Allow for a 3:1 FAR in the ESCO Redevelopment subarea with the transfer of density off of dedicated public open space;
  5. Allow for 75' maximum building height in the ESCO redevelopment area with a provision for 150' height at designated parcels in the northern portion.



## Zoning



**Open Space Easements and Height**



*Fox Commons 'creative office' renovation*



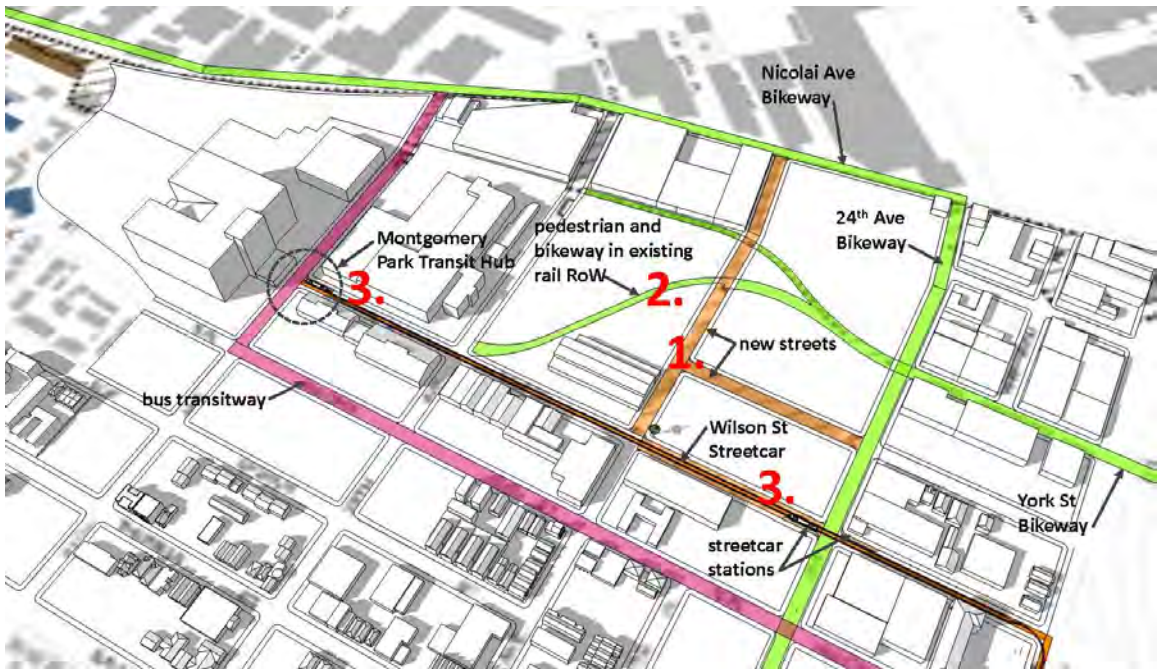
*South of Wilson St*



*East of 24<sup>th</sup> Ave*

## Transportation

- **Real Mode Splits:** provide sufficient transportation infrastructure that, while supportive of access, diversity and modal split goals, is based on the current reality of existing mode choices;
  - **Streetcar Routing:** align, if implemented, to an adopted urban design scheme, rather than it being the de facto generator of one;
1. Provide new general purpose, flexible, two-way streets with typical street profiles in the ESCO area; avoid unnecessary special purpose lanes and curb zone arrangements;
  2. Separate bikeways and routes from streetcar streets; they are incompatible;
  3. Route the streetcar in the existing Wilson Street right of way, not in the American Can Company setback, and place the stop at 27th Ave as a part of a transit hub with the adjacent bus lines.



Street Hierarchy

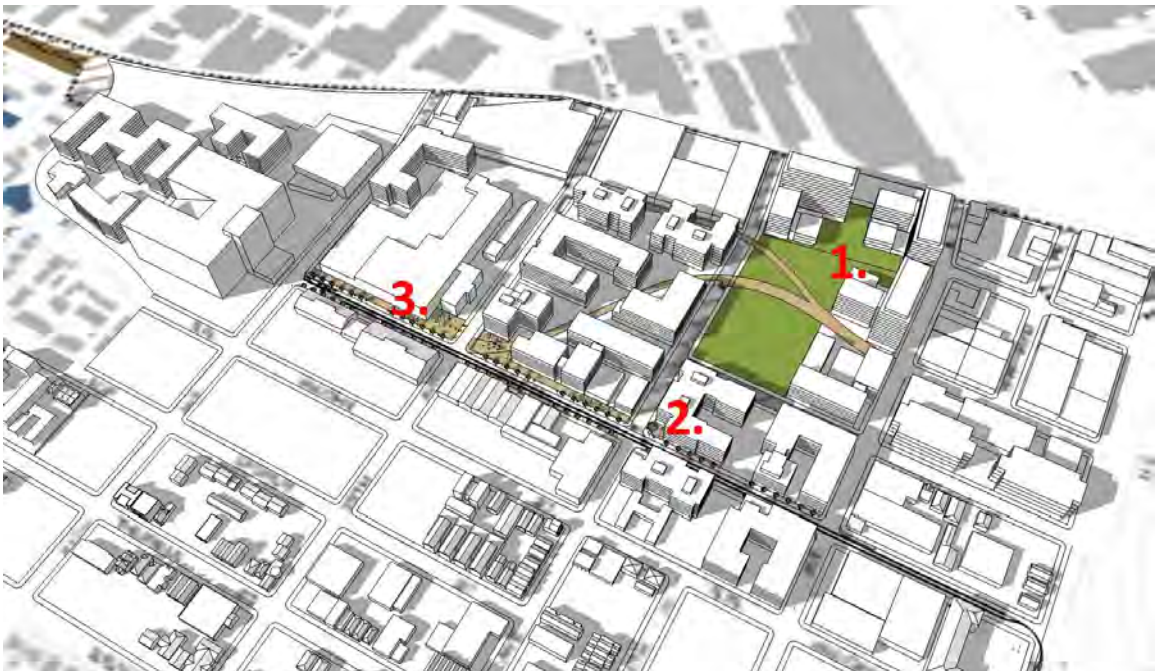


Streetcar in Wilson St

## Urban Design

- **Affordability:** preserve the affordable and imageable areas south of Wilson and east of 24th;
- **New Streets:** preserve the existing parcels and rail right-of-way, overlaying a new typical street grid only as needed;
- **Site Specific Heritage:** create a particular and unique urban environment that reflects its site-specific heritage, character and potential, and create the regulatory tools to facilitate that vision, not necessarily tied to today's conception of zoning regulation.

1. Allow additional height above 75' only at the perimeter properties north of York St. to conserve sun access to the areas to the south;
2. Preserve the existing 'old tree' at the 25th and Wilson gateway;
3. Create linear public square in an extended setback on the north side of Wilson Street from 27<sup>th</sup> to 25<sup>th</sup> to match the setback at the American Can Company building.



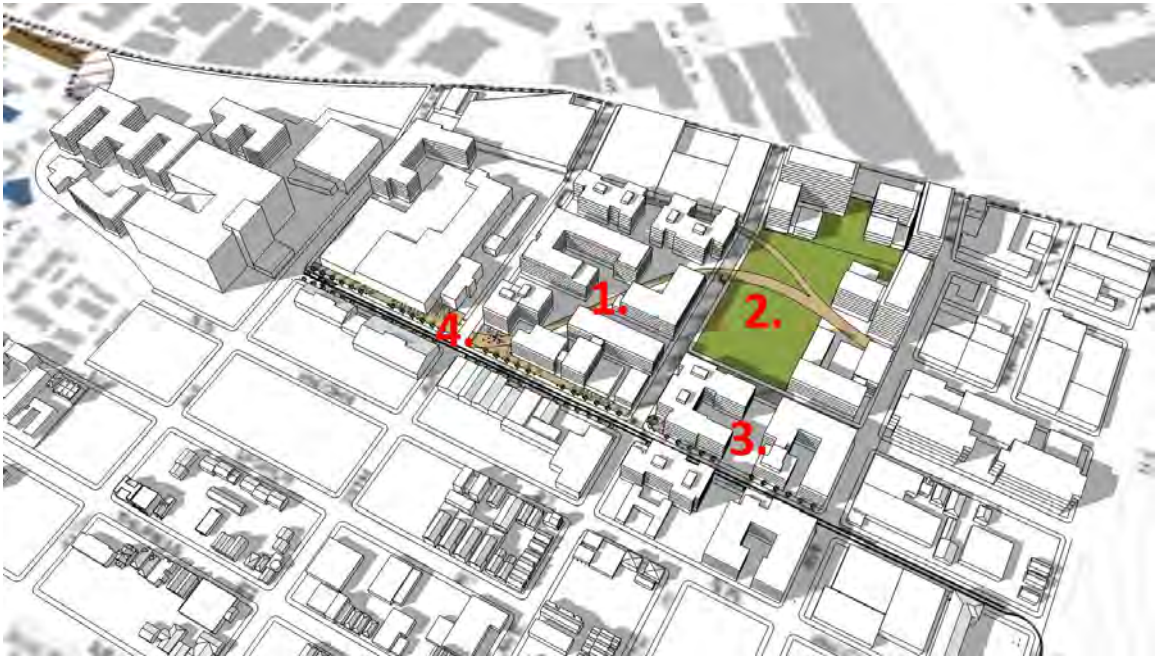
Vision Diagram – Urban Design



25<sup>th</sup> and Wilson 'old tree' gateway

## Parks and Open Space

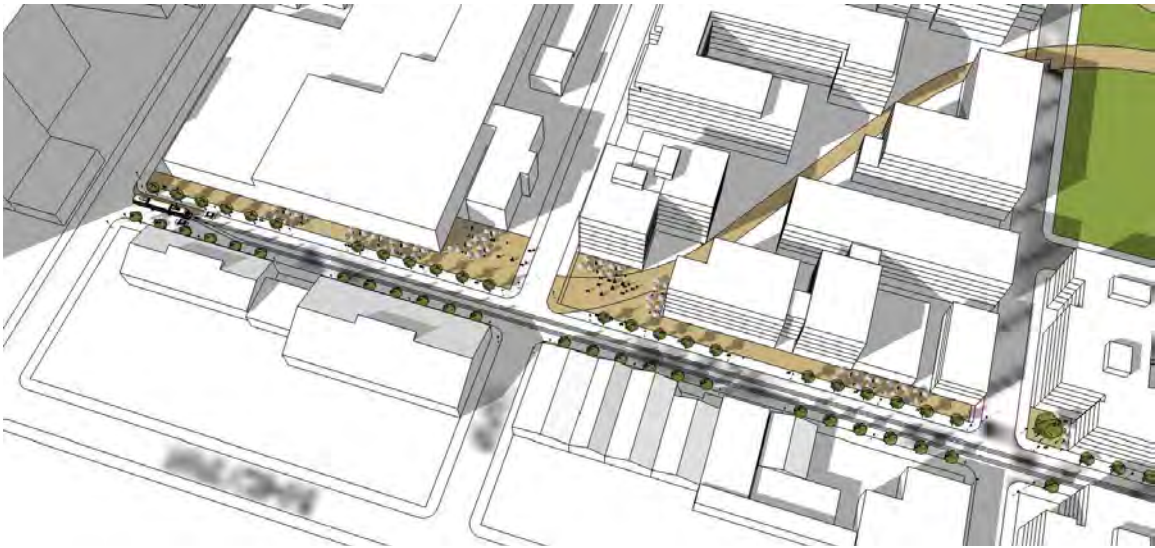
- **Network of Open Space:** create a system of interlinked publicly-owned open spaces, including the street envelopes and viable, meaningful, full use parks and public squares. Avoid 'plazas' and privately-owned and controlled open spaces;
  1. Preserve the existing rail right of way and use as public passage element to connect and leverage adjacent 'private' open spaces;
  2. Create publicly funded and accessible park located adjacent to the densest housing uses;
  3. Coordinate and organize 'private' open spaces to connect with and reinforce each other;
  4. Create a strong public spine along Wilson Street, reinforcing the visual corridor with the Montgomery Park building to the west and the Fremont bridge to the east, and connecting the Montgomery Park Transit Hub with the 'old tree' gateway square.



Vision Diagram – Parks and Open Space



Rail Right of Way Passage



*Wilson Street Square*



*Wilson Street at the American Can Company*



*Wilson Street visual corridor from Montgomery Park*



## Process

1. Amend the NW District Plan to provide an updated policy framework for public actions in the study area;
2. Create a Master Plan area and development agreement in the proposed Vaughn-Nicolai Plan District in lieu of the Planned Development provision;
3. Identify the Master Plan area as the ESCO Redevelopment Subarea, and as a requirement of any proposed zone change.

Best Regards,  
Northwest District Association



Greg Theisen  
*Chair, Planning Committee, NW District Association*



Steve Pinger  
*Member, Planning Committee, NW District Association*