



Northwest District Association

June 29, 2023

City of Portland Bureau of Transportation
Attn: Shawn Canney, Transportation Planner

City of Portland Bureau of Planning and Sustainability
Attn: Barry Manning, Senior Planner

Via electronic mail

RE: Proposed Montgomery Park Streetcar Extension (MP2H)

Shawn, Barry et al:

By Resolution: the NW District Association is forwarding comments and recommendations below regarding the presentation made to our Planning Committee on June 1, 2023 on the current status of the MP2H proposed streetcar extension. It includes responses to PBoT replies to several questions that the NWDA had requested be addressed at the June 1 meeting.

To the June 1 PBoT/BPS Presentation:

Goals

- Assess the characteristics of the former ESCO site, the Montgomery Park holdings, and the adjacent properties in the MP2H Study area;
- Define the desired future use of the area, although that use may be a form of mixed-use that does not have a precedent;

Comments, Findings, Observations

- The proposed streetcar extension appears to be leading this planning process for this area rather than following it;
- Outreach efforts to date have tended to be seeking buy-in more than input;
- PBoT responses to NWDA comments have tended to reiterate the original positions that input was being offered to; more answering than listening;
- NIBA is not supporting the changes to zoning required to make the streetcar expansion feasible because of its impact on land values, industrial uses and their attendant median-wage jobs and diverse employment characteristics;
- The Montgomery Park Master Plan is not dependent on the streetcar extension;
- The ESCO properties redevelopment is not dependent on the streetcar extension;

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- The proposed routing on NW 23rd Ave. will not remove curb parking, but may require loss of parking due to stormwater structures. Storm drainage swales are not appropriate on the 23rd Ave. Main Street;
- The extension would involve the creation of a Local Improvement District, LID, for funding a portion of the project. The portion of the project cost to be funded through the LID has not been identified, but has been ~14% in previous streetcar projects;
- A 'Streetcar Coalition' was formed in 2019 of property owners adjacent to the previous route north from NW 18th/19th, presumably in support of LID funding.;
- It is unclear whether the current route proposed north on 23rd Ave. from Northrup has the support of the adjacent property owners for participation in a LID, especially after the multiple impacts of COVID 19 and civil unrest on retail viability;
- There is a concern that the proposed streetcar extension would benefit primarily the large property holders north of Vaughn, and, hence, they should be responsible for the extension's cost;
- The urban design concept that has been used appears to be based on the South Waterfront model, which is explicitly not the desired outcome;
 - the area is to be conceived of as a *Complete Neighborhood*, with a diverse, viable retail main street;
 - because it has been conceived of primarily as an extension of the streetcar system, it proposes a one-way couplet and special-use street profiles that would not have been considered otherwise;
 - and while the proposed one-way couplet is great for operating streetcars on, it's not so great for creating viable main streets;
 - the new main street wants to focus retail activity into a continuous critical mass on one street, and not have it spread out on two or more streets;
 - and removing curb parking for bike lanes has an impact that is hard on retail viability.
- The MP2H study area is different from the Con-Way Master Plan area in that the latter did not involve a zone change, but rather the re-distribution of developable floor area to create significant open spaces throughout the area;
- The proposed zone changes would be an enormous windfall to property owners;
- The proposed zone changes are not being initiated by hardship needs;
- The program of proposed 'public benefits' to justify the zoning changes now includes a.) an on-site jobs target, b.) early-on affordable housing, and c.) wealth building for underserved communities. How these programs might be structured has not been identified, but the affordable housing acceleration is presumably due to large IH offset fees from recent downtown projects.
- There is a broad concern that this version of 'public benefits' will become an additional regulatory burden, imposed at a time when long-time Portland developers are no longer willing to work in the City because of the regulatory environment;

- The current performance of the Inclusionary Housing programs needs to be assessed before applying them further in the study area;
- The primary public benefit that is needed is the creation of a network of open spaces, not “one 1 acre park”;
- The structure of the attendant development agreement has not been identified, but it appears that the timeline is now being driven by it being adopted before the changes in governmental structure due in 2024.

Recommendations

- Separate the streetcar extension from the needed planning process for the area;
- Put aside previous development models;
- Thoroughly explore the specific, leverageable characteristics of the area, see NWDA Discussion Draft Comments, April 2022.

From the June 1 PBoT Presentation:

What we heard in past engagement

- The project should consider various travel modes, including bicycles and pedestrians, while respecting current mode split and preserving on street parking.
- The NW in Motion plan calls for reconstruction of NW 23rd Avenue, which received robust community support. Local stakeholders have been advocating for a rebuild of NW 23rd for years.
- Development should focus on good lighting, inviting transit stops, and placemaking through effective station integration.
- Design should improve safety and minimize conflict between modes.
- The streetcar extension could decrease area traffic/relieve parking problems and make it easier for some people to get to work.
- The project should respect the cultural and historical significance of this area.

Responses to NWDA Transportation Comments

- **Real Mode Splits: Provide sufficient transportation infrastructure that, while supportive of access, diversity, and modal split goals, is based on the current reality of mode choices.**

PBoT Response: Current designs consider both long-term policy goals in VMT reduction and mode shift while supporting multimodal access and movement. Parking is maintained as much as possible, and on-street parking will be added on new streets.

- **Streetcar Routing: Align, if implemented, to an adopted urban design scheme, rather than it being the de facto generator of one.**

PBoT Response: *The alignment supports the 2003 Northwest District Plan Urban Design Concept. NW 23rd Avenue is a main street that supports mixed use development, and current land uses will be preserved south of Vaughn. Current land use proposals consider changes focused only north of Vaughn, and urban design direction was explored in the development of the MP2H draft and is the topic of BPS's current community engagement. NW 23rd is a Major Transit Priority Street in the City's TSP.*

NWDA: The NWDA's consistent view of this proposal since 2017 is that an extension of the streetcar should be considered only as a result a typical area planning process, in this case the result of an update of the NW District Plan. It has appeared for the last six years that the streetcar extension has led the process, not followed it; this is backwards. Please see the NWDA May 28 2019 letter re: NW Streetcar and Land Use Alternatives Analysis comments, attached. The MP2H 'Urban Design Concepts', issued in June 2020, offered no analysis of the existing characteristics and character of the area, and was largely seen as applying an inappropriate template from elsewhere to an area without performing the typical detailed assessment of what is already there, and is unique, leverageable, and in need of preservation. It is not surprising that BPS is now convening an 'Urban Design Character Workshop', but now may be a few years late.

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.**

PBoT Response: *NW Roosevelt and NW Wilson would go through the ESCO area as one-way streets. The design is intended to minimize impacts of increased traffic long-term through an internal street network that can be efficient, safe, minimize conflicts as well as ensuring that the streetcar covers the loop in a fast and reliable way.*

NWDA: the PBoT response above is simply reiterating the original proposal that the NWDA's comments were addressing; one-way streets and special purpose street profiles, including protected bike lanes next to streetcar tracks, do not support the creation of a viable main street essential to the success of the creation of a 'Complete Neighborhood'. The NWDA opposes the 'South Waterfront' model being applied in this area, and believes the specific opportunity here is to create a forward-looking development model, based on different relationships of land uses that will require a different view to the transportation hierarchy, more flexible streets, and bikeways actually on separate RoWs. Please see the Open Space and Street Hierarchy diagrams in the NWDA MP2H Discussion Draft Comments.

2. **Separate bikeways and routes from streetcar streets; they are incompatible.**

PBoT Response: Proposed bike facilities on streetcar streets are protected and separated from streetcar movement. These bike lanes will help complete the all-ages and abilities bike network from downtown to Montgomery Park.

NWDA: see above. There are many ways of completing the all ages all abilities bike networks from NW 24th and NW York (and NW 27th) without placing them on a street with streetcar service.

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 Avenue as part of a transit hub with the adjacent bus line.**

PBoT Response: These are both planned. Streetcar will be routed in the ROW on Wilson, and the north side of Wilson between NW 26th Avenue and NW 27th Avenue will include a terminus Streetcar Station, and we are coordinating with TriMet on room for buses on that side of that segment, as well.

NWDA: The current proposal shows the streetcar terminating a block away from NW 27th. It is the segment between 26th and 27th, specifically, where the NWDA opposes utilizing the private setback north of the public RoW. This setback could be far better utilized as a part of an open space system, as shown in the Montgomery Park Master Plan. It is unclear what is being coordinated with TriMet; the existing bus service is on NW 27th. Is moving the bus routing to Wilson St. being proposed?

Best Regards,
Northwest District Association



Greg Theisen
Chair, Planning Committee, NW District Association