



18 November 2024

RE: Recommended amendments for Montgomery Park Area Plan (MPAP)

The Working Waterfront Coalition (WWC), Columbia River Corridor Association (CCA), the Northwest Industrial Business Association (NIBA) and Swan Island Business Association (SIBA) have serious concerns about the negative effects of the *Montgomery Park Area Plan (MPAP) Proposed Draft*. We also support the concerns and recommendations from the Northwest District Association (NWDA).

To address some these concerns, we have the following recommendations for plan amendments. Please let us know if you have interest in championing any amendments. We look forward to working with you. Contact Corky@ColumbiaCorridor.org and Tanya.Hartnett@WorkingWaterfrontPortland.org.

Finance

We question whether the Trump administration will approve federal funding for streetcars in Portland that will result in a loss of industrial jobs.

- 1. In order to avoid using an estimated \$136 million in city flexible funds, we recommend an amendment that requires 65% federal funding for the project.**

There is no funding plan for maintenance of the additional streetcar tracks, electronic systems, and purchase of new streetcars.

- 2. In order to avoid adding to our \$4 billion transportation maintenance backlog, we recommend creating a maintenance fund specifically for maintenance of project elements (streetcar tracks, electronics and cars). For precedence, refer to PBOT's sinking fund for parking meters.**

Job Equity

We previously recommended a mitigation fund for industrial land, thus ensuring middle wage jobs with high percentages of BIPOC and non-four-year degree holders. BPS has chosen to use a contorted alternative that includes the need for job audits and undocumented assumptions of equity. We appreciate that BPS is acknowledging the job equity problem and is attempting to mitigate for it. Their system will need additional effort to monitor.

- 3. Assure the job audits will be done.**
- 4. Job equity (wage, race, education level) should be a critical factor, not a talking point. In order to check BPS equity assumptions, survey employees for racial**

percentages. We have found such surveys to be potentially flawed but still relatively accurate.

5. **Audit job sources. Did the job move from downtown/central eastside? Is it a new job to the city?**

Benefits

As noted by the NWDA, there is inadequate public space in the plan.

6. **We recommend the project bring a higher-than-average amount of dedicated public parks, open space and other elements of public infrastructure.**

Part of what makes industrial areas successful is a healthy freight street system. As the residential area is moving north, the need to establish a robust buffer and protect freight movement increases. One way to do this is to follow cities such as Amsterdam by creating freight-only roads. It would have the added benefit of reinforcing a buffer between residential and industrial areas. It would not be a simple task, but we stand ready to assist with the effort.

7. **We recommend designating NW Nicolai as a freight-only road. Details can be developed over the coming months.**

The NWDA is correct in its analysis of the streetcar route. In addition, we call your attention to the fact that the streetcar routes between NW 23rd and NW 24th will preclude use of many of the existing loading docks.

8. **We recommend relocation assistance for tenants that are forced out of the district due to streetcar alignment.**

With amendments, we feel the Montgomery Park Area Plan can reasonably mitigate for inherent problems. Please contact us with any questions or interest in the amendments.

[Tanya Hartnett](#)

Executive Director

Working Waterfront Coalition

503.381.6713

[Corky Collier](#)

Executive Director

Columbia Corridor Association

Swan Island Business Assoc.

503.241.1888

[Chris Crever](#)

President

Northwest Industrial

Business Association

503.228.2048