

Testifier	Organization	Date	Comment Origin	Video Timestamp	Video URL	Complete Video URL
Olsen, Kirk		4/20/2016	Hearing	0:09:40	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=9m40s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=9m40s</a>
Carroll, Bob		4/20/2016	Hearing	0:11:27	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=11m27s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=11m27s</a>
Sallinger, Bob		4/20/2016	Hearing	0:12:42	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=12m42s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=12m42s</a>
Barnes, Brenda		4/20/2016	Hearing	0:15:45	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=15m45s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=15m45s</a>
Krawczuk, Dana		4/20/2016	Hearing	0:17:25	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=17m25s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=17m25s</a>
DeRidder, Tamara		4/20/2016	Hearing	0:19:30	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=19m30s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=19m30s</a>
Hovee, Eric		4/20/2016	Hearing	2:21:36	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6</a>	<a href="https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=141m36s">https://www.youtube.com/watch?v=fH0BZye8hXA&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=6&amp;t=141m36s</a>
Wax, Ellen		4/14/2016	Hearing	0:18:12	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=18m12s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=18m12s</a>
Iverson-Summer, Patti		4/14/2016	Hearing	0:19:16	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=19m16s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=19m16s</a>
Mathers, Rob		4/14/2016	Hearing	0:22:20	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=22m20s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=22m20s</a>
Theisen, Greg		4/14/2016	Hearing	0:23:44	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=23m44s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=23m44s</a>
Whitlow, Mark		4/14/2016	Hearing	2:24:03	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=144m03s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=144m03s</a>
Hovee, Eric		4/14/2016	Hearing	2:32:00	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=152m00s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=152m00s</a>
Ahrend, Brent		4/14/2016	Hearing	2:34:10	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8</a>	<a href="https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=154m10s">https://www.youtube.com/watch?v=as5tJHBLSnE&amp;list=PL4m94ICOY10kcH-ufAjNih1ntEICEIA4_&amp;index=8&amp;t=154m10s</a>

April 20, 2016

Mayor Charlie Hales  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Steve Novick  
Commissioner Dan Salzman  
City of Portland  
1221 SW 4th Avenue, Room 110  
Portland, OR 97204

#### Portland Comprehensive Plan Amendment M34

Riverside Golf and Country Club would like to offer additional comments on the Draft Portland Comprehensive Plan. We most appreciate your considering amendment M34 which removes the Industrial Sanctuary designation from Riverside and restores the Open Space designation. We don't believe it is realistic to designate Riverside as future industrial.

We have provided material and testimony in the past that:

1. Riverside plans on continuing to operate as a golf course for a very long time. We don't have any desire to change our great facility and we are operating successfully. Our Board has taken a strong position in opposition to an industrial designation.
2. We have asserted that an industrial designation hurts our business operation. We have regular turnover in our membership which means we are marketing to new potential members. We compete with other area courses such as Columbia Edgewater and other courses in the Portland-Vancouver area. When members choose to join, they are often considering whether their children or grandchildren might be able to join in the future. We have already heard of other courses talking about Riverside "being converted to warehouses", "being rezoned by the City" or the "City taking us over."
3. We provided material that shows that while the golf industry has contracted approximately 15%, it is by no means going away. This is especially true for a well-located course such as Riverside with a growing population base and strong neighborhoods. Riverside's membership based business model differentiates us from pay per play public use courses.
4. At the moment, our membership has substantially recovered from the recession area levels, but we must continue to market and earn new customers.

We object to the staff of BES apparent willingness to oppose M33 and not consider impacts on Riverside.

With the recent attention on natural resource attributes of Broadmoor, we believe it's worth considering Riverside's contributions also. In looking at the three golf course areas (Broadmoor, Riverside and Columbia Edgewater), there is quite a large area that is open space. Figure 1 illustrates these three areas. Figure 2 shows these three areas and illustrates the general movement of wildlife between these areas. On the ground this movement is quite noticeable.

In looking at the Figure 3, amendments M33 and M34 are illustrated. One of the aspects of the Riverside open space in amendment M34 is that it would not sever this wildlife connectivity.

 **Riverside** GOLF AND COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE: (503) 288-6468 FAX: (503) 282-1383

Another resource impact comparison between the two amendments is that the number of trees is quite different between the two parcels. These are

Riverside M34 Area: 881 potentially lost trees

Broadmoor M33 Area: 97 potentially lost trees

What this suggests is that while there are natural resource impacts from both actions, the Riverside impacts are not insignificant. The Riverside amendment M34 preserves the wildlife corridor and a huge number of trees.

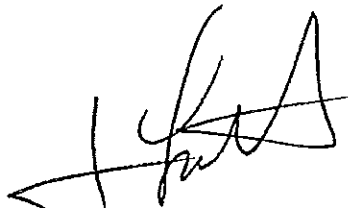
Given Riverside's repeated objection to the industrial designation and our stated plans to not convert our property to industrial use, we believe that the City is not in compliance with Goal 9; and that a decision relying upon Riverside as industrial land would not be supported by substantial evidence.

We would request that Council support the Riverside M34 amendment and preserve this open space.

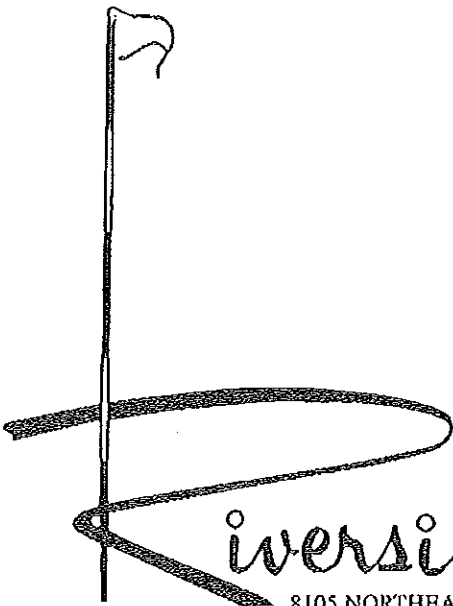
Sincerely,



Lucas Miller, General Manager



Jim Daubenthal, Member



Riverside

GOLF AND COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE: (503) 288-6468 FAX: (503) 282-1383

## Arevalo, Nora

---

**From:** Moore-Love, Karla  
**Sent:** Friday, April 22, 2016 3:12 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: Addendum to 4/14/16 written testimony:

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**From:** Alice Blatt [mailto:[aliceb@pacifier.com](mailto:aliceb@pacifier.com)]  
**Sent:** Wednesday, April 20, 2016 4:38 PM  
**To:** Moore-Love, Karla <[Karla.Moore-Love@portlandoregon.gov](mailto:Karla.Moore-Love@portlandoregon.gov)>  
**Cc:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>; Commissioner Saltzman <[dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)>; Commissioner Fish <[nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)>; Commissioner Fritz <[amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)>; Commissioner Novick <[novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)>  
**Subject:** Addendum to 4/14/16 written testimony:

Alice Blatt

15231 NE Holladay

Portland, OR 97230

Acknowledging my failure to fully understand the March 2016 EOA, if in fact the city has more than enough industrial land capacity for job growth (surplus capacity of 71 acres), I would urge retaining at least part of the Riverside Golf Course (altering M34) as open space, as well as returning 57 acres of Broadmoor (M33) to open space.

**Arevalo, Nora**

---

**From:** Vogel, Stephanie (Perkins Coie) <SVogel@perkinscoie.com> on behalf of Whitlow, Mark (Perkins Coie) <MWhitlow@perkinscoie.com>  
**Sent:** Friday, April 22, 2016 1:48 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Engstrom, Eric; Armstrong, Tom; Kountz, Steve; Bump, Tyler; Grumm, Matt; Dunphy, Jamie; 'Gary Oxley'; Eric Hovee; 'jangel@pacificstar.biz'; Bob LeFeber; Brent Ahrend; Whitlow, Mark (Perkins Coie); Vogel, Stephanie (Perkins Coie)  
**Subject:** 2035 Comprehensive Plan - Mixed Use Zones Testimony  
**Attachments:** 22042016[Filename].pdf; Pattern Area Retail Demand & Sales Analysis (Response to BPS 4-22-16).pdf; RLL Letter on Retail Policy 04.22.16.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please see attached testimony to be made a part of the record. Thank you.

**Mark D. Whitlow | Perkins Coie LLP**  
1120 N.W. Couch Street  
Tenth Floor  
Portland, OR 97209-4128  
PHONE: 503.727.2073  
FAX: 503.346.2073  
E-MAIL: MWhitlow@perkinscoie.com



Selected as 2014 "Law Firm of the Year"  
in Litigation - Land Use & Zoning by  
*U.S. News – Best Lawyers® "Best Law Firms"*

---

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

April 22, 2016

VIA EMAIL

[cpustestimony@portlandoregon.gov](mailto:cpustestimony@portlandoregon.gov)

Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 97204

**Re: 2035 Comprehensive Plan - Mixed Use Zones; RTF/ICSC Response to BPS  
Memorandum to Mayor Hales and City Council dated April 19, 2016**

Dear Mayor Hales and Council Members:

This letter is submitted on behalf of the Retail task Force (RTF) and the International Council of Shopping Centers (ICSC) regarding the above. Please make this letter and its attachment a part of the hearing record for supporting testimony.

We forward the response prepared by Eric Hovee of E.D. Hovee & Company to respond to the BPS Memorandum to Mayor Hales and City Council of April 19, 2016, together with the supporting letter from Robert LeFeber of CRA dated April 22, 2016.

Respectfully submitted,



Mark D. Whitlow

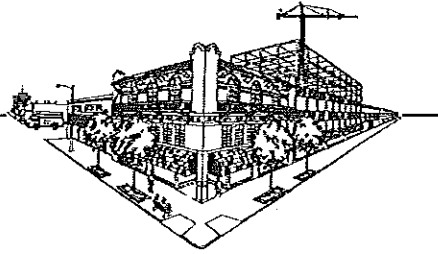
MDW:sv

Enclosures

cc: Eric Engstrom (w/encls.)  
Tom Armstrong (w/encls.)  
Steve Koutz (w/encls.)  
Tyler Bump (w/encls.)  
Matt Grumm (w/encls.)  
Jamie Dunphy (w/encls.)  
Gary Oxley (w/encls.)  
Eric Hovee (w/encls.)  
Joseph Angel (w/encls.)  
Robert LeFeber (w/encls.)  
Brent Ahrend (w/encls.)

# E. D. Hovee & Company, LLC

Economic and Development Services



## MEMORANDUM

---

To: Mayor Hales and City Council  
From: Eric Hovee - Principal  
Subject: Portland and Pattern Area Retail Demand and Sales Analysis  
Date: April 22, 2016

---

On April 14 and 20, I provided testimony to the City Council supporting Comprehensive Plan policies related to retail development (P60), a full spectrum of grocery stores (P44), and development regulations that transition over time (P51). By memorandum dated April 19, BPS staff responded to material I submitted at the initial April 14 City Council hearing titled *Retail Performance by Pattern Area* (as a draft document initially prepared January 14, 2016).

The purpose of this memorandum is to respond to the BPS analysis with supplemental discussion which is requested to be made part of the open record. The April 19 BPS memo makes two overall points summarized with our response as follows:

- 1) **BPS staff does not think there is a need to amend the Economic Opportunities Analysis (EOA) to address retail capacity issues raised in testimony of Mark Whitlow and Eric Hovee on April 14 on behalf of the Retail Task Force (RTF) and International Council of Shopping Centers (ICSC).**

Response: While we raised the need for EOA revisions in earlier discussions with BPS, we have not made this request in oral testimony to the City Council as policy revisions (item #2) represent the greater RTF/ICSC priority for Council support. However, we ask that the written record include a request for Council consideration of substantive but minimal retail-related revisions to the EOA (per the Appendix to this memorandum).<sup>1</sup>

- 2) **BPS supports amending or adding policies to the Comprehensive Plan in support of retail development, especially grocery stores – but takes exception to our supporting retail analysis.**

Response: These policies have been requested by Commissioner Saltzman and are supported as part of the BPS staff recommendation which is most appreciated. However, we would also take this opportunity to respond to specific concerns raised by the BPS memorandum.

The remainder of this memo provides additional detail regarding these two items.

---

P.O. Box 225 • Vancouver, WA 98666  
(360) 696-9870 • (503) 230-1414 • Fax (360) 696-8453  
E-mail: edhovee@edhovee.com

# 1) AMENDING THE EOA

Reasons for requesting EOA amendments as manner proposed by the Appendix are three-fold:

- a) **To establish the most succinct, yet clear linkage between supporting Comp Plan documentation and resulting retail-related policies as currently proposed** – better assuring compliance with state Goal 9 requirements. Mark Whitlow has submitted testimony expressing the concern that rezoning away from general commercial (CG) will greatly reduce the supply of sites suitable for auto-accommodating retail, which is untenable when more 80% of trips outside the Central City are still made by automobile. For example, the City is required to include findings explaining how new proposed site development restrictions, such as those imposed with the Centers Main Street Overlay (CMSO), will not adversely impact its Goal 9 inventory. A related concern is that new site development constraints (as with the Mixed Use Zones proposal) will further undermine the buildable land/commercial supply analysis in the EOA. Commercially designated lands that currently support larger-format and value-oriented neighborhood commercial uses and drive-through facilities may no longer serve this function if proposed site development standards will prove either too physically constraining or too expensive for many lower-margin businesses – including grocery stores – to be feasibly sustainable. In effect, the City is proposing new and stringent site development standards that seriously limit the ability to the full range of neighborhood commercial uses – but without analyzing how such site development standards impact Portland’s new effective inventory of commercial land. In the absence of a revised inventory or appropriate policy guidance, the EOA appears vulnerable to falling short of the requirement that the plan accommodate “the widest range of retail” as defined by OAR 660-009-005(6).<sup>2</sup>
- b) **To reference more detailed retail analysis than has been included with the EOA** – the initial preparation of which dates to 2009. Of particular importance is the need to evaluate retail sales and leakage patterns by geographic (or “pattern areas”) of the city – as now proposed with Mixed Use Zones Project that will be considered by City Council following Comp Plan adoption – but not envisioned at the time the EOA retail analysis was conducted. Also relevant is the request to reference subsequent analysis for PDC indicating a “lack of available sites” for grocery stores. While it can be methodologically challenging to distinguish short term from long-term availability, this is an issue that nonetheless warrants Goal 9 consideration per OAR 660-009-0025(7).
- c) **To occur concurrently with other EOA revisions being requested by BPS** – while avoiding the need to have the EOA revised or amended in more comprehensive fashion. The relatively minor but substantive retail revisions being requested are consistent with though less significant than the EOA revisions being made by BPS to amend the Harbor forecast. Our understanding is that while BPS would prefer to minimize EOA revisions, these requested retail-specific additions could readily be made if so directed by City Council.



There are at least two ways of addressing questions related to adequacy of the current EOA. One option would be delay Comp Plan adoption pending revision of the existing buildable land inventory to more directly assess supply suitable for grocery and other large format uses vis-à-vis the proposed new mixed use zones. A second option is to proceed with Comp Plan adoption as now proposed – but with policies and EOA inclusions that provide clear guidance for subsequent implementation actions including Mixed Use Zone consideration. This second option meets with RTF/ICSC concurrence subject to appropriate policy and EOA safeguards.

## 2) RETAIL LEAKAGE

There are a number of concerns related to our retail analysis that BPS raises with its April 19 memorandum that can be addressed point-by-point. Before proceeding with this detailed discussion, it is important to first highlight a pivotal area of agreement between the retail analyses provided both by our firm and BPS, namely that:

*Both the BPS and Hovee analyses agree that there is grocery sales leakage when considered on a city-wide basis as well as for the east, west and inner pattern areas of the City. Because we use different data sources, estimates of the degree to which these pattern areas are under-retailed vary – but there is virtual 100% alignment on which areas of the City are underserved. This common finding provides clear empirical support for the retail policies that have been recommended by BPS and which we support for Council adoption (P44, P51, and P60)*

We now proceed to consider some of the areas of BPS concern in more detail.

**Different Data Sources.** For this analysis, we have used the two of the most prominent private demographic and retail sales leakage data sources in the country:

- **BPS utilized ESRI** – a firm best known for its geographic information system (GIS) software but which has become an important provider of location-specific demographic and economic data.
- **EDH utilized Nielsen** – a firm perhaps best known at one time for television ratings but now (with the acquisition of Claritas) is a significant provider of customized market data.

As with many private proprietary data bases, the internal economic modeling mechanics of ESRI and Nielsen are essentially a *black box* system, with specific modeling formulations not readily divulged. Both firms are somewhat more clear about the data sources and both appear to draw from similar sources of data. As defined by Nielsen (with data sets as we have provided to BPS):

Nielsen's Retail Market Power data is derived from two major sources of information. The demand data is derived from the Consumer Expenditure Survey (CE Survey, or CEX), which is fielded by the U.S. Bureau of Labor Statistics (BLS). The supply data is derived from the Census of Retail Trade (CRT), which is made available by the U.S. Census. Additional data sources are incorporated to create both supply and demand estimates.

More detailed statements of Nielsen demographic and retail analytics are provided by the web site: <http://www.tetrad.com/demographics/usa/nielsen/>.

Areas of potential divergence are that ESRI appears to place more reliance on Dun and Bradstreet business information than Nielsen while Nielsen appears to place greater reliance on American Community Survey (ACS) data of the U.S. Census Bureau for estimating household income.

In any event, Nielsen estimates in-city consumer demand (and household incomes) to be higher than what ESRI estimates, while ESRI indicates actual spending in Portland to be higher than what is indicated by Nielsen modeling.

If BPS is interested, we would be prepared to cooperate in a more detailed review of the data sources and methodologies used by both of these national data providers. In the absence of what might be a considerable research project, an alternative approach is to use the two retail analyses to bracket the likely range of potential retail performance and sales leakage in Portland. This is the approach taken with this memorandum.

**Overall Sales Leakage or Surplus?** While both ESRI and Nielsen agree that Portland experiences sales leakage in grocery, there is disagreement between the data two sources as to whether Portland experiences net sales leakage or surplus when considered for *all retail store types* combined. Nielsen data indicates net leakage for all retail of 9% while BPS-cited ESRI figures indicate a net surplus of 10%.

Our initial draft working paper on Retail Performance by Pattern Area (of 1-14-16) cited just the Nielsen figure, as we did not have the counterpart BPS-ESRI data at that time. Based on the combined sources, it is reasonable to say that while it is not clear whether Portland experiences overall net sales leakage or surplus, the City appears to be roughly in balance (with a range of about +/- 10%).

**Additional Sales/Leakage Caveats.** Two additional items are of note:

- Based on what we see with data in hand at this time, it also appears to be the case that any net positive retail contributions may be attributable primarily to Portland's Central City area where sales far exceed what the Central City's residential population alone supports. Based on Nielsen data, the other pattern areas of the city show overall sales leakage not just for grocery but for other retail sales categories. It would be helpful if BPS were to provide the data to confirm whether this is the case or not with ESRI data, as well. *Note:* BPS has provided leakage data by pattern area for grocery retail but does not provide this level of geographic detail for all retail store types combined (with its April 19 memo).
- Our retail performance analysis indicates that about 18% of retail sales (especially large format) activity city-wide occurs outside of BPS defined pattern areas – primarily at Hayden Island/Meadows and Cascade Station. For total comparability, it would be

useful for BPS to provide ESRI estimates for this *outside of pattern area* geography – or indicate how these otherwise unaccounted for in-city retail sales have been allocated.

**Vacancy Rates & Rents.** BPS analysis suggests that our findings of a higher vacancy rate and lower rents in East Portland are an indicator of retail space availability – also that something other than zoning capacity/land development is at work – most likely insufficient demand and business support. BPS further asserts that rather than rezoning more land for commercial retail, the solution is to “support business growth through programs like PDC’s Neighborhood Prosperity Initiative.”

The BPS analysis appears to overlook three critical items:

- There is more East Portland demand than supply evidenced by apparent sales leakage. With grocery, the deficiency is met in part by residents traveling elsewhere out-of-distance to shop and by spending more at the nearby but less healthy convenience store alternative.
- With lower East Portland incomes, unmet demand is evident but is not being adequately addressed by retailers operating at lower price points with discount stores or entrepreneurial startups that require lower cost space, operating at narrow profit margins. Design requirements that can be afforded in higher income, higher cost locales (as with the inner area) render development infeasible when development requirements and associated costs exceed what low rental rates will support.
- PDC programs tend to be limited in scope, eligibility and funding availability. If these resources are to be viewed as a city-wide mechanism to fill the financial feasibility gap for grocery and other retail, further financial analysis should be provided with the EOA or other BPS analysis to demonstrate adequacy of resources required over the 20-year time horizon of the proposed Comprehensive Plan.

In effect, the issue appears not to be one primarily of demand or even available financial incentives, but of supply. Zoning and associated development regulations do directly affect the supply of sites sized to the market with design standards and associated costs that either meet or exceed what area rents will support. For East Portland, addressing the pricing aspect of supply will prove instrumental to better taking care of unmet resident demand both in the near term and over the 20-year horizon of the Comprehensive Plan.

**Food Deserts.** We would concur with much of the BPS discussion regarding difficulties faced by West Portland grocers due to topographical constraints. Resolving this will require much different approaches than in East Portland. Redevelopment with SW corridor high capacity transit may afford new opportunities but with recognition of continued need for auto accessibility for residents located away from major arterials on streets best accessed by car.

The grocery map for parts of Inner and East Portland indicate grocery gaps that extend beyond the Parkrose and 122<sup>nd</sup>/Foster areas – with additional coverage gaps extending beyond the 1+ mile walking distance – as in inner Southeast and east of 122<sup>nd</sup> Avenue. While reduced housing

density in East Portland may support less grocery retail than elsewhere in the city, further planning attention is suggested to better assure availability of adequately sized, auto-accommodating and competitively priced sites in these underserved submarkets of the city.

**Buildable Land Inventory.** Several responses to the BPS analysis are noted:

- The 2011 PDC/Leland study is most useful at addressing short-term land availability and suitability (or lack thereof) for consistency with OAR 660-009-0025 (7), topics which are not well covered by the EOA.
- Our firm was most directly involved with the buildable land inventory (BLI) with the initial EOA draft in 2009, less so with the 2012 EOA as adopted by City Council, and not at all with subsequent revisions including the August 2015 and March 2016 drafts. It also should be noted for the record that none of the City's draft or adopted EOAs considered the wholesale conversion of all of the City's commercial land to mixed use, both in the proposed comprehensive plan text and map and, again, in the text of the proposed Mixed Use Zones zoning code and related zoning map.
- Of most significance is that the breakout of sites for pattern areas can be useful as a means of better evaluating realistic commercial development capacity with both this Comp Plan update and the Mixed Use Zones Project proposal. Of less utility is the April 19 BPS breakout which is limited to less than three acre versus more than three acre sites. Based on prior discussions with BPS, RTF/ICSC interest is most focused on 3-10 acre sites which are especially important for viable grocery development.

Our understanding of the current BLI is that 3-10 acre neighborhood commercial sites are in extremely limited supply, meaning that land shortages will need to be offset by parcelization of larger 10 – 50+ acre properties – if suitable and feasible. The BPS analysis would be far more useful if: a) the inventory would be disaggregated to separate 3-10 acre sites from other size classes; and b) the inventory in this size class and the larger size classes were mapped to better ascertain locational suitability for retail development near- and long-term.

## CONCLUSION

The following observations are offered by way of summary:

- RTF/ICSC may be in less disagreement about overall sales leakage than what the BPS report indicates. Given the two data sources now available, the range of retail performance city-wide could be anywhere +/- 10% net leakage or surplus – or roughly in balance.
- Of greater importance for the policy discussion, both Hovee and BPS analysis indicates that Portland experiences net grocery sales leakage that warrants appropriate Comprehensive Plan retail-focused policies – across all pattern areas except the Central City. And our understanding is that RTF/ICSC and BPS staff are both in support of policy amendments P44, P51 and P60.

- Council adoption of the above policies plus RTF/ICSC requested denial of adoption of P32 (regarding drive-through facilities as also pivotal to providing the widest range of retail possible) represent the highest priorities for RTF/ICSC. We also strongly urge City Council consideration of refining the EOA as outlined by the Appendix to this memorandum. This approach assures a better linkage between Comp Plan supporting documentation and policy, as data rather than policy-driven, and as representing a path that offers less risk of Goal 9 non-compliance.
- Whether now or subsequent to Comp Plan adoption (but prior to Mixed Use Zone adoption), we would urge BPS to refine and revise the buildable lands inventory as needed to better address proposed zoning changes and resulting retail suitability with transition from current general commercial to mixed use designations.

Bottom line, RTF/ICSC is prepared to work with the Council and BPS with final Comp Plan policy and ensuing inventory refinements with Mixed Use Zone discussions – together with on-going plan monitoring post-adoption.

Council and BPS considerations of this supplemental written testimony is most appreciated.

c: Mark Whitlow, Perkins Coie LLP

## APPENDIX. RETAIL-RELATED REVISIONS TO PORTLAND EOA (DRAFT 2-24-16)

As a result of meetings involving the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) with the City of Portland Bureau of Planning and Sustainability (BPS), policy revisions are proposed to strengthen Comprehensive Plan provisions to more clearly encourage grocery stores and retail development, especially in underserved areas of Portland. RTF/ICSC also recommends that the following minimal revisions be included with supporting documents of the City of Portland Economic Opportunities Analysis (EOA), August 2015 draft.

**EOA Section 1 Trends Opportunities and Market Factors.** The August 2015 EOA provides retail sales and leakage analysis based on now dated 2008 data at pages 60-67. Suggested for insertion (at page 62 of the Section 1 draft EOA document) is the following update paragraph:

Updated retail sales and leakage data (as of 2015) confirms initial 2008 EOA analysis that that Portland generally appears adequately retailed, when considered for all retail sectors combined. This is due in large part to the high retail volumes of the Central City attracting spending from both City and non-City residents. However, much of Portland outside the Central City area experiences significant sales leakage with retail sales not fully serving resident demand. 2015 retail sales data indicates that sales leakage is particularly pronounced for grocery stores, causing in-city residents to make longer trips outside of their immediate neighborhoods and even out of Portland to meet these daily needs.

**EOA Section 2/3 Employment Land Needs and Supply.** Page 39 of the existing Section 2/3 EOA document notes that: "As with the Town Centers geography, most of the Neighborhood Commercial capacity is in smaller, underutilized, redevelopable sites." Suggested clarification would read as follows:

The ability to reduce sales leakage and better serve neighborhood business needs may be particularly limited for store types that require larger sites – as with grocery – and in parts of the city where building rents are not adequate to support redevelopment. Also noted is that more recent analysis conducted for PDC (Leland 2011) indicates that a current "lack of available sites" makes it difficult to facilitate grocery store development in underserved areas.

**EOA Section 4 – Community Choices.** Introductory text to existing EOA discussion of Neighborhood Business Districts (EOA Section 4, page 29) describes the importance of these neighborhood business district geographies to the city. Either here or in conjunction with text related to the proposed policies regarding grocery stores and/or retail development, insert a new paragraph as follows:

**Serving unmet neighborhood retail and service needs.** With the exception of Portland's Central City area, retail needs generated by local residents are generally underserved, especially for grocery that often serves as a neighborhood business anchor use. Providing a diversity of goods and services that are convenient, affordable and accessible will better fulfill objectives of 20-minute neighborhoods, reduced auto use, healthy food choices and improved resident livability.

This listing of potential retail-related revisions to Portland EOA documentation has been prepared for the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) by the economic and development consulting firm E. D. Hovee & Company, LLC. For further information, contact firm principal Eric Hovee, phone: (503) 230-1414, email: [ehovee@edhovee.com](mailto:ehovee@edhovee.com), or website: [www.edhovee.com](http://www.edhovee.com).

## END NOTES

- <sup>1</sup> By email dated February 29, 2016, Mark Whitlow transmitted the 1-page of *Retail-Related Revisions to Portland EOA* (draft of 2-24-16) to Steve Kountz and Tom Armstrong with the request that “we would like to continue (our) conversation about the need to amend the EOA in a very minor way as proposed by Eric Hovee in the attachment. Please consider it, as we think it is an important factual base that should be in the EOA.”
- <sup>2</sup> As provided via email dated, April 6, 2016 from Mark Whitlow, Perkins Coie, LLP, to Tom Armstrong, BP: “... the City is required to include findings explaining how new proposed site development restrictions will not adversely impact its Goal 9 inventory. Such inventory must be preserved or expanded based on an Economic Opportunities Analysis (EOA) that identifies the characteristics and types of “other employment uses” (OAR 660-009-0015), which are defined to include “all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities.” OAR 660-009-005(6). In addition, the EOA must identify sites that are expected to accommodate employment growth based on the site characteristics typical of expected uses. OAR 660-009-0015(2). The resulting plan must base its inventory of employment lands, in part, on the site characteristics of the various employment uses expected to generate employment growth. OAR 660-009-0025. Stated plainly, the EOA must analyze the need for, and inventory of, “other employment” uses based on their particular site characteristics, and must provide for such sites in the resulting plan.

Goal 9, subparagraph 3, requires that the City’s inventory of suitable commercial sites be adequate not just in terms of total acreage, but also with regard to size, type, location, and service levels, to provide for a “variety of industrial and commercial uses consistent with the plan policies.” Where a City adopts site design and development regulations that limit the feasibility of commercial uses on such affected properties, the City is obligated to demonstrate how it remains in compliance with the Goal 9 requirement for an adequate inventory of commercial sites. *Opus Development Corp. v. City of Eugene*, 28 Or LUBA 670 (1995). In the relatively recent case of *Gunderson, LLC v. City of Portland* (62 Or LUBA 403 (2011)), LUBA held that the City erred when adopting greenway regulations that, while they did not include express use restrictions, effectively converted industrial land to open space due by imposing extremely restrictive site development requirements. LUBA also found fault with the City’s EOA because it categorized industrial uses by their geographical distribution rather than by site characteristics. *Id.* at 418.

The City’s current EOA and its proposed amendments appears to take the same approach that LUBA rejected in *Gunderson* (I should note that the 2012 EOA was developed prior to the proposed zoning code amendments and therefore would not reasonably have evaluated such impacts). Even if the City decides to restrict the development of a certain type of commercial use, such as large format retail, it must at least demonstrate that it considered the impact on such retail uses before enacting such restrictions, and must demonstrate that it retains a sufficient supply of Goal 9 land, considering site characteristics, notwithstanding such restrictions. *Home Depot v. City of Portland*, 37 Or LUBA 870 (2000). As we discussed, the City’s enactment of very stringent site development restrictions that would limit several commercial uses, including large format commercial and drive-throughs, was not critically evaluated in the of City’s draft EOA. Thus, the City has failed to demonstrate that such site development restrictions will not adversely impact its supply of Goal 9 land, based on the site characteristics of certain use categories. “

This review of *Portland and Pattern Area Retail Demand and Sales Analysis* has been prepared for RTF/ICSC by the economic and development consulting firm E. D. Hovee & Company, LLC with input from Perkins Coie, LLP. . On behalf of the Bureau of Planning and Sustainability E. D. Hovee was responsible for initial drafting of the *City of Portland Economic Opportunities Analysis (EOA)* in 2008-2009, with updated analysis made as part of the EOA document adopted by Portland City Council in 2012. E. D. Hovee has not been directly involved with the more recent EOA draft documents dated August 2015 and March 2016.

Since 1984, E. D. Hovee has provided economic and development consulting services for a range of public, non-profit and private clients – focused in the states of Oregon and Washington. In addition to Portland, EOAs and related Goal 9 analyses have been prepared for communities as diverse as Beaverton, McMinnville, Cascade Locks, Wilsonville, Forest Grove, Hood River County, Medford, Phoenix, and Ashland. E. D. Hovee has also conducted assignments elsewhere across the U.S. – particularly with respect to downtown/neighborhood business district revitalization and transit supportive development.

COMMERCIAL  
REALTY  
ADVISORS



NORTHWEST, LLC

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

April 22, 2016

VIA EMAIL

**Re: 2035 Comprehensive Plan Testimony**

Dear Mayor Hales and Council Members:

This letter supplements my January 4<sup>th</sup> letter and verbal testimony on April 14<sup>th</sup>. As stated at the hearing, I urge you to: oppose P32 the proposed policy on drive-thrus; support P44 on grocery stores; support P51 the proposed policy to consider the market when proposing new development regulations; and support P60 the proposed policy to provide an adequate supply of land for all types of retail.

CRA represents great retailers including higher end grocers and larger format grocers selling more affordable goods. Grocery operators need auto-accommodating commercial sites of sufficient size in convenient locations with good auto and transit access to satisfy "the widest range of retail" from upper end to value-based grocery. People need a wide range of goods to truly make Portland a complete community. If they can not get what they want in Portland evidence shows they will travel to the suburbs or outer regions of Portland to get what they need. This adds unnecessary trips and disadvantages those without cars or direct transit access who then resort to unhealthy food choices.

Appropriate zoning for grocery stores would allow traditional horizontal development, drive-thrus, ample off-street parking and convenient access. There are few, if any, undeveloped sites in Portland that are large enough with appropriate zoning to accommodate traditional grocery stores. The problem is particularly acute with larger format affordable grocers. Larger format discount grocery customers typically travel from a greater distance and stay longer thus requiring more parking. Preferred parking ratios are at least 4 spaces per 1,000 sf of building and preferable 5 spaces per 1,000 sf. They have lower profit margins in order to offer lower prices. They can not afford higher land values, expensive design requirements and especially structured parking. A 50,000 sf store needs around 5 acres for parking, circulation, pedestrian connections and landscaping. Hopefully these new comprehensive plan policies will lead to more appropriate sites. Thank you again for the opportunity to comment.

Sincerely,

Robert L. LeFeber, Principal Broker

cc: Tom Anderson, Eric Engstrom, and Susan Anderson. BPS  
RTF/ICSC GR Committee



## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Thursday, April 21, 2016 2:46 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** brenda\_kirsch@yahoo.com  
**Subject:** FW: Letter on Portland Harbor Forecast  
**Attachments:** PORT OF PDX LETTER 4-8-16 LETTERHEAD.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Brenda,

Thank you for comments regarding the 2035 Comprehensive Plan. Your comments have been forwarded to the Comprehensive Plan email: [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov). Written testimonies in response to supporting documents to the Comprehensive Plan will be accepted until April 22<sup>nd</sup>, 2016 at 5:00 p.m. Written testimonies for proposed policy and/or map related amendments to the Comprehensive Plan will be accepted until April 27<sup>th</sup>, 2016 at 5:00 p.m. **In-person testimony will be held on April 27<sup>th</sup>, 2016 at 2:00 p.m. This hearing is limited to those who signed up to speak at the April 20<sup>th</sup> hearing but were not able to testify that day.**

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

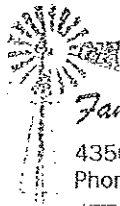
**From:** Brenda Frketich [mailto:brenda\_kirsch@yahoo.com]  
**Sent:** Wednesday, April 13, 2016 9:14 AM  
**To:** Commissioner Novick <novick@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>  
**Subject:** Letter on Portland Harbor Forecast

Please see attached letter.

Thank you,  
Brenda Frketich

*Kirsch Family Farms, Inc.*  
*St. Paul, Oregon*  
*Blog: [www.NuttyGrass.com](http://www.NuttyGrass.com)*

A lightning fast message from Yahoo Mail. [Get it now](#)



**KIRSCH**

*Family Farms, Inc.*

4350 Mahony Rd. • St. Paul, Oregon 97137  
Phone: (503) 633-4772 • Fax: (503) 633-4788

April 8, 2016

Portland City Council  
City Hall  
1221 SW 4<sup>th</sup> Ave  
Portland OR 97204

Dear Mayor Hales and City Commissioners:

Thank you for supporting a revision to the Economic Opportunities Analysis (EOA) to incorporate a medium growth forecast for the Portland Harbor into the City of Portland Comprehensive Plan. Oregon's agriculture industry relies on the Port to ship our products to overseas markets. A medium growth forecast more accurately reflects the importance of the harbor as an area of future growth and investment.

I farm 1000 acres growing over 11 different crops every year – crops that include hazelnuts, vegetable seeds, grass seed and wheat – to name a few. A large percentage of our straw, seed and nuts leave this country to feed the world via the Port of Portland. Our ability to continue to be player in the global marketplace is critical to keeping Oregon farmers strong and viable well into the future.

During your upcoming hearings you will have the opportunity to amend the Comprehensive Plan to more accurately reflect the activity in and future development of the Portland Harbor. Please support Oregon's agriculture industry and the important contribution we make to the state by adopting the amendment to change the harbor forecast back to medium growth as originally recommended by Bureau of Planning and Sustainability staff.

Sincerely,

Brenda Frketich  
President  
Kirsch Family Farms, Inc.



04.20.2016

Portland City Council  
City Hall  
1221 SW 4<sup>th</sup> Ave.  
Portland OR 97204

Dear Mayor Hales and Commissioners:

I am here as a representative of Oregon Tradeswomen, Inc. where I work as the pre-apprenticeship training manager, preparing women in poverty and women of color to enter high wage, skilled construction and metal trades. I want to speak to you about the low growth forecast for the Portland harbor in the draft Comprehensive Plan and what it means to our students and the communities we serve.

Oregon Tradeswomen, Inc. is a small non-profit that recruits and trains approximately 100 low income, diverse women a year. We reach out to women in marginalized communities in Portland: women who cannot afford a college education, women returning from incarceration, single mothers that need family wage jobs, and women reentering the workforce after dislocation.

Graduates of our trades and manufacturing program learn job skills such as carpentry and welding and receive job placement and job retention assistance. Many of our women have gone to work in high skill, high wage careers with Portland harbor businesses, such as Gunderson and Vigor. Recent Census data indicates that 20 percent of the harbor's workforce comes from communities of color.

At present, 22 of our graduated women have been able to lift themselves out of poverty through jobs in the Portland harbor. Melissa M. is just one of these stories. Before coming to Oregon Tradeswomen, Melissa was unemployed after years of working a few months here and there in dead end jobs. After graduating our training program, Melissa secured a job at Gunderson where she started out at \$12.60 an hour as a fitter welder. Within a year, Melissa is now up to \$18.65 an hour, or approximately \$39,000 a year. Residents like Melissa need employment alternatives to low-wage, low skill service jobs that keep them in poverty. Industrial, manufacturing and trades work provide these exact opportunities for middle class careers that we all strive to support through a range policy priorities. Our land use plans should not be an exception to that.

Changing the growth forecast for the Portland harbor is an issue of gender and racial economic justice. On behalf of our current and future students and their communities, we ask you to change the growth forecast from low to moderate. Investment in an expanding harbor will support job opportunities for all of Portland's residents and is critical to economic opportunity and equity in our city.

Best regards,

Abby Bandurraga  
Pathways Program Manager  
Oregon Tradeswomen, Inc.



Meet OTI Trades and Apprenticeship Career Class graduate, Melissa Mazurek.

Melissa was just 22 years old when she enrolled in Oregon Tradeswomen, Inc.'s Trades and Apprenticeship Career Class – a pre-apprenticeship program preparing women for success in the building, construction, mechanical, and utility trades. She was born and raised in Grand Rapids, Michigan which is on the west side of the state, not too far from Lake Michigan. Here is her story:

I left home at 18, and after traveling all over the country and working seasonal jobs in Montana, I met my current partner, and about 3 and a half years ago, by chance, ended up staying in Portland.

Before starting my training at OTI last year, I was unemployed. I worked a few odd jobs here and there .. farmer's markets, bakeries, and did farm work in Montana each year. I was homeless off and on. A lot of it had to do with not being satisfied with where I was and what I was doing. I was moving around too much and ended up completely broke more often than not. The seasonal farm work I had done in Montana each year provided me with a little bit of savings, but I couldn't find a full time job that paid well and held my interest. OTI's pre-apprenticeship program and the people I met while going through the class helped me realize that the jobs I had dreamed about being able to get were actually possible.

I learned about OTI's class from a couple of friends who told me about either going through the program or having a partner who did. I wasn't sure if I was going to go through with it at first. It seemed so intimidating to walk into a classroom again after years of avoiding it to learn something I was completely unfamiliar with. I was a little afraid of failing (isn't everyone?), and thought, *'What if I do this and it doesn't work out either?'* Luckily, I have some people in my life who are very supportive, and they talked me into it. I'm pretty damn glad they did.

During my time with OTI, the biggest thing I noticed were the changes within myself. I felt timid and unsure about the class and everything when I started. At the end, everything had completely changed. My classmates and instructors had gotten me so excited about the new opportunities that lay ahead, and I felt more confident and stronger than ever. I finally had some idea of where I wanted my work/career to go. Plus, we did all those killer fitness training work outs, and after getting through those, I think we all felt like we could accomplish anything!

I started at Gunderson, LLC, a part of the Greenbrier Companies. Currently, I'm a fitter welder. When I began training in September of 2014, they started me out at \$12.60 an hour. After a month of training and passing some weld tests, they bumped me up to \$16.80 an hour, and I am now earning \$18.65 an hour! And I will receive another raise after I am here for a year.

The best thing about welding is how extremely satisfying it feels to lay out beautiful, strong welds. It's a really fun trade! I'm also slightly competitive and work in a pretty fast paced, production environment, so I like to time myself and see what I can do to be faster and still pump out high quality parts. I really love the fitting aspect of it too, all the measuring and putting things perfectly in place. I've always liked detailed jobs. At Gunderson, we get to make parts for train cars/ whole train cars, and I'm sort of a nerd for trains, so it's cool to be a part of producing them.

Moving ahead, I'd really like to learn more welding processes, get some certifications, and explore other areas of production. I'm at the very beginning of this journey and know I still have a lot to learn. In the back of my mind I've always wanted to work for myself, so that's also something I'd like to work up to over the next few years.

Two years ago, I would have never imagined being able to accomplish what I have in the past year. It's crazy how much has happened! OTI really gave me a lot of confidence and is such a valuable resource and support system. I honestly don't think I could have done all of this so quickly on my own and am incredibly grateful for what OTI has taught me and helped me with.

Whether it was relearning my shop math, helping me find connections to learn about welding, or literally sending my resume to an employer and helping me get an interview, OTI has been there. Things felt a little hopeless before I went through the pre-apprenticeship program. Now I have a job that I love, my own apartment and a little extra income to use to enjoy doing things I couldn't be doing otherwise. It's awesome!

If I were to give any advice to other women considering pursuing an apprenticeship and a career in the trades is to do it! Plain and simple. Some days are really going to suck and you might want to quit, while others are exhilarating and fun. It can be frustrating, but it's totally worth it in the end. What you learn and what you challenge yourself to do will only make you stronger.

Oh, and I would also recommend that you get lots of sleep, eat well, and exercise often! Saying please, thank you and staying calm in tough work situations will get you a long way with all of your coworkers. Also, never be afraid to ask for help, it shows that you have the desire and will to learn.

## Arevalo, Nora

---

**From:** Tom Wright <TWright@mcknze.com>  
**Sent:** Wednesday, April 20, 2016 2:16 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Krawczuk, Dana (Perkins Coie) (DKrawczuk@perkinscoie.com); ekrieger@riverlakepartners.com; 'Scott, Nicholas & Laurie, Drew Krieger (themoor72@comcast.net)'; Gabriela Frask; Collier, Corky; 'Jim Laubenthal'  
**Subject:** Testimony for Comp Plan Map Update and EOA  
**Attachments:** LTR-City of Portland-Support for Amendment M33-160420.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Please include the attached testimony in the record for the (1) EOA and (2) Comprehensive Plan Map Update, and distribute at today's City Council hearing.

Thank you.

Tom Wright LEED AP  
Principal/Director of Planning

# MACKENZIE.

DESIGN DRIVEN | CLIENT FOCUSED

Architecture · Interiors · Engineering · Planning

P 503.224.9560 W [mcknze.com](http://mcknze.com) C [vcard](#)

RiverEast Center  
1515 SE Water Ave, Suite 100  
Portland OR 97214

This email is confidential, may be legally privileged, and is intended solely for the addressee. If you are not the intended recipient, access is prohibited. As email can be altered, its integrity is not guaranteed.

# MACKENZIE.

DESIGN DRIVEN | CLIENT FOCUSED

April 20, 2016

City of Portland, City Council  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201-5380

**Re: Support for Amendment #M33 and Suitability of a Portion of Broadmoor Golf Course for Industrial Development**

Dear Mayor Hales and Commissioners:

The purpose of this testimony is to offer our professional opinion that the approximately 42-acre portion of Broadmoor Golf Course that is proposed to be designated as Industrial by Amendment #M33 is generally suitable for industrial development.

Mackenzie is the primary author of 2012 Regional Industrial Site Readiness Project as well as additional industrial and employment lands studies for several Portland/Vancouver area jurisdictions. Mackenzie is also one of the leading A/E firms in industrial development, and specifically in the Columbia Corridor. The purpose of this letter is to provide a general overview of the feasibility of industrial use on the Broadmoor golf course site.

As evidenced by the Regional Industrial Site Readiness Project, there is a major shortage of land in the Portland Metro area that is shovel ready. The 2014 inventory update (from the original 2012 project) identified only 2 sites, larger than 25 acres, within the City of Portland (Specht Properties and Colwood) that were available for development within 6 months. Those sites are now being developed, so the City of Portland has no large industrial sites available. Further, the City of Portland has only two sites that are development ready within 30 months, both of which are owned by the Port of Portland.

Within the Portland Metro Area, due to the shortage of industrial/employment land, it is necessary to consider all relatively flat land that has good access and availability of public infrastructure when evaluating our land supply. The Broadmoor site, and specifically the 42 acres proposed for industrial designation north of the sloughs (#M33), has physical characteristics similar to many other developed industrial sites in the Columbia Corridor. It is relatively flat, is within an area of other viable industrial uses (as well proximity to Portland International Airport) and has reasonable access to public utilities. Due to the managed floodplain in the Columbia Corridor, the FEMA floodplain is not a major factor that would limit development (fill and floodplain storage are addressed with drainage district). Similar to Colwood redevelopment, Broadmoor has opportunity to provide for an estimated 1,100 industrial jobs (based on Metro figures), yet still provide for 123+/- acres of natural resource land. This amounts to 2/3 of the original Broadmoor site dedicated for natural resource purposes. Lastly, the Broadmoor site is already within the Urban Growth Boundary, which results in less pressure to expand the regional UGB.

The Broadmoor site does not come without challenges, but as indicated above there are limited industrial sites left within the Portland Metro area, and specifically within the City of Portland. Most of the sites that have been developed in this area require special attention to soils (surcharge is typical in Columbia Corridor). Road access to the site, with public utility extension, will require cooperation with the Port of Portland (i.e., extension of NE Cornfoot Road) and potential private land acquisition for through connection to NE 33rd Drive. However, a potential public road between NE



P 503.224.9560 • F 503.228.1285 • W MCKNZE.COM • RiverEast Center, 1515 SE Water Avenue, #100, Portland, OR 97214  
ARCHITECTURE • INTERIORS • STRUCTURAL ENGINEERING • CIVIL ENGINEERING • LAND USE PLANNING • TRANSPORTATION PLANNING • LANDSCAPE ARCHITECTURE  
Portland, Oregon • Vancouver, Washington • Seattle, Washington



City of Portland, City Council

Support for Amendment #M33 and Suitability of a Portion of Broadmoor Golf Course for Industrial Development

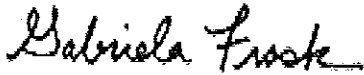
April 20, 2016

Page 2

Cornfoot and NE 33rd Drive could be of great benefit to connectivity for the area's transportation system. In our professional opinion and experience, based on our preliminary evaluation, access to the #M33 area is feasible.

The adjacent Metro property to the north (Catkin Marsh), previously owned by Broadmoor, is currently zoned industrial by the City and is primarily covered in wetlands. Given the critical shortage of industrial lands, it is unfortunate that the City did not proactively consider "swapping" this industrial zoning to an area of Broadmoor that is more feasible for industrial development. In 2008-2009, the site was briefly marketed for sale and interest for industrial development was strong. Based on our involvement at that time, the primary holdback was not the physical conditions of the property, but instead the need to have proper industrial zoning in place. Amendment #M33 proposes to include an Industrial Comprehensive Plan designation on a portion of Broadmoor, which will still allow evaluation and public review when industrial zoning is requested at a later date. The City has a land use process already in place, through a zoning map amendment application (and associated approval criteria) to determine if adequate public services are available. It will be a lost opportunity if the City does not allow the requested industrial comprehensive plan designation through the current Employment Zoning Project.

Sincerely,



Gabriela Frask  
Planner



## Arevalo, Nora

---

**From:** Krawczuk, Dana (Perkins Coie) <DKrawczuk@perkinscoie.com>  
**Sent:** Wednesday, April 20, 2016 1:02 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Erik Krieger; Scott, Nicholas & Laurie, Drew Krieger (themoor72@comcast.net) (themoor72@comcast.net); Tom Wright  
**Subject:** RE: Testimony for Comp Plan Map Update and EOA  
**Attachments:** LETTER\_001.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

My previous email accidentally included an earlier draft of the map. Please replace that testimony with the attached, and include it in the record. I apologize for the confusion and inconvenience.

**Dana Krawczuk | Perkins Coie LLP**  
SENIOR COUNSEL  
1120 N.W. Couch Street Tenth Floor  
Portland, OR 97209-4128  
D. +1.503.727.2036  
F. +1.503.346.2036  
E. [DKrawczuk@perkinscoie.com](mailto:DKrawczuk@perkinscoie.com)

---

**From:** Krawczuk, Dana (Perkins Coie)  
**Sent:** Wednesday, April 20, 2016 12:56 PM  
**To:** [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
**Cc:** Erik Krieger; Scott, Nicholas & Laurie, Drew Krieger (themoor72@comcast.net) (themoor72@comcast.net); Tom Wright  
**Subject:** Testimony for Comp Plan Map Update and EOA

Please include the attached testimony in the record for the (1) EOA and (2) Comprehensive Plan Map Update, and distribute at today's City Council hearing.

Thank you.

**Dana Krawczuk | Perkins Coie LLP**  
SENIOR COUNSEL  
1120 N.W. Couch Street Tenth Floor  
Portland, OR 97209-4128  
D. +1.503.727.2036  
F. +1.503.346.2036  
E. [DKrawczuk@perkinscoie.com](mailto:DKrawczuk@perkinscoie.com)

---

NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

Dana L. Krawczuk  
DKrawczuk@perkinscoie.com  
D. +1.503.727.2036  
F. +1.503.346.2036

April 20, 2016

VIA EMAIL (CPUTESTIMONY@PORTLANDOREGON.GOV)

Portland City Council  
Attention: Ms. Karla Moore-Love, Council Clerk  
City of Portland  
1221 SW Fourth Avenue  
Portland, OR 97204

**Re: Testimony related to the Economics Opportunity Analysis and in Support of  
Comp Plan Amendment #M33**

Dear Mayor Hales and City Council Members:

This firm represents Broadmoor Inc. ("Broadmoor"), which is comprised of a family that has owned the Broadmoor Golf Course located at 3509 NE Columbia Boulevard for over 100 years. Please include this testimony in the record of the above-referenced proceedings (the EOA and the comp plan) and provide us with notice of the final decisions.

Broadmoor intends to continue to operate as a public golf course for the foreseeable future. However, as golf revenues at public courses have continued to decline over the past 10 years and the City's need for additional employment land increases, Broadmoor acknowledges that at some point developing a portion of the golf course with an industrial use, while preserving higher-quality natural resources in open space, may be the highest and best use of the land. For these reasons, Broadmoor supports Comp Plan Amendment #M33, which proposes to designate approximately 42 acres north of the Columbia Slough as Industrial, as depicted upon the attached map.

As Council considers #M33, we believe that it is important to keep the following facts and issues in mind:

- The proposed comprehensive plan amendment does not allow industrial development. The property must go through a separate zoning map amendment process prior to when development could occur. Zoning map amendments require a robust public process, at which time mitigation requirements would be identified.

- The proposed comprehensive plan amendment does not reduce the existing “c” and “p” environmental overlay zones on the property. The existing environmental protections that were imposed as part of the recent Airport Futures Plan remain intact.
- Of the area where the Industrial comp plan designation is proposed by #M33, over 13 acres has no “c” and “p” environmental overlay zones. Therefore, when the environmental overlay zones were updated on the golf course in 2011 as part of Airport Futures, the City determined that the resource value of a portion of the area did not warrant special protection.
- We have seen no adopted data that demonstrates that the approximately 42-acre area subject to #M33 at Broadmoor has superior habitat value to the approximately 86-acre area subject to #M34 at Riverside. For example, as part of Airport Futures, the City adopted the May 13, 2011 Middle Columbia Corridor/Airport Economic, Social, Environmental and Energy Analysis (“ESEE”).  
<https://www.portlandoregon.gov/bps/article/3001150>. The ESEE describes “Inventory Site CS1: Buffalo Slough and Peninsula Canal,” which is 1,287 acres and includes Broadmoor, Riverside and Columbia Edgewater, as well as other lands. In that analysis, the golf courses are generally described as a single feature (see page 129 and Table 26. The ESEE also describes that both the #M33 and #M34 area are special habitat areas (Site CS2-Map 3)
- Broadmoor and the owners of Riverside Golf Course counted the number of trees in the area subject to #M33 as compared to #M34. Broadmoor has approximately 80 trees; Riverside has 764 trees.
- Industrial development of the #M33 area is feasible, as described in the testimony from Mackenzie on behalf of Broadmoor.
- Broadmoor has no immediate development plans. If they develop in the future, they expect that the open space areas of the golf course (including those that do not currently have an environmental overlay designation) will be enhanced. As depicted on the attached map, over 50% of Broadmoor’s current golf course would be open space; and, when the previously Broadmoor-owned Catkin Marsh<sup>1</sup> is considered, the ratio increases to 2/3 of the property being protected as open space. The end result would be a lift in the functions and values of the higher quality resources, while also providing jobs.

---

<sup>1</sup> A few years ago Broadmoor sold the approximately 54-acre Catkin Marsh area to Metro. This area is currently zoned industrial, and is proposed to be converted to open space.

- The proposed comp plan designation provides the opportunity to provide a critically needed east/west road improvement connection to NE 33<sup>rd</sup> Avenue that could relieve freight congestion on NE Columbia Boulevard.
- This new road connection, or the enhanced natural areas, would provide the opportunity for extending pedestrian and cycling access via the 40-mile link.
- Broadmoor is open to the possibility of pursuing development of the #M33 area at some point in the future, so #M33 is considered “available” and “developable land” pursuant to the Goal 9 rules. Therefore, the City has a legal and evidentiary basis to rely upon this acreage as part of its total land inventory, short term supply, EOA and comp plan. Conversely, Riverside Golf Course has consistently objected strongly to the proposed designation of approximately 86 acres of its property as Industrial. Should the City reject Amendment #M34 and designate that acreage as Industrial, relying upon that land capacity as being available during the planning period is inconsistent with Goal 9,<sup>2</sup> its implementing rules and is not substantial evidence.

BPS recommends support of #M33, but BES has offered testimony in opposition to the amendment. We request that the Council and bureaus work collaboratively to create a data-driven solution that protects valuable natural resources, while also providing our community with the opportunity to accommodate needed jobs.

We appreciate your consideration of our testimony.

Very truly yours,



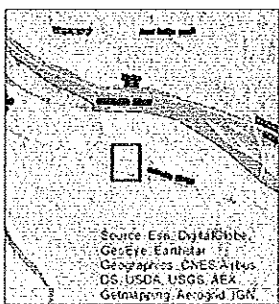
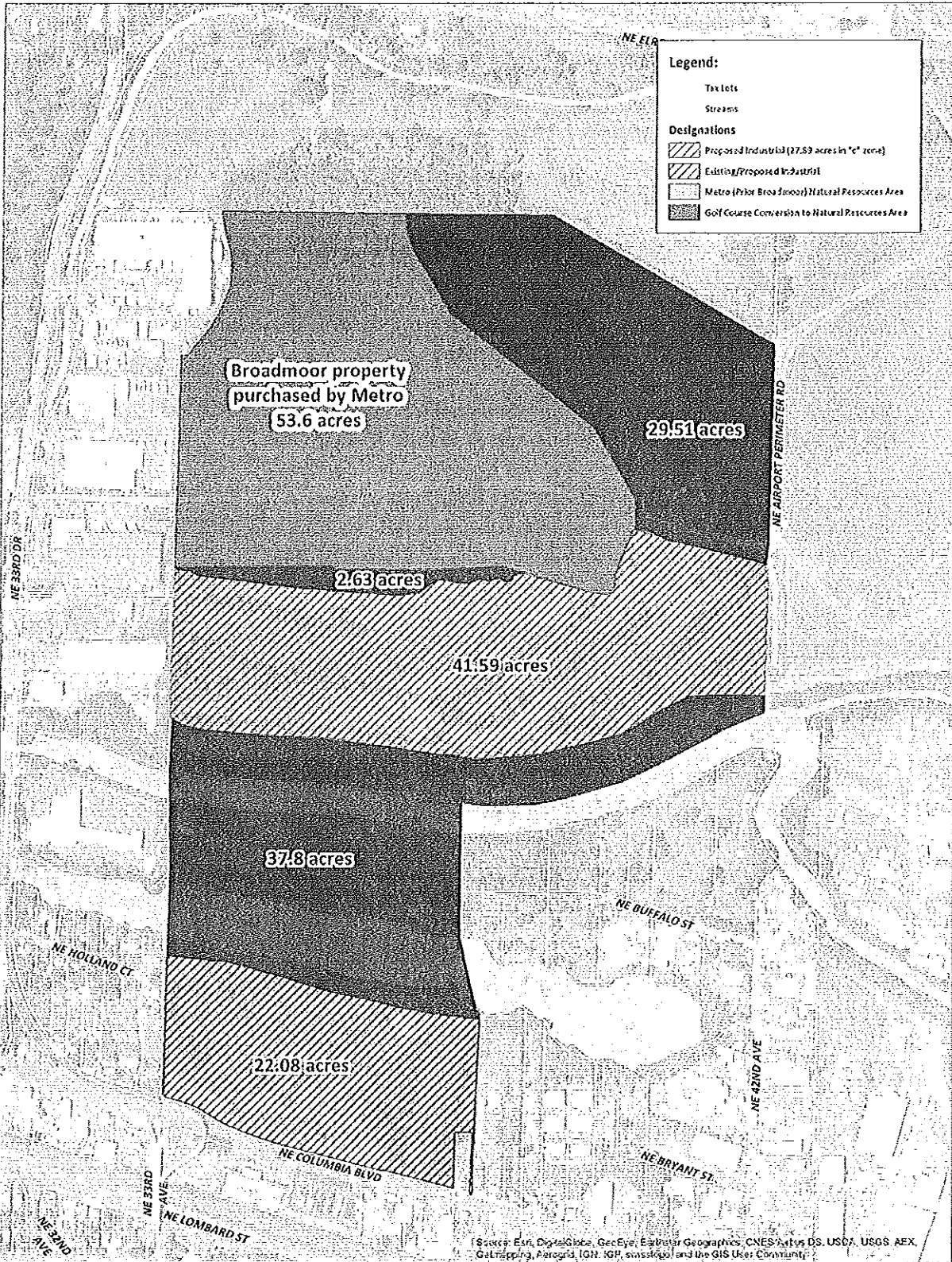
Dana L. Krawczuk

Enclosures

cc: Scott Krieger, Broadmoor, Inc. (via email) (with enc.)  
Erik Krieger, Broadmoor, Inc. (via email) (with enc.)  
Tom Wright, Mackenzie (via email) (with enc.)

---

<sup>2</sup> Riverside Golf Course is considered “developed land” because it is occupied by permanent buildings and improvements. Therefore, in order to be included in the total land supply, the golf course must be “likely to be redeveloped during the planning period.” OAR 660-009-0005(1) and (13). To be considered available as short term supply, the golf course land should also be available. OAR 660-009-0025(7).



**BROADMOOR GOLF COURSE  
Industrial/ Natural Resource Opportunities**

Portland, Oregon

0 200 400 600 Feet  
1 inch = 400 Feet

**MACKENZIE.**  
ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEX, GETMAPPING, AERGRID, IGN, IGP, SWISSTOPO, AND THE GIS USER COMMUNITY

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Wednesday, April 20, 2016 12:25 PM  
**To:** Deanna  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Broadmoor Golf Course: Please withdraw your support for the "industrial rezoning" Amendment

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Deanna,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** Deanna [mailto:deanna@involved.com]  
**Sent:** Wednesday, April 20, 2016 12:01 PM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Broadmoor Golf Course: Please withdraw your support for the "industrial rezoning" Amendment

Dear Mayor Hales:

We urge you to withdraw your proposed Amendment that would rezone 57 acres of Broadmoor Golf Course from "natural area" to "industrial."

The City and Metro have made considerable investments in this vicinity to buy additional natural areas and rehab degraded areas. Turning this large chunk of existing natural area (adjacent to and containing wetlands itself) into industrial use is short-sighted. It has important ecological functions, as well as offering low-cost (e.g. walking, hiking) opportunities in the area.

In 2012, the City, together with Metro, purchased 54 acres adjacent to Broadmoor (east of NE 33rd Drive). The Environmental Services Director of Portland noted at the time that this is "a rare remnant of Columbia River floodplain,"

and that "Preserving it will protect a significant natural resource and help improve water quality in the slough." Indeed, the entire site ranks as "high value" on the regional natural resources inventory.

There are plenty of other, more appropriate areas for industrial development, e.g. in brownfields that need to be cleaned up in any case for the livability - and environmental health - of our city.

Thank you for your consideration.

Deanna & Wilfried Mueller-Crispin  
1221 SW 10th Ave Unit 1013  
Portland, OR 97205



## Arevalo, Nora

---

**From:** Majida Nelson <majidaji@mac.com>  
**Sent:** Wednesday, May 04, 2016 7:52 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Re: Changes to Broadmoore Golf Course

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

My address as requested

564 N Humboldt  
Portland OR 97217

> On Apr 28, 2016, at 1:51 PM, BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov> wrote:

>  
> Thank you for your comment. Could you please send us your physical mailing address?

>  
> Best regards,

>  
> Nora Arevalo  
> Community Services Aide II  
> Bureau of Planning and Sustainability

>  
> -----Original Message-----

> From: Majida Nelson [mailto:majidaji@mac.com]  
> Sent: Tuesday, April 19, 2016 8:32 AM  
> To: Council Clerk - Testimony <CCTestimony@portlandoregon.gov>  
> Subject: Changes to Broadmoore Golf Course

>  
> I am writing to express my frustration that at the last moment a major change for human health and our environment will take place by rezoning the open area of 57 acres near Broadmoore Golf Course to an industrial zone.

>  
> As a native Portlander of six generations, I know the value of wildlife and open areas to human health. This open parcel is zoned open space to provide a buffer from industrial chemical effects, including deisel truck fumes from deliveries and pick up.

>  
> Considering the lack of effective regulation and competence in air quality monitoring in Portland recently revealed, I have no confidence in any agency or city promises that adding to industrial zones will bring benefit to Portlanders or wildlife.

>  
> We need this parcel to remain the small link to health that it is scheduled to be in the Portland Comprehensive Plan.

>  
> The work to clean up the Columbia Slough industrial area and the Smith and Bybee Lakes pollution has taken decades to make it safe for human and wildlife.

>  
> To change the Portland Comprehensive Plan after so much work and compromise is to undermine the process of planning entirely. How can we come to the table to make compromises with good faith when a devistating major change to air, water and wildlife quality is shoved through at the last minute.

>  
> This change will cause not more wealth for Portland, but require more of my tax money to create infrastructure for traffic, sewage, water, major power upgrades and environmental monitoring. Based on history, there will be environmental cleanup in the future and the change in ecology, loss of water system natural flood absorption, will create more problems.

>  
> Living in North Portland I see many many industrial areas that are not yet being upgraded and used efficiently. We do not need new industry bordering the renewal of Northeast Portland's growing residential areas.

>  
> Sincerely,  
> Majida Nelson

>  
>

**Arevalo, Nora**

---

**From:** Washington, Mustafa  
**Sent:** Friday, April 15, 2016 9:41 AM  
**To:** BPS Comprehensive Plan Testimony; aliceb@pacifier.com  
**Subject:** FW: Comprehensive Plan Amendment Testimony  
**Attachments:** comp plan amndmnt testimony.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Alice,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** Alice Blatt [mailto:[aliceb@pacifier.com](mailto:aliceb@pacifier.com)]  
**Sent:** Thursday, April 14, 2016 5:25 PM  
**To:** Moore-Love, Karla <[Karla.Moore-Love@portlandoregon.gov](mailto:Karla.Moore-Love@portlandoregon.gov)>  
**Cc:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>; Commissioner Saltzman <[dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)>; Commissioner Fish <[nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)>; Commissioner Fritz <[amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)>; Commissioner Novick <[novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)>  
**Subject:** Comprehensive Plan Amendment Testimony

See attached.

Alice P. Blatt  
15231 NE Holladay  
Portland, OR 97230

To: Portland City Council members

I am offering comments regarding the Comprehensive Plan proposed amendments #M33 (Broadmoor Golf Course) and #M34 (Riverside Golf Course) which have only recently become part of this several years' process. I urge withdrawal of these amendments for these reasons:

We have been informed that a March 2016 Revised Draft Economic Opportunities Analysis memo indicates there are sufficient industrial lands to meet State land use goals. The Broadmoor property is better suited as open space and habitat and doesn't offer significant enough job potential to justify infrastructure investment.

For more than 25 years many NE Portland residents have joined in attempting to balance the industrial "Sanctuary" zoning needs of our Columbia River floodplain with its environmental wildlife corridor function between the Columbia Gorge and the Willamette/Columbia confluence. Wildlife corridors depend for their survival on connectivity and sufficient breadth – ours is barely adequate – fragmenting valuable locations threatens their survival.

The Broadmoor 57 acres, 38 of which are E-zoned, are crucially located on the long north riparian slope of the main slough, and have been recognized as one of the most important wildlife complexes along the 18 mile slough course. Their multitudes of mature trees provide not only valuable habitat but air and water quality functions, countering our generally diminishing tree canopy. This site is surrounded by additionally valuable wetlands, the survival of which could be precarious, with loss of their core. Western Painted Turtles and a variety of at-risk bird species occupy this site.

Protection of all the most valuable environmental locations in the floodplain is important for a multitude of reasons – we hear frequently from residents, as well as locally-employed individuals, of the sheer pleasure and pacifying influence of associating with these natural areas and their flora and fauna. To the great credit of the Columbia Slough Watershed Council, the Regatta, Explorando, and the vast number of wonderfully innovative educational experiences for all age levels is beyond estimation of value.

# MACKENZIE.

DESIGN DRIVEN | CLIENT FOCUSED

April 13, 2016

Mayor Charlie Hales  
Portland City Council  
1221 SW 4th Avenue, Room 130  
Portland, OR 97214

Re: 2035 Comprehensive Plan - Mixed Use Zones  
*Transportation Analysis*  
Project Number 2160034.01

Dear Mayor Hales and Council Members:

Mackenzie has prepared this transportation analysis on behalf of the Retail Task Force and the International Council of Shopping Centers (ICSC) to address the potential traffic impacts of proposed mixed use zoning changes in the City of Portland.

Specifically, we have considered the impacts of reducing the opportunities for auto accommodating development as it pertains to larger grocery and discount stores. These uses are important for lower income residents and typically are accessed by automobiles. While some alternate travel occurs for these uses, customers are limited to what they can carry when biking or riding transit. Even with current zoning requirements, many of these users have located to the fringes of the City of Portland along 82nd Avenue and locations to the east or into the suburbs.

The analysis prepared by Eric Hovee identifies that many Portland residents travel outside of their local neighborhoods to access these types of retail uses – referred to as retail leakage. Not only does this result in retail dollars leaving the City, but can result in increased automobile travel distances, which leads to more congestion and greenhouse gas emissions. Impacts on congestion are difficult to measure without addressing specific locations, but the travel distances are more readily quantifiable.

We have considered two examples of existing retail uses that are located in or around the City of Portland where residents of the City are currently driving outside of the City or out to the fringes.

One user we considered was Costco. Costco serves the needs of consumers to buy bulk goods and groceries. At one point Costco had proposed locating a store in Northwest Portland but was unsuccessful in siting the store. Currently, residents of Portland shop at Costco stores located in Beaverton, Tigard, Clackamas, and Northeast Portland on 138th Avenue near Airport Way. Costco confirmed a significant number of City residents shop at these stores, and that these are all automobile trips.

In order to assess the potential reduction in travel distances, or vehicle miles traveled (VMT), we made an assessment of average travel distances for areas of Portland to each of the stores that residents would likely shop at. We then compared that distance to the distance they would have driven to a store in Northwest Portland. See the attached maps showing the location of existing Costco stores, the previously planned store location, and travel distances.



503.224.9360 • 503.228.1285 • MCKNZE.COM • RiverEast Center 1515 SE Water Avenue, #100 Portland, OR 97214  
ARCHITECTURE • INTERIOR DESIGN • STRATEGIC PLANNING • LANDSCAPE ARCHITECTURE • CIVIL ENGINEERING • ENVIRONMENTAL PLANNING • TRANSPORTATION PLANNING • COMMUNITY DEVELOPMENT • ENVIRONMENTAL IMPACT ASSESSMENT  
1515 SE Water Avenue, Suite 100, Portland, OR 97214 • 503.224.9360 • 503.228.1285 • MCKNZE.COM

Mayor Charlie Hales  
Mixed Use Zones  
Project Number 2160034.01  
April 13, 2016  
Page 2

On average, a trip to Costco for a Portland resident would be 6.2 miles less each way with the proposed Northwest Portland store location. Nearly all trips to a Costco are made by private vehicles. With an average of 14,000 daily trips for a Costco store, the VMT is estimated to be reduced by up to 86,800 miles per day or approximately 32 million miles annually. We also looked at a number of other grocery retailers currently located along the 82nd Avenue corridor within Southeast Portland and Clackamas. We were able to obtain customer information from one of these retailers to confirm the effective service area of a store. The information is not included with this letter, as it is proprietary, but in general, the data show a market area extending west to the Willamette River in the area of Southeast Portland.

For this one store in particular, the percentage of customers traveling from the west or inner Southeast Portland is higher than those traveling from the east. This clearly shows customers are driving from inner Southeast Portland out to less dense areas of the city for these shopping opportunities. Again, we would note most customers buying groceries or large bulk items travel in automobiles.

For residents living between downtown Portland and the 82nd Avenue corridor, there is not an opportunity for pass-by trips during an evening commute. Instead, these customers would need to travel beyond their residence for these shopping opportunities, resulting in additional congestion and VMT.

In summary, by limiting the opportunity for locating auto-accommodating retail uses in close-in areas of the City and along high density corridors, City residents will continue to drive to the fringes of the City or to other nearby Cities for these shopping opportunities. The result will be increased congestion, increased VMT, increased greenhouse gas emissions, and loss of retail dollars for these neighborhoods of Portland.

Sincerely,



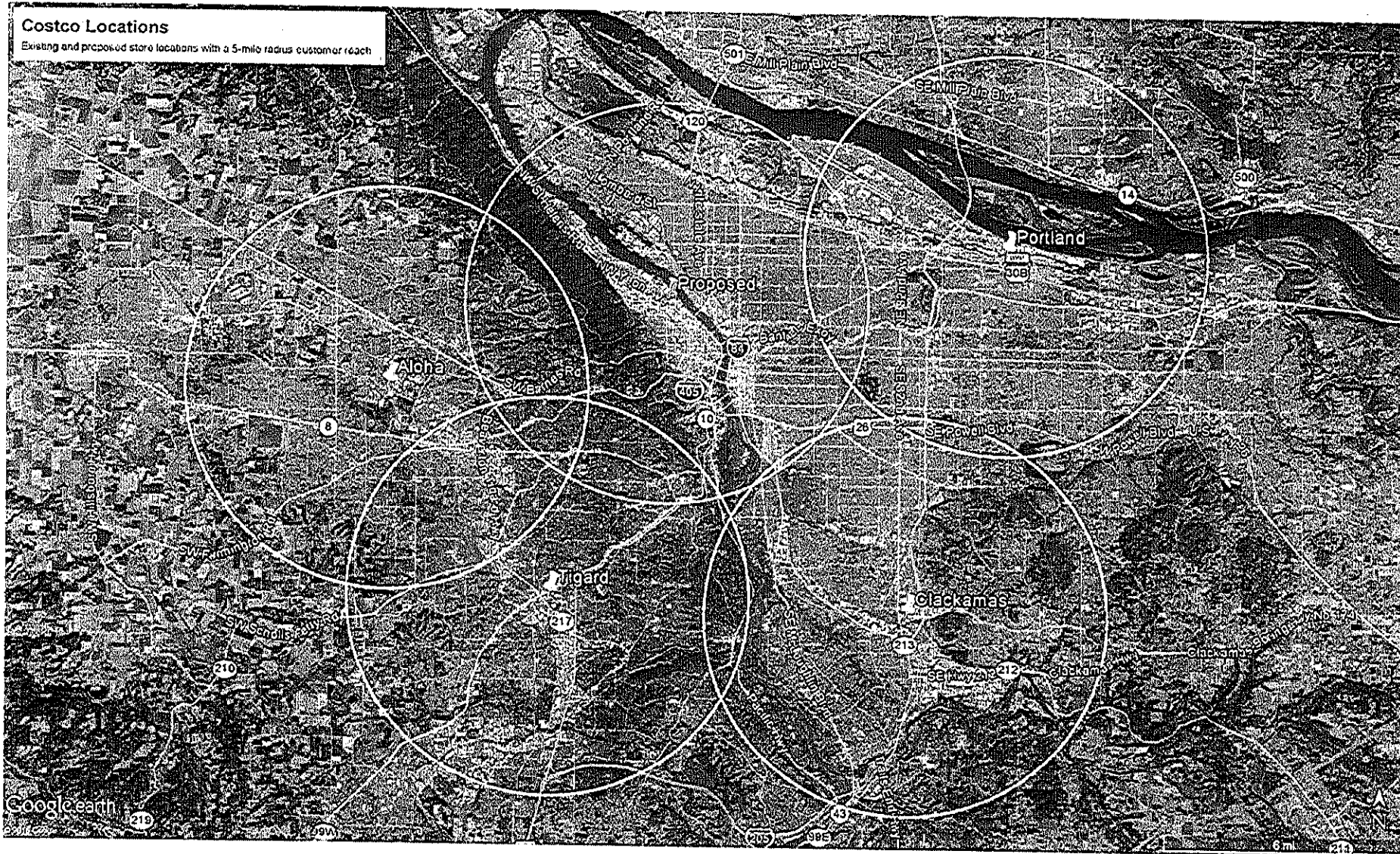
Brent Ahrend, PE  
Traffic Engineer | Senior Associate

Enclosure: Costco Location and Travel Distance Information



### Costco Locations

Existing and proposed store locations with a 5-mile radius customer reach



Travel Distances for Costco Locations						
To/From	Aloha	Tigard	Portland	Clackamas	Proposed	Average Miles Reduced
N Portland	14.9		9.3		4.7	7.4
Downtown	10.4	9.5			1.7	8.3
SE Portland			9.0	9.2	6.1	3.0
Proposed Location Vehicle Miles Traveled Average Reduction						6.2

\\fl1\shared\Projects\Projects\216003400\3\_Design\Calculations\Traffic\Travel Distances

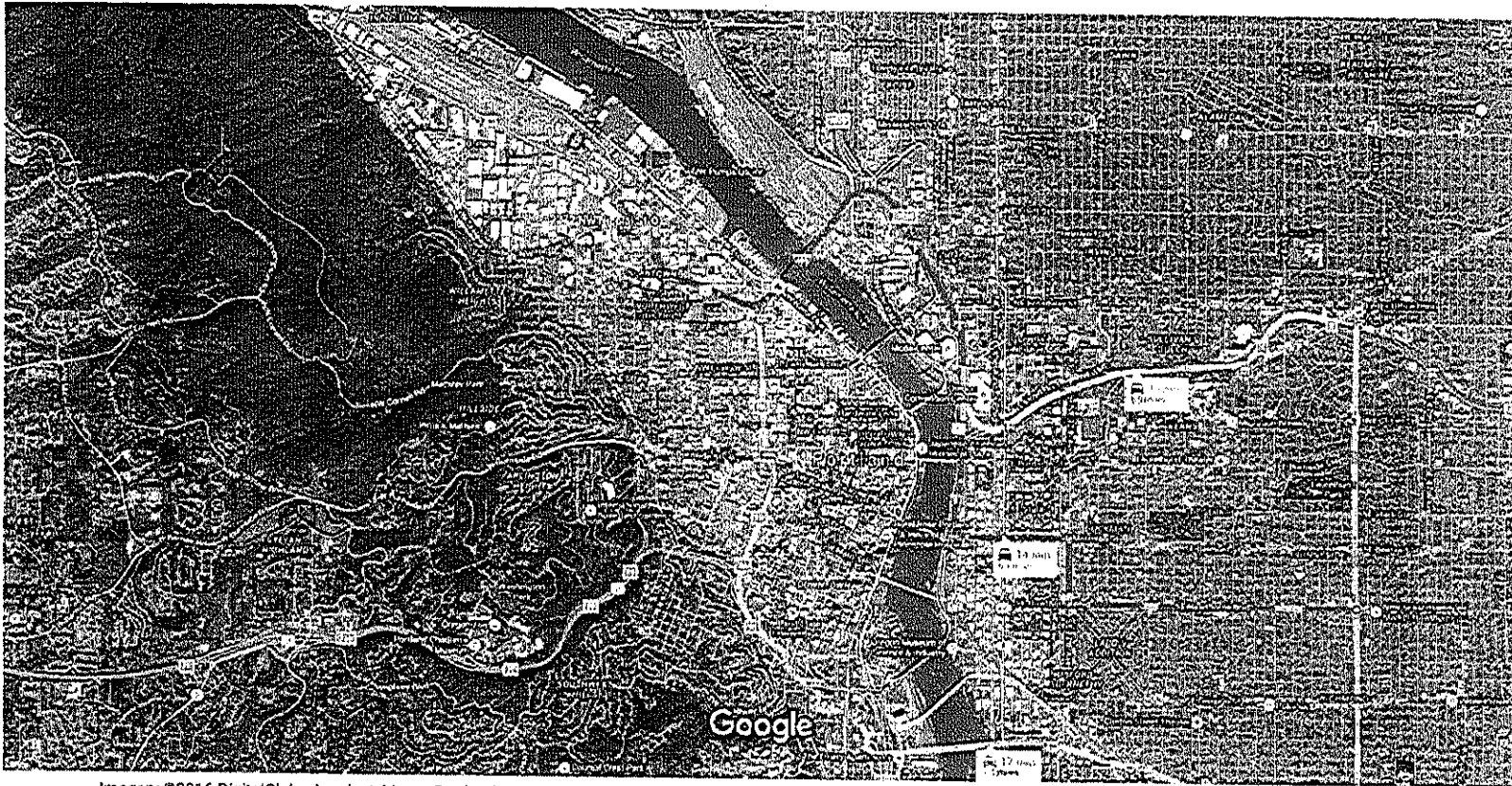


Google Maps

1500-1576 SE Cesar Estrada Chavez Blvd, Portland, OR 97214 to 2272 NW Nicolai St

Drive 6.1 miles, 14 min

SE Portland Customers Traveling to Proposed Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 2000 ft

via SE Hawthorne Blvd  
12 min without traffic

14 min  
6.1 miles

<https://www.google.com/maps/dir/1500-1576+SE+Cesar+Estrada+Chavez+Blvd+Portland+OR+97214/2272+N+W+Nicolai+St+Portland+OR+97214>

via I-84  
12 min without traffic

15 min  
6.9 miles

via SE Powell Blvd  
15 min without traffic

17 min  
7.1 miles

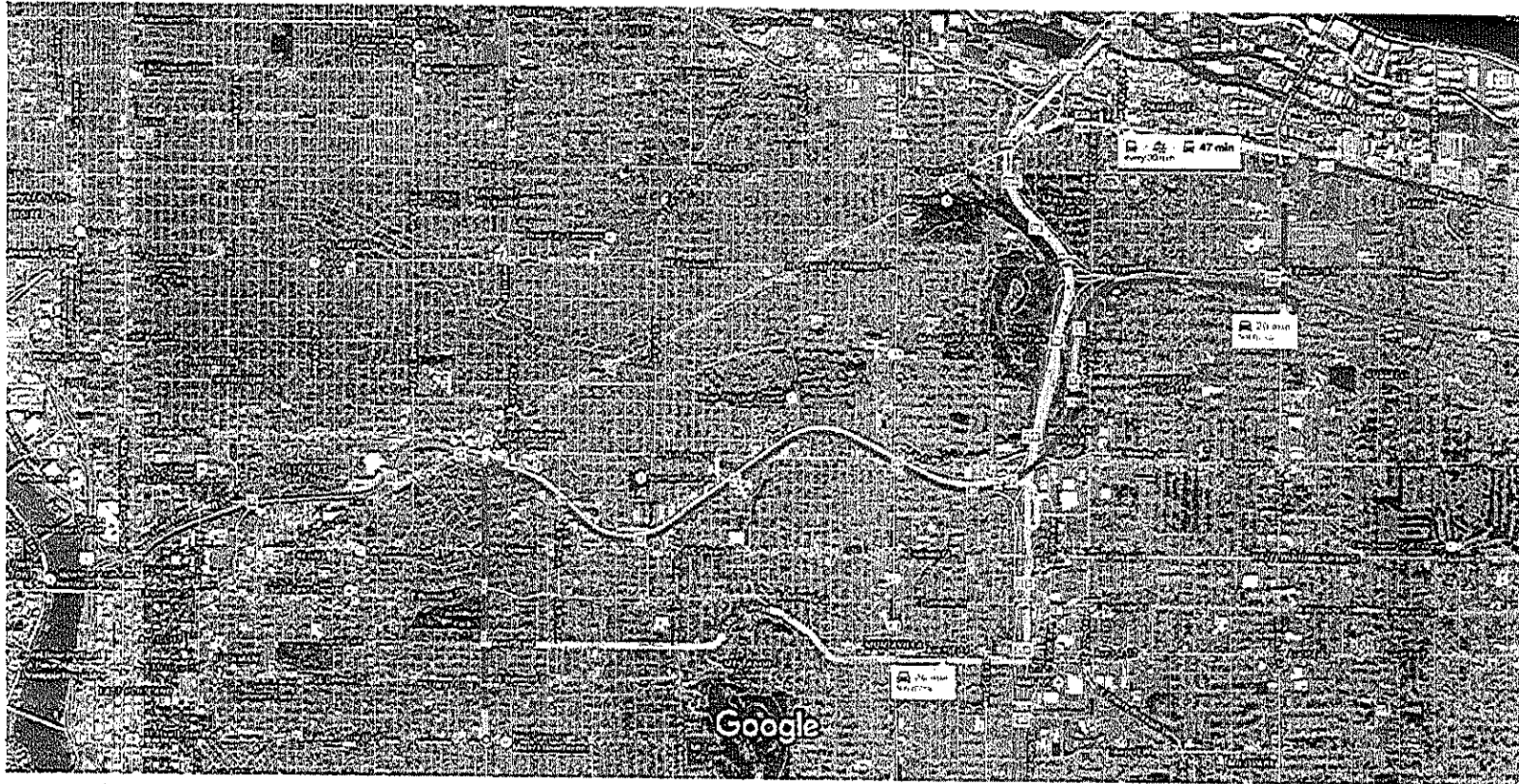
Google Maps

Google Maps

1500-1576 SE Cesar Estrada Chavez Blvd, Portland, OR 97214 to Costco Wholesale

Drive 9.0 miles, 20 min

SE Portland Customers Traveling to NE Portland Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 2000 ft

via I-84 E  
17 min without traffic

20 min  
9.0 miles





<https://www.google.com/maps/dir/1500-1576+SE+Cesar+Estrada+Chavez+Blvd+Portland+OR+97214/Costco+Wholesale+NE>

via I-205 N  
22 min without traffic

26 min  
9.6 miles

1:11 PM–1:58 PM

47 min

 75  MAX Red Line  21 

Google Maps

Google Maps

1500-1576 SE Cesar Estrada Chavez Blvd, Portland, OR 97214 to Costco Wholesale

Drive 9.2 miles, 23 min

SE Portland Customers Traveling to Clackamas Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 5000 ft

via I-205 S  
18 min without traffic

23 min  
12.4 miles

<https://www.google.com/maps/dir/1500-1576+SE+Cesar+Estrada+Chavez+Blvd+Portland+OR+97214/Costco+Wholesale+Se> 1/5/2016

via SE Foster Rd and I-205 S  
18 min without traffic

23 min  
8.3 miles

via SE Division St and I-205 S  
19 min without traffic

23 min  
9.2 miles

Google Maps

Google Maps

2829 N Lombard St, Portland, OR 97217 to 2272 NW Nicolai St, Portland, OR 97210

Drive 4.7 miles, 9 min

North Portland Customers Traveling to Proposed Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 2000 ft

via I-5 S  
7 min without traffic

9 min  
4.7 miles

<https://www.google.com/maps/dir/2829+N+Lombard+St+Portland+OR+97217/2272+NW+Nicolai+St+Portland+OR+97210>

via N Greeley Ave  
12 min without traffic

14 min  
5.7 miles

🕒 12:09 PM—1:03 PM

🚌 35 🚌 77 🚶

54 min

Google Maps

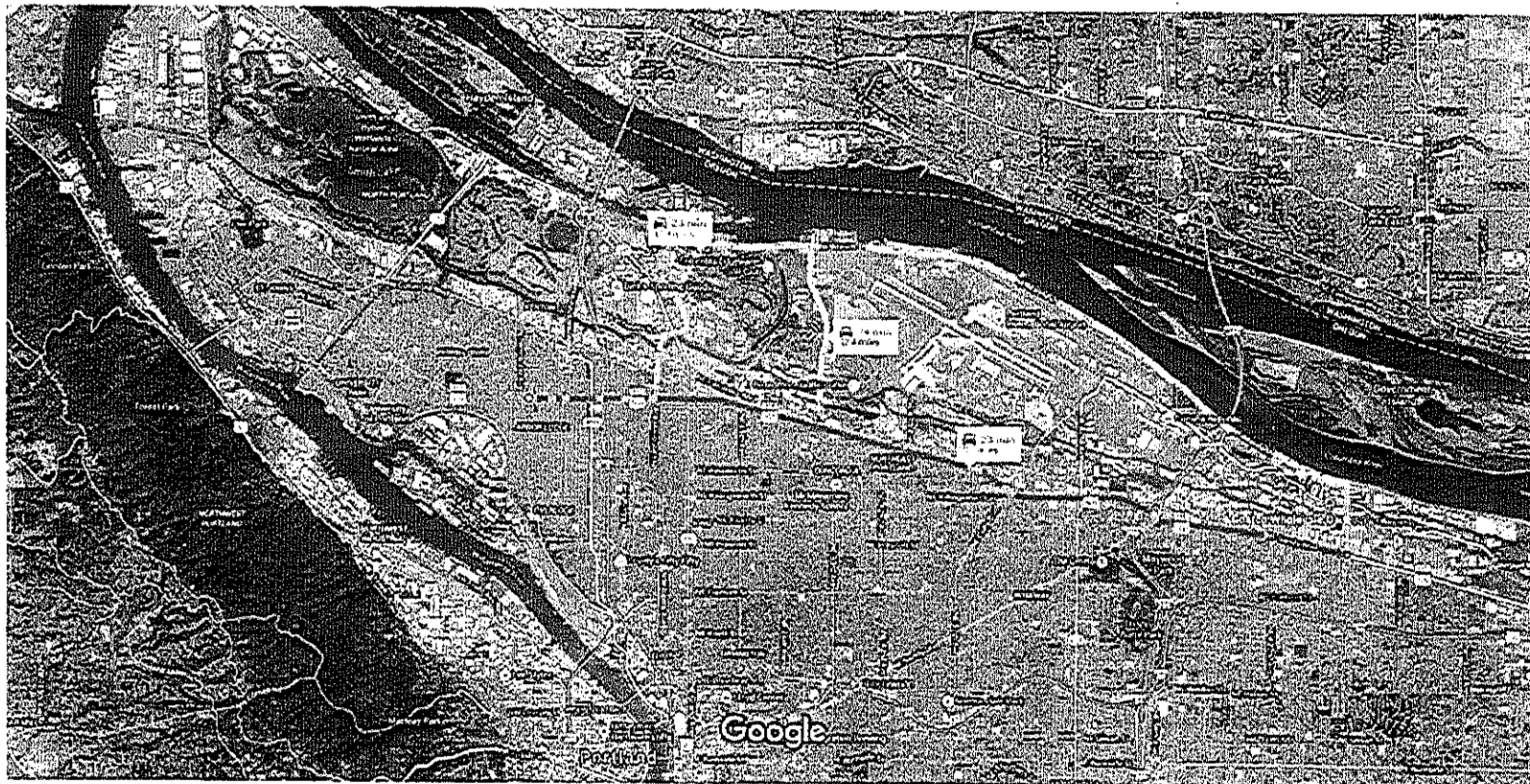


Google Maps

2747-2829 N Lombard St, Portland, OR 97217 to Costco Wholesale

Drive 9.3 miles, 23 min

North Portland Customers Traveling to NE Portland Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 5000 ft

via US-30BYP E  
21 min without traffic

23 min  
9.3 miles

<https://www.google.com/maps/dir/2747-2829+N+Lombard+St+Portland,+OR+97217/Costco+Wholesale+Northport+128th+Ave+1157016>

via NE Marine Dr  
21 min without traffic

23 min  
11.3 miles

via N Lombard St and NE Marine Dr  
22 min without traffic

24 min  
12.4 miles

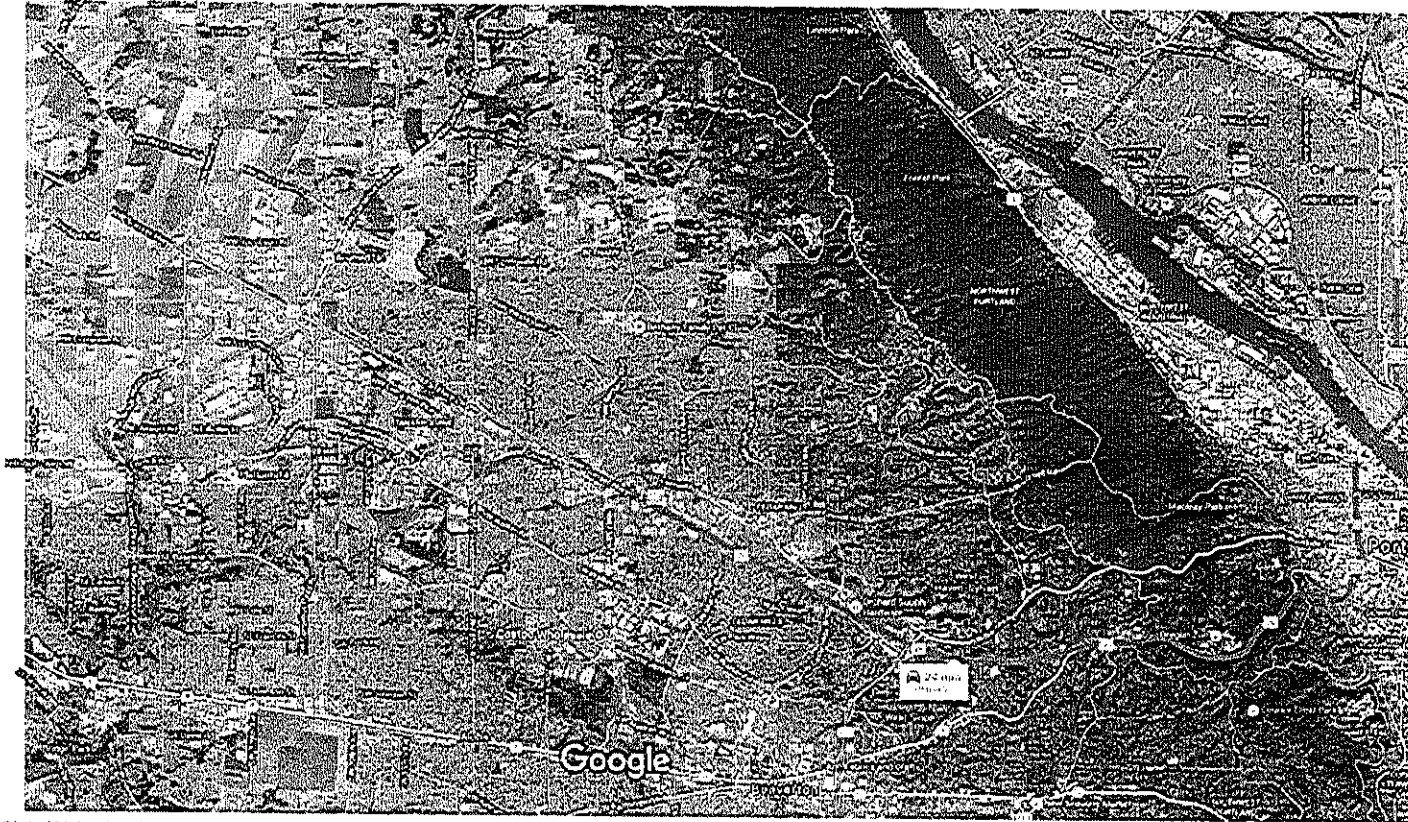
Google Maps

Go gle Maps

2747-2829 N Lombard St, Portland, OR 97217 to Costco Wholesale, Beaverton, OR

Drive 14.9 miles, 24 min

North Portland Customers Traveling to Aloha Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 5000 ft

via US-26 W  
21 min without traffic

24 min  
14.9 miles

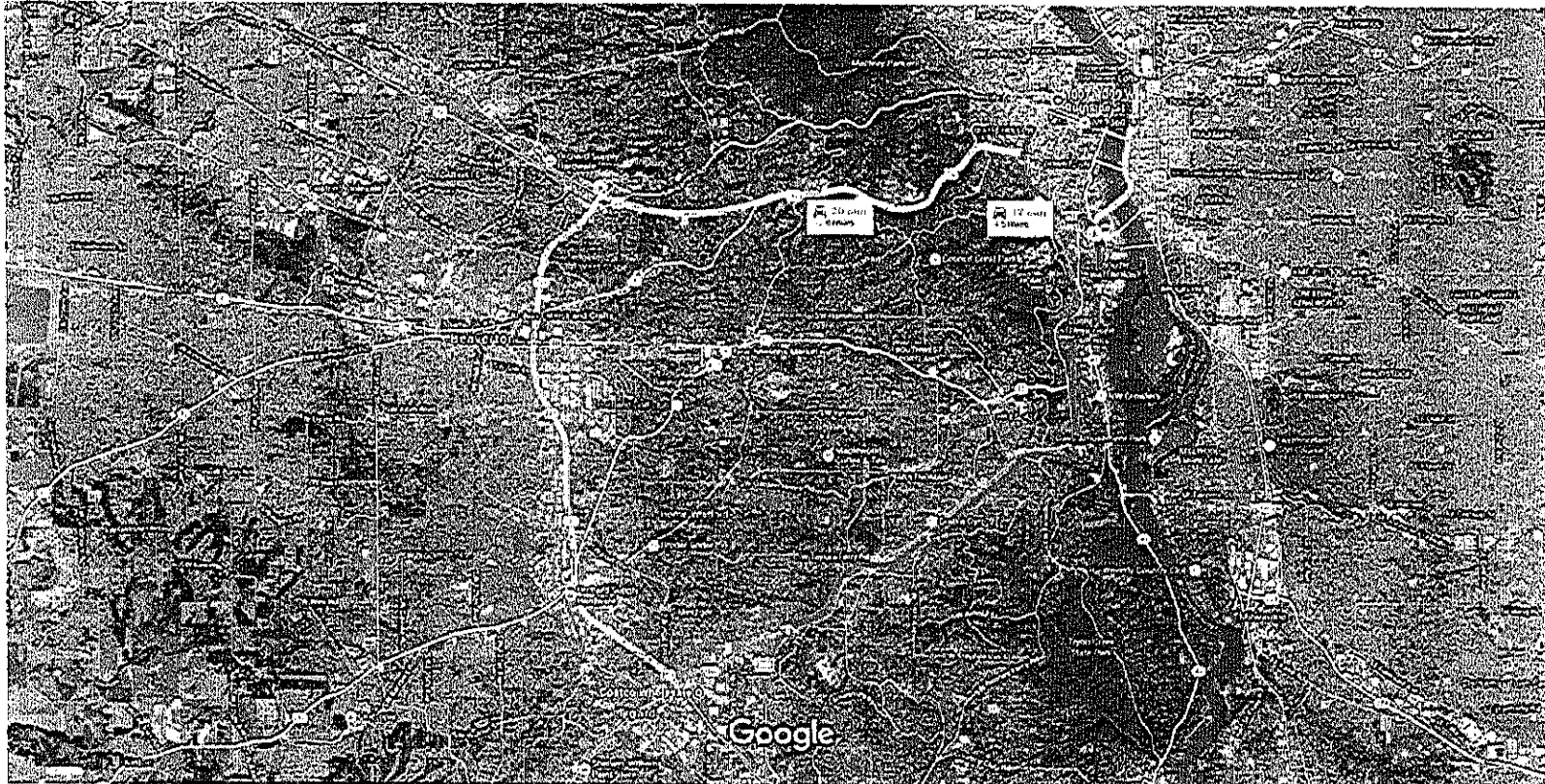
<https://www.google.com/maps/dir/2747-2829+N+Lombard+St+Portland+OR+97217/Costco+Wholesale+Beaverton+OR/@45.515/2016>

Google Maps

Google Maps

1007-1099 W Burnside St, Portland, OR 97209 to Costco Wholesale  
Downtown Portland Customers Traveling to Tigard Location

Drive 9.5 miles, 17 min



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 5000 ft

via I-5 S  
14 min without traffic

17 min  
9.5 miles

<https://www.google.com/maps/dir/45.5229878,-122.6819076/Costco+Wholesale+Southwest+Dartmouth+Street+Portland+OR/> 1/5/2016

via I-405 N and I-5 S

16 min without traffic

18 min

12.4 miles

via US-26 W and OR-217 S

18 min without traffic

20 min

12.8 miles

Google Maps

Google Maps

1007-1099 W Burnside St, Portland, OR to 2272 NW Nicolai St, Portland, OR 97210

Drive 1.7 miles, 3 min

Downtown Portland Customers Traveling to Proposed Location



Imagery ©2016 DigitalGlobe, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 1000 ft

via US-30 W  
3 min without traffic

3 min  
1.7 miles

12:08 PM—12:26 PM

Walking Bus 16 min Walking

18 min

12:17 PM—12:48 PM

Portland Streetcar - NS Line Walking

31 min

Google Maps

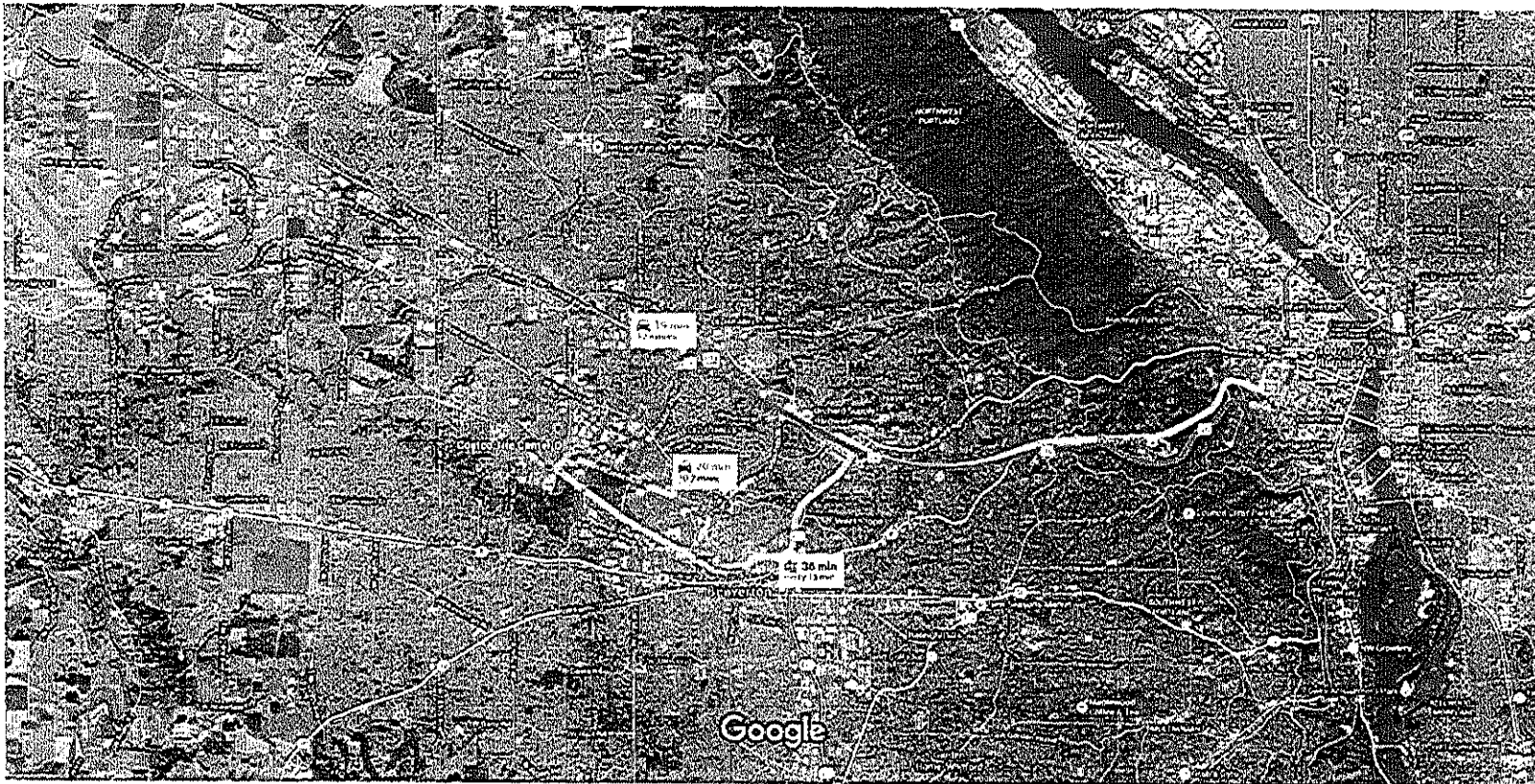


Google Maps

1007-1099 W Burnside St, Portland, OR 97209 to Costco Tire Center

Drive 10.4 miles, 19 min

Downtown Portland Customer Traveling to Aloha Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 5000 ft

via US-26 W  
16 min without traffic

19 min  
10.4 miles

<https://www.google.com/maps/dir/45.5229878,-122.6819026/Costco+Tire+Center+Southwest+Jenkins+Road+Aloha+OR/@45.5229878,-122.6819026,15z>

via US-26 W and SW Jenkins Rd  
18 min without traffic

20 min  
10.2 miles

12:13 PM—12:51 PM

38 min

🚶 🚗 MAX Blue Line 🚶

Google Maps

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Thursday, April 14, 2016 2:49 PM  
**To:** bookin@bookinggroup.com  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** FW: Written Testimony on Portland Harbor Industrial Forecast  
**Attachments:** Industrial Lands Letter 4-13-16.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Beverly,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** Beverly Bookin [mailto:bookin@bookinggroup.com]  
**Sent:** Thursday, April 14, 2016 11:17 AM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Written Testimony on Portland Harbor Industrial Forecast

*Please accept my testimony on the this important issue in preparation for the upcoming hearing. Thanks.*

Beverly Bookin, AICP  
The Bookin Group LLC  
812 SW Washington, Suite 600  
Portland, OR 97205  
503.241.2423 (Office)  
503.309.4140 (Cell)



THE  
BOOKIN  
GROUP  
LLC

Executive &  
Entrepreneurial  
Planning

Risk Analysis

Project  
Management

Transportation  
Evaluation

April 14, 2016

Portland City Council  
City Hall  
1221 SW 4<sup>th</sup> Ave  
Portland OR 97204

Dear Mayor Hales and City Commissioners:

*I have been a consulting land use planner for nearly 35 years practicing primarily within Portland. During that period, I have been active on many fronts in lobbying to insure that the Portland metropolitan region has a sufficient supply of vacant and redevelopable industrial land to provide much-needed family-wage jobs and provide goods and services so vital to our economy. Waterfront industrial land is a particularly critical component of the industrial land supply.*

*I am writing to you today about the City of Portland Comprehensive Plan and the supporting Economic Opportunities Analysis (EOA). I believe that the low-growth forecast for waterfront industrial land as recommended in these documents sends a negative message about the value of Portland Harbor and its impact on the region's economy. As you know, both the Port of Portland and private companies collectively make the Harbor a major-impact employer in the city and region by engaging in the procurement and shipping of supplies, raw materials and finished goods and providing other services, with significant secondary and tertiary job impact. Specifically, the low-growth forecast under-estimates the demand for waterfront industrial land and over-estimates the supply of such land available for future industrial development, thus inhibiting both the ability for existing and new businesses to grow and flourish.*

*During your upcoming April hearings, you will have the opportunity to amend the Comprehensive Plan to more accurately reflect the activity in and future development of the Portland Harbor. If you care about the future not only of Portland, but our entire region and state, then I urge you to support the amendment that would change the low-growth forecast for the Harbor back to a medium-growth forecast, which more realistically represents the Harbor's historic activity and future contributions.*

*Thank you for the opportunity to express my concerns in this matter.*

Sincerely,

*Beverly Bookin*

Beverly Bookin, AICP  
The Bookin Group LLC

1011 SW Washington Street  
Suite 600  
Portland Oregon  
97204  
Telephone:  
503 241 7421

## **Eric Hovee Retail Policy Amendment Testimony (4-14-16)**

For the record, my name is Eric Hovee, economic and development consultant. On behalf of RTF/ICSC, I am here to speak in support of policies for grocery stores and retail development – especially in underserved neighborhood business districts.

In addition to a summary of Retail-Related Revisions to the Portland EOA (already submitted), I am also submitting a 4-page overview of retail performance for “pattern areas” as currently identified with the BPS proposed Mixed Use Zones Project. Three overall conclusions emerge from our analysis:

- Outside of the Central City, Portland is under-retailed – not meeting the day-to-day needs of city residents, especially for grocery retail.
- Retail needs are particularly underserved in east Portland where building rents are lowest and least adequate to support high costs of new development. The lack of adequate, affordable full service grocery means that residents must travel further to shop or use convenience stores as a less healthy alternative.
- City-wide development standards that work in higher density areas with good transit service run the risk of proving counterproductive for residents living in areas with the poorest access to quality, healthy and affordable retail services.

Our analysis supports two policy additions requested by Commissioner Saltzman:

**Policy 4.79 Grocery Stores and Markets in Centers** – including the provision of adequate land supply to accommodate a full spectrum of grocery stores catering to all socio economic groups and providing groceries at all levels of affordability.

**New Policy after 6.65 Retail Development** – to assure a competitive supply of retail sites for customer convenience, affordability, accessibility and diversity of goods and services, especially in underserved areas of the city.

We encourage your support of these retail policy amendments. Thank you.

Eric Hovee  
4/14/2016

## RETAIL PERFORMANCE BY PATTERN AREA (DRAFT 1-14-16)

At the end of 2015, the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) submitted testimony to Portland City Council members expressing concern that current proposals for commercial areas of the city "will make access to affordable goods and services, including healthy food, more difficult."

To understand the rationale for these concerns, RTF/ICSC has conducted in-depth evaluation of current patterns of retail sales and commercial real estate rental space city-wide. Principal findings are that:

- Portland is already under-retailed – especially lacking in meeting the day-to-day needs of city residents as for grocery retail.
- Disparities are greatest for areas removed from the city core – to the east where commercial space rents lowest and least adequate to support high costs of new development and to the west where viable retail sites are limited due to topography and proximity to Beaverton retail.
- City-wide imposition of development standards that may be workable in higher density areas with good transit service risk even greater shortfalls in retail availability for residents who already have the poorest access to quality, healthy and affordable retail services.

The remainder of this discussion paper details RTF/ICSC analysis and findings.

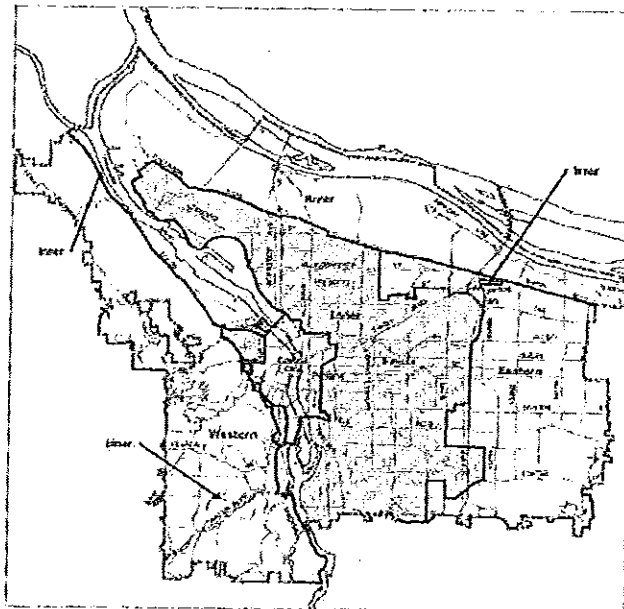
### CITY PATTERN AREAS

As part of the BPS-prepared *Mixed Use Zones Project – Discussion Draft* report, "pattern areas" were identified for areas of the city being considered for added mixed use zoning (including replacement of existing commercial zone designations):

- **Central City** – not part of the mixed use zones project but shown with this analysis for comparative purposes
- **Inner** – an area extending east to about the I-205 freeway
- **Eastern** – from the Inner area to the eastern city limits
- **Western** – extending west of the Central City area

Not included within any of the City pattern areas are industrial and other land uses generally extending along the Columbia and Willamette Rivers (north of the Central City). While not included, it is noteworthy that about 18% of all retail sales in the city are generated from these other non-pattern areas.

Proposed City of Portland Pattern Areas



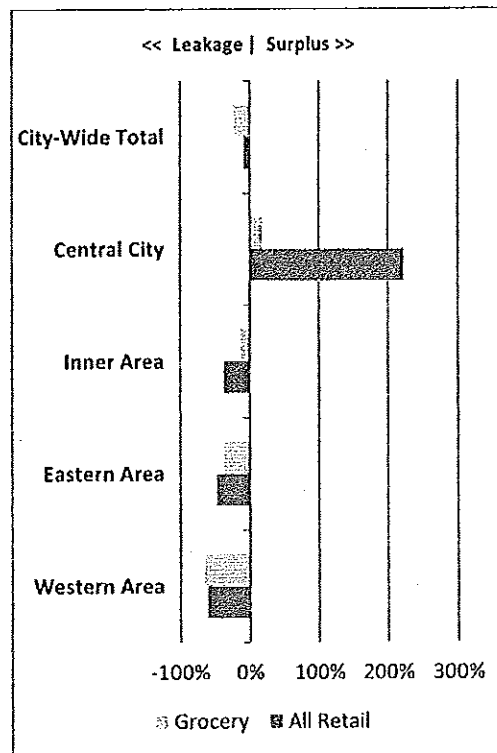
Source: City of Portland Bureau of Planning & Sustainability (BPS), *Mixed Use Zones Project – Discussion Draft*, September 2015.

## RETAIL SALES & LEAKAGE

As a *first step*, 2015 retail sales patterns have been evaluated using nationally recognized Nielsen (formerly Claritas) data for the entire City of Portland and for the pattern areas roughly aligning with those defined by BPS. Sales leakage estimates are income-adjusted, with consumer spending measured as a % of resident demand. A synopsis of findings reflects RTF/ISCS concerns.

- **City-wide sales leakage** is about 9% of resident-generated demand – meaning that spending in Portland is about 9% less than one would expect based on resident household incomes and typical expenditure levels. Grocery leakage is about 24%. Surplus sales (greater than supported by resident demand alone) are found only with categories of home furnishings, electronics, apparel and dining – based on substantial support from other metro area residents and visitors as well as Portland residents.
- **Central City**, not surprisingly, is the exception to the rule for the rest of the City. Retail sales in the Central City are more than double what the purchasing power of Central City residents alone would support. The only categories of apparent leakage are with health/personal care products, gasoline stations and general merchandise (including discount stores). Grocery stores are above par (somewhat).
- **Inner areas** are indicated as having net sales leakage at about 38% of resident demand, including grocery leakage of 15%. Overall sales leakage is least of the pattern areas (except for Central City) – with the strongest performing retail generally west of César Chavez Blvd. Retail categories noted as “oversupplied” for residents alone are home furnishings and dining.
- **Eastern areas** are indicated as having overall sales leakage at 48% of resident demand, including grocery leakage of 39%. Leakage is experienced across virtually all major categories. Interestingly, a couple of subcategories for which sales are indicated as above the norm are with convenience stores (a subset of grocery) and drinking places (a subcategory of food service/dining). Of Portland’s pattern areas, the western area is the most racially and ethnically diverse, albeit with lowest average incomes and highest rates of family poverty.
- **Western** has the highest overall sales leakage of any pattern area at 61% and grocery even higher at 66% – as many residents go over the hill to Beaverton, especially for day-to-day convenience purchases. Subcategories performing above the norm are computer/software and camera sales (subsets of the overall electronics/appliances category) and limited service dining.

**Retail Leakage by Pattern Area (2015)**



Source: E. D. Hovee & Company, LLC from Nielsen purchasing power and retail sales data.

As noted, about 18% of retail sales activity occurs outside of BPS defined pattern areas. Retail categories with relatively high volumes of sales activity (at 25% or more of city-wide sales) including motor vehicle and parts dealers, furniture and home furnishings, building materials and garden supply, and general merchandise (notably discount) stores.

These sales are occurring within areas designated largely for industrial use (as with Hayden Meadows and the Columbia Corridor) or with commercially zoned property outside of the pattern areas (as at Jantzen Beach). The types of retail activity represented tend to be strongly oriented to large format users – requiring more substantial building floor area and/or site acreage.

### COMMERCIAL RETAIL SPACE RENTS

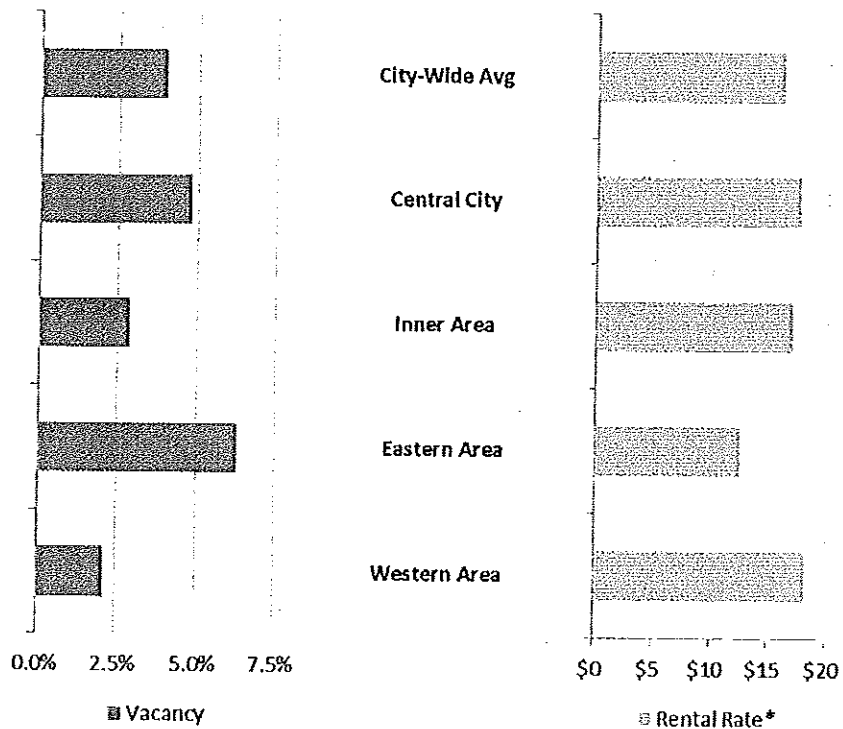
As a *second step* in evaluating retail performance, retail space leasing conditions also are compared for each of the BPS pattern areas – using data from the real estate information service CoStar.

The chart to the right provides a comparison for two important indicators of retail vitality – vacancy rates and rental rates.

As with the sales leakage analysis, this data shows considerable variation in retail performance between the BPS-designated pattern areas in Portland.

The eastern pattern area, in particular, is noted as having substantially higher retail vacancies and lower rental rates than the rest of the city.

**Retail Vacancies & Rents by Pattern Area (end of 2015)**



\* Note: Rental rates are shown as annual averages by pattern area.  
Source: E. D. Hovee & Company, LLC from CoStar as of year end 2015.



Retail leasing and occupancy observations by pattern area are noted as follows:

- **City-wide**, CoStar has inventoried 42.6 million square feet of retail space. As of year-end 2015, retail space was renting at an annual rate of just over \$16 per square foot, typically quoted on a triple-net basis with tenants paying all expenses. Overall vacancy averaged just 4% city-wide.
- With about one-quarter of Portland's retail inventory, the **Central City** is experiencing rental rates above the city-wide average but also somewhat higher vacancies nearing 5%. Space absorption reportedly was negative in 2015 (meaning that more space was vacated than leased), although considerable added Central City construction is currently planned.
- The **Inner** area (including 23<sup>rd</sup> Avenue) accounts for the largest share of the city's retail space inventory, with above-average rental rates and below average vacancy under 3%. This area took a dominant share of retail space absorption in 2015 – with further planned construction ahead. *Note:* added analysis indicates rents are lower and space absorption slower in the portion of the Inner pattern area east of César Chavez Blvd than is the case going west to the City core.
- **Eastern** area rental rates average less than \$13 per square foot, about 20% below the city-wide average. At over 6%, vacancy rates are more than 50% above the City-wide retail vacancy figure of 4%. CoStar data shows no new construction in 2015, with little new inventory planned ahead. A challenging conundrum for Portland's eastside pattern area is that despite substantial unmet retail demand, the economics of new store construction in a lower rent environment do not appear to readily support adding more retail commercial space to better meet local need.
- At just over 2%, the **Westside** area has the lowest vacancy rate combined with rents of \$18+ that average the highest of Portland's pattern areas. Despite strong market pressure including substantial unmet local demand, delivery of new retail product is constrained by west hills topography, limited suitable retail sites, and substantial travel to shop in Beaverton (for day-to-day convenience goods) and Central City (for higher end, comparison goods). The challenge of finding suitable sites is highlighted by the fact that CoStar data indicates zero absorption of retail space in 2015 and no new construction in the pipeline as currently planned.

## IMPLICATIONS FOR CITY RETAIL POLICY & PROPOSED MIXED USE ZONES

Two implications for City policy and planning deliberation are drawn from this analysis:

- City policy and zoning as proposed appears counterproductive for places like the Eastern pattern area that already are grocery and retail deserts, as retail rents will prove ever more challenged to meet design requirements and higher development costs with proposed added regulations.
- Providing adequate retail goods and services throughout Portland requires regulations that not only reduce the development cost burden but also provide sites adequate for grocery and other retail not well represented throughout the city, including even much of the Inner pattern area.

RTF/ICSC participants stand ready to assist in framing and reviewing policies supportive of City Comprehensive Plan objectives that also can be crafted as customer and retail friendly.

This analysis of Portland retail performance by *pattern area* has been prepared for the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) by the economic and development consulting firm E. D. Hovee & Company, LLC. For further information, contact firm principal Eric Hovee, phone: (503) 230-1414, email: [ehovee@edhovee.com](mailto:ehovee@edhovee.com), or website: [www.edhovee.com](http://www.edhovee.com).

Testimony to Portland City Council, Apr. 14, 2016 re EOA and Medium Marine Cargo Forecast

I'm Rob Mathers, 5880 NW St Helens Road, a board-member of the Working Waterfront Coalition.

I'm here to support Council's adoption of the latest version of the Economic Opportunities Analysis (EOA), which includes an updated analysis of marine-terminal land needs and a shift from the low-scenario to the **medium-scenario** of the marine-cargo forecast. This change is wholly-supportable from both a supply and demand perspective. And it better reflects the generally "higher-aiming" aspects of the city's Comprehensive Plan, particularly in terms of maintaining vigorous economic growth and further-achieving a healthy, *diverse* economy. My hope and expectation is that the updated EOA with medium cargo forecast will be adopted unanimously by Council.

I have a comment (see below)\* about a proposed policy Amendment to the Comprehensive Plan (i.e., #P56), but will submit this testimony to the Clerk in writing. Thank you.      END OF VERBAL TESTIMONY

\*A proposed Amendment to the Comprehensive Plan I'm personally not in favor of is #P56 (New Policy after 6.48). This policy would "limit fossil fuel distribution and storage facilities to those necessary to serve the regional market". I understand that the city wants to prohibit the "export" of fossil fuels through the city. However, this blanket limitation could have unintended consequences (after all, 20 years is a long time and other regions could benefit from using Portland's significant energy infrastructure as these other regions transition to the use of renewable fuels), and it seeks to impose an absolute restriction on one potential element of diversified economy. ~~Only that the Council pass to consider this policy for its amendment.~~

Rob Mathers, 5880 NW St Helens Road, Portland, OR 97210

*RM*

Received  
APR 14 2016

Maryellen Read  
125 SW Collins St.  
Portland OR 97219-6584  
April 11, 2015

Mayor Charlie Hales  
Portland City Hall Room 340  
1221 SW 4<sup>th</sup>  
Portland Oregon 97214  
RE: Opposition to Last Minute Amendments to the Comprehensive Plan

Dear Mayor Hales:

This list of last minute amendments -- radical and far reaching changes to the 2035 Comprehensive Plan--have been inserted into the Plan with little time for public awareness, much less review or comment. Is this intentional on the part of City Council? Or, is it the result of lack of foresight, or planning or just incompetence?

In either case, the citizens of Portland have been removed from participating in decisions that will greatly affect them.

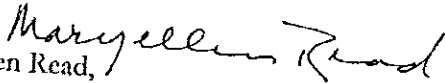
In either case it is an emergency for involved citizens. Public confidence in the process has curdled to cynicism.

At the very least, City Council needs to add significant time to the process of community review and examination of the proposed amendments. Immediately

Going ahead with the existing time constraints, and the attendant lack of public awareness and scrutiny, erodes citizen confidence in the open and due process of Portland's commitment to openness in governance.

Oregon's ethics law requires transparency. Disclosures of financial interests associated with these amendments should be in the public record. Sufficient time to examine this record is required for meaningful input by the citizens and for scrutiny by the press.

The abbreviated time-line imposed by the 11<sup>th</sup> hour announcement of these amendments to the 2035 Comp Plan is disenfranchising residents and marginalizing neighborhood input.

Signed,   
Maryellen Read,

Resident of Portland OR



April 13, 2016

Dear Mayor Hales and Members of City Council,

On behalf of the Audubon Society of Portland, I would like to submit the following comments on the proposed Comprehensive Plan Amendments.

**Oppose Amendment M33: Designation of 57 acres of wildlife habitat at Broadmoor Golf Course as Industrial Sanctuary:** We strongly oppose Amendment #34 which would add an industrial sanctuary designation to 57 acres of high value wildlife habitat at Broadmoor Golf Course. Audubon participated in multiple Comprehensive Plan Committees including the Watershed Health PEG and the Industrial Lands/ Watershed Health PEG which extensively discussed future uses of Broadmoor Golf Course. Throughout the entire process, the City repeatedly assured participants that, while it would consider converting lower value habitat frontage along Columbia Blvd to industrial use, it was committed to permanently protecting the rest of the golf course as openspace and wildlife habitat. Never once during this multi-year effort did the City indicate that high value habitat at the Golf Course would be consider for conversion to industrial use. To the contrary, the City repeatedly represented the conversion of the frontage as a trade-off that would ensure that the rest of the parcel would be permanently retained as open space, similar to the deal that was cut at Colwood Golf Course to the east. While we do not support conversion of any openspace at this site to industrial use, we chose not to actively and aggressively oppose the conversion of the frontage along Columbia based on the clear understanding that the City was committed to permanently protecting habitat and openspace throughout the rest of the parcel. The decision to convert an additional 57 acres of high value habitat through the amendment process fundamentally breaks faith with that extensive public process.

The additional 57 acres that are now being proposed for conversion to industrial use occur on the northern portion of the golf course, away from Columbia Blvd and inaccessible from the current road grid. The entire 57 acres are ranked as high value habitat in the City's most recent Natural Resource Inventory and the majority of the site is currently covered by an environmental overlay. The site is surrounded on three sides by wetlands including the Columbia Slough to the south and City owned Catkin Marsh to the north. In total, the site includes more than 6,000 linear feet of riparian habitat. The City has spent millions of public dollars restoring the Slough and Catkin Marsh and the conversion of these 57 acres would destroy the connectivity between these sites, leave them isolated from each other, and significantly reduce their natural resource functionality. One of the most important features

of urban natural areas in terms of functionality is their size---this amendment would take one of the most significant large natural areas along the slough and reduce it to three small isolated fragments.

The site has been documented to provide habitat for 11 at-risk bird species as well as state listed "sensitive" western painted turtles. This site is also full of dozens of very large, beautiful trees and hundreds of smaller trees that would be eliminated by development. The amendment makes a mockery of the City's professed concern for protecting big trees.

Finally, conversion of these 57 acres is not necessary to meet industrial land demand. BPS staff have confirmed that this conversion would add to a surplus of industrial land that now exists in the proposed comprehensive plan. The property owner was already going to reap a significant financial windfall from the conversion of the frontage at Broadmoor. Converting an additional 57 acres of high value habitat puts the owner's excessive profits ahead of the interests of the community and the environment.

Put simply, this is a site that should never have been given consideration for conversion. We are deeply troubled that the city is considering converting any openspace at all to industrial use, but the conversion of these 57 acres demonstrates a complete and total disregard for the value wildlife habitat, openspace, water quality and community livability. We urge council in the strongest possible terms to reject this amendment.

**Oppose: Amendment to Transportation System Plan to add Hayden Island Bridge from Expo Center to Hayden Island:** This bridge, estimated to cost \$80 million, but in all reality likely to cost far more, would terminate in high value wildlife habitat on West Hayden Island causing extensive habitat destruction, habitat fragmentation, loss of shallow water habitat for listed salmonid species, noise and pollution. It would also require an extensive road through high value West Hayden Island habitat in order to connect with development on East Hayden Island, resulting in even more natural resource destruction and introducing potentially destructive activities into the natural area that have not been discussed or considered as part of the Comprehensive Plan process. Given that the Economic Opportunity Analysis and Comprehensive Plan no longer includes development on any portion of West Hayden Island as part of the industrial land supply or for any other purpose, it is completely inappropriate to locate a bridge and road in this high value natural area. It is deeply surprising and disappointing, after all the work that has been done discussing West Hayden Island, and which resulted in a clear decision to remove this parcel entirely from the industrial lands inventory, that the City would now add back into the TSP a major development proposal (bridge and road) without any discussion or analysis what-so-ever of the potential impacts. The City and Port have repeatedly indicated that the only justification for a bridge to West Hayden Island would be to support industrial development on that parcel. In recent years, the Port has indicated that even with development on West Hayden Island, a bridge still would not pencil out. If the City's goal is to service West Hayden Island, then any new bridge that is needed should connect directly to East Hayden Island. We are hard pressed to understand why the City would frivolously and irresponsibly add as a last minute amendment, an \$80 million bridge that was only ever proposed to service a facility that will not be built and which would severely degrade one of the city's most valuable wildlife areas. We urge the City to remove this amendment to the TSP.

**Oppose: Amendment S18 to retain single-dwelling 10,000 rather than down-designation to single-dwelling 20,000.** We believe this amendment is at odds with the city's commitment and obligation to prevent unsafe development on steep slopes with high risk of landslides. In this case, the property in question is a large site of more than 12 acres that is significantly constrained. The property is largely

comprised of forested slopes >25% with poorly infiltrating soils. Several streams/drainageways traverse the property, as do historical landslide deposits, landslide scarps and scarp flanks, and liquefaction zones. The property is ranked moderate-high for earthquake hazard and earthquake related landslide hazard. Nearly the entire property is within the environmental protection or environmental conservation overlay zone. The property is within the City's potential landslide and wildfire hazard zones, and experiences long emergency response times. There are no City of Portland storm-only sewers available to this property. Future development would necessitate removal of trees that intercept rainfall and maintain slope stability, and result in additional stormwater runoff to vulnerable onsite drainage ways from new buildings and substantial required road and sidewalk improvements. There is no water main in SW Humphrey at the site of the proposed development.

Put simply, intensive development on this property is an accident waiting to happen and will seriously erode important natural resource values. Reducing future development potential in this area is important to meet Comprehensive Plan goals and policies for public health and safety, resilience to natural hazards and climate change, urban forest management, and protection of natural resources. We urge you to reject this amendment.

**Changes to the Economic Opportunities Analysis:** Audubon is greatly concerned about the decision to shift from the low scenario to the medium scenario in the marine cargo forecast. As the analysis notes, this change is occurring based on the Port of Portland's testimony to City Council at the final Comprehensive Plan hearing in January 2016 in which it suddenly revealed that it possessed "substantially expanded capacity for cargo growth" at its existing facilities (ie without relying on development at West Hayden Island.) While we are pleased to hear that the Port has admitted that it has greater cargo capacity at existing facilities than previously revealed and does not need West Hayden island to meet that demand, something that we have suspected was in fact the case, it is deeply troubling that the Port waited literally until the very final hearing of a multi-year process to reveal this information. The Port not only denied that this capacity existed throughout the multi-year process to develop the Comprehensive Plan, but also through multiple other river related public processes including two recent West Hayden Island processes and the North Reach River Plan process. Additionally, the Port not only denied the existence of this capacity, it also consistently and aggressively asserted that this capacity could not be achieved through redevelopment, reconfiguration, land assembly or any other strategy, save one: development of West Hayden Island.

The Port's last minute revelation regarding increased capacity, calls into question why this information was not revealed sooner. A dramatic increase in marine cargo capacity is not something that is suddenly discovered looking behind a building or a tree. It is the product of years of careful planning and deliberate development and it something that the Port has to know about long before it was revealed in this instance. Given the degree to which the City and private consultants have previously validated the Port's denials of this capacity or even the potential to create this capacity, the City needs to take a hard look at how it assesses industrial land capacity. The process as it currently stands is far too reliant on proprietary information, unverified information provided by corporate entities with a vested interest in the outcome, subjective interviews with industrial property owners, and the review of a handful of consultants that move back and forth between working for the City and working with industrial land owners they are supposed to objectively assess. The process tends to exclude truly independent experts

and non-industrial and community stakeholders. Put simply, the current process for assessing industrial land capacity lacks credibility, reliability, transparency and it rife with conflict of interest.

While we are pleased to hear the Port admit that it has capacity and does not need West Hayden Island, we are concerned that failure to disclose this information previously undermined the integrity of multiple public processes. We are also concerned that the EOA, a highly complex multi-volume analysis, that has previously undergone rigorous review and comment, is now being significantly modified at literally the last minute with nominal rigor and review. This appears to us to be a recipe for error and unintended consequences. As a stakeholder which has invested tremendous time and resources in working on industrial land and natural resource issues in Portland Harbor, it is difficult to know exactly how to respond to a last minute revelation of this magnitude. We would however, like to capture three points that we think are critical to moving forward:

- 1) The Port has stated explicitly that it has adequate capacity at its existing facilities to meet the midrange forecast without necessitating development on West Hayden Island.
- 2) West Hayden Island was not included in the Comp Plan industrial land inventory in either the prior EOA (which used a low forecast) or the Revise EOA (which uses a midrange forecast.) Should the last minute changes to the EOA result in unintended or unanticipated challenges, errors, omissions, etc. we want to make sure that it is clearly on the record that under the current or previous version of the EOA or under the low or midrange forecast is West Hayden Island included in the industrial land inventory or expected to be needed for industrial development during the life of this Comp Plan.
- 3) We urge the City to take a systemic look at how it conducts industrial land capacity and demand analyses. A change of this magnitude so late in the process indicates that a much higher level of rigor, transparency and credible independent validation needs to be incorporated into these processes.

Audubon greatly appreciates your consideration of these comments.

Respectfully,



Bob Sallinger  
Conservation Director  
Audubon Society of Portland

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Thursday, April 14, 2016 4:02 PM  
**To:** Pam Treece  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: EOA Forecast for the Portland Comprehensive Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Pam,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** Pam Treece [mailto:PTreece@westside-alliance.org]  
**Sent:** Thursday, April 14, 2016 3:48 PM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>  
**Cc:** Mary Quinn <mquinn@westside-alliance.org>; Teresa Dunham <tdunham@westside-alliance.org>; Ed Trompke (Ed.Trompke@jordanramis.com) <Ed.Trompke@jordanramis.com>; Mike Morey (mike.morey@standard.com) <mike.morey@standard.com>  
**Subject:** EOA Forecast for the Portland Comprehensive Plan

Dear Mayor Hales and Council,

Thank you, in advance, for supporting a revision to the Economic Opportunities Analysis (EOA) to incorporate a medium-cargo forecast in the Portland Comprehensive Plan. I know that the Portland harbor is home to more than 100 businesses that depend on hundreds of smaller local businesses; collectively these businesses employ more than 50,000 employees. Nearly 60% of this work force earn middle income wages and about 20% are ethnically or racially diverse. In the past five years these



Portland harbor businesses have invested more than \$370 million and have generated more than \$4.5 million in local tax revenue annually.

As Executive Director of the Westside Economic Alliance, I was pleased to support the change to moderate growth forecast in the initial hearings before City Council last fall. It's important for our Portland-Metro region to have a thriving, growing working waterfront and a city that supports and understands the importance of our port.

The region needs increased growth in the harbor. I urge you to change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Planning and Sustainability Commission.

Thank you for your consideration.

Pamela Treece  
Executive Director

**Westside Economic Alliance**

10220 SW Nimbus Ave. Suite K-12 Tigard, OR. 97223

Phone: 503-968-3100 cell: 503 913-8199

[ptreece@westside-alliance.org](mailto:ptreece@westside-alliance.org)

follow this link to our website:

[Welcome to the Westside Economic Alliance!](#)

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Thursday, April 14, 2016 3:35 PM  
**To:** Jeff Stone  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Portland Comprehensive Plan revision

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Jeff,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** Jeff Stone [mailto:jstone@oan.org]  
**Sent:** Thursday, April 14, 2016 10:59 AM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Portland Comprehensive Plan revision

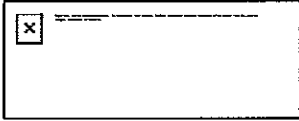
Mayor Hales

Thank you, in advance, for supporting a revision to the Economic Opportunities Analysis (EOA) to incorporate a medium-cargo forecast in the Portland Comprehensive Plan. I know that the Portland harbor is home to more than 100 businesses that employ hundreds of smaller local businesses, which collectively employ more than 50,000 employees. Nearly 60% of this work force earn middle income wages and about 20% are ethnically or racially diverse. In the past five years these Portland harbor businesses have invested more than \$370 million and have generated more than \$4.5 million in local tax revenue annually.

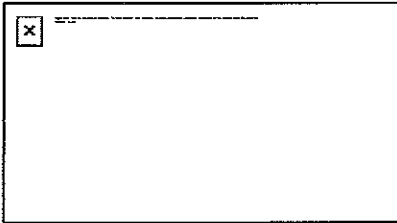
As Executive Director of the Oregon Association of Nurseries, I was proud to support the change to moderate growth forecast in the initial hearings before City Council last fall. It's important for our Oregon nurseries to have a thriving, growing working waterfront and a city that supports and understands the importance of our port.

If you care about maintaining and growing robust employment opportunities for all of the residents of the City, then you should ensure that there is adequate growth in the harbor. I urge you to change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff.

Jeff



JEFF STONE / Executive Director, Oregon Association of Nurseries  
email: [jstone@oan.org](mailto:jstone@oan.org) office: 503-682-5089 cell: 971-235-3868  
29751 SW Town Center Loop West, Wilsonville, Oregon 97070



FAR FROM ORDINARY  
AUGUST 25-27, 2016  
[www.farwestshow.com](http://www.farwestshow.com)

PERKINScoie

1120 NW Couch Street  
10th Floor  
Portland, OR 97209-4128

① +1.503.727.2000  
② +1.503.727.2222  
PerkinsCoie.com

April 14, 2016

Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 97204

**Re: 2-35 Comprehensive Plan Testimony - RTF & ICSC**

Dear Mayor Hales and Council Members:

This letter is submitted on behalf of the RTF and the Oregon GR Committee for ICSC. Please make it part of the hearing record.

I transmit copies of letters from various retailers and their consultants urging adoption of the proposed grocery store (new Policy 4.79) and retail (new Policy after 6.65) policies aimed at solving the food desert problem, plus a number of newspaper articles that talk of the problem. These letters also speak of the need to avoid nonconformity, which is addressed by the proposed new Sub-Policy 6.17.

I also forward letters from ORLA, OBA and USBLN stating concern over the proposed prohibition of drive-through facilities in opposition to the new Policy being proposed after 4.23.

Thank you for opportunity to comment. Please vote for our proposed policies.

Respectfully submitted,



Mark D. Whitlow

MDW:sv  
Enclosures

91004-0005/130629521.1

Perkins Coie LLP



US Business Leadership Network<sup>®</sup> (USBLN<sup>®</sup>)  
1310 Braddock Place, Suite 101  
Alexandria, VA 22314  
Phone: (800) 706-2710  
Fax: (800) 706-1335  
[info@usbln.org](mailto:info@usbln.org)  
[www.usbln.org](http://www.usbln.org)

April 14, 2016

The US Business Leadership Network (USBLN) urges the Portland City Council and Mayor Charlie Hales to reconsider their proposal to prohibit drive through facilities in the Central City and limit them in other centers and corridors. While the intent of the policy is admirable, it is shortsighted in recognizing the impact to people with disabilities.

Drive through allow people with disabilities access to a variety of businesses including restaurants, banks, and pharmacies. While it may seem like a matter of convenience to some, being able to access these and other establishments can often be challenging to people with a variety of disabilities, and a drive through can often be a solution. This policy would have a negative impact on people with mobility issues, including wheelchair users and senior citizens.

The USBLN opposes any action that would limit the accessibility of public accommodations to people with disabilities, and hopes that City Council and the Mayor will work with the business community on an alternative solution.

###

The US Business Leadership Network is a national non-profit that helps business drive performance by leveraging disability inclusion in the workplace, supply chain, and marketplace. The USBLN serves as the collective voice of nearly 50 Business Leadership Network affiliates across the United States, representing over 5,000 businesses. Additionally, the USBLN Disability Supplier Diversity Program (DSDP) is the nation's leading third party certification program for disability-owned businesses, including businesses owned by service-disabled veterans.



February 29, 2016

Barry Manning  
Senior Planner  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for Albertsons/Safeway Stores**

Dear Mr. Manning:

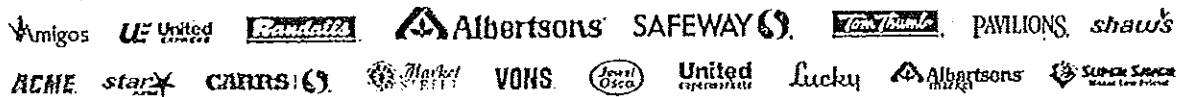
I am the Senior Real Estate Manager for Albertsons Companies, Inc. and wish to comment on the proposed zoning for the Albertsons and Safeway stores in the areas of Portland subject to the proposed mixed use zones. Our stores are all "auto-accommodating", as defined in the Portland Zoning Code (copy attached). None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking and main entrance locations) contained in the definition, but the CE zone comes the closest. Also, we notice that the CE zone is the only new zone that doesn't prohibit drive-through facilities, which are part of our grocery supermarket operations. Therefore, we request that our store sites be zoned CE, without the CMSO overlay, because we need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. A list of our existing Albertsons and Safeway stores impacted by the Mixed Use Zones Project is attached.

We are also concerned about the high degree of nonconformity which will be created for our existing Portland stores if they are zoned anything but CE. Nonconformity lowers market value, makes it more difficult to obtain financing and to sell and, finally, makes it difficult if not impossible to maintain and upgrade in the interim. Zoning the Albertsons and Safeway stores to CE, with no CMSO overlay, will be necessary to avoid excess nonconformity.

We are also concerned that the proposed CE zone is not truly "auto-accommodating". Accordingly, we would ask that consideration be given to softening the main entrance and glazing requirements of the CE zone's development standards to be consistent with the Code's definition of "auto-accommodating".

Finally, we are concerned with the City's proposal to greatly reduce, if not effectively eliminate, drive-through facilities in the City. Please remember that grocery supermarkets consist of a variety of drive-through facilities, including those for fuel, pharmacy and grocery pickup. In addition, grocery supermarkets frequently have pad users with drive-through facilities for restaurants, banks and coffee shops. Elderly citizens and people with disabilities rely on drive-through facilities to assist them in obtaining their daily goods and services. We request that fuel stations in conjunction with grocery supermarkets be exempted from any prohibition of drive-through facilities in any of the zones, especially the CE zone.

Working together to be the *favorite local supermarket*





Thank you for the opportunity to present written comments. We would appreciate an opportunity to further discuss our recommendations with you prior to the issuance of your next staff report.

Yours truly,

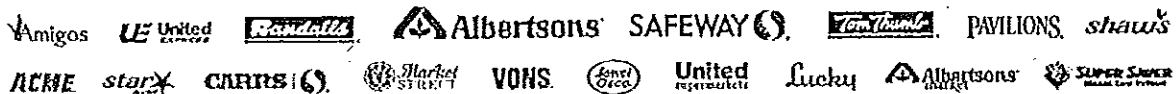
Eric Holzer

Enclosure

Cc: RTF/ICSC GR Committee

Store			Current Zoning		Proposed Zoning	
Banner	Street Address	Sq. Ft.	Zoning	Zoning	Comp Plan	Overlay Zone
Safeway	3527 SE 122nd Ave	48,564	CG	CE	MU-C	No
Albertsons	5415 SW Beav.-Hillsdale Hwy	37,547	CG	CE	MU-C	No
Safeway	5920 NE Martin Luther King Blvd	39,064	CG	CM2	MU-C	No
Albertsons	5850 NE Prescott St	48,754	CG	CM2	MU-N	CMSO
Safeway	11919 North Jantzen Ave	54,975	CG	CE	MU-D	No
Safeway	6901 NE Sandy Blvd	51,602	CG	CM2	MU-C	CMSO
Safeway	221 NE 122nd Ave	52,568	CX	CM3	MU-C	CMSO
Safeway	4515 SE Woodstock	54,689	CN2	CM2	MU-N	CMSO
Safeway	3930 SE Powell Blvd	47,248	CG	CM2	MU-C	CMSO
Safeway	8336 N. Ivanhoe St	56,536	CN2	CM2	MU-UC	No
Safeway	2800 SE Hawthorne Blvd	55,787	CS	CM2	MU-UC	Design
Safeway	8145 SW Barbur Blvd	62,925	CG	CM2	MU-C	No

Working together to be the favorite local supermarket™





*The Voice of Oregon Banking • Since 1905*

January 6, 2016

Portland City Council  
Attn: Council Clerk  
1221 SW Fourth Ave., Room 130  
Portland, Oregon 97204

RE: 2035 Comprehensive Plan and Drive-Through Facilities

Dear Mayor Hales and Members of the Portland City Council:

On behalf of the Oregon Bankers Association (OBA) and the Independent Community Banks of Oregon (ICBO) and our membership of Oregon's state and national banks, we appreciate the opportunity to provide written testimony on the above-referenced proposal concerning updates to the City of Portland Comprehensive Plan and the Issue of auto-oriented uses, including drive-through facilities. By way of background, the OBA is the full-service trade association for the banking industry in the State of Oregon. The ICBO serves the independent banks headquartered in the State of Oregon. OBA and ICBO work collaboratively and represent the voice of the Oregon banking community before federal, state, and local governmental entities.

Discussion

We would strongly encourage the City to adopt a comprehensive retail policy that gives better direction for commercial zoning and allows auto-oriented uses and developments, including drive-through facilities. OBA, like many of its business community partners, is concerned that changes to the Comprehensive Plan and zoning requirements could lead to the prohibition of drive-through facilities or their redevelopment, except in rare and limited circumstances, in the City of Portland.

Drive-through facilities are a necessary component of retail developments of all kinds, including banks. Reasons for drive-through facilities in the banking industry include, among other things:

- Customer ease and convenience;
- Access opportunities for the elderly and disabled;



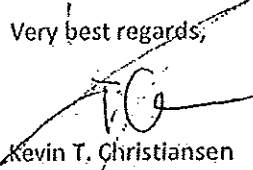
- Physical Safety and Security (especially during non-peak business hours);
- Customer demand for drive-through access; and
- Lack of parking alternatives.

These same justifications apply to other industries who utilize drive-through facilities including pharmacies, grocery stores, dry cleaners, coffee shops, restaurants, and others. Banking customers want drive-through facilities and we strongly encourage that City to preserve this option in adopting its Comprehensive Plan and the applicable zoning allowances.

Conclusion

We appreciate the opportunity to provide written testimony with respect to the 2035 Comprehensive Plan. If you have additional questions, please feel free to contact us. Thank you.

Very best regards,



Kevin T. Christiansen  
Government Affairs Director  
Oregon Bankers Association &  
Independent Community Banks of Oregon



January 5, 2016

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

Re: 2035 Comprehensive Plan

Dear Mayor Hales and Council Members:

I am the CEO of the Oregon Restaurant & Lodging Association and submit our letter of concern to be placed in the Council's hearing record on the proposed Comprehensive Plan amendments.

The City should adopt a comprehensive retail policy that gives better direction to adopt commercial zoning that allows auto-oriented uses and developments in appropriate areas, including those with drive-through components. The unwritten policy expressed in the City's proposed commercial zoning in the Mixed Use Zones Project is to prohibit drive-through facilities or their redevelopment, except in rare circumstances.

Drive-through facilities are a necessary component of retail development and redevelopment of grocery stores, banks, pharmacies, grocery stores, dry cleaners, fuel stations and coffee kiosks, in addition to fast food. Many of these uses develop with grocery stores and pharmacies as pad users needed to off-set the high cost of urban development, absent which it is harder to provide essential grocery and pharmacy facilities.

The City needs a better retail policy in the City's Comprehensive Plan to provide better zoning guidance in the proposed amendments to the Zoning Code. Please adopt the retail policy proposed by the RTF and ICSC.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Brandt", is written over a light blue horizontal line.

Jason Brandt  
President & CEO  
Oregon Restaurant & Lodging Association

Cc: Tom Armstrong, BPS  
Eric Engstrom, BPS  
Susan Anderson, Director, BPS  
RTF/ICSC GR Committee

# PERKINS COIE

1120 NW Couch Street  
10th Floor  
Portland, OR 97209-4128

☎ +1.503.727.2000  
☎ +1.503.727.2222  
PerkinsCoie.com

January 6, 2016

Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

## VIA EMAIL

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, Oregon 97204

Re: 2035 Comprehensive Plan Supplemental Testimony - RTF & ICSC

Dear Mayor Hales and Council Members:

This letter supplements the December 31, 2015 letter written on behalf of the Retail Task Force (RTF) and the Oregon Government Relations (GR) Committee for the International Council of Shopping Centers (ICSC) regarding the above matter. Please make this supplemental letter a part of your record of proceedings.

Enclosed are additional letters from concerned retailers and their consultants, each testifying to the need to adopt a concise retail policy within the City's Comprehensive Plan. The retail policy is needed to direct the City's work in implementing the Comprehensive Plan through the Portland Zoning Code. Without the requested policy, the amendments currently proposed to the Zoning Code inhibit rather than facilitating new opportunities for grocery store development in Portland's neighborhood.

We are working with Barry Manning and Bill Cunningham on the companion Mixed-Use Zones Project, but first wanted to request the needed policy in the Comprehensive Plan, as we are now doing.

Thank you again for the further opportunity to comment. We look forward to working with your staff regarding the proposed retail policy.

Very truly yours,



Mark D. Whitlow

Enclosures

CCs (with enclosures):

Tom Armstrong, BPS  
Eric Engstrom, BPS  
Susan Anderson, Director, BPS  
RTF/ICSC GR Committee  
Barry Manning  
Bill Cunningham

00000-0000/31438213.1

Perkins Coie LLP

Integra Realty Resources  
Portland

1220 SW Morrison Street  
Suite 800  
Portland, OR 97205

T 503.478.1000  
F 503.274.8630  
[www.rr.com/portland](http://www.rr.com/portland)



January 5, 2016

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4<sup>th</sup> Avenue, Room 130  
Portland, OR

RE: 2035 Comprehensive Plan Testimony – RTF & ICSC

Dear Mayor Hales and council Members:

The Retail Task Force (RTF) and the Oregon Government Relations (GR) Committee for the International Council of Shopping Centers (ICSC) have already provided testimony on the 2035 Comprehensive Plan. I want to testify from a slightly different point of view. I have been appraising and consulting on commercial real estate in Portland for more than 40 years and am a native. I hold the professional designation of MAI (Appraisal Institute; the largest and oldest professional valuation organization in the United States), FRICS (Fellow RICS; the largest international valuation organization); and CRE (Counsellors of Real Estate; a national professional consulting organization). I was the national president of the Appraisal Institute and chair of all of the Americas for RICS and served two terms on the International Valuation Standards Council (IVSC), writing international standards for professional practice.

The proposed plan identifies the potential for 120,000 new residents in Portland and proposes increased density to accommodate them. Regarding transportation, the Plan pushes increasing

walking, biking and public transportation and proposes much lower parking availability to lower the carbon footprint. Data from the U.S. Census Bureau (2006-2010) show that only 12 percent of Portland workers commute to work by mass transit and another 12 percent walk, bike or work at home. Dan Anderson of the Portland Bureau of transportation has stated that Portland has the highest percentage of bike commuters in the U.S. at 6 percent. That leaves 75 percent of the population using the automobile.

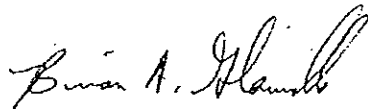
I further believe that many, if not most, of the other 25% of commuters do not use mass transit or their bikes when grocery shopping or shopping for larger items that must be transported home, especially when they have children with them. Replacing carbon fuels is a notable goal, but I submit that those vehicles will eventually be replaced by automobiles powered by electricity or other fuels. Thus, there will still be automobile traffic to deal with. Utopian ideals are to be commended, but leaders must also look at reality.

Two basic components of value for commercial real estate are exposure to traffic and the availability of parking. Lenders require that these two questions be answered in detail, as the lack of either can have a major negative impact on value, hence increasing the risk of a business failure and property foreclosure. If the property does not meet market expectations, either the loan will not be made or a lower loan to value ratio will be applied.

The Plan appears to encourage reduced parking for major shopping sites on transit streets. The consequences of this policy can be expected to result in some failed and poorly performing projects and will eventually force many retailers to move to the suburbs, forcing Portland residents to drive even further for their shopping needs.

For an example of an under parked shopping center, I suggest looking at Bridgeport Village in Tualatin, yet it has far better parking than the proposed plan would allow. Portland is already having trouble attracting grocery stores to the East side and this change of zoning will not help. I encourage the Council to look closer at the proposed Comprehensive plan and make adjustments to the policy to better serve the residents of Portland.

Respectively submitted:  
INTEGRA REALTY RESOURCES - PORTLAND



Brian A. Glanville, CRE, FRICS, MAI  
Senior Managing Director

COMMERCIAL  
REALTY  
ADVISORS



NORTHWEST, L.L.C.

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

January 4, 2016

VIA EMAIL

Re: 2035 Comprehensive Plan Testimony

Dear Mayor Hales and Council Members:

I have been a retail broker active in the Portland region for almost 20 years. I have been fortunate to represent some great retailers over these years, including large-format operators selling affordable groceries. These grocery operators need properly zoned commercial sites with access in the close-in urban area to allow their loyal customers to shop local and not have to drive out to their stores in the suburbs to save on their shopping. Appropriate zoning for these grocery operators would allow traditional horizontal development with ample off-street parking and convenient access. There are few, if any, sites in Portland that are large enough with appropriate zoning to accommodate traditional grocery stores.

It would be great if in this round of amendments to the Comprehensive Plan a concise retail policy could also be adopted to provide better direction in the zoning code implementation, especially now that the Zoning Code is also being amended without that needed guidance. With appropriate retail zones that allow market-based development, land within existing centers and commercial strips might be assembled into sites large enough to accommodate grocers providing affordable food to customers using all modes of transportation, including the auto. The City needs to create some retail zones with safe harbors for auto-oriented grocery store and related pad development in the city's commercial zoning regulations that make development or redevelopment within those zones affordable for these grocery operators.

For the above reasons, I urge you to adopt the retail policy proposed by the RTF and ICSC into the City's Comprehensive Plan to give better guidance to the City in adopting new amendments to the city's Zoning Code. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. L. LeFeber'.

Robert L. LeFeber  
Principal Broker

cc: Tom Anderson, Eric Engstrom, and Susan Anderson. BPS  
RTF/ICSC GR Committee

# Fred Meyer

Corporate Real Estate  
3800 SE 21<sup>st</sup> Ave.  
Portland, OR 97202

Don Forrest  
Division Real Estate Manager  
don\_forrest@kryger.com

(503) 797-3117  
Fax (503) 797-3539

December 31, 2015

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

Re: 2035 Comprehensive Plan

Dear Mayor Hales and Council Members:

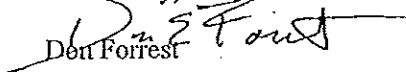
I am the Division Real Estate Manager for Fred Meyer. Currently, Fred Meyer operates over 140 stores throughout Oregon, Washington, Alaska and Idaho.. Fred Meyer supports the retail policy now being proposed by the RTF/ICSC GR Committee to facilitate new grocery store development and redevelopment in Portland's residential neighborhoods.

Grocery store development and redevelopment is controlled by the current market, and the economic challenges associated with existing circumstances and those that are planned for in the future. If one of Portland's goals is to provide healthy food choices for all of Portland's neighborhoods, many of which are unserved or under-served, Portland needs to provide retail zones that work for grocery stores selling goods to customers using cars, the dominate mode choice both currently and within the next 20-year planning period. Most of the City's commercial zones outside the core are still not served by frequent transit with good ridership that may mitigate the need for traditional building orientation and parking to serve the auto mode of transportation.

Please adopt a cogent retail policy in the comprehensive plan amendments that addresses traditional grocery store site zoning needs for adequate off-street parking and convenient access.

Thanks for the opportunity to comment. We urge the Council to direct staff to include the requested retail policy in the next discussion draft.

Yours truly,

  
Don Forrest

Cc: Tom Armstrong, BPS  
Eric Engstrom, BPS  
Susan Anderson, Director, BPS  
RTF/ICSC GR Committee

# **WinCo**

## **FOODS**

*An Employee Owned Company*

WinCo Foods, LLC  
Corporate Office  
650 N. Armstrong Place  
Boise, Idaho 83704

P.O. BOX 5756  
Boise, Idaho 83705-0756  
(208) 377-0110  
FAX (208) 377-0474

December 29, 2015

VIA EMAIL

Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

Re: 2035 Comprehensive Plan Testimony

Dear Mayor Hales and Council Members:

I am the Vice President of Real Estate for WinCo Foods and coordinate WinCo store development in eight states, including Oregon. For many years, WinCo has sought to add additional stores to the Portland area but unfortunately have had to skip over most potential store sites in Portland because the zoning standards in most existing zones do not work for us regarding building placement and limitations on parking and access. WinCo needs retail land that can serve people needing affordable groceries who shop by car, meaning more of a traditional retail center with direct arterial access and Code allowance ample off-street parking. That type of land just doesn't exist in Portland. It is unfortunate, as we get many requests from your constituency wanting a full size WinCo in areas where we do not have a store close by.

Please consider adding a good policy statement to the Comprehensive Plan that results in the creation of commercial land zoned to allow development of auto-oriented retail grocery facilities which do not need structured parking. Mixed use projects with structured parking are too expensive for value-based grocers such as WinCo to develop and operate. The City has the obligation to make zoning allowances to provide affordable food facilities, not just affordable housing. Please adopt a retail policy that results in making affordable food available in all of Portland's neighborhoods.

Thank you for the opportunity to comment.

Yours truly,



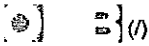
Greg Goins  
VP of Real Estate  
WinCo Foods, LLC

91004-0005/129159136.1

[www.wincofoods.com](http://www.wincofoods.com)



OPB FM Now Playing: All Things Considered



contribute (<https://secure.opb.org/support/contribute/>)



News

News ([/News/Topic/News/](#)) | Food ([/News/Topic/Food/](#)) | Local ([/News/Topic/Local/](#)) | *East Of 82nd* ([/News/Series/East-Of-82nd-A-Closer-Look-At-East-Portland/](#))

# East Of 82nd: Raising Children In A 'Food Desert'

by Amanda Peacher ([/contributor/amanda-peacher/](#)) OPB | June 25, 2013 5 a.m. | Updated: Feb 18, 2016 8:16 a.m. | Portland



OPBNews

East Of 82nd: Raising Children In A 'Food Desert'

[SOUND CLOUD](#)

Share



[Cookie policy](#)

509

*According to the U.S. Census, East Portland is the fastest growing part of the city and home to many of the area's youngest residents. With only a quarter of the city's total population, East Portland is where 40 percent of the children live.*

*This week in our series, "East of 82nd" we'll explore what's available for children there. Where can they play? How safe is it for them to walk in their neighborhood?*

*We begin our series with a look at the availability of affordable, fresh food.*

*You can share your East Portland stories on our Tumblr page (<http://eastportland.tumblr.com>).*

Naniloa Bannister likes being the responsible big sister. Every day after school the 8-year-old gets a snack ready for herself and her little sister Adrianna.

"I usually open a can of food for us," says Naniloa, as she works a can opener around a can of SpaghettiOs.

Adrianna and Naniloa live with their mom Casey Bannister in a compact, two-bedroom



THANKS TO OUR SPONSORS:

[become a sponsor \(/support/partners/\)](#)



## Related Content



[\(/news/video/youtube-east-of-82nd-playgrounds-as-healing-spaces/\)](#)

East Of 82nd: Playgrounds As Healing Spaces  
[\(/news/video/youtube-east-of-82nd-playgrounds-as-healing-spacas/\)](#)



apartment near Burnside and 151st Avenue in East Portland. Today, the cupboard and the fridge are well-stocked. That's because Bannister just made a trip to the grocery store.

Adrianna and Nani'oa Bannister enjoy fresh strawberries.

Amanda Peacher /OPB

"We eat strawberries, and we drink juice," says four year-old Adrianna, as she peers into the fridge.

Bannister doesn't have a car, so she usually takes the bus or light rail to get groceries.

"I want to get to the grocery store and I want to get a whole bunch of stuff but I have to remember that I can't carry all those things home," says Bannister. "It can be challenging at times, and tiring. But you gotta do what you gotta do sometimes."

Bannister lives in part of Portland that that the U.S. Department of Agriculture calls a "food desert



Four-year-old Adrianna Bannister loves Spaghettios as an afternoon snack.

Amanda Peacher /OPB

(<http://apps.ams.usda.gov/fooddeserts/foodDeserts.aspx>)." Those are regions where it's hard to find of fresh fruit, vegetables and other healthy unprocessed foods.

Forty percent of Portland residents live more than a mile away from a grocery store, according to the USDA. Many live East of 82nd Avenue. In this part of town, five major grocery stores have closed in three years — most recently a Safeway at 82nd and Burnside.

The closest grocery store to Bannister is a mile and a half away, and that can make walking or biking a challenge.

"I've had to stop a couple times because the groceries are so heavy and either sore on my shoulder or on my hands, especially when they were plastic bags," says Bannister.



(/news/video/youtube-east-of-82nd-better-than-my-life/)

East of 82nd: Better Than My Life (/news/video/youtube-east-of-82nd-better-than-my-life/)



(/news/series/east-of-82nd-a-closer-look-at-east-portland/east-of-82nd-kids-look-for-parks-and-places-to-play/)

East Of 82nd: Kids Seek Parks And Places To Play (/news/series/east-of-82nd-a-closer-look-at-east-portland/east-of-82nd-kids-look-for-parks-and-places-to-play/)



(/news/series/east-of-82nd-a-closer-look-at-east-portland/east-of-82nd-city-struggles-to-make-neighborhoods-walkable/)

East Of 82nd: City Struggles To Make Neighborhoods Walkable (/news/series/east-of-82nd-a-closer-look-at-east-portland/east-of-82nd-city-struggles-to-make-neighborhoods-walkable/)

THANKS TO OUR SPONSORS



Casey Bannister lives with her two kids in outer East Portland.

Amanda Peacher/OPB

"They would cut off the circulation in my fingers and I'd have to stop and take a break."

Neighborhood activists have been asking for more fresh food options here for years.

A Grocery Outlet discount store opened in February on 122nd Avenue. But the demographics of this area won't support a high end grocer.



In some outer East Portland neighborhoods, more than 30 percent of residents live in poverty. The median income here is \$10,000 - \$25,000 less than the median income for the Portland metro area as a whole.

Only two of 24 Portland farmers' markets are located East of 82nd Avenue.

Bannister divides her grocery dollars between Safeway and Winco. She's unemployed right now, and she gets income assistance from the state. She plans meals to a tee, based on what she can afford and what groceries she can carry in her arms.



According to the USDA, forty percent of Portland lives in a food desert. This map shows neighborhoods where grocery stores are more than one mile away.

USDA

"Spaghetti, baked chicken with broccoli or corn, or steamed rice," says Bannister, listing some of her typical meals.

When money gets tight at the end of the month, sometimes she collects cans and bottles for the deposit money. She dreads any unexpected costs.

Saul Orduna is familiar with that feeling. He's a single dad with shared custody of two young kids.



Six-year-old Andrea Orduna picks out some fruit for the family at the SUN food pantry at Shaver Elementary.

Amanda Peacher /OPB

"I try to provide them as much as I can," says Orduna. A couple of years ago he went through a rough time. He lost his job and moved his family to a homeless shelter. They lived there for five months before Orduna found work and was able to afford a one-bedroom apartment across from the train tracks in outer Northeast Portland.

Now, Orduna works nights at a group home for disabled people. He earns about \$1,300 each month.

"My utility payments come up to \$200," says Orduna. "Plus my rent is about \$600 a month. And I have to use probably \$100, \$120 for gas every month. So the rest, I have it for groceries."

That leaves about \$380. Sometimes that's not enough to feed a family of three, says Orduna. So twice a month, he gets food assistance from a program at Shaver Elementary.

Six and seven-year-old Andrea and Ethan Orduna are helping their dad pick out groceries at the school food pantry.

Any family with kids at Shaver can get groceries here. Tables are piled with boxes of fresh fruits and vegetables. Shelves are lined with bread, juice and other staples, and there's milk and eggs in fridges.



The SUN food pantry offers families fresh fruits and vegetables

Amanda Peacher /OPB

"Daddy can we get this?" says Andrea, pointing to fresh strawberries and pineapple.

Orduna says yes, and looks at the other fresh fruits and vegetables piled high on the table. "So, let's see-bananas... asparagus .... You want grapes?"

Orduna gets half, sometimes two thirds of his groceries here. There are more than 50 food pantries East of 82nd Avenue in Portland. For many low-income families, these services help fill the "food desert" gap.

Orduna relies on this kind of help to put food on the table for Ethan and Andrea.



Andrea Orduna helps her dad Saul pick out food at the Shaver Elementary food pantry.

Amanda Peacher /OPB

Orduna says he'd love to be in a position where he doesn't need the services. But he says he's better off than he was two years ago, when he was living with his kids at the homeless shelter.

"I'm happy just to have them here with me. Just to spend time with them, to see them sleeping and see them smiling. Those are the best moments, when I'm able to provide

for them."

Five-year-old Andrea loves family dinners at home. "Some of my favorite things are food Daddy makes, and macaroni and cheese and sopa."

And with a little help from the food pantry, those are all options for dinner tonight.

*Many of the sources for this series came to OPB via our Public Insight Network. (<http://www.opb.org/news/pin/>) Do you live or work East of 82nd Avenue in Portland? You can share your stories, photos and more on our tumblr (<http://eastportland.tumblr.com/>).*

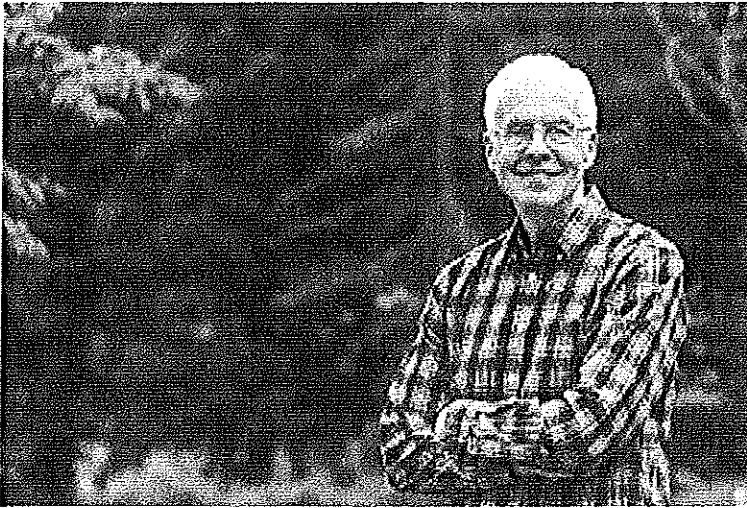
More From East Of 82nd (</news/series/east-of-82nd-a-closer-look-at-east-portland/>)

(</news/series/east-of-82nd-a-closer-look-at-east-portland/east-of-82nd-city-struggles-to-make-neighborhoods-walkable/>)

East Of 82nd: City Struggles To Make Neighborhoods Walkable  
(</news/series/east-of-82nd-a-closer-look-at-east-portland/east-of-82nd-city-struggles-to-make-neighborhoods-walkable/>)

More News





(/news/series/election-2016/bud-pierce-oregon-governor-campaign-fund/)

Salem Cancer Doctor Has Spent \$1 Million On Gubernatorial Campaign (/news/series/election-2016/bud-pierce-oregon-governor-campaign-fund)



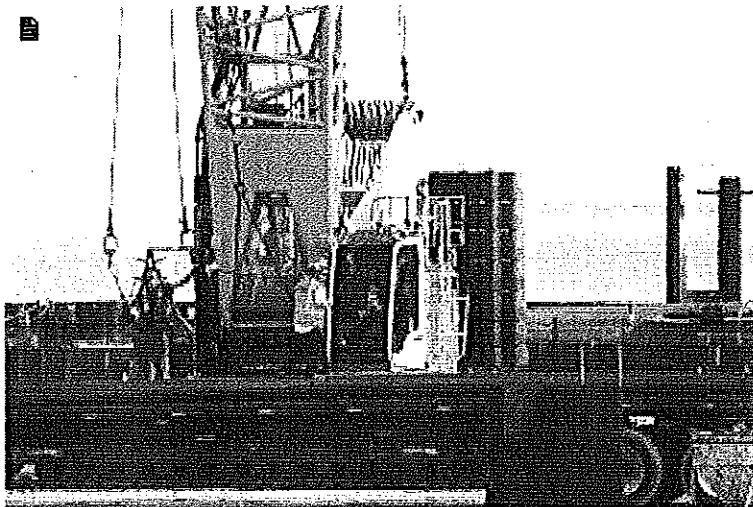
(/news/article/warm-springs-voters-no-constitutional-amendments/)

Warm Springs Voters Say No To Constitutional Amendments (/news/article/warm-springs-voters-no-constitutional-amendments/)



(/news/article/oregon-state-university-cascades-campus-planning/)

OSU-Cascades Kicks Off Community Campus Planning Workshops (/news/article/oregon-state-university-cascades-campus-planning/)



(/news/article/npr-adapting-to-a-more-extreme-climate-coastal-cities-get-creative/)

Adapting To A More Extreme Climate. Coastal Cities Get Creative (/news/article/npr-adapting-to-a-more-extreme-climate-coastal-cities-get-creative/)

More OPB

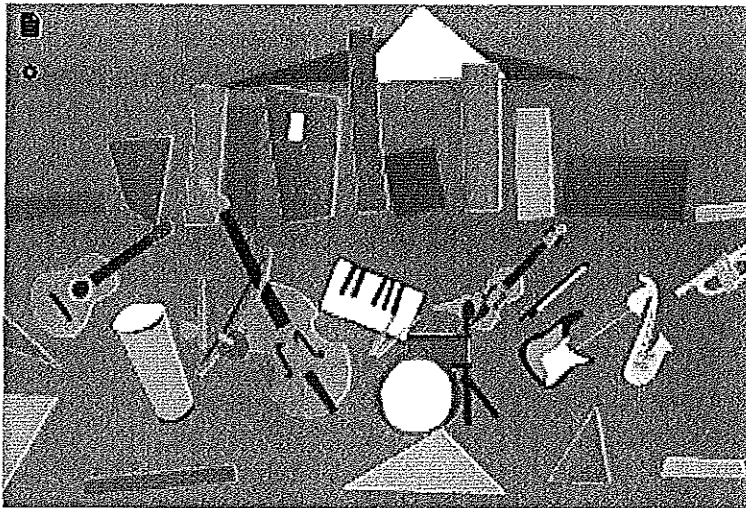




[\(/radio/programs/thinkoutloud/segment/rent-control-rural-organizing-project-threats-sould-out-regional-roundup/\)](#)

Rent Control | Rural Organizing Project Threats | Soufd Out | Regional Roundup  
[\(/radio/programs/thinkoutloud/segment/rent-control-rural-organizing-project-threats-sould-out-regional-roundup/\)](#)

OPB | April 13, 2016



[\(/artsandlife/series/jazztown/watch-what-is-jazz/\)](#)

Watch: What Is Jazz? [\(/artsandlife/series/jazztown/watch-what-is-jazz/\)](#)

**About [\(/about/\)](#)**

[FAQs \(/about/faq/member/\)](#)

[Employment \(/about/careers/\)](#)

[Volunteering \(/about/volunteering/\)](#)

[Internships \(/about/internships/\)](#)

[Producing for OPB \(/about/produce/\)](#)



[Accessibility \(/about/accessibility/\)](#)  
[Hire OPB \(/about/services/\)](#)  
[Pressroom \(/pressroom/\)](#)  
[OPB Public Files \(/about/#moreinfo\)](#)

**Contact (/about/contactus/)**

[Email OPB \(/about/contactus/\)](#)  
[Newsroom \(/about/contactus/newsroom/\)](#)  
[Connect \(/about/connect/\)](#)  
[Facebook \(http://www.facebook.com/oregonpublicbroadcasting?\\_fb\\_noscript=1\)](http://www.facebook.com/oregonpublicbroadcasting?_fb_noscript=1)  
[Twitter \(http://twitter.com/opb\)](http://twitter.com/opb)  
[Reception Issues \(/about/contactus/reception/\)](#)

**Mobile (/about/connect/apps/)**

[Podcasts \(/ondemand/#podcasts\)](#)  
[Mobile Apps \(/about/connect/apps/\)](#)  
[Newsletters \(/about/newsletter/\)](#)  
[RSS Feeds \(/about/rssfeeds/\)](#)

**Support (/support/)**

[Contribute \(https://secure.opb.org/support/contribute/\)](https://secure.opb.org/support/contribute/)  
[Business Partners \(/support/partners/\)](#)  
[Leadership Giving \(/support/membership/leadership/\)](#)  
[Planned Giving \(/support/plannedgiving/\)](#)  
[Vehicle Donations \(/support/vehicledonation/\)](#)  
[Volunteering \(/about/volunteering/\)](#)  
[Shop \(http://www.pntrac.com/t/2-26430-54246-51107\)](http://www.pntrac.com/t/2-26430-54246-51107)

**Shop (http://www.pntrac.com/t/2-26430-54246-51107)**





**Legal (/about/termsfuse/)**

[Privacy Policy \(/about/privacypolicy/\)](#)  
[Terms of Use \(/about/termsfuse/\)](#)  
[Editorial Policy \(/about/editorialpolicy/\)](#)  
[Contest Rules \(/support/drawing/\)](#)

**FCC Public Files (https://stations.fcc.gov/station-profile/kopb-tv)**

[KOPB-TV \(https://stations.fcc.gov/station-profile/kopb-tv\)](https://stations.fcc.gov/station-profile/kopb-tv)  
[KOAB-TV \(https://stations.fcc.gov/station-profile/koab-tv\)](https://stations.fcc.gov/station-profile/koab-tv)  
[KOAC-TV \(https://stations.fcc.gov/station-profile/koac-tv\)](https://stations.fcc.gov/station-profile/koac-tv)  
[KEPB-TV \(https://stations.fcc.gov/station-profile/kep-b-tv\)](https://stations.fcc.gov/station-profile/kep-b-tv)  
[KTVR \(https://stations.fcc.gov/station-profile/ktvr\)](https://stations.fcc.gov/station-profile/ktvr)

Search OPB

 <http://www.pbs.org/?station=KOPB>  [http://www.npr.org/stations/force/force\\_location.php?station=KOPB\\_FM&url=http://www.npr.org/](http://www.npr.org/stations/force/force_location.php?station=KOPB_FM&url=http://www.npr.org/)  <http://www.bbc.co.uk/worldservice>  <http://americanpublicmedia.org>

© 2016, Oregon Public Broadcasting (O)

# Portland's low-income neighborhoods are city's 'food deserts'



By [The Oregonian/OregonLive](#)

[Follow on Twitter](#)

on November 15, 2008 at 8:30 PM, updated January 15, 2015 at 6:45 AM

A trip to a city grocery store seems like a small thing.

The last time you went it took an hour or so, right? You probably stuck your spouse with the kids some Saturday while you shopped, then ferried home the heavy bags by car.

Not Lesli Calderon. She might as well live in a desert. The closest grocery stores are more like mirages. No bus lines or sidewalks lead to one of the two in her neighborhood, and Calderon can't drive there because she can't afford a car. She could take a bus to the other, but she can't afford the food.

So when Calderon's cupboards run bare, she hops a bus in Northeast Portland's Cully neighborhood.

And she rides it.

And rides it.

Until she reaches Clackamas County, and WinCo, 10 miles away.

It can take four hours, round trip.

When getting to market takes this much effort, epidemiologists consider it a threat to our collective health.

Where we live determines where we buy food, which influences what we eat, factors into whether we're fat and can seal whether, someday, we get diabetes or have a heart attack.

Low-income and minority families, prone to obesity and dietary-related diseases, are also more likely to live in communities where nutritious food is hard to come by, the Robert Wood Johnson Foundation reports. These are otherwise known as "food deserts." Nationally, the typical low-income neighborhood has 30 percent fewer supermarkets than higher-income neighborhoods.

Parts of outer Northeast Portland popped out as having particularly poor access to food when the Coalition for a Livable Future analyzed grocery store locations using 2004 data.

"You have people literally living off of Plaid Pantries," says Brendan Finn, chief of staff to Portland City Commissioner Dan Saltzman, who oversees the Office of Sustainable Development.

Public health advocates have pushed their concerns to the fore of the urban planning agenda. For the first time, planners will make food access a component of Portland's comprehensive plan, which guides physical and economic development and is being revised.

Portlanders live in a city that pays attention to food's economic and environmental repercussions. We love our farmers markets and natural-food stores, and many Portlanders who care about food and equity want more. But will that improve the diets of the poorest and least healthy?

"I don't think anybody here thinks we have the answer," says Noelle Dobson, a project director with Community Health Partnership who focuses on health, design and chronic disease.

**Portland food access**  
For maps, go to the [Equity Atlas Project](#) or [click here](#) (13-page PDF).

"What we do have figured out is that we need to try harder," she said. "We can tell people to buy fresh fruits and vegetables until we're blue in the face, but if we don't address the social barriers of cost and availability, it's just not going to happen."

#### Long Journey

Calderon rests her hand on the wheeled wire basket that will haul home nearly a month's worth of groceries for her family of four.

It's after 5 p.m. on a Friday. Calderon and her daughter, Amelia, wait for the No. 72 bus.

From the bus shelter, Calderon has a good view of the neighborhood's most prominent business. The Sugar Shack, a vast strip club and adult business.

"Let's just suppose if they were to get rid of the strip joint across the street, if they put a store there," Calderon muses in Spanish.

Instead, the closest markets are convenience stores. They're sugar shacks of a kind, given their selection of cigarettes, beer and processed foods. At one, the produce section amounts to a few bruised tomatoes, limes and jalapenos. The other charges \$4.89 for a gallon of milk, about \$2 more than a regular supermarket.

As the Calderons settle into their seats on the crowded bus, Amelia explains that supermarkets along other routes would be miles closer, but the trips require time-sucking transfers.

Even along this route, the Calderons pass three supermarkets before they reach WinCo. They can't afford them. They live on one income, and Calderon's husband isn't earning what he used to as a mechanic. Food stamps buy their groceries.

Calderon spins through WinCo's bustling produce section first.

Into her cart she throws a half-pound of green beans, 1 pound of zucchini, 1 1/2 pounds of Mexican squash, a head of cauliflower and another of cabbage. She adds two bags of salad mix, 2 pounds of carrots, two bunches of radishes and two more of cilantro. Three cucumbers, four avocados, five kiwis, 5 pounds of onions, 5 pounds of bananas and 15 limes.

That's about 7 percent of the fruit and 22 percent of the vegetables her household needs each month to meet the USDA dietary guidelines for good health and disease prevention, says Anne Hoisington, a dietitian with Oregon State University's extension service.

Fruits and vegetables are crucial because of their low calories and dense nutrition. High-calorie diets add weight, and as that increases, so does a person's chances of heart disease, high blood pressure, diabetes -- and the risk of premature death.

If she lived closer to affordable groceries, Calderon says, she'd buy more fruits and vegetables because she wouldn't worry about them spoiling. So would others in her shoes. In a 2002 study of 10,000 people, University of North Carolina researchers found African Americans ate an average of 32 percent more fruits and vegetables for each supermarket in their census tract.

In the meat aisles, Calderon loads up on filling and freezable protein. Next, she buys milk, cheese, yogurt and eggs. She piles tortillas -- only 98 cents a package compared with \$2.09 at Safeway -- tostada shells and bags of white sandwich bread into the cart.

Lesli and Amelia pack their groceries into their traveling cart, working in the dark by the bus stop. It's nearly 9 p.m. when they unload their food at home.

"Every month," Calderon says, "it's like this."

#### Food flight

Nationally, food deserts originated with the urban flight of the 1960s and 1970s.

When white, middle-class residents left cities for the suburbs, grocery stores followed, according to PolicyLink, a national nonprofit focused on social and economic inequities. Grocers tweaked their formats to favor a suburban customer, building vast markets with acres of parking, locking into long-term contracts with suppliers who offered price breaks because the chain stores sold in huge volumes.

Locally, chain supermarkets' expansions in the 1980s winnowed Oregon and Washington's independents from as many as 1,400 to about 900, says Dirk T. Davis, vice president of marketing for Unified Grocers, a wholesaler.

"The volume would shift from the independents to this brand-new beautiful store," Davis says.

Stores that didn't make money, many in poorer neighborhoods, didn't survive. Convenience stores replaced supermarkets, high-calorie processed food replaced fresh, and a generation of poor people and minorities gained weight and developed chronic diseases.

Beginning in 2002, the Portland Development Commission sought a supermarket to anchor a development on Martin Luther King Jr. Boulevard in the city's historic African American heart.

Developers unsuccessfully courted seven grocers, four seriously, recalls Michael McElwee, then the project's manager for PDC. He's since left the agency.

Grocers "have a pretty sophisticated methodology for determining site selection," he says. They look at population density, household income and education levels. One grocer examined a competitor's parking lot for oil spills, figuring leaking cars belong to people who can't afford much food.

"It's almost like food redlining," McElwee says, "grocery-store redlining."

Calderon dreams that someday she'll see a neighborhood grocer replace the strip club.

"We need to have more stores, more supermarkets in particular, in that part of town," agrees Saltzman, the commissioner. "There are opportunities for us to work with a particular store or a particular developer. There are ways that we can be helpful, but it takes them taking the initiative."

Of all the possible solutions, building new supermarkets ranks as the most complex, PolicyLink reports. Portland's newest grocery store, a Safeway in the Pearl District, opened Friday, after years in the making, and that's in one of the city's snazziest neighborhoods.

Supermarkets cost millions -- when banks are willing to loan. Developers can face hurdles galore, as Brian Rohter found when he spent \$300,000 and one year to meet city requirements for a store that eventually opened in North Portland.

Rohter is CEO of some of Oregon's fanciest organic grocery stores, New Seasons Markets. He truly cares about what we eat -- especially how and where it's grown -- and considers food an expression of social justice.

He keeps framed in his office old grocery store advertisements, a reminder of why he got into the business. Rohter has rehabbed other grocers' abandoned buildings and opened his stores in them.

"I feel good that we're able to go into neighborhoods that the national grocery stores had given up on," Rohter says. "We've affected positive social change."

But he's a capitalist, not a doe-eyed idealist. Rohter strategically places stores where neighborhoods of different economic strata meet. He stocks brand names at prices competitive with national chains -- and \$22 bottles of olive oil.

One of his markets sits along the No. 72 line, in the opposite direction Calderon travels to WinCo. It's an eight-minute bus ride from her apartment. Given her grocery budget, has she ever been inside New Seasons?

She'd never heard of it.

#### Lents' "test kitchen"

It's here that reform bumps against reality.

So far, a lot of energy locally has gone into expanding access to natural food stores and farmers markets, with all their fresh fruits and vegetables. But who hasn't lusted after a juicy organic tomato only to be chastened by its price tag?

In other words: Can poor people afford the produce at farmers markets and natural food stores?

"I wonder the same thing," Saltzman says. "It's creating more options, but it doesn't mean people are going to use those options."

Public health advocates, including Dobson of Community Health Partnership, look to Southeast Portland's Lents neighborhood as perhaps their best test kitchen for improving food access. Urban renewal money is helping revamp the area, which has poverty rates that mirror the city average and a median income that's slightly higher.

A coalition of health advocates, farmers and others have launched a farmers market. Now neighbors are itching for a natural food store. They see enough discount retailers and ethnic markets, says the marketing expert working on their behalf.

Natural food stores and farmers markets have their limitations, says Dobson, who is proud of her part in hatching the Lents market.

"I don't know if we can say if they're working yet," Dobson says. "If we want to make sure we're increasing access or addressing a barrier, we need to drill down to the next level and be very conscious of the paths we take to get there. The path of least resistance is to give more choices to people who already have choices."

An alternative path, under study by Multnomah County and under way in other states, would have government pay convenience store owners an incentive to replace some of their unhealthy stock with fresh produce.

City officials would like to expand community gardens to get low-income residents growing their own fruits and vegetables. Grocery stores could run shuttles into underserved communities. New bus lines could smooth the commute of shoppers like the Calderons.

It's nearly time for them to buy this month's groceries, by the way.

So any day now, Lesli and Amelia Calderon will make their way across the desert.

-- Paige Parker

---

Registration on or use of this site constitutes acceptance of our [User Agreement](#) and [Privacy Policy](#)

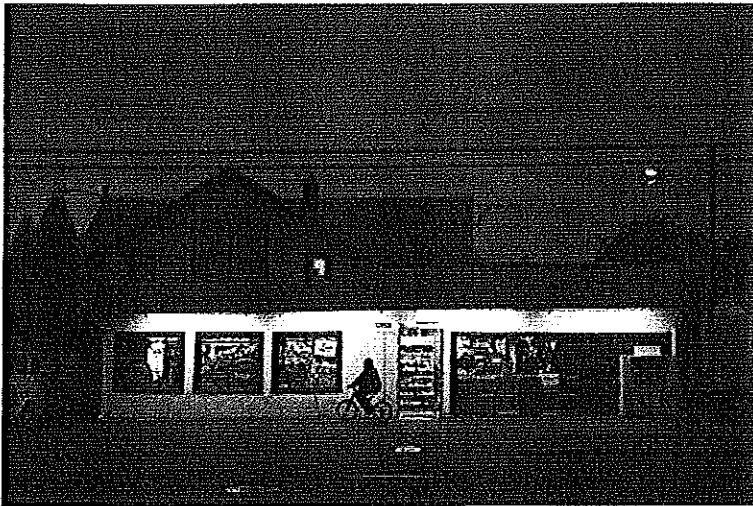
© 2016 Oregon Live LLC. All rights reserved ([About Us](#)).

The material on this site may not be reproduced, distributed, transmitted, cached or otherwise used, except with the prior written permission of Oregon Live LLC.

[Community Rules](#) apply to all content you upload or otherwise submit to this site. [Contact interactivity management](#).

[Ad Choices](#)

## East Portland's frustrating quest for more, better grocery stores



Despite city efforts to bring more full-service groceries to east Portland neighborhoods, residents in under-served areas on the city's edge still lack the same easy access to healthy, fresh food and must rely on a broader collection of alternatives -- including convenience stores -- to complete their grocery lists. (Thomas Boyd/The Oregonian)



By Anna Griffin | The Oregonian/OregonLive

[Email the author](#) | [Follow on Twitter](#)

on August 23, 2013 at 1:41 PM, updated August 23, 2013 at 3:29 PM

The **State of the City** speech is an annual chance for Portland's mayor to lay out his priorities and dreams. Two years ago, Sam Adams put bringing more grocery stores to the city's poorest neighborhoods on his to-do list.

Between calls to create a new downtown urban-renewal district and take over river policing from Multnomah County, Adams told a who's-who-in-Portland-politics crowd that he was going to make tackling food deserts a priority.

The mayor didn't name east Portland specifically, but activists beyond 82nd Avenue knew he was talking about their backyards: Statistics from the **U.S. Department of Agriculture** show 25 severely under-served census tracts in the region. Ten sit in east Portland.

"This is one of those issues that everyone who actually lives out here knows is a problem," said **Jeremy O'Leary**, a resident of the **Centennial** neighborhood. "I was happy when Mayor Adams made that pitch. It was one of those 'this may not come to anything, but at least the people in power are aware' moments."

It hasn't come to much yet. The specific policy program created after Adams' speech died with no official farewell or concrete results. City officials say they still hope to attract more full-service markets to east Portland, but in the interim have scaled back their ambitions.

The reasons for that failure, and for east Portland's continuing lack of ample food access, reveal as much about the grocery industry as the city's most neglected and needy neck of the woods.

### The food hinterlands

Technically speaking, the Portland area has few food deserts.

We're not **Chicago**, **Detroit** or **Philadelphia** where vast pockets of poor, predominately black or Latino neighborhoods have no full-service markets and little access to fresh, healthy food. The closest thing to a statistically true food desert in Portland may exist in the ultra-affluent West Hills.

Yet not all food access is equal.

The city's long-term plans call for all of Portland -- not just the inner-city neighborhoods that serve as "**Portlandia**" sets -- to become a community of **20-minute neighborhoods**, where every basic service sits within an easy bike ride or walk. The underlying idea is to get people out of their cars, in the process fighting pollution and obesity while promoting civic engagement.

People affluent enough to afford older, close-in neighborhoods already live that way. East of 82nd Avenue, and particularly I-205, the vision has been **harder to realize**. Neighborhoods annexed within the past 25 years, among the poorest and most diverse in Portland, also suffer from the spottiest public services: many still lack sidewalks, streetlights and a coherent street grid.

They also lack the same complement of grocery stores. In an ongoing **Oregonian survey** of east Portland residents, dozens echoed Mill Park homeowner Barbara Green's response when asked whether she enjoys easy access to healthy and fresh food:

"I will," Green wrote, "as long as I can drive."

Bargain shoppers with the time to drive to multiple stores enjoy a bounty of options, including **WinCo** and **Grocery Outlet**. As east Portland evolves, however, there's a growing call for more upscale options.

"I'd like to see a New Seasons or a QFC," said Addie Meyers, who has lived near Mount Scott for 32 years. She shops at the Fred Meyer at Johnson Creek Road and Southeast 82nd Avenue, but sometimes drives as far as the QFC in Sellwood, almost 5 miles away, for meat and seafood. Kroger owns both QFC and Fred Meyer, but Meyers said the shopping experience in Sellwood feels very different.

"It's worth the drive. The seafood looks fresher, and there's a butcher right there that I can talk to," she said. "It just always looks like we get second-best out here."

### "Start a conversation"

Adams' speech led to the Grocery Store Initiative, a joint effort by the Portland Development Commission and the Bureau of Planning and Sustainability.

City staff convened a committee to study the issue of food access, and in March 2012 issued a "**request for information**" asking grocers whether they were interested in investing in under-served areas and what incentives might help.

"We just wanted to start a conversation," said Steve Cohen, who manages food policy for the planning bureau. "We wanted to see who was out there."

They got **12 responses**, ranging from underwhelming to undercooked to utterly implausible. A development team hoping to bring Trader Joe's to the increasingly affluent Alberta district suggested city help could speed such a project along. A **consortium** headlined by actress Eva Longoria nodded toward east and north Portland but focused on "Slabtown," industrial territory near the Pearl District. Whole Foods and New Seasons both sent one-page letters that indicated little interest in the areas city leaders hoped to target:

"We could potentially be interested in real estate in all areas of Portland," Whole Foods executives wrote. "Selected sites must model profitably for us since we cannot fulfill our company's overall mission without the profits our stores provide."

### Broken Promises



Follow The Oregonian's series on the **future of east Portland**, looking closely at promises not kept.

But we need your help. Do you live, work, study or own property east of 82nd Avenue? **Tell us your story.**

### Interactive maps



See maps of major grocery stores and demographic data

At least they responded. Safeway, Fred Meyer, QFC and Trader Joe's didn't bother.

**City staff** reached out to a few larger market chains, the kind that build 50,000-square-foot supermarkets, only to learn that those companies consider Portland oversaturated and don't mind that shoppers must drive a few miles to shop at their stores. The level of enthusiasm from mainstream grocers was low enough for some city staffers to suggest the unthinkable: Maybe **Wal-Mart** is the best option for underserved working-class neighborhoods.

"What we learned was that the city on its own wasn't going to change the way chain grocery stores look at some of these markets," said Patrick Quinton, the PDC's executive director. "The companies we keep hearing people say they want have these business models, and they stick to them."

#### A rough business

Big-name chains stick to their business models for a reason: The grocery business is exceedingly difficult. Overhead costs are high and constant. Profit margins are thin and based on volume.

The **Food Marketing Institute**, a lobbying and research group that represents some 40,000 U.S. grocery stores and pharmacies, reports that food retailers earn less than two cents on each dollar that they sell.

So when grocers consider new stores, they're seeking areas awash in customers able and eager to stock up on their most profitable goods.

"You're not going to get a well-established chain to throw their business model out the door just because somebody told them a good story," Quinton said.

Each big grocer has their own complicated formula, depending on market niche, that they use to decide where to invest. The single biggest factor more upscale markets use isn't, as you might think, income. Instead, it's education level.

"If I had a choice of a place that had a lower income but higher education or the reverse, I'd always take a poorer population with more degrees," said **John Stanton**, a professor of food marketing at St. Joseph's University in Philadelphia. "You're building a store that is going to last for 20 years. If the education is there, the income and the amount they have to spend will eventually rise."

That helps explain why New Seasons keeps **expanding** in the suburbs and **northeast Portland**, where the chain will soon have four stores all within five miles of each other.

"The problem we have is that retailers refuse to look at the demographics with any kind of nuance," said Cora Potter, a neighborhood activist in **Lents**. "The city's attitude seems to be, 'Well, if it doesn't look and act exactly like inner northeast Portland, then the market just isn't there.' They need to find ways to show New Seasons and Trader Joe's and the other stores that they can attract the same people who shop at **Fubonn**."

#### Alternative answers

The unpleasant reality is that the tools city economic developers routinely use to revitalize neighborhoods closer to the central city -- the ones that have formed the bedrock of Portland's economic-development strategies for decades now -- aren't much help when it comes to recruiting groceries.

The Food Marketing Institute estimates that the typical big-box grocery store takes at least five years to show a return on investment. The short-term subsidies that work with other businesses aren't that appealing to mainstream grocers. Government cannot subsidize a large grocery store into sustained success simply by easing permit requirements for a new store or offering a few years' worth of tax breaks.

"I was surprised hearing from grocery stores about things they'd been offered in other areas, the sort of incentives that sounded mind-boggling to me, weren't enough to make it pencil out for them," Cohen said. "Their margins are just so thin, and their start-up costs are so high. This one-size-fits-all solution of plopping down a big-box retailer won't work everywhere."

Instead, when it comes to east Portland, city leaders say they're focusing on a patchwork quilt of alternatives.

#### The view from east Portland

"From my perspective, not scientific, Parkrose is a food swamp. While it's important to increase access to healthy foods, decreasing access to unhealthy foods should also be part of the conversation."

— Kim W. La Croix

[See more](#)



**Multnomah County** has given grants to convenience stores that sell fresh produce. The PDC is working with a community development corporation to open a **Latino-themed public market** at Southeast 72nd Avenue and Foster Road. City staff say they're also exploring ways to help bring **pop-up groceries** and more bodegas to east Portland, and to support **neighborhood farmers' markets** and **buying clubs**.

The **Lents Buying Club** has almost 300 people on its email list. They bulk order from some 20 vendors. The selection tends toward natural and organic food.

"You could buy most of your food through a food-buying club and never set foot in a grocery store if you tailored your eating habits that way," said Laura Bouma, the club coordinator. "The main problem is what you do if you don't have a computer, if you don't speak English, if you're using food stamps. So it's not going to work for a certain percentage of people in east Portland."

Bouma and other club members hope to use the group as a stepping stone toward establishing a cooperative grocery in Lents, much the way northeast Portland residents used bulk buying to pave the way for the **Alberta Co-op Grocery**.

But that transition will require a substantial amount of capital, something that becomes harder to find the further you go from downtown Portland. The Alberta co-op cost \$70,000 to open, and that was almost 15 years ago.

#### **A land-use dilemma**

Government's emphasis on alternative food sources for east Portland fails to solve two big problems: First, buying clubs, farmers markets and pop-up grocers don't really help the harried parent who must buy all their groceries on the way home from work.

"When you talk food access, that's something you can do after work and all year round," said Potter, the Lents activist. "Farmers markets and buying clubs are great, but they can't completely fill the gap."

Second, none of those alternative solutions addresses a larger land-use reality: Grocery stores aren't just places to buy food. Done right, they're a vital part of a vibrant, walkable, interactive community.

Bring in a big-name grocery store such as the Trader Joe's or New Seasons many people beyond 82nd Avenue covet and odds rise that a neighborhood strip mall or corner development can support other, smaller businesses that many east Portlanders also want. That list includes coffee shops, bookstores, brew pubs and other businesses that promote civic life, the kinds of establishments that can help turn a collection of streets into a place that feels like a true neighborhood.

A grocery store can be the first domino to fall in broader change.

"The city keeps trying to increase density out here as a way to reduce emissions, to help us all live greener. But there's good density, and there's bad density," said O'Leary, the Centennial resident, who grows fruits and vegetables in his backyard and is a member of a buying club and a cooperative grocery. "A lot of the density so far has come with rising poverty and no new jobs, no sense of this being a place you'd want to raise a family or invest your money."

"We don't even have grocery stores you can walk to. That's not a recipe for success."

- Anna Griffin

Registration on or use of this site constitutes acceptance of our [User Agreement](#) and [Privacy Policy](#)

© 2016 Oregon Live LLC. All rights reserved ([About Us](#)).

The material on this site may not be reproduced, distributed, transmitted, cached or otherwise used, except with the prior written permission of Oregon Live LLC.

[Community Rules](#) apply to all content you upload or otherwise submit to this site. [Contact interactivity management](#).

[Ad Choices](#)

# CITY JOURNAL

FROM THE MAGAZINE

## Defining Food Deserts Down

Portland goes diet-crazy.

Ethan Epstein

On the northern cusp of Portland, Oregon, the St. Johns district is certainly no “food desert”—as activists call neighborhoods, mostly low-income, that are short on grocery stores. A 54,000-square-foot Safeway supermarket dominates the area, selling fresh produce, meat, and frozen goods. Just a few blocks away stands a 13,500-square-foot Grocery Outlet, retailing food, fresh and otherwise, at steep discounts. And for residents of the Bobo persuasion, a small neighborhood store, Proper Eats, specializes in organic and vegan groceries.

Yet thanks to a program called the Healthy Retail Initiative—administered by Multnomah County, home of Portland, and funded by federal money from the Centers for Disease Control—another store in the neighborhood, El Compadre Market, has received taxpayer money to “increase community access to healthy, affordable food.” El Compadre, which doubles as a restaurant selling greasy burritos and hamburgers, has received \$4,500 in public money to buy grains and install a walk-in freezer. So far, Multnomah County has doled out grants of up to \$4,500 each to at least 22 Portland stores, all in the name of providing “access” to fresh food. Many recipients, like El Compadre, stand in close proximity to grocery stores. El Tepeyac, for example, is 0.3 miles from a Fred Meyer grocery store (the local Kroger affiliate); another, Alberta Market, is just 0.8 miles from a Safeway.

In justifying the program, the county says that “many communities in Multnomah County do not have easy access to full-service grocery stores and instead rely on small neighborhood stores for many of their daily food needs.” Given that many establishments receiving subsidies are located in neighborhoods that don’t lack full-service grocery stores, the “providing access” explanation seems suspect. What might the real motive be? Consider some of the strings attached to the grants, such as the requirement that healthy food at subsidized stores must be available at the checkout counter or in a “highly visible area marked with ‘healthy options here’ signs.” This sounds like an attempt at “nudging,” the behavioral-economics approach popularized by former Obama administration official Cass Sunstein, which holds that people can be steered toward making “better” decisions without their conscious awareness. Put a nice shiny apple on the counter, and the customer may think twice about going for the bag of chips. The paternalistic approach comes with a racial subtext: many of the Portland stores receiving subsidies serve predominantly Mexican and black customers.

Not to be outdone, the city of Portland has its own program to assist “underserved areas.” According to USDA guidelines, neighborhoods more than a mile from a grocery store (and meeting certain below-average-income requirements) qualify as food deserts. Portland, however, deems low-income areas a mere *half*-mile from a grocery store “underserved,” despite the fact that 94 percent of Portland households report owning at least one car (compared with 70 percent of households in San Francisco and 46 percent in New York). Further, to meet the city’s income threshold, an area need only have a median household income lower than what the city government identifies as Portland’s median household income of \$54,352. (This despite the fact that according to the 2010 census, Portland’s median household income was actually \$48,831.) And if the center of a census tract is more than half a mile from a full-service grocery store, the *entire tract* is labeled underserved. As a result, Portland boasts “food deserts” containing Safeway, Trader Joe’s, and Grocery Outlet stores simply because those outlets are more than half a mile from the center of the local census tract.

Portland is offering a bevy of tax incentives and subsidies to grocery stores willing to locate in these putatively underserved areas. Last year, the city reviewed bids from locally owned chain New Seasons, as well as national giants like Whole Foods, Trader Joe's, and Walmart, which is now the nation's largest retailer of organic food. (No successful bids have been announced yet.) Perversely, Portland taxpayers could end up funneling money to Trader Joe's—or even the dreaded Walmart—to set up shop just steps from an extant grocery store. It's a nice deal for politically favored businesses but a perversion of the market economy and a highly dubious use of public dollars.

Other cities are implementing anti-food-desert policies as well. In Minneapolis, a program similar to the Healthy Retail Initiative provides grants to corner stores to stock produce. Washington, D.C., is giving corner stores in food deserts grants of up to \$1,500 to install refrigerators, shelving, and other equipment for stocking produce. In Chicago, Mayor Rahm Emanuel recently introduced an ordinance to allow large-scale urban agriculture projects within city limits. These cities use a one-mile standard to define food deserts instead of the half-mile that Portland employs, though they do measure food deserts by census tract, as Portland does.

In many cases, food-desert policies are thinly veiled behavior-modification schemes or sweetheart subsidies for connected businesses. Worse, these programs obscure *genuine* fresh-food access problems, which do exist in far-flung rural communities and in poor urban neighborhoods lacking transportation. By seeking to nudge us all to eat better, the bureaucrats could end up failing to help those actually in need of assistance.

---

*Ethan Epstein is a writer based in Portland, Oregon.*

52 Vanderbilt Avenue New York, NY 10017 | (212) 599-7000

# neighborhood notes

Join Our Community!

Use our tools to create, personalize, and share your perfect Portland day.

[Login](#) | [Sign up](#)



- [Home](#)
- [About](#)
- [Business Directory](#)
- [Submit Your Business](#)
- [City Guides](#)
- [Eat](#)
- [Shop](#)
- [Do](#)
- [Neighborhood Guide](#)
- [NW PDX](#)
- [NE PDX](#)
- [SW PDX](#)
- [SE PDX](#)
- [N PDX](#)
- [E PDX](#)
- [Blog](#)

search...

February 27th, 2012

By [Kyle Curtis](#)

Food for Thought

## Addressing Portland's Food Deserts



*The former Albertsons' grocery store at SE 122nd Avenue and Division Street. Food for Thought is a monthly series that examines the progress of the plans to confront economic factors and create a hunger-free Oregon.*

At the intersection of SE 162nd and Division you will find a former Safeway supermarket that has sat shuttered and empty since closing its doors in March 2011. At one time, the full-service grocery served as an anchor for the Division Crossing shopping center in Portland's Centennial neighborhood. Along with the closing of an Albertsons forty blocks away in the Mill Park

neighborhood this past winter, these stores' closings further reduce the options for East Portland residents to do their grocery shopping in an area burdened with food access issues.

The technical definition of the term of a "food desert" is an "area of exclusion where people experience physical and economic barriers to accessing healthy food." There are arguments that Portland lacks any "true" food deserts, however, the Portland Development Commission (PDC) recently released a report on grocery store distance related to population density and income. This report shows that certain parts of the city struggle with inequities regarding food access, with the expected problem areas found in East, North, and deep SE Portland.

#### Mayor Adams' Grocery Store Initiative

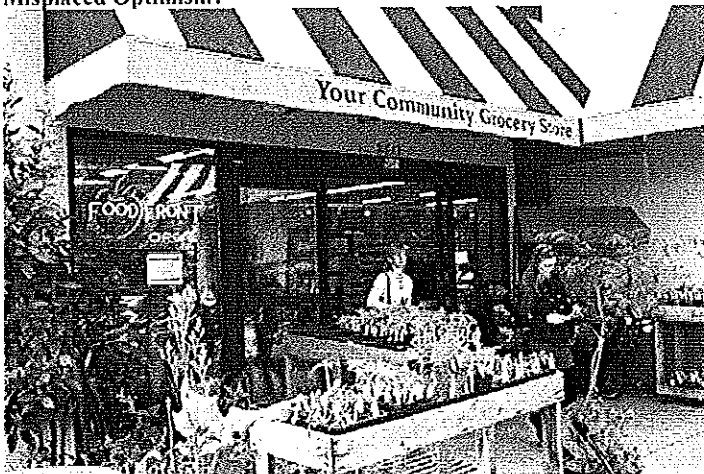


Neighborhood Notes

The former Safeway grocery store at SE 162nd Avenue and Division Street. In his 2011 State of the City address, Mayor Sam Adams acknowledged these challenges, pointing out that "approximately 40 percent of Portland residents live at least a mile away from a grocery store." In the same speech, Mayor Adams tied this geographic barrier to the concept of neighborhood livability and announced the Grocery Store Initiative to "explore ways to make grocery stores financially feasible in under-served areas."

For the past year, PDC has been tasked with implementing the Grocery Store Initiative. "We did an initial request for information," explains John Jackley, PDC's Neighborhood Division Manager. "This resulted in a dozen or so responses from large grocery retailers, as well as from some folks who haven't even started yet." One can't help but wonder if "large grocery retailers" is a code word for Walmart, which has a history of trying to expand further into the Portland market, while studies show that poverty levels increase in areas where Walmart opens stores. "I am aware of their [Walmart's] interest, but they just provided a general submission," Jackley says. "Besides, that is not our priority. Our priority is community-based solutions to these problems."

#### Misplaced Optimism?



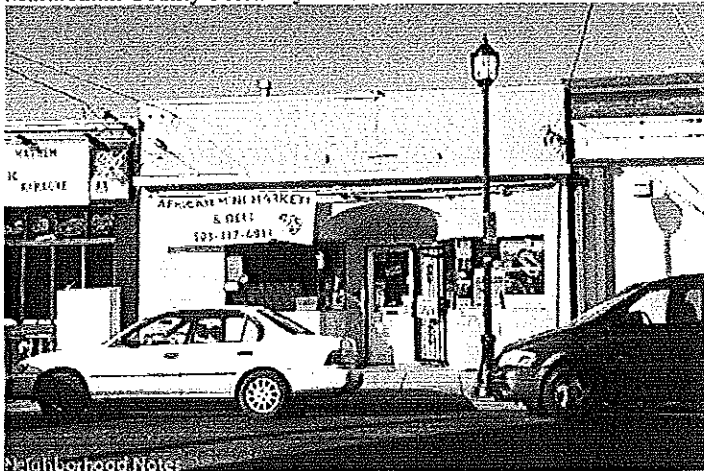
Food Front Cooperative Grocery in Northwest District. Certainly, it is encouraging to hear PDC optimistic about the ability to address the lack of available healthy food in certain parts of the city. At the same time, considering that large grocery retailers Safeway and Albertsons weren't able to keep afloat in these same areas, is the reliance on community solutions perhaps misplaced?

"We realize that there's not going to be any quick fixes," Jackley says. "If there were, there would be no need for this initiative. Each store has its own model, and the difference between an unsuccessful Safeway and a successful store might be the use of a different model: co-op, pop-up shops, etc. Again, you're not going to find any guarantees. But there is sustained commitment from the city and the leadership of the steering committee is community-wide, so I am confident we will help find the solutions that work best for each community."

In his research on food deserts in Oakland, Portland State University professor Nathan McClintock provides a historical explanation of how the rise of large-scale grocery retailers also resulted in a lack of food options in the country's inner-city neighborhoods. At one point in our nation's history, the corner market was ubiquitous, offering the ability to purchase fresh food for dinner on the way home from work. But the economics of grocery retail in the latter half of the 20th century resulted in chain supermarkets driving smaller grocers out of business while pursuing the wealthier customers who had moved out to the suburbs.

As supermarkets controlled nearly three-quarters of the grocery market, small grocers simply could not compete and would often sell or merge with competing chains. In this manner, Safeway closed over 600 less-competitive, inner-city stores from 1978 to 1984, resulting in the boarded-up hull of a former grocery store being a familiar symbol of the American post-industrial city. Considering this history, it would be ironic if a renaissance of new corner markets were to occur, filling the food access gaps caused by the closing of supermarkets in low-income urban areas. At the same time, how can steps be taken to ensure quality of content in any new store, avoiding an influx of candy bars on every corner, all in the name of combating "food deserts?"

**Multnomah County's Healthy Retail Initiative**



African Mini Market in Humbolt received a Healthy Retail Initiative grant. The purpose of Multnomah County's Healthy Retail Initiative is to ensure that increased food options also expand access to healthy food. A project originally funded by the Communities Putting Prevention to Work—a \$7 million grant for public health projects funded as part of President Obama's stimulus package—the origins of the Healthy Retail Initiative are found with the county's HEAL and ACHIEVE coalitions, groups that work to improve the public health of Latino and African-American communities. The Healthy Retail Initiative provides small grants for stores to make investments towards increased freezer and shelf space for healthy products, as well as technical assistance with marketing, produce handling, and developing a business plan.

"It is exciting that there are multiple initiatives that are getting different communities to assist with expanding food access," says Rachael Banks, a program supervisor for the county's public wellness efforts. "Right now, we are currently working with existing stores, with 23 store owners [now] able to increase food options that were being requested by their customers." Funding from a grant provided by Kaiser Permanente will allow an expansion of the initiative, either in its scope or its geographic reach. "Currently our efforts are focused in North, NE and deep SE Portland," Banks explains. "But we want to move further into East Portland and, eventually, Gresham."

Combined, these two initiatives address issues regarding quantity and quality of food options in areas that could be considered Portland's "food deserts." Together, these initiatives will, according to Banks, "lead to an increased variety of healthy food options in the neighborhoods where people live, work and play."

**Do you live in a food desert? How would you like to see the lack of healthy, affordable food addressed in your neighborhood?**

To Email(required)   
From Name(required)   
From Email(required)

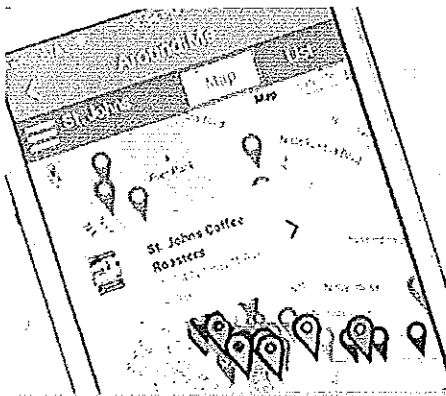
Comments

Perform this simple arithmetic:

11-3

[Send Email](#)

Want to join the conversation? [Login](#) or [Sign up!](#)



Love Portland? Get the App.


Put your business in front of  
40,000-plus consumers every month  
with a free listing in The Localist.

[Click to start.](#)

© 2016 Neighborhood Notes. All rights reserved. [Terms and Conditions](#)  
[Contact](#)



## Oasis opens in East Portland food desert

Created on Thursday, 02 July 2015 07:00 | Written by [Jennifer Anderson](#) | 

[0 Comments](#)

Urban Grange offers fresh, local food where it's needed the most



TRIBUNE PHOTO: JONATHAN HOUSE - Charlotte Wise digs for potatoes at Zenger Farm in Southeast Portland.

Kids at Zenger Farm's summer camp are never far from a snack.

Last week they made their own popcorn, tossing in fresh herbs from the garden for flavoring — oregano, rosemary, even mint.

Other students harvested their own ingredients for a kid-friendly kale salad: carrots, radishes, butter lettuce and edible flowers from the children's garden on site.

The oldest campers used the shiny new space to make fresh orecchiette pasta from scratch.

That level of industrious activity would have never been possible before the opening of the farm's new,

6,600-square-foot teaching facility, the Urban Grange — part of Zenger Farm's 20-acre site at Southeast Foster Road and 117th Avenue.

After a two-year, \$2.3 million capital campaign and nine months of construction, the Urban Grange is now making its official debut — just in time for summer camp.

With the issue of food justice being at the heart of many of the region's biggest woes — hunger, poverty, obesity and education, to name a few — the Urban Grange is more than just a building, Zenger Farm leaders say.

It's about equity.

"Anybody from Oregon takes pride in our farmers markets," says Mike Wenrick, who signed on as Zenger Farm's new executive director in May. "When asparagus comes up every year, when the Hoodos are ripe, when peaches are perfect. It's part of our cultural identity. But unfortunately not everybody has that experience or access. We hope we can change that dialogue and make the bounty of our region accessible to all people."

### Low-income residents underserved

The Malden Community Orchard, a few miles away at Southeast 87th and Flavel Street (see story in June 25 Tribune) is another major point of access in the Lents and Powellhurst-Gilbert neighborhoods.

And all of Portland will be able to visit the James Beard Public Market, set to open downtown in a few years.

But that's a world away from East Portland, where gentrification has brought the city's lowest-income residents to an officially designated food desert.

The city has increased its Community Garden program to meet some of the need.

But the Urban Grange is equipped to become even more of a hub for healthy local food, sustainable urban agriculture and environmental stewardship.

Like the newly opened Portland Mercado on Foster and 72nd — another major boon to the community — the Grange has a commercial kitchen available for upstart entrepreneurs to use.

It will house new community cooking classes, and provide a production space for vendors at Lents International Farmers Market.

The 45 students at Zenger Farm’s summer camp last week used the Grange’s 1,200-square-foot convertible classroom, which will allow the farm to double the number of youth visiting each year, to 20,000.

Most of that increased use will come from more field trips by local schools; currently every fifth-grader in the David Douglas School District gets two trips to Zenger Farm each year, and a visit from a farmer to their school.

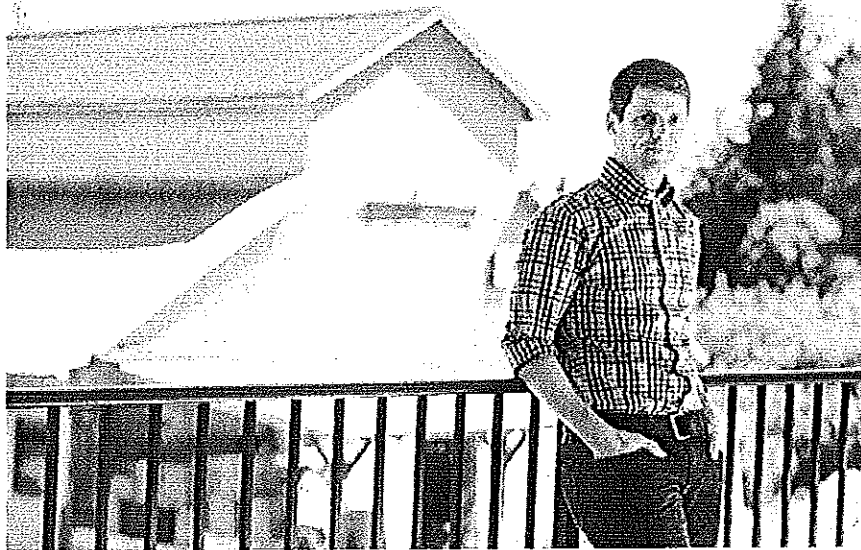
Wenrick says he’ll reach out to other nearby districts, like Reynolds and Portland Public, to offer similar opportunities.

The Grange also will be a home to family nutrition education workshops and farmer training programs, and for public use like neighborhood meetings or quarterly community dinners.

“The meal will be an excuse for people to gather in this community space,” Wenrick says.

Ten to 15 percent of the summer campers this year are attending through scholarships. The campers come from across Portland, including surrounding neighborhoods.

**Plans for the future**



TRIBUNE PHOTO: JONATHAN HOUSE - Mike Wenrick is the executive director for Zenger Farm.

There’s another year left in Zenger Farm’s three-year strategic plan, but Wenrick says the Grange’s opening warrants an earlier revisit of the plan.

He’d like to rethink the way fresh food is available to the people who need it most, by offering a prepared food service of sorts.

“A lot of people are just generally living on the margins and working really hard,” he says. “They get a bunch of radishes or beets or kale or carrots (through their farmers market or CSA SNAP benefits) and they might not have time to prepare them.”

So the idea came up, Wenrick says, to make nutritious and affordable food from the Grange’s kitchen, and sell it to go. They’d have to hire a full-time cook and open a storefront, but it’s an idea the Zenger Farm board may explore.

“If we want people, especially low-income folks to change their behavior, we have to make it easy,” he says. “If it’s difficult making fresh vegetables or having fast food and you’re short on time, the decision is straightforward to most people.”

City leaders laud the development as another rung in the ladder for East Portland.

“Zenger Farm has made huge gains and significant impact by prioritizing access and equity,” Commissioner Nick Fish said in a statement. “The Urban Grange is the next step toward a Portland in which all people can learn about and enjoy fresh, local food.”

[janderson@portlandtribune.com](mailto:janderson@portlandtribune.com)

@jenmomanderson

Sponsored

### Like Bush Refunds Again?

2001, Bush gave Americans \$300 to \$600 checks. Now Obama is giving out cash again. Claim by: Apr 18.



0 Comments

Pamplin Media

Login

Recommend

Share

Sort by Best



Be the first to comment.

Sponsored

**Forget The iPhone 7. Next Apple Sensation Leaked**

The Molley Foot

**Guess Who's About To Go Bankrupt Next In America?**

Stansberry Research

**Homeowners Are in for a Big Surprise in 2016**

AmeriValue Rate Quotes

**8 Poisonous Foods We Commonly Eat**

DailyHealthRemedies.com

**101 Jaw-Dropping Historical Photos**

Sharetable.com

**10 Ugly Duckling TV Characters Played by Gorgeous Actresses**

The Star

[JW DISQUS BACK TO TOP](#)

# Portland's Food Deserts

That's deserts, not desserts.

By **RUTH BROWN**

Updated May 4, 2011

Published May 4, 2011

The USDA has just cobbled together a ton of data on access to food around the U.S. (sadly hosted on some of the worst, slowest servers on earth). One of the tools it has created is an interactive map of "**food deserts**," which it defines as: "a low-income census tract where a substantial number or share of residents has low access to a supermarket or large grocery store." ---

The data identifies **nine food deserts in Multnomah County**, in which a total of 17,537 residents have low access to a supermarket or large grocery store, of which 6,850 are classified as "low income," 4,708 are under 18, and 1,837 are over 65.

The worst affected area appears to be around **Glenfair Park**, where 100 percent of residents have low access, almost a third of whom are children.

The Department has also created a "**Food Environment Atlas**," mapping things like communities' proximity to farmers markets, restaurants, prices and relative health indicators.

According to the data, **Multnomah County purchases 49 gallons of soda, 109 lbs. of packaged sweets and snacks, and 56.7 lbs. of fruit and vegetables per resident, per year.** We spend an average of \$710.69 per person, per year at fast-food outlets, and \$778.44 on full-service restaurants. As of 2008, we have 1,026 fast-food outlets, and 646 full-service restaurants.

There's just so much graph pron here, you should go play with it yourself (if the site is actually working).

Submitted by Barry Horowitz, 4-13-16

"Dear Mayor Hales and Commissioners: Thank you, in advance, for supporting a revision to the Economic Opportunities Analysis (EOA) to incorporate a medium-cargo forecast in the Portland Comprehensive Plan. As Chairman of the Export Council of Oregon, I know that the Portland harbor is home to more than 100 businesses that employ hundreds of smaller local businesses, which collectively employ more than 50,000 employees. Nearly 60% of this work force earn middle income wages and about 20% are ethnically or racially diverse. In the past five years these Portland harbor businesses have invested more than \$370 million and have generated more than \$4.5 million in local tax revenue annually. As I write this letter, I am in Singapore at the beginning of an Oregon Dairy Council Trade Mission which is intending to bring high quality Oregon Dairy products to growing numbers of consumers in SE Asia. This growth in exports from Oregon will in turn produce ever more well paying jobs in our economy. An efficient, strongly supported international seaport is a crucial element of this international market. Since 1973, the Export Council of Oregon has provided a variety of export-oriented services to hundreds of businesses in Oregon and southwest Washington. Individually and collectively these internationally focused companies are major employers in our City. Their procurement of supplies, raw materials, capital goods and services from other small and medium-sized local businesses is meaningful to the City, their neighborhoods and the thousands of local folks that are employed as a result. If you care about maintaining and growing robust employment opportunities for all of the residents of the City, then you should ensure that there is adequate growth in the harbor. I urge you to change the Portland harbor forecast back to the "most likely" moderate growth as originally recommended by Bureau of planning and sustainability staff. Sincerely,"



# CITY OF PORTLAND ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Michael Jordan, Director

March 30, 2016

Dear Mayor and Commissioners,

An amendment is being proposed to the Comp Plan Map, as part of the Comp Plan update, that affects Open Space in the Columbia Slough watershed. Amendment #M33 adds additional industrial acreage to Broadmoor Golf Course. While we understand the need to provide for future job growth, the characteristics of the site make it unsuitable for development.

The Broadmoor site has been the subject of extensive discussions and deliberations during the Comp Plan process: at the Industrial Health and Watershed Health Work Group (formed to advise BPS on balancing economic and environmental goals); among Bureau staff; and at the Planning and Sustainability Commission. At each level of the decision-making process, it was determined that the portion of the site that is the subject of amendment #M33 did not offer significant enough job potential to justify the investment in infrastructure that would be needed or the impacts to natural resources. Instead, the southern portion of Broadmoor, with frontage along Columbia Blvd, was given the industrial designation (see enclosed map).

It is unclear how the portion of the Broadmoor site subject to this amendment would get the access it needs. Currently there is no road or right-of-way going to the site. The TSP project #40073, mentioned in Council documents, is still quite a distance from this site. Development of a future road connection to project #40073, with accompanying water, sewer, lighting and other infrastructure would further impact the natural resources surrounding this site.

The portion of the Broadmoor site subject to the amendment is bordered by the Columbia Slough on the south, Catkin Marsh on the north, and mitigation and enhancement areas on the east. This site is in the middle of a large mosaic of wetland, woodland and riparian habitat.

The natural resource values on the Broadmoor site are significant. The entire site is a "Special Habitat Area." The site provides habitat for native and migratory birds, several native bat species, as well as Western Painted Turtles. Because it is bordered on three sides by water and wetlands, the riparian buffers on the site are important areas to protect and restore.

The development that would occur on the Broadmoor site as a result of the industrial designation will fragment the larger habitat area, and disrupt habitat connections between the slough channels on the south and the wetland areas to the north. The Columbia Slough watershed already receives a D- on its watershed health report card for habitat. We should not be further decreasing or fragmenting the habitat that exists or connectivity between habitats.

BES strongly recommends against amendment #M33. Adding an industrial designation to this part of the Broadmoor site would cause too much impact for too little gain.

If this means that the industrial designation on the Riverside parcel must remain in order to meet our industrial acreage demand, then amendment #M34 should be denied as well.

Thank you for your consideration. If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Jordan".

Mike Jordan, Director

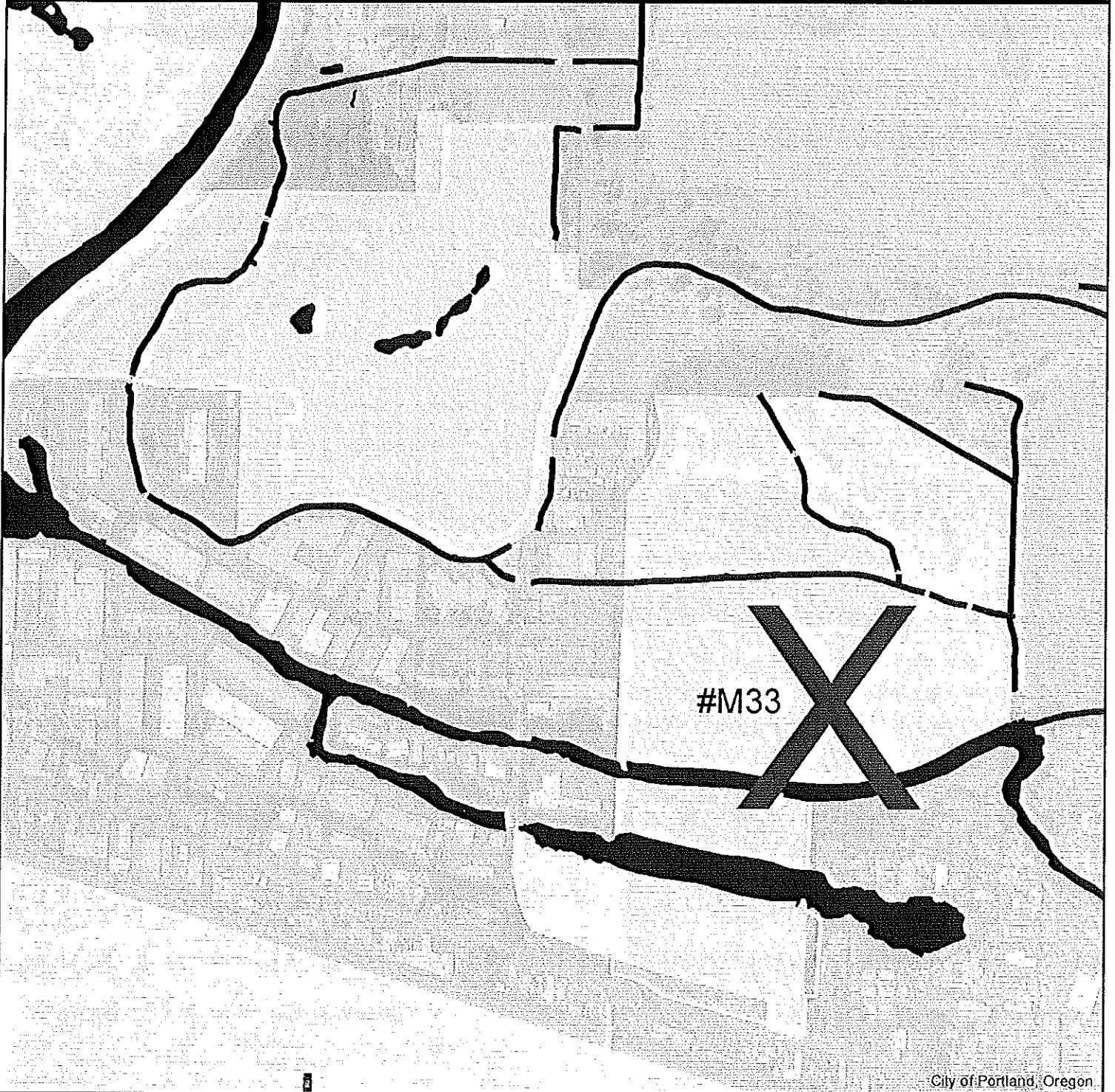
Encl:

map of amendment footprint

map of environmental overlays



# BES recommends against additional industrial designation at Broadmoor

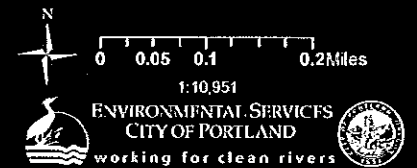


City of Portland, Oregon

Produced 3/23/2016

## Zoning Currently Recommended by BPS

-  Open Space
-  Residential
-  Industrial/Employment



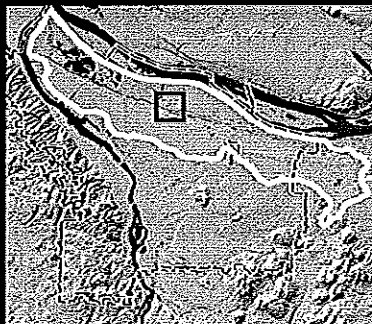
# Environmental Overlays



City of Portland, Oregon  
Produced 3/23/2016

## Current Environmental Zones

-  c - Conservation Zone
-  p - Protection Zone



1:10,951





April 12, 2016

Portland City Council  
City Hall  
1221 SW 4th Ave  
Portland OR 97204

Dear Mayor Hales and City Commissioners:

I am writing to you today the about the low growth forecast for the Portland Harbor as recommended in the City of Portland Draft Comprehensive Plan and the supporting Economic Opportunities Analysis. I believe that a low growth forecast sends a negative message about the value of Portland harbor jobs and their future.

Oregon's 23 ports provide recreational, commercial, and economic development services to residents and businesses in Oregon and beyond, serving as state, national, and international transportation gateways. Our members are a key component in sustaining Oregon's economy and quality of life, supporting thousands of family wage jobs. One out of six Oregon jobs is directly or indirectly tied to cargo, recreation, industrial, commercial or other activities through Oregon's ports.

The low growth forecast is inconsistent with the trends we see in the movement of cargo and the growing importance of Oregon exports to our economy. This recommendation puts Portland at risk of being ill prepared to respond to trade opportunities. Another issue not commonly understood is the role our ports – small and large – play in intra-region trade. We don't just export; our facilities remove thousands of trucks from the road by transporting freight from one part of Oregon to other ports in Oregon and points along the West Coast. Limiting capacity, which the "low growth" forecast will do, means a greater reliance on surface transportation.

Portland is uniquely positioned to take advantage of significant new opportunities being shaped by the altering dynamics of shipping routes and trade. Between the receding ice in the Arctic that is allowing passage with faster times and improvements to passage through the expanded Panama Canal, our ability to reach global markets quickly is no longer limited by our distance from the Atlantic Ocean.

During your upcoming April hearings you will have the opportunity to amend the Comprehensive Plan to more accurately reflect the activity in and future development of the Portland Harbor. If you care about the future not only of Portland, but our entire state then I urge you to support the amendment that would change the low growth forecast for the Portland Harbor back to a medium growth forecast. A medium growth scenario more realistically represents the harbor's historic activity, investments and future.

Thank you for your consideration of our views.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Landauer', with a long horizontal flourish extending to the right.

Mark Landauer  
Executive Director  
Oregon Public Ports Association

## **Arevalo, Nora**

---

**From:** BPS Comprehensive Plan Testimony  
**Sent:** Tuesday, May 10, 2016 12:28 PM  
**To:** Shauna Smith  
**Subject:** RE: Broadmore golf course

Thank you for your comment. Could you please send us your physical mailing address?

Best regards,

Nora Arevalo  
Community Services Aide II  
Bureau of Planning and Sustainability

-----Original Message-----

**From:** Washington, Mustafa  
**Sent:** Wednesday, April 13, 2016 4:11 PM  
**To:** Shauna Smith <shaunanicole-smith@gmail.com>  
**Cc:** BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>  
**Subject:** RE: Broadmore golf course

Dear Shauna,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20th 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

-----Original Message-----

**From:** Shauna Smith [mailto:shaunanicole-smith@gmail.com]  
**Sent:** Wednesday, April 13, 2016 11:24 AM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Broadmore golf course

Mr Hales,

What is the financial gain of converting this golf course into industrial?

I see plenty of industrial space along Columbia and airport way underutilized.

This seems pointless.

Don't do it.

Shauna Smith.

Sent from my iPhone

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Wednesday, April 13, 2016 4:10 PM  
**To:** Greg Snider  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Broadmoor golf course future

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Greg,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** Greg Snider [mailto:gregwsnider@gmail.com]  
**Sent:** Wednesday, April 13, 2016 11:20 AM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Broadmoor golf course future

Dear Mayor Hales,

I don't understand how Portland can be considering destroying over 50 acres of bird and wildlife habitat at the Broadmoor golf course site to turn it into an industrial site.

When is Portland City Council going to join the rest of the modern world and recognize the value and necessity of urban green spaces?

Why not re-use existing industrial sites?

Why does City Council need to be constantly re-educated on these matters instead of taking the lead in a modern, common sense, necessary approach to city planning?

Please do not go forward with the destructive, environmentally backward plan to turn a nature habitat into a concrete jungle of pollution and environmental degradation.

Thank you,

Greg Snider  
Portland resident



## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Wednesday, April 13, 2016 4:01 PM  
**To:** M  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Broadmoor Golf Course

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mary,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)  
<https://www.portlandoregon.gov/toolkit/>

**From:** M [mailto:marywahl1980@gmail.com]  
**Sent:** Wednesday, April 13, 2016 10:38 AM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Cc:** mary wahl <marywahl1980@gmail.com>  
**Subject:** Broadmoor Golf Course

Mayor Hales:

I'm writing to urge that you not move forward with the proposal to convert Broadmoor Golf Course to industrial use. It's an important natural resource area, and those are increasingly rare. With climate change impacts, the ecological functions of sites like the Broadmoor Golf Course are even more valuable. Further, any short-term economic gain from converting an asset like the Broadmoor Golf Course to industrial use is outweighed by the economic gain from conserving the natural resource values. It's not just the economic gains to real estate near natural resource areas that is important, but also the value to the broader area for still having intact natural resources. In the "old days" in Oregon, we figured out that it wasn't a matter of "jobs vs fish," when we considered our forests and other high value natural resource areas, but a matter of the economic value of the jobs in a state that conserved its natural resources vs the kinds of jobs in a state that gave up its natural

resources. Portland will lose an important asset if it gives up the Broadmoor Gold Course, and the value of this increasingly rare kind of resource is far greater -- both in natural resource and economic terms -- than we will ever realize from converting this site to industrial use. Please vote to conserve this as a natural resource asset.

Thank you.

Mary Wahl

1800 NE 17th Ave #1

Portland, OR 97212



April 12, 2016

The Honorable Mayor Charlie Hales  
1221 SW Fourth Avenue, Suite 340  
Portland, Oregon 97201

Dear Mayor Hales:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on draft Portland City Council amendments regarding the 2035 Comprehensive Plan. The Alliance has participated in the planning process over the last three years and we commend planning staff for their hard work at a time when our city faces significant change and we determine how best to accommodate projected growth over the next 20 years.

Throughout the “comp plan” process, the Alliance has consistently commented on a number of ways to better achieve a prosperous economic future for all Portlanders. While there are many policies embedded in the comp plan that impact Portland’s economic prosperity, including several we support, we have focused our attached comments on specific proposed amendments where we have specific concerns.

For example, we are pleased to see that the city has revised its economic opportunities analysis to more accurately reflect market trends and harbor investments by assuming a mid-cargo marine forecast. As we have shown in our Value of Jobs reports, 90 percent of Oregon’s exporters are small- and medium-sized businesses, and export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. In particular, the production of goods intended for trade is still the backbone of Portland-metro’s traded-sector economy. Manufacturing jobs are also found to provide higher wages and better benefits than non-manufacturing jobs for workers with comparable educational achievement levels, and the wage differences are particularly significant for communities of color and non-English speakers. A mid-range marine forecast, therefore, better supports the imperative that the city focus trade as a driver of middle-income job growth and achievement of the city’s equity goals.

The Alliance is not only concerned about middle-income jobs but also about the need to provide housing options for low- to middle-income households. It is a competitive economic advantage to have an adequate supply of housing options for all income levels in order to support and attract a diverse workforce. We are, therefore, concerned that amendments have been proposed that would hinder the development of low- to middle-income housing due to additional regulation and design review especially related to historic preservation. We need to ensure that historic preservation and design review are not cost-prohibitive to the development of low- to middle-income housing. We encourage that these and other policies and tools addressing the city’s housing crisis be reviewed as a package to better understand how they work together to help address this urgent community need.

*Greater Portland’s Chamber of Commerce*

200 SW Market Street, Ste. 150 | Portland, OR 97201 | 503-224-8684 | FAX 503-323-9186 | [www.portlandalliance.com](http://www.portlandalliance.com)

**Ord. 187831, Vol. 1.3.B, page 1516**

Thank you for considering our comments. We look forward to seeing completion of a Comprehensive plan that lays out a strategy for ensuring Portland becomes a prosperous, healthy, equitable and resilient city.

Sincerely,

A handwritten signature in black ink that reads "Sandra McDonough". The signature is written in a cursive, flowing style.

Sandra McDonough  
President & CEO

cc: Susan Anderson, Bureau of Planning and Sustainability  
Planning & Sustainability Commission  
Portland City Council

## APPENDIX OF COMMENTS

### Chapter 1 Amendments:

Policy 1.17 Community Involvement Committee. Establish a Community Involvement Committee to oversee the Community Involvement Program for land use decisions as recognized by Oregon Statewide Planning Goal 1 – Community Involvement and policies 2.15 – 2.18 of this Comprehensive Plan.

The Alliance opposes this amendment because there is already a sufficient land use review process as required by state land use law that requires public notice. The Community Involvement Committee (CIC) should not exercise authority over land use decisions. The CIC's objective should remain to oversee public involvement efforts related to the comprehensive plan. Broadening its scope would only undermine existing land use review and the role of the Planning and Sustainability Commission, which is to provide input on policies and plans.

### Chapter 3 Amendments:

Policy 3.3 Equitable development. Guide development, growth and public facility investment to reduce disparities; encourage equitable access to opportunities, mitigate the impacts of development on income disparity, displacement and housing affordability, and produce positive outcomes for all Portlanders.

3.3. a. Anticipate, avoid, reduce and mitigate negative public facility and development impacts, especially where those impacts inequitable burden communities of color, underserved and underrepresented communities, and other vulnerable populations.

3.3.b. Make needed investments in areas that are deficient in public facilities to reduce disparities and increase equity. Accompany these investments with proactive measures to avoid displacement and increase affordable housing.

3.3.c. Encourage use of plans, agreements, incentives and other tools to promote equitable outcomes for development projects that benefit from public financial assistance.

3.3.d. Incorporate requirements into the Zoning Code to provide public and community benefits as a condition for development projects to receive increased development allowances.

3.3.e. When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.

3.3.f. Coordinate housing economic development, and public facility plans and investments to create an integrated community development approach to restore communities impacted by past decisions.

3.3.g. Encourage developers to engage directly with a broad range of impacted communities to identify potential impacts of private development projects, develop mitigation measures, and provide community benefits to address adverse impacts.

The Alliance recognizes there is broad concern with equity and displacement issues associated with development. However, the Alliance cautions against overly burdening development as the tool to overcome these issues, both for legal reasons related to nexus and proportionality, as well as the potential that development may not occur if it becomes financially infeasible. Further, we recommend "community benefits" be defined; this suite of policies creates a very uncertain environment, which may impact development.

Policy 3.20 Center connections. Connect centers to each other and to other key local and regional destinations, such as schools, parks, and employment areas by pedestrian trails and sidewalks, bicycle sharing, bicycle routes, frequent and convenient transit, and electric vehicle charging stations. Prepare and adopt future street plans for centers which currently have poor street connectivity, especially where large commercial parcels are planned to receive significant additional housing density.

Centers and local and regional destinations such as schools, parks and employment areas must also be connected and accessible by freight and auto. These modes should be included in the underlined language above.

#### Chapter 4 Amendments:

New Policy after 4.23 Drive through facilities. Prohibit drive through facilities in the Central City, and limit them in centers and corridors in order to support a pedestrian-oriented environment and reduce conflicts between automobiles and pedestrians and bicyclists.

The Alliance opposes this amendment to prohibit drive through facilities in the Central City and limit them in centers and corridors. There are existing drive through facilities throughout the city that consist of different business types including, but not limited to banks and food service. It is unclear if these existing drive through facilities would become non-conforming uses and or prohibited all together. The market will best determine where drive through facilities should exist based on demand and land values.

Policy 4.52 Economic viability. Provide options for financial and regulatory incentives to allow for the productive, reasonable and adaptive reuse of historic resources.

Given the changes to Policies 4.27 and 4.45, the Alliance strongly supports this amendment especially if there are to be requirements for historic preservation and rehabilitation. Financial and regulatory incentives should be offered proportional to the cost of rehabilitation and adaptive reuse of historic resources.

Chapter 5 Amendments:

New Policy after 5.5 Middle housing. Enable and encourage development of middle housing. This includes multi-unit or clustered residential buildings that provide relatively smaller, less expensive units; more units; and a scale transition between the core of the mixed use center and surrounding single family areas. Apply zoning that would allow this within a quarter mile of designated centers, where appropriate, and within the Inner Ring around the Central City.

The Alliance strongly supports this amendment to encourage the development of more middle housing in the central city and throughout.

Policy 5.26 Funding plan. Encourage development of financial or regulatory mechanisms to achieve the regulated affordable housing target set forth for 2035.

The Alliance strongly supports the need for more affordable housing and financial and regulatory mechanisms to encourage its development. Strategies including regulatory relief (i.e. design review, SDC waivers, etc.) should be explored to help curb development costs and encourage more development of housing units across the income spectrum. That said, any financial and regulatory mechanisms should be offered as incentives to developers and not punitive in nature in order for affordable housing goals to be achieved by 2035.

Policy 5.45 Housing continuum. Prevent homelessness and reduce the time spent being homeless by allowing and striving to provide a continuum of safe and affordable housing opportunities and related supportive services including but not limited to rent assistance, permanent supportive housing, transitional housing, micro-housing communities, emergency shelters, temporary shelters such as warming centers, and transitional campgrounds/rest areas.

The Alliance strongly supports providing a continuum of safe and humane affordable housing options in both the near-term (i.e. emergency shelter) and long-term (i.e. permanent supportive housing) but does not support transitional campgrounds/rest areas as a humane solution. Instead, individuals experiencing homelessness deserve safe indoor shelter with access to services.

Chapter 6 Amendments:

Policy 6.15 ~~Delete this policy: Annexation. Facilitate a predictable, equitable process for annexation of employment lands within the urban services area as needed to meet the City's forecasted land needs.~~

The Alliance strongly opposes the deletion of this policy in the comprehensive plan. Deletion of this policy runs counter to our land use process and cripples the city from annexing lands to meet future employment needs. We need to ensure that we have an adequate supply of employment lands to ensure that we promote quality middle-income jobs and address our city's equity goals.

New Policy after 6.48 Fossil fuel distribution. Limit fossil fuels distribution and storage facilities to those necessary to serve the regional market.

The Alliance strongly opposes this proposed amendment. This amendment is inconsistent with Resolution 37168, adopted by City Council in 2015, which includes additional factors to which the policy does not apply. The Portland-metro region is the state's hub for petroleum distribution. 95 percent of the state's petroleum runs through terminals located in the Portland harbor. This policy would run counter to the existing market and distribution of needed fuels throughout the state.

New Policy after 6.54 Neighborhood Park Use. Allow neighborhood park development within industrial zones where needed to provide adequate park service within one-half mile of every resident.

The Alliance supports the proposed employment zoning project and therefore cannot support this amendment. The employment zoning project is absolutely critical to preserving the extraneous conversion of prime industrial land which is a significant generator of middle-income jobs, particularly for those with less than a four-year college degree. Since the last comprehensive plan update, the city of Portland has lost about 1,000 acres of industrial land that have been converted to other land use designations. We cannot afford to convert more acres given our industrial lands shortfall. Title 4 restricts the conversion of industrial land for other purposes and this proposed amendment runs counter to it.

Policy 6.57 Development impacts. Protect the livability of surrounding neighborhoods through adequate infrastructure and campus development standards that foster suitable density and attractive campus design. Minimize off-site impacts in collaboration with institutions and neighbors, especially in reducing automobile traffic and parking impacts.

The Alliance recommends adding language that reads as follows "ensure that employees, patients, and students can access campuses and institutions using all modes of transportation and that freight mobility is maintained."

#### Chapter 9 Amendments:

Policy 9.57 Off-street parking. Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand. Provide adequate but not excessive off-street parking where needed.

Parking promotes the economic vitality of businesses located in centers and corridors. Limiting parking has already created issues in some areas of the city. We support the inclusion of a statement about providing adequate off-street parking, but remain concerned about the overall policy to limit new parking spaces as the city continues to grow and develop.



Policy 9.6 Transportation strategy for people movement. Implement a prioritization of modes for people movement by making transportation system decisions according to the following ordered list:

1. Walking
2. Cycling
3. Transit
4. Taxi / commercial transit / shared vehicles
5. Zero emission vehicles
6. Other single occupant vehicles

When implementing this prioritization, ensure that:

The needs and safety of each group of road users are considered, and changes do not make existing conditions worse for the most vulnerable users higher on the ordered list.

- All users' needs are balanced, with the intent of optimizing the right of way for multiple modes on the same street.
- When necessary to ensure safety, accommodate some users on parallel streets as part of multi-street corridors.
- Land use and system plans, network functionality for all modes, other street functions, and complete street policies, are maintained.
- Rationale is provided if modes lower in the hierarchy are prioritized.

As we have conveyed before there is a pervasive bias for active transportation in the Recommended Draft 2035 Comprehensive Plan and while we understand that there will be increased demand for these travel options there will also be increased demand for vehicular movement. We need to be strategic when crafting policies to ensure a balance of modal options.

We appreciate that city staff have adopted the Vancouver, British Columbia model of differentiating between the movement of people and the movement of goods. While this "ordered list" of modes applies only to the movement of people, it should be made clear that it does not apply to freight corridors and the movement of goods. This hierarchy should not be applied to freight districts, regional truck ways, priority truck streets, and major truck streets as designated in the city's Transportation System Plan (TSP).

For facilities not identified as freight facilities in the TSP, we suggest that, in cases where there is overlap between the "movement of people" and the "movement of goods and services," that freight be prioritized and the above ordered list not applied.

New Policy after 9.8 Accessible and age-friendly transportation system. Ensure that transportation facilities are accessible to people of all ages and abilities, and that all improvements to the transportation system (traffic, transit, bicycle, and pedestrian) in the public right-of-way comply with the Americans with Disabilities Act of 1990. Improve and adapt the transportation system to better meet the needs of the most vulnerable users, including the young older adults, and people with different abilities.

We believe that an age-friendly transportation system would place more emphasis on transit and vehicular movement. As seniors age, they are more likely to be dependent on transit and drivers (i.e. shuttle drivers, carpools, taxi and private-for-hire modes). This is another reason why policy 9.6 with the ordered list of modes should be reprioritized.

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Friday, April 08, 2016 9:51 AM  
**To:** Mary Hayden  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Proposal to Upzone 57 acres of Precious Wildlife Habitat

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mary,

Thank you for comments regarding the 2035 Comprehensive Plan. Testimonies for the proposed amendments to the draft Comprehensive Plan will be heard Thursday April 14th, 6pm-8pm at the Portland Building Auditorium and Wednesday April 20<sup>th</sup> 2pm-5pm at City Hall.

For more information, please visit the Bureau of Planning and Sustainability website at:  
<https://www.portlandoregon.gov/bps/57352>

Thanks again,

Mustafa Washington  
Constituent Services Specialist  
Office of Mayor Charlie Hales  
P:503-823-4120  
[mustafa.washington@portlandoregon.gov](mailto:mustafa.washington@portlandoregon.gov)  
[www.portlandoregon.gov/mayor](http://www.portlandoregon.gov/mayor)

**From:** Mary Hayden [mailto:hayden.mary.k@gmail.com]  
**Sent:** Thursday, April 07, 2016 3:14 PM  
**To:** Commissioner Fish <nick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Proposal to Upzone 57 acres of Precious Wildlife Habitat

Why is this Broadmoor Golf Course acreage VALUABLE HABITAT?

- The majority of the site is within a designated environmental overlay, an area the city recognizes has "highly significant resources and functional values."
- The site is bordered on three sides by waterways and wetlands including the Columbia Slough, the Catkin Marsh Wetlands, and a Port of Portland environmental mitigation site. This parcel contains more than a full mile of riparian habitat! Destroying this site will not only eliminate important habitat. It will leave the surrounding habitat isolated and fragmented, cutting the heart out of one of the most important wildlife complexes on the slough.
- The site is full of massive trees including many large giant sequoias like the ones that the community fought to save in SE Portland.
- 11 at-risk bird species and the state listed sensitive Western Painted Turtles have been identified in this habitat complex.

- The entire site ranks as "high value" on the regional natural resources inventory.

Please don't grant any request to upzone this habitat for industrial development.  
It is PRICELESS as it stands.

Thanks for listening!

Mary Hayden



Virus-free. [www.avast.com](http://www.avast.com)

Shirley Simmons  
216 SE 30 Ave  
Portland, OR 97214

AUDITOR 04/06/16 PM 1:18

To: City Council Clerk  
RE: Opposition to Comp Plan amendments: M33, M34

I have the following comments on the proposed amendment M#33 (Broadmoor). I am opposed to this amendment for the following reasons:

#33:

This proposed amendment has the effect of rezoning 57 acres of high quality habitat on the Broadmoor Golf Course. Thirty eight (38) acres are rezoned. This not only will affect the natural resource values and quality of this parcel but will also severely impact the natural resource values of the adjacent city owned wetlands, Port mitigation site and Port enhancement parcels, and the protected slough borders next to the Broadmoor parcel. There are 14 sensitive species listed on adjacent city owned land.

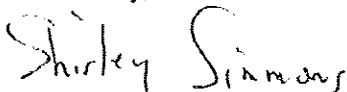
The Bureau of Planning and Sustainability in its March 2016 Revised Draft EOA memo indicates that it has sufficient acres of industrial lands to meet the state land use supply goals. In fact there are surplus acres identified. Amendments #33 and #34 are unnecessary.

Analysis by the Industrial Health and Watershed Health Work Group, and at the Planning and Sustainability Commission indicates that designating this Broadmoor parcel is a costly jobs vs infrastructure cost trade. **The Broadmoor parcel is better suited as open space and habitat than industrial land. It doesn't offer significant enough job potential to justify the investment in infrastructure needed to develop. So why are we doing it?**

I urge you to vote against/withdraw these amendments because:

- \* The amendments are unnecessary (the acres are unneeded.)
- \* Development on the rezoned sites would damage high value and highly unique environmental areas including city owned land.

Sincerely,



Shirley Simmons  
Portland

Cc: Mayor Hales, Commissioner Fritz, Commissioner Fish  
Commissioner Novick, Commissioner Saltzman

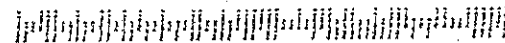
Simmons  
216 SE 30 Ave  
Portland, OR 97214

PORTLAND OR 972  
04 APR 2016 PM 1 L



City Council Clerk  
1221 SW 4<sup>th</sup> Ave #130  
Portland, OR 97204

97204190021



394  
4/20

**ADOPT NEW AND AMENDED SUPPORTING DOCUMENTS**  
**FOR PORTLAND COMPREHENSIVE PLAN UPDATE**

IF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME.

IF YOU ALSO WISH TO BE ON THE NOTIFICATION LIST, SUPPLY YOUR MAILING ADDRESS.

Number	Name (please print)	Address & Zip Code	Email (optional)
1	Abby Bandurraga	5318 NE Wistaria DR. # 3 Portland OR 97213	
✓ 2	Kirk Olsen	1300 SW 5 <sup>th</sup> Ave, Ste 800 Portland, OR 97201	
✓ 3	Bob Carroll	15537 NE Airport way Portland	
✓ 4	Bob Sallinger	5151 NW Correll Row PORT 97210	
✓ 5	Brenda Barnes	825 NE Multnomah St. Suite 910, Portland, OR 97232	brenda.barnes@geosbush.com
✓ 6	Dana Krawczyk	1120 NW Couch, 10 <sup>th</sup> Fl PORT, OR 97209	dkrawczyk@perkinscor.com
✓ 7	Tamara DeLidder	1707 NE 52nd Portland, OR 97213	-
8			
9			
10			

**ADOPT NEW AND AMENDED SUPPORTING DOCUMENTS**  
**FOR PORTLAND COMPREHENSIVE PLAN UPDATE**

IF YOU WISH TO SPEAK TO CITY COUNCIL, **PRINT** YOUR NAME.

IF YOU ALSO WISH TO BE ON THE NOTIFICATION LIST, SUPPLY YOUR MAILING ADDRESS.

Number	Name (please print)	Address & Zip Code	Email (optional)
✓ 1	ELLEN WAX	200 SW MARKET ST #190 PORTLAND OR 9720	ELLEN.WAX@ WORKINGWATERFRONT PORTLAND.ORG
✓ 2	Patti IVERSON-Summer	5933 NE 80 <sup>th</sup> Ave PORTLAND, OR 97218	psummer@gti.net
✓ 3	ROB MATHERS	5880 NW ST HELENS RD PORTLAND 97210	ROB_MATHERS@KINDERMORGAN.com
✓ 4	Greg Theisen	Port of Portland	
5			
6			
7			
8			
9			
10			