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Name: _	Nolan Lienhart	· •	(Please print legibly)
Authorized S	pokesperson representing: 1223 SW Washingto		(if applicable)
City:	Portland		503.863.2462
Email Addres	ss and/or Fax No.:	Nolan. lienhart @ gmarl. con	<u> </u>
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Name:	EDWARD BULLIUD	GROWDWORK PORTLAND	(Please print legibly)
Authorized	Spokesperson representing	•	(if applicable)
Address:	€ 3805 NE MU		
City:	POUTLOND	Zip: <u>97212</u> Phone:	503-662-2590
Email Addre	ess and/or Fax No.:	Edward @ poblaced go	randwork portland.org
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Portland Planning and Sustainability Commission Public Hearing Date: Name: (Please print legibly) Authorized Spokesperson representing: Address: City: Email Address and/or Fax No.: What agenda item do you wish to comment on? Site Address, if different from above: (check if written comments are included on back) Portland Planning and Sustainability Commission Public Hearing Date: (Please print legibly) Name: Authorized Spokesperson representing: (if applicable) Address: City: Zip: Phone: Email Address and/or Fax No.: What agenda item do you wish to comment on?

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Date: Name: (Please print legibly) Authorized Spokesperson representing: (if applicable) Address: City: Zip: Phone: Email Address and/or Fax No.: What agenda item do you wish to comment on? Site Address, if different from above: (check if written comments are included on back) Portland Planning and Sustainability Commission Public Hearing 6-23-15 Date: Doug Klotz Name: (Please print legibly) Authorized Spokesperson representing: (if applicable) Place SE 35+4 Address: Zip: 97214 City: Phone: dougurb @gmail.com Email Address and/or Fax No.: What agenda item do you wish to comment on? Site Address, if different from above:

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Date: 6/23/2015	
Name: Jan Wilson	(Please print legibly)
	(if applicable)
Address: 4790 SW Seymour Ct.	
City: fortland Zip: 91221 Phone: 54	1-341-1380
Email Address and/or Fax No.: janett. wilson @ gm	ail.com
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Date: 6/23	
Name: Greg Theisen	(Please print legibly)
Authorized Spokesperson representing: Post of Partland Address: 7200 NE Air post Way	(if applicable)
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From: Brian Cefola [mailto:bjcefola1984@aol.com]

Sent: Tuesday, June 23, 2015 2:45 PM **To:** Planning and Sustainability Commission **Subject:** May 2015 Growth Scenarios Report

Brian Cefola 3244 NE Schuyler Street Portland OR 97212 June 23rd, 2015

To: Planning and Sustainability Commission Re: May 2015 Growth Scenarios Report

Commissioners,

I'm writing to express support for the Proposed Comprehensive Plan as the best option for meeting the city's needs. It performs better than the other options by nearly every measure, and in particular on mode share and households in complete neighborhoods.

I especially like that it seeks to include more people in inner city neighborhoods. Inner city Portland has many neighborhoods rich in amenities like parks, transit, and safe walkable commercial districts. What it doesn't have much of is diversity, neither economic nor racial. I think including more housing options in the city, not off on the fringes but in the center, can only help make for more diverse and inclusive neighborhoods. That's a good thing.

Thanks for your consideration, Brian Cefola

June 23, 2015

Portland Planning and Sustainability Commission 1900 SW 4th Avenue Portland, OR 97201



RE: Comprehensive Plan Anti-displacement Policies and Growth Scenario Report

Dear Chair Baugh and commission members,

Upstream Public Health thanks you for considering amendments to the comprehensive plan that will support community stability and mitigate against displacement. We appreciate the considerable effort that staff and commission members have put in to respond to community concerns, and we encourage you all to support the amendments that will be presented by Chair Baugh and Commissioner Tallmadge.

Upstream works to improve the physical, social, and economic environments to reduce health disparities and ensure that all Oregonians have opportunities for good health. As you know, Portland's famed livability is only experienced by some of the people in our region as others struggle to remain in their homes, find reliable transportation to work, or secure a high quality education for their children. Each of these challenges has a significant impact on the health and well-being of individuals and our community as a whole. As families are priced out of their homes, children experience interruptions in their education, critical and long-standing social networks are diminished or completely broken, and families incur financial costs including those related to moving and new transportation needs. These burdens impact health in the short- and the long-term, with many health impacts following children well into adulthood.

We have the opportunity to reduce these impacts and repair damage done to our communities by exclusionary policies and disinvestment. When the City creates value through infrastructure or program investments or by supporting new development, that value should serve to reduce gaps in opportunity and help reduce health inequities, reversing some of the harmful trends we have lived through in recent years.

The amendments presented this evening by Chair Baugh and Commissioner Tallmadge reflect thoughtful collaboration between the Bureau of Planning and Sustainability staff and community based organizations. These amendments help address the City's need – emphasized in the Growth Scenarios Report – to carefully address existing inequities even as much of our future growth is planned for well-served areas.

Thank you for your time and consideration,

Heidi Guenin

Policy Manager, Transportation & Land Use

Doug Klotz 1908 SE 35th Place Portland, OR 97214 June 23, 2015

To: Planning and Sustainability Commission Re: May 2015 Growth Scenarios Report

Chair Baugh and Commissioners:

I support the Proposed Comprehensive Plan as the best alternative to all the Growth Scenarios presented in this report.

The Proposed Plan performs significantly better than the other alternatives on four transportation-related measures; Complete Neighborhoods, Frequent Transit Access, Low-stress Bike Network Access, VMT reduction, and Mode Share. I should note that these results depend on aggressively building out the planned greenway network, and reducing auto traffic on these greenways to make them truly "low-stress". The Commission should be aware of needed vigilance to ensure that these networks are built as planned, and not sidetracked for political reasons.

The Housing Choice chapter describes a plan that will result in more households in walkable neighborhoods. It lays out a range of housing types, including Attached House (High Density), otherwise known as duplexes, triplexes, fourplexes, etc., that are currently not allowed in Single-family zones and underperform in Multifamily zones. The Single Family Zones should be modified to allow this type of housing, as well as traditional detached and row houses. The multi-dwelling housing on transit corridors does not provide enough variety or numbers to maximize housing choice.

The Report notes (on P. 53) that "adding more R2.5 or R2 zoning near neighborhood centers could increase the supply of small lot single family homes, duplexes, townhouses, and low density multifamily development types. This should be a consideration as refinement plans are developed for centers and corridors." I look forward to these zoning changes, especially to higher density than R2.5..

I support the Proposed Plan over the alternatives, and would be pleased to support a strong position by the Planning and Sustainability Commission in further work on ensuring the Plan accomplishes these promised results.

Doug Klotz

James F. Peterson Custom Woodworking 2502 SW Multnomah Blvd. Portland, Oregon 97219

June 23, 2015

Planning and Sustainability Commission 1900 SW Fourth Ave Portland, Oregon 97201-5380

Re: Growth Scenarios Report

The projected growth of 124,000 housing units that the City of Portland is planning for in the 2035 Comprehensive Plan has some flawed assumptions. The Metro is using a capture rate of 72 % in their forecast, when their historically the capture rate has been 62 %. That is 8.6 % higher rate than has been achieved. The City of Portland is planning is also planning for 60% share of the new housing units with in the Metro UGB. The largest share of housing units that the city of Portland has achieved has been 36%. Thus the more likely number of housing units should be 68,000 housing units. The city of Portland has been averaging 2,700 housing units per year. The best years of 2003 and 2014 it produced a little over 5000 units. This is far from the average of 6,000 hosing units it would take to get to 124,000 housing units.

It should be noted that Clark County Washington has been producing close to the same number of housing units with 56% of the growth out side the UGB. Most of the housing units planed in the Portland will be apartments and condos. The 2014 Housing Preference Study found another flaw in Portland's plan because 80 % of respondents preferred single family detached housing. Will Portland's growth then happen in Clark County?

The Bureau of Planning and Sustainability has projected an increase in capacity of 28% in Multnomah Neighborhood in their proposed changes to the Comprehensive Plan. They have stated that there is more than enough with the current zoning thus the increase capacity would be considered Market Factor which is prohibited. The neighborhood is also slated for a misappropriate 11% growth of SW Portland due to the proposed changes in the plan

The increase in housing capacity in excess of the projected growth will put undetermined loads on an underfunded transportation system which is inconsistent with the State Transportation Rule.

Please add this to the record of the Comprehensive Plan

Thank you,

James F Peterson

Encl: Development Potential Urban Centers April 14, 2015

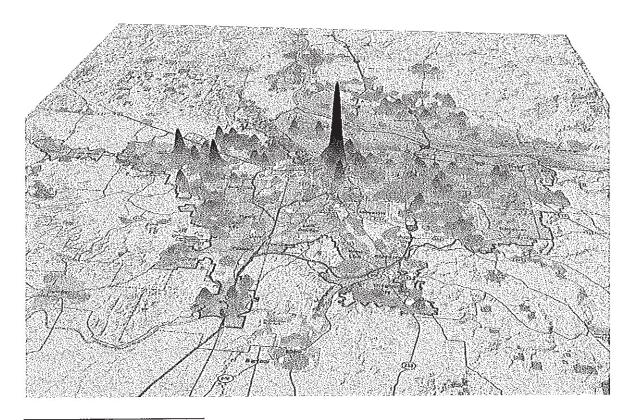
cc: City Council

- Without asking for respondents to make tradeoffs such as price, neighborhood type, and commute time, 80 percent of respondents preferred single-family detached housing.
- Accounting for tradeoffs such as price, neighborhood type, and commute time, 62
 percent of respondents chose single-family detached housing (comparable to the share
 that live in this housing type today).
- The draft UCR indicates that the city would see about 124,000 new households over the next 20
 years. This amounts to an average of about 6,000 new homes every year, which exceeds
 average annual housing production for the city.

What are some of the recent development trends around the region?

Growth management decisions are an exercise in planning for the future. However, what has happened in the past can inform discussions about what might happen over the next 20 years. Below are data on past residential development activity from 1998 through the third quarter of 2014.

Figure 1: New residential permit activity (total new residences 1998 through 3rd quarter 2014)



¹ Data source: Construction Monitor. These data are for approved permits for new residential construction. Pending permits and renewed permits were excluded. These data were compared with and found to dosely match U.S. Census Bureau permit data. Though this is the best available data, there may be some instances when approved permits did not get built.

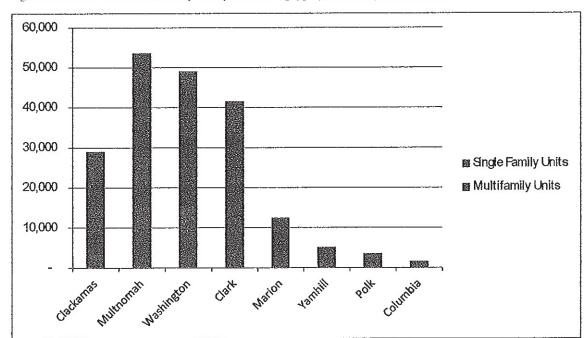


Figure 2: Permitted new residences by county and housing type (1998 through 3rd quarter 2014)

As depicted in Figure 2, there were about 196,000 new residences permitted in the eight counties shown. These new residences are evenly split between single-family and multifamily units.

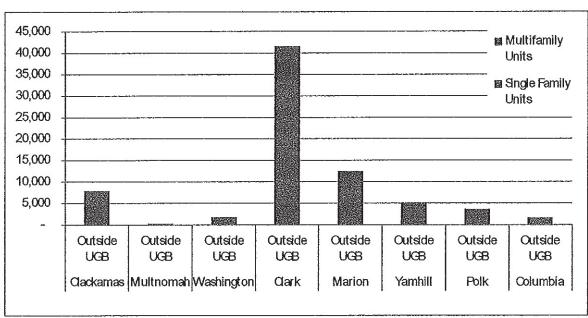
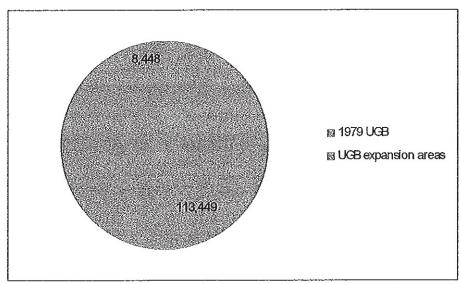


Figure 3: Permitted new residences outside the Metro UGB by housing type (1998 through 3rd quarter 2014)

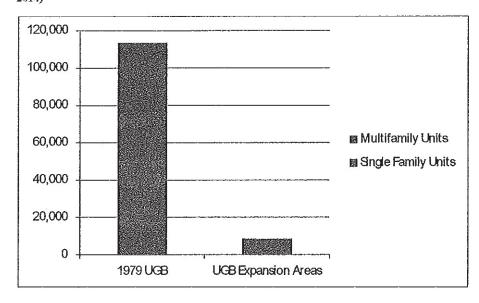
As depicted in Figure 3, most (56 percent) of the residential growth happening outside the Metro UCB has occurred in Clark County. Washington State also manages growth through its Growth Management Act.

Figure 4: Permitted new residences in original 1979 UGB and expansion areas (1998 through 3rd quarter 2014)



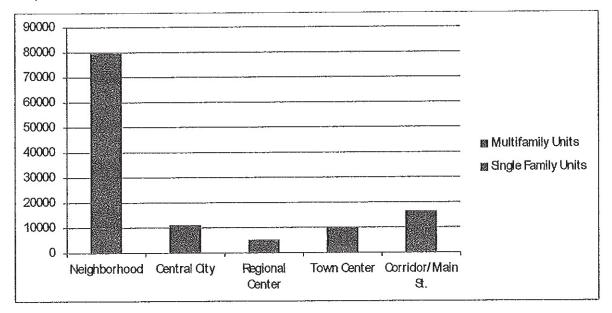
There are approximately 260,000 acres inside the Metro UCB, including about 32,000 acres that have been added since the UCB's adoption in 1979. As depicted in Figure 4, 93 percent of the new residences were permitted inside the original 1979 Metro UCB. UCB expansion areas contributed seven percent of the region's new housing.

Figure 5: Permitted new residences by type in the original 1979 UGB and expansion areas (1998 through 3rd quarter 2014)



As depicted in Figure 5, 54 percent of the new housing permitted inside the original 1979 UCB has been single-family housing. In UCB expansion areas, single-family housing represents 87 percent of the new housing.

Figure 6: Permitted new residences in the Metro UGB by 2040 design type and housing type (1998 through 3rd quarter 2014)



The regional vision for growth, the 2040 Growth Concept, identifies several different design types. The Neighborhood design type is the most ubiquitous and, as depicted in Figure 6, accounted for most (65 percent) of the new residences in the Metro UCB.

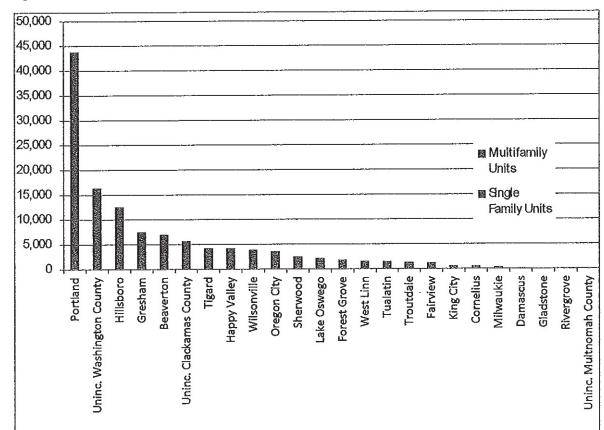


Figure 7: Permitted new residences by city inside the Metro UGB (1998 through 3rd quarter 2014)

As depicted in Figure 7, over the last 16 years, the City of Portland led residential construction in the Metro UCB with 36 percent of the new residences. This represents an average housing production in Portland of over 2,700 units per year, which is about half of the average annual housing production forecast for the City of Portland in the draft UCR In its best years (2003 and 2014), Portland produced over 5,000 units of new housing per year. Portland's lowest housing production occurred during the Creat Recession. From 1998 through the third quarter of 2014, 64 percent of Portland's new housing was multifamily.

From: Brandon Van Buskirk [mailto:b.scott.vanbuskirk@gmail.com]

Sent: Monday, June 22, 2015 3:39 PM **To:** Planning and Sustainability Commission

Subject: Zoning Changes

Hello,

In order for supply to meet demand, our city must build faster, and less expensively. Although I believe in very loose zoning regulation, it should at the very least be altered so that it does not primarily benefit the owners of single-family homes and developers wealthy enough to execute the building of large apartment/condo buildings.

Zoning should be altered so that an existing single-family can be subdivided or a duplex/multi-family dwelling unit can be built anywhere within neighborhoods. This was a common building type which allows those with less money to buy/rent in a close-in neighborhoods and a greater mix of people to join the development community. The form doesn't drastically change the character neighborhoods and their placement happens based on demand. Their implementation can help stabilize the supply side because these projects are quicker to complete and lower cost.

Please reach out if there is anything else I can do to push this change in this much needed direction.

Brandon Van Buskirk 833 NE Thompson Portland OR 97212 503.754.6550 b.scott.vanbuskirk@gmail.com

PORT OF PORTLAND
Possibility. In every direction

June 22, 2015

Andre Baugh, Chair Portland Planning and Sustainability Commission 1900 SW Fourth Avenue, Suite 7100 Portland, Oregon 97201

Dear Chairman Baugh and Commission Members:

Thank you for the opportunity to provide a final set of comments on the Comprehensive Plan documents. As you are aware the Port of Portland has been engaged in this process with the Bureau of Planning since the Portland Plan established the broad foundation for the City of Portland's Comprehensive Plan. Consistent with the Port's mission, our comments have focused on the importance of trade, jobs and transportation investment and the significant role that the City of Portland can play in facilitating positive outcomes in those areas. We appreciate the response to our input on several of the points raised but remain concerned about several areas of the Comprehensive Plan and supporting documents.

- 1) The Draft Growth Scenarios Report defines performance measures. The performance measures proposed do not actually evaluate the economic measures of success defined in the Portland Plan. We have proposed five alternative performance measures for the Commission to consider (see attached letter "Draft Growth Scenarios Report").
- 2) The Economic Opportunities Analysis (EOA) March 2015 proposed draft recommends the low forecast scenario for the harbor lands. As noted in our April 17th letter, the low forecast scenario for harbor lands is inconsistent with past growth trends, is not aligned with current market activity and is likely to create a self-fulfilling prophecy that will impede the ability of the City to attract new investment to the harbor and support the superfund clean-up. Specifically the low growth forecast is for 28.246 million tons by 2040. Today, that same geography moves 27 million tons. The forecast proposes just over 1 million tons of growth in twenty-five years which translates to no growth in the harbor and is inconsistent with planned developments (see attached report Impacts of Channel Deepening on the Columbia River (ECONorthwest June 2015). We strongly urge you to adopt the mid or high growth forecast.

Andre Baugh, Chair June 23, 2015 Page 2

> 3) Our suggested changes to the Draft Recommended Comprehensive Plan June 2015 are in attachment 1. One of particular concern is highlighted below:

> > The removal of policy 6.41, (annexation of WHI). For all practical purposes, the Port is without options for future large scale marine terminal development. West Hayden Island represents a fantastic opportunity for economic growth and natural resource protection over the next 20 years. The seven years of work undertaken on WHI should be incorporated into the City Comprehensive Plan. This action would capture the community's and the Commission's level of understanding of the opportunities and requirements for annexation. The lack of a policy is inconsistent with City Council action (July 2010) and Metro's designation. We recommend policy language supporting future annexation of West Hayden Island for deep water marine terminal industrial uses and open space.

We appreciate the opportunity to raise our concerns with you again today. Please let me know if we can provide any additional information to clarify these points. We look forward to working with staff as the City's Comprehensive Plan moves to final review and adoption.

Sincerely,

Susie Lahsene, Senior Manager

Transportation and Land Use Policy

Attachments

Possibility. In every direction

June 23, 2015

Andre Baugh, Chair Planning and Sustainability Commission 1900 SW Fourth Avenue, Suite 7100 Portland, Oregon 97201

Chair Baugh and Commissioners,

Thank you for the opportunity to comment on the Draft Growth Scenarios Report (GSR). We understand and appreciate the GSR has been evolving since initially published in 2013. We also understand that the root of the GSR is found in the 2012 Portland Plan, specifically the Portland Plan's 12 Measures of Success.

- 1. Equity and inclusion
- 2. Resident satisfaction
- 3. Educated youth
- 4. Prosperous households
- 5. Growing business
- 6. Job growth

- 7. Transit and active transportation
- 8. Reduced carbon emissions
- 9. Complete neighborhoods
- 10. Healthier people
- 11. Safer city
- 12. Healthy watersheds

Of these 12 core measures, numbers 4-6 (highlighted) directly relate to the economic growth and vitality of the City. However, of the Performance Measures selected in the GSR, only one (highlighted) relates somewhat to the economic growth and vitality of the City:

1. Access to family-wage jobs

- 2. Housing choice
- 3. Gentrification risk areas
- 4. Complete neighborhoods
- 5. Frequent transit access
- 6. Low-stress bike network access
- 7. Transportation: Vehicle miles traveled and mode share
- 8. Greenhouse gas emissions
- 9. Parks access
- 10. Watershed health
- 11. Tree canopy
- 12. Natural area access

In addition, while "Access to family-wage jobs" is important, the measure is more about improved transit access and less about the jobs themselves. While transit access from East Portland to the Columbia could be improved, this measure is not meaningful if industrial jobs are not also being retained and grown. Our comments are also provided on the basis of how the GSR implements the Measures of Success and connects to the performance of the Comprehensive Plan.

Andre Baugh, Chair June 23, 2015 Page 2

The Performance Measures selected in the GSR are also not consistent with at least one of the key questions that the document purports to answer. Under the Purpose heading on page 8, "This report is intended to provide information about the potential implications of growth that will help answer key questions like: Where will new businesses be located?" With the current list of Performance Measures, that question will likely be impossible to answer.

TAKE ACTION

Add EOA Economic Measures: The Port's conversation with BPS staff has led us to believe that BPS feels economic-related metrics are not necessary in the GSR because they are already captured in the Draft Economic Opportunity Analysis (EOA). However, this argument is not compelling for several reasons:

- Most, if not all, of the Performance Measures selected in the GSR are already reflected in other
 City documents. Examples include:
 - o PP&R Urban Canopy Report 2012, measuring change in tree canopy over time;
 - o BES Portland Watershed Management Plan Annual Report, measuring watershed health over time;
 - Climate Action Plan 2009 and Draft 2015, measuring greenhouse gas emissions change over time;
 - o Transportation System Plan, measuring change in VMT and mode share over time.

Based on these examples in the GSR, economic measures contained in the EOA should not be an impediment to including similar measures in the GSR. The EOA economic measures should be included in the GR.

Add Income and Tax Receipt Measures: In addition, the EOA is created for a specific purpose, namely to comply with State Administrative Rule OAR 660-09-0015. As such, it is focused on the employment land supply and jobs that can be located on such land. However, there may also be useful economic measures beyond those contained in the EOA, such as the amount of tax generated by private investment for the benefit of the City of Portland and other public agencies.

Increase/Intensify Cargo Throughput: Alternate Growth Scenarios do not consider employment, and are only focused on housing. The report suggests measures are not applicable to employment, because it is a fixed geography. However, the same could be said about centers, corridors and the Central City. The scenarios all discuss policy levers for how to densify housing in discrete geographies. There should also be a discussion of policy levers to intensify cargo throughput and/or jobs on employment land in discrete geographies such as harbor access lands.

Andre Baugh, Chair June 23, 2015 Page 3

Strengthen Pattern Area for Jobs/Economy: Of the five "Pattern Areas" (p.23-26), the Industrial and River Area only merits one sentence compared to multiple paragraphs for the other four "Pattern Areas". In addition, each of the four "Pattern Areas" except for the Industrial and River Area include multiple bulleted statements describing the positive attributes of new development within that particular geography. There are none identified for the Industrial and River Area. And finally, in the Key Findings (p. 78) there is nothing related to economic measures beyond east Portland access to jobs.

In an income tax dependent state, jobs not only create the opportunity for meaningful health and welfare benefits to the individual but they also provide the revenue to accomplish the many other objectives outlined in the Portland Plan and City Comprehensive Plan. Progress toward the provision of middle income job growth must be measured if the intent is to change the current trajectory. For these reasons, the Port recommends that robust and meaningful economic measures be added to the Growth Scenarios Report. Such measures should include:

- Foreign direct investment
- Export growth
- New business creation
- Portland Harbor cargo volumes
- Job distribution and growth by wage and location

Again, the Port appreciates the work of the Commission to address growth scenarios and to incorporate all Measures of Success and additional Performance Measures.

Sincerely,

Susie Lahsene, Senior Manager

Transportation and Land Use Policy

Investment Growth and the Continued Economic Impact of the Portland Harbor



The deepening of the Columbia River shipping channel in 2010 opened a floodgate of investments at terminals and ports along the river. Nowhere is this more evident than in the Portland Harbor. Columbia Grain and LD Commodities upgraded and expanded their grain terminals. Kinder Morgan increased the capacity of their bulk-commodities terminal. International Raw Materials and Canpotex invested in their fertilizer operations. Servicing the larger ships that carry more cargo requires larger, more powerful tugs. Shaver Transport invested in a new tug that's being fabricated in Portland Harbor at Diversified Marine. Shaver also invested in the first new grain barge on the Columbia River in ten years. Vigor Industrial is now home to the largest drydock in the U.S. The Port of Portland, along with other public and private partners, is investing in road and rail improvements in the Rivergate area, which will help meet the growing demand for transportation services from the expanded terminals. But for the deepening of the Columbia River shipping channel many of these investments either would not have happened, or would not have happened in the Portland Harbor.

\$370 Million

Total Investment at the Portland Harbor Since 2010

\$4.5 Million

Estimated Increased Annual Tax
Revenue from Investments at the
Portland Harbor

Investments on the Portland Harbor Since the 2010 Deepening of the Columbia River Channel

Project (On-Line Date)	Investment Amount	Description
Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
International Raw Materials (2014)	\$2 million	Improvements to rail and storage tanks
LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
Vigor Industrial (2014)	\$50 million	Largest dry dock in the US
Rivergate Road and Rail Improvements (2012)	\$82 million	Improve road and rail access and capacity
Canpotex - Portland Bulk Terminal (2013)	\$140 million	Increase efficiency of shiploading
Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Capital Investments to Date	\$370 million	
Pembina (2018) (Proposed)	\$500 million	Propane export terminal
Recent and Proposed Investments	\$870 million	







Impacts of Channel Deepening on the Columbia River



IMPORTANCE OF THE SHIPPING CHANNEL

The Columbia River Navigation Channel runs from the Astoria bar to the Portland Harbor, a distance of 105 miles. Every year millions of tons of cargo worth billions of dollars flow in and out of the Northwest, making this shipping channel a critical connection between our region and the rest of the world. In the fall of 2010, the Army Corps of Engineers completed deepening the navigation channel from 40 to 43 feet. Private industry responded with a wave of new investments coming into the river system. Since 2010, there has been more than \$1 billion invested in facilities and transportation capabilities that are dependent on river commerce. Much of the investment made by private industry has been as a result of the channel deepening.

IMPORTANCE OF CHANNEL MAINTENANCE

Maintaining the shipping channel to 43 feet will help ensure the continued growth in cargo movement and related economic activity. Firms made investments and built capacity assuming a level of commerce supported by a 43-foot shipping channel. A channel less than this depth would strand investments, reduce economic activity, and impact jobs.

\$370 Million

Total Investment in the Portland Harbor

\$1 Billion

Total Investment on the Columbia River Since 2010

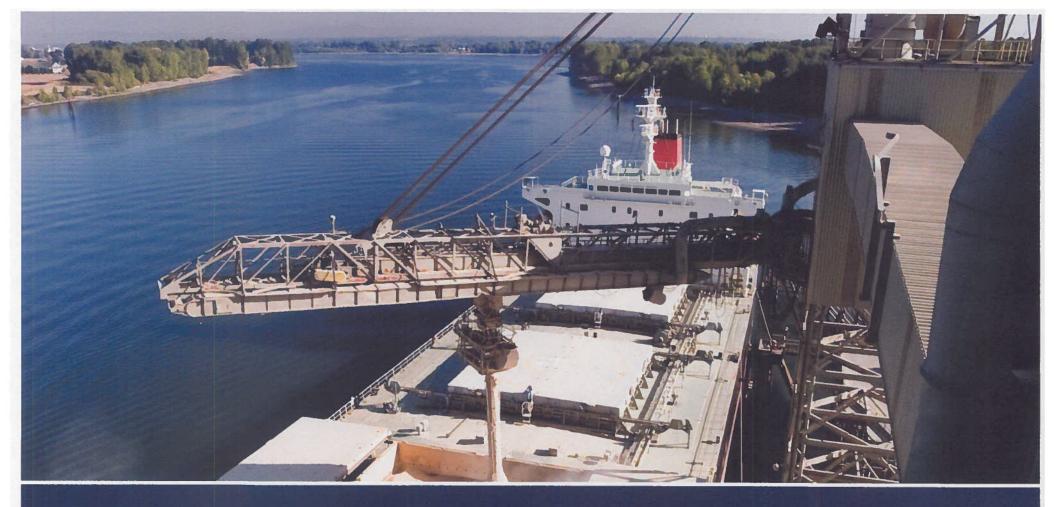
\$5.15 Billion

Additional Investments Planned for the Columbia River

Port	Project	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
	Port of Kalama (2014-15)	\$7 million	Rail upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
Vancouver	United Grain Corporation (2012)	\$80 million	Enlarge storage and handling capacity
	West Vancouver Freight Rail Access (2015)	\$228 million	Rail expansion, new loop track, and road improvement
	Tidewater Barge Lines (2015)	\$30 million	Three new tugboats
Portland	Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
	Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
	International Raw Materials (2014)	\$2 million	Improvements to rail and storage tanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
	Vigor Industrial (2014)	\$50 million	Largest drydock in the US
	Rivergate Road and Rail Improvements (2012)	\$82 million	Improve road and rail access and capacity
	Canpotex - Portland Bulk Terminal (2013)	\$140 million	Increase efficiency of shiploading
	Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Sub Total		\$1.08 Billion	
Proposed investments			
Longview	Millennium Bulk Terminal (2018)	\$600 million	New coal terminal
	Millennium Bulk Terminal (2018)	\$25 million	Smelter removal and environmental cleanup for new bulk terminal
Kalama	NW Works (2017-18)	\$1.8 billion	New methanol plant
St. Helens Port Westward	Global - Columbia Pacific Bio-Refinery (2018)	\$80 million	Increased storage and rail improvements
	NW Works (2017-18)	\$1.8 billion	New methanol plant
	Ambre Energy (2018)	\$242 million	Coal transport
Vancouver	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propane export terminal
Total Proposed		\$5.15 Billion	







Impacts of Channel Deepening on the Columbia River

June 2015







CONTACT INFORMATION

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ECONorthwest specializes in economics, planning, and finance. Established in 1974, ECONorthwest has over three decades of experience helping clients make sound decisions based on rigorous economic, planning and financial analysis.

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ACKNOWLEDGMENTS

We gratefully acknowledge the assistance of staff from ports and terminal operators who provided information on investments.

The Ports of Longview, Kalama, St. Helens, Portland, and Vancouver

Export Grain Terminal

Temco LLC

Kalama Export Grain

Global - Columbia Pacific Bio-Refinery

United Grain Corporation

West Vancouver Freight Rail Access

Vancouver Energy

Tidewater Barge Lines

Columbia Grain

Kinder Morgan Bulk Terminal

International Raw Material

LD Commodities

Vigor Industrial

Rivergate Road and Rail Improvements

Canpotex - Portland Bulk Terminal

Shaver Transportation Company

Millennium Bulk Terminal

NW Innovations Works

Pembina

SUMMARY

Three developments in the shipping industry are driving the push to deepen shipping channels around the world. The first is the increasing size and capacity of trade vessels.1 The size of vessels continues growing as shippers strive for increasing efficiency gains that reduce costs. The second is the widening and deepening of the Panama Canal. When completed in 2016, the canal will accommodate ships with draft of up to 50 feet, and that can carry up to twice the cargo capacity of the ships that currently pass through the canal.2 The third is the increasing competition among ports and terminals to attract and accommodate the larger trade vessels.3 The U.S. Army Corps of Engineers oversees the federal channel-deepening work in the U.S. The Columbia River channel deepening was coordinated by the Corps, with a mix of funding from the Federal government and the States of Oregon and Washington.

Completion of the deepening of the Columbia River shipping channel in 2010 opened a floodgate of investments at terminals and ports along the river. According to a port representative, the deepening and the investments that followed provides shipping and commodity firms with certainty—certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that today's global economy requires. Firms have confidence that shipments won't face backlogs at ports due to capacity constraints. Shipments move efficiently. Firms also spend less time monitoring, planning, and developing contingency shipping plans.⁴

Figure 1: Columbia River Ports



Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Ryan, Timothy P. The Economic Impact of Deepening the Mississippi River to 50 Feet. Big River Coalition, August 22, 2013. Panama Canal Authority. 2006. Proposal for the Expansion of the Panama Canal. Third Set of Locks Project. April 24.

Interview with Katy Brooks, Port of Vancouver, March 5, 2015.

Table 1 lists the investments in our study. Private and public entities invested \$370 million in the Portland Harbor, and \$1 billion at terminals and ports along the Columbia River, since 2010. Additional investments planned along the river amount to \$5.15 billion. Investments completed to date include:

- The first new grain terminal built in the U.S. in 25 years
- Expansion of the largest export grain terminal on the West Coast of the U.S.
- The first new grain barge on the Columbia River since 2011
- The largest drydock in the U.S.

Maintaining the shipping channel to 43 feet will help ensure the continued growth in cargo movement and related economic activity that has occurred since the deepening. Firms made investments and built capacity assuming a level of commerce supported by a 43-foot shipping channel. A channel less than this depth would strand investments, reduce economic activity, and impact jobs.

Table 1. Current and Planned Port Investments Along the Columbia River since 2010

Port	Project	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
	Port of Kalama (2014-15)	\$7 million	Rail upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
Vancouver	United Grain Corporation (2012)	\$80 million	Enlarge storage and handling capacity
	West Vancouver Freight Rail Access (2015)	\$228 million	Rail expansion, new loop track, and
	West Valicouver Freight half Access (2015)	\$220 111111011	road improvement
	Tidewater Barge Lines (2015)	\$30 million	Three new tugboats
Portland	Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
	Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
	International Raw Materials (2014)	\$2 million	Improvements to rail and storage tanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
	Vigor Industrial (2014)	\$50 million	Largest drydock in the US
	Rivergate Road and Rail Improvements (2012)	\$82 million	Improve road and rail access and capacity
	Canpotex - Portland Bulk Terminal (2013)	\$140 million	Increase efficiency of shiploading
	Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Sub Total		\$1.08 Billion	
Proposed Investments			
Longview	Millennium Bulk Terminal (2018)	\$600 million	New coal terminal
	Allegation D. R. T. C. L(1949)		Smelter removal and environmental
	Millennium Bulk Terminal (2018)	\$25 million	cleanup for new bulk terminal
Kalama	NW Works (2017-18)	\$1.8 billion	New methanol plant
St. Helens Port Westward	Global Columbia Basilia Bia Balia (2012)	#00 III	Increased storage and rail
St. Heleris Fort Westward	Global – Columbia Pacific Bio-Refinery (2018)	\$80 million	improvements
	NW Works (2017-18)	\$1.8 billion	New methanol plant
	Ambre Energy (2018)	\$242 million	Coal transport
Vancouver	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propane export terminal
Total Proposed		\$5.15 Billion	

INVESTMENT DETAILS

The Columbia River federal navigation channel runs from the Astoria bar to the Portland Harbor, a distance of 105 miles. Every year millions of tons of cargo worth billions of dollars flow into and out of the region, making this shipping channel a critical connection between the region and the rest of the world. In the fall of 2010, the U.S. Army Corps of Engineers completed deepening the shipping channel from 40 to 43 feet. Since 2010, private and public entities invested more than \$1 billion in facilities and transportation capabilities. Much of this investment can be linked to the channel deepening.

ECONorthwest reviewed news reports, press releases, and other public information on the investments made at terminals and ports along the Columbia River since the 2010 channel deepening. We also interviewed representatives of terminal operators and ports about these investments. Table 1 (on page 2) lists the major investments by port and terminal and those proposed for the near future.

Here we summarize information on each investment and proposed investment, by port. We begin with investments at the Port of Longview, and then move upstream to the Ports of Kalama, St. Helens/Port Westward, Vancouver, and Portland.

THE CHANNEL DEEPENING MAKES THE PHONE RING AT PORTS AND TERMINALS.

Soon after it became clear that the deepening would happen, a "floodgate" of investment opened. The deepening gave private firms the confidence to invest in terminal and transportation infrastructure at ports along the Columbia River. But for the deepening, much of this investment would not have happened at ports on the Columbia River.

The deepening of the Columbia River shipping channel, and the investments in port, terminal and transportation infrastructure that followed, provides shipping and commodity firms with the certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that competing in today's global economy requires. Firms have confidence that shipments won't face backlogs at ports due to capacity constraints. Shipments move efficiently. Firms also spend less time monitoring, planning, and developing contingency shipping plans.

A representative from one of the Columbia River ports summed up the effect of the deepening as: "The channel deepening makes the phone ring."⁷

PORT OF LONGVIEW

Export Grain Terminal

The Export Grain Terminal (EGT) at the Port of Longview was the first new grain terminal in the U.S. in 25 years. This efficient, state-of-the-art terminal was the first of a series of investments in grain terminals along the Columbia River. Increasing demand from Pacific Rim countries combined with the greater efficiency of larger ships with deeper drafts facilitated by the deepening of the Columbia shipping channel, gave EGT and other terminal operators the confidence that their investments would pay off. EGT invested approximately \$230 million in their

Longview terminal, which came online in 2012. Prior to the channel deepening, EGT primarily stored and moved wheat. Now, with expanded capacity and facilities, they store and move wheat, corn and soybeans. The increased grain shipments through the EGT terminal after the channel deepening also increased the demand for rail service to the terminal.⁵

Millennium Bulk Terminal

Millennium Bulk Terminal is proposing an investment of \$600 million toward renovating an existing terminal into a coal export terminal and another \$25 million to complete the environmental cleanup to make way for a new bulk terminal.6

Interview with Peter Bennett, Millennium Bulk Terminal, March 14, 2015; Information on Millennium Bulk Terminal's website, www.millenniumbulk.com.
Interview with Katy Brooks, Port of Vancouver, March 5, 2015.

Interview with Ashley Helenberg, Port of Longview, March 18, 2015; Port of Longview New Release, Port of Longview Inks Property Lease for Export Grain Terminal, June 1, 2009; Export Grain Terminal New Release, July 9, 2012, http://www.egtgrain.com/news/release/egt-facility-creates-new-export-opportunities-for-american-farmers/.

PORT OF KALAMA

Temco (CHS/Cargill)

The \$100 million expansion of the Temco LLC grain terminal tripled the terminal's capacity. The project included a new vessel dock and loading equipment, new rail and barge receiving machinery, and upgraded grain cleaners. The terminal can now process up to 200 million bushels of grain per year, comparable to the Temco terminal in Tacoma. As a result of the expansion, employment during grain-shipping season will double to 120.8

The Port of Kalama invested \$7 million in rail upgrades at the port to facilitate and support the increased rail traffic.9

Kalama Export Company

Kalama Export expanded their grain storage and handling capacity by 25 percent with a \$36 million dollar investment. In addition to expanded storage, they added a new grain cleaning system and loading belt.¹⁰

NW Innovation Works

NW Innovation Works is considering multiple sites in Oregon and Washington to locate two methanol plants. The Port of Kalama is one of those sites. Each plant would be built in two phases. A phase one \$1 billion investment, with \$800 million invested in phase two. Once operational, the plant would employ 120 full-time workers.¹¹

PORT OF ST. HELENS AND PORT WESTWARD

Global Partners- Columbia Pacific Bio-Refinery

Global Partners is investing approximately \$80 million in improved and expanded rail lines, increased oil storage and unloading capacity, and is working with the Port to expand their dock to support moorages of larger vessels.¹³

NW Innovation Works

NW Innovation Works is also considering the Port Westward location for a methanol plant. This plant would also happen over two phases with a total investment of \$1.8 billion and full-time employment of 120.14

Ambre Energy

Ambre Energy is pursuing the Morrow Pacific Project where up to 8 million tons of coal would travel by rail to the Port of Morrow and by barge to the Port of St. Helens for export loading. This project has a total investment of \$242 million and would create over 1,000 jobs.

CHANNEL DEEPENING INCREASED THE COMPETITIVENESS OF COLUMBIA RIVER PORTS AND TERMINALS.

The investments spurred by the deepening increased the competitiveness of Columbia River ports. For example, ports on the Columbia River have a cost and time advantage over Gulf Coast ports for corn and soybean shipments to the Pacific Rim. Before the deepening, corn and soybeans produced in the Midwest moved by barge down the Mississippi River to Gulf Coast ports for shipment through the Panama Canal to Pacific Rim destinations.

Terminals at Columbia River ports were not equipped to move these grains, which require different conveyer and storage infrastructure than wheat, the dominant grain moved through Columbia River terminals at the time. Investments made at ports along the Columbia River in the wake of the deepening include upgraded grain elevators designed for corn and soybeans, along with expanded unit train capabilities. The result: a significant shift in grain activity from Gulf ports to Columbia River ports.¹²

Interview with Paul Butters, Temco LLC, March 2, 2015; Luck, M. 2014. "Temco grain terminal expansion nearly complete." TDN.com. November 24; Pittman, J. 2014. "Temco grain terminal expansion on track for fall completion, officials say." TDN.com. July 21; Comments from Pacific Northwest Waterways Association staff, May, 2015.

[&]quot;The Columbian. "Port of Kalama to double Temco site's rail capacity." December 13, 2013.

I^cInterview with Steve Oakes, Kalama Export Company, March 19, 2015; Olson, E. 2010. "Kalama port officials say grain export expansion will create 180 jobs." TDN.com. February 17; Siemers, E. 2011. "Vancouver port lands \$72M deal." The Portland Business Journal, http://www.bizjournals.com/portland/print-edition/2011/01/14/vancouver-port-lands-72m-deal.html?s=print; ADM. 2014. News Release: Marubeni and ADM Bolster Export Joint Venture in U.S. Pacific Northwest. September 30. "Interview with Mark Wilson, Port of Kalama, March 9, 2014; Northwest Innovation Works, http://winnovationworks.com/; Castano, C. 2014. "China-funded methanol plants in Oregon." KOIN6. http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/.

¹² Interview with Tony Flagg, United Grain Corporation, March 16, 2015.

Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Toledanes, L. 2013. "Port of St. Helens commissioners approve increase to train traffic." TDN.com. November 13.

Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Northwest Innovation Works, http://nwinnovationworks.com/; Castano, C. 2014. "China-funded methanol plants in Oregon." KOIN6. http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/; Miller, M. 2014. "Port of St. Helens give OK to methanol plant lease option." Pamplin Media, http://www.pamplinmedia.com; The Clatskanie Chief, 2014. "Port commission signs lease option with methanol company." The Clatskanie Chief. February 20. http://www.thechiefarchive.com/author/clatskaniechief/page/147/; Godley, V. 2014. Letter to the Port of St. Helens Community. NW Innovation Works. October.

BECAUSE OF THE DEEPENING, COLUMBIA RIVER PORTS AND TERMINALS ARE WELL POSITIONED TO RESPOND TO GROWING DEMAND FROM THE PACIFIC RIM

Many terminal operators indicated that without the deepening they would not have invested in upgrading their facilities. With growing demand from China and other countries along the Pacific Rim, this would have been a significant lost opportunity for terminal operators and shippers. Now, terminals along the Columbia River are well positioned to take advantage of this growth.¹⁵



United Grain Corporation

With their \$80 million investment to expand their grain terminal, United Grain Corporation now has the largest export grain terminal on the West Coast, and the second tallest grain structure in the world. The development started in 2008-2009, anticipating the channel deepening completion and larger ships with deeper drafts calling on Columbia River ports. Like other grain terminals along the Columbia River, United Grain Corporation's expansion included adding



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storage and transport capabilities for grains new to this market—corn and soybeans—along with their traditional wheat product.¹⁶

West Vancouver Freight Rail Access

The Port of Vancouver is investing \$228 million in rail and road improvements to meet the transportation demands of terminal operators such as United Grain Corporation. These investments include expanding rail tracks, adding a loop track, and improved road and rail access to the port and terminals.¹⁷

Vancouver Energy

Vancouver Energy is investing approximately \$100 million in a "crude-by-rail" terminal. The project is projected to start in 2016. The investment includes new rail lines and storage facilities to move crude oil through the terminal. This terminal will be one of those serviced by the new West Vancouver Freight Rail Access investments.¹⁸

[&]quot;Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Northwest Innovation Works, http://nwinnovationworks.com/; Castano, C. 2014. "China-funded methanol plants in Oregon." KOIN6. http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/; Miller, M. 2014. "Port of St. Helens give OK to methanol plant lease option with methanol company." The Clatskanie Chief, 2014. "Port commission signs lease option with methanol company." The Clatskanie Chief. February 20, http://www.thechiefarchive.com/author/clatskaniechief/page/147/; Godley, V. 2014. Letter to the Port of St. Helens Community. NW Innovation Works. October.

*Interview with Katy Brooks, Port of Vancouver, March 5, 2015.

Interview with Tony Flagg, United Grain Corporation, March 16, 2015; United Grain Corporation, http://www.bizjournals.com/portland/print-edition/2011/01/14/vancouver-port-lands-72m-deal.html?s=print; Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Mitsui & Co. "Harvesting opportunities in agriculture." https://www.mitsui.com/jp/en/business/challenge/1201987_1856.html;

[&]quot;Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Port of Vancouver USA Press Release, "Port begins final phase of West Vancouver Freight Access, attp://www.portvanusa.com/wvfa/wvfa-home/; Guerra, K. 2011. "Port of Vancouver Isanches key component of multimillion-dollar rail expansion project." The Oregonian. December 7. "Interview with Katy Brooks, Port of Vancouver, K. 2011. "Port of Vancouver Isanches key component of multimillion-dollar rail expansion project." The Oregonian. December 7. "Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Port of Vancouver USA. Board of Commissioners Workshop Tesoro-Savage Joint Venture Lease Overview. July 22, 2013; Savage. Tesoro and Savage announce joint venture to construct and operate crude-by-rail unloading and marine loading facility at Port of Vancouver USA. http://www.savageservices.com/pressroom/; Energy Facility Site Evaluation Council, http://www.efsec.wa.gov/Tesoro-Savage.shtml.

DEEPENING-RELATED INVESTMENTS STRETCH BACK TO THE MIDWEST

Most of the investments spurred by the deepening happened or are happening at terminals along the Columbia River. Some investments, however, occured many miles away. For example, some shippers made investments in rail infrastructure that supports their upgraded and expanded elevators at terminals on the river. These investments include unit-train cars, rail loops, and loading facilities in Montana and North Dakota.²⁰

Tidewater Barge Lines

With the channel deepening came larger ships, with deeper drafts, carrying increased amounts of cargo. Much of this cargo moves up and downriver via tugs and barges. In response to this demand, Tidewater Barge Lines is investing an estimated \$30 million in three new and environmentally friendly tugs, with reduced air emissions and improved fuel efficiency. Vigor Industrial in Portland is fabricating the tugs, which will be delivered by the end of 2015. Fabricating the tugs in the Portland area helps keep more investment dollars in the local economy.¹⁹

PORTLAND

Columbia Grain

Columbia Grain is expanding their grain storage and handling capacity with a \$44 million investment. In addition to more storage capacity, the expansion will allow Columbia Grain to store and move corn and soybeans in addition to wheat, which had been their primary grain product.²¹

Kinder Morgan Bulk Terminal

Kinder Morgan invested \$10 million in a new ship loader. This is the largest investment Kinder Morgan has made in any of their terminals on the Columbia River (Ports of Longivew, Vancouver, and Portland).²²

International Raw Materials

International Raw Materials switched their loading operations from loading shallow-water barges to a deep water berth that can service larger ships that use the added depth of the shipping channel. They invested \$1.5 million in the switch. International Raw Materials now has one of the deepest berths on the West Coast of the U.S. Ships carrying liquid fertilizer frequently dock at their facility to offload fertilizer and then head south to terminals with shallower berths that could not accommodate fully-loaded vessels.²³

LD Commodities

Louis Dreyfus Commodities invested \$21 million to remodel and update its grain terminal on the Willamette River. Prior to this investment, their terminal frequently hit capacity due to the increasing volumes of grains traveling down the Columbia River.²⁴

Vigor Industrial

The largest floating drydock in the U.S., the *Vigorous*, arrived at Vigor Industrial's Portland shipyard in August of 2014. Vigor invested \$40 million building the drydock and \$10 million delivering and assembling it. Demand for the new drydock will come from servicing cruise ships, post-Panamax vessels and U.S. Military Sealift Command ships. At the time the *Vigorous* arrived at Vigor Industrial, two large cargo ships operated by the Maritime Administration were waiting for service using the new drydock.²⁵

Rivergate Road and Rail Improvements

The Port of Portland, along with other public and private partners, is investing approximately \$82 million in road and rail improvements in the Rivergate area. These investments include widening roadways and adding rail overpasses, expanding rail yards, deepening berths, and investing in new cranes and wharfs. These investments are necessary to meet the growing demand for

¹⁷Interview with Jennifer Riddle, Tidewater Barge Lines. March 31, 2015; estimates by ECONorthwest.

²⁰ Interview with Tony Flagg, United Grain Corporation, March 16, 2015.

²¹Interview with Amer Badawi, Columbia Grain, March 9, 2015; Interview with Patrick Bryan, Pacificor LLC, February 25, 2015; ADM. "Marubeni and ADM bolster export joint venture in the U.S. pacific Northwest." Longshore Shipping News. October 1, 2014. http://www.longshoreshippingnews.com/2014/10/adm-marubeni-announce-changes-in-northwest-grain/.

²²Interview with Neil Maunu, Kinder Morgan Bulk Terminal. March 10, 2015.

²³Interview with Tim Mahoney, International Raw Materials, March 11, 2015; International Raw Materials LTD, http://www.irmteam.com/our-company/;

²⁴Culverwell, W. 2012. "Louis Dreyfus plans \$21 M update to Rose Quarter grain elevator. The Portland Business Journal. December 27.

[&]quot;Interview with Alan Sprott, Vigor Industrial, March 19, 2015. Vigor Industrial. "The Vigorous: investing in the future," "Country's larges floating drydock coming to Portland." Vigorindustrial. "One of Portland." Vigorindustrial." The Oregonian. Nivember 23. http://blog.oregonlive.com/business_impact/print.html?entry=/2014/11/north_americas_largest_drydock_1.html. "Finterview with Phil Healy, Port of Portland. February 17, 2015; Linstrom, A. 2012. "South Rivergate Rail Yard Expansion boosts flow of export." PortDispatch. Port of Portland. August, 7. http://www.portofportland.com/publications/PortDispatch/post/South-Rivergate-Rail-Yard-Expansion-Boosts-Flow-of-Exports.asp

transportation services from expanded terminals that service larger ships with deeper berths that use the added depth in the shipping channel.²⁶

Canpotex - Portland Bulk Terminal

Canpotex is investing \$140 million in new facilities and equipment to increase the efficiency of their potash shiploading facility. The investment includes a new shiploader, improved operations and management capabilities, and an upgraded conveyance system. The increased efficiency will shorten turnaround times for Canpotex trains and ships at their Portland terminal.²⁷

Shaver Transportation Company

Shaver Transportation Company has been on a steady program of upgrade and construction since the channel deepening. The company responded to the increased demands from larger vessels with a repowering and new construction program kicked off in 2011. Shaver invested \$9.5 million in a new tug, the SUMMER S, which is being fabricated in Portland at Diversified Marine. They also invested \$4.9 million in new engines and repowering some of their existing tugs. They also invested \$7 million in two new grain barges, the first new grain barges on the Columbia River since 2011.²⁸

Pembina

Pembina proposes building a \$500 million propane export terminal. The City of Portland's Planning and Sustainability Commission recently voted to amend a zoning code to allow the terminal to be built. The



By Sarah McD from Portland, OR, USA (Tidewater Barge - Columbia River) [CC BY 2.0 (http://creativecommons.org/licenses/by/2.0)], via Wikimedia Commons

proposal now goes to the Portland City Council for a vote. If the Council approves the project, it may come online by 2018.²⁹

CONCLUSION

According to terminal operators, if not for the deepening of the Columbia River shipping channel to 43 feet, many of the investments listed in this report either would not have happened, or would not have happened at ports or terminals along the Columbia River. The deepening occurred at a time of increasing demand from Pacific Rim countries, especially China, for U.S. grain exports. Columbia River ports and terminals capitalized on this demand in large part because of the enhanced shipping capacity that the deepening offered. Operators

upgraded and expanded grain terminals. Transportation investments facilitated moving increasing amounts of Midwest grain to ports on the Columbia River—grain that otherwise would have moved down the Mississippi River to Gulf Cost ports. In addition to grain terminal and transportation infrastructure investments, terminal operators expanded or proposed new facilities for energy and bulk commodities.

Maintaining the shipping channel to 43 feet will help ensure the continued growth in cargo movement and related economic activity seen since the deepening. Firms made investments and built capacity assuming a level of commerce supported by a 43-foot shipping channel. A channel less than this depth would strand investments, reduce economic activity, and impact jobs.

^{**}Port of Portland. 2014. Press Release. "Canpotex to Invest at Port of Portland Terminal." October 8. http://www.portofportland.com/NewsRelease; Canpotex. Logistics. http://www.canpotex.com/what-we-do/logistics; Siemers, E. 2013, "Canpotex planning new potash storage facility at Port of Portland." The Portland Business Journal. February 20. http://www.bizjournals.com/portland/news/2013/02/20/canpotex-planning-new-potash-storage.html?s=print; George-Cosh, D. 2014. "Canpotex expanding Portland, Ore., marine terminal." The Wall Street Journal. October 8. http://www.wsj.com/articles/canpotex-expanding-portland-ore-marine-terminal-1412796970.

**Interview with Rob Rich, Shaver Transportation Company, March 31, 2015.

^{*}Interview with Teresa Carr, Port of Portland, April 3, 2015; Holmstrom, C. 2015. "Propane pipeline one step closer to Portland." KOIN6. April 7. http://koin.com/2015/04/07/pembina-propane-plan-draws-port-protesters/.

Attachment 1

City	Policy Issue/Recommended by City staff (June 2015 draft comp plan)	Additional Port Comments June 2015
1.11	Consistency with Metro Urban Growth Management Functional Plan and Urban Growth Boundary. Ensure that the Comprehensive Plan is remains consistent with the Metro Urban Growth Management Functional Plan and supports a tight urban growth boundary for the Portland metropolitan area.	Support Policy is consistent with retaining WHI Policy 6.41 from prior draft and as proposed in this letter.
6.14 Brownfield Redevelopment	Overcome financial-feasibility gaps to cleanup and redevelop 60 percent of brownfield acreage by 2035. Additional related policies are found in the Industrial and employment districts section of this chapter.	Add specific policies to support, encourage and incent brownfield redevelopment 6.14.a Review local land use policies and development code regulations to ensure they are supportive of cleanup and redevelopment for the highest and best use. 6.14.b Pursue grants, loans and or other technical assistance to make redevelopment financially viable to a private developer. 6.14.c Commit future city budget surplus to brownfield redevelopment
6.39 Prime industrial land retention	Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1 – Industrial and Employment Districts) that is prioritized for long-term retention.	Support
6.39.a. Prime industrial land retention	Strictly limit-Prohibit quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.	Support
6.39.c. Prime industrial land retention	Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area. Identify how regulations affect the capacity, affordability, and viability of industrial uses, and limit minimize those impacts.	Support

6.39.d. Prime industrial land retention	Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics. Offsets may include but are not limited to additional brownfield remediation, industrial use intensification, strategic investments, and other innovative tools and partnerships that increase industrial utilization of industrial land.	Support
6.39.e. Prime industrial land retention	Limit the use of prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.	Change to read: STRICTLY limit the use of prime industrial land
6.39.f. Prime industrial land retention	Promote efficient use of freight hub infrastructure and prime industrial land by limiting non-industrial uses that do not need to be located in the prime industrial area.	Support
6.41 West Hayden Island	Entire section 6.41 stricken from comp plan i.e. not included	Retain first section of 6.41: Provide for the future annexation of WHI for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or implementation agreement that ensures mitigation of impacts and provision of public benefits. Policy is retained based on City Council action and Metro designation.
6.43 Columbia East	Provide a mix of industrial and limited business park development in Columbia East (east of 82 nd Avenue) that expand employment opportunities supported by proximity to Portland International Airport and multimodal access.	Support
7.46 Sensitive habitats	Enhance grasslands and wetland habitats in the Columbia Slough, such as those found in the Smith and Bybee Lakes and at the St. John landfill site, to provide habitat for sensitive species, and for wildlife traveling along the Columbia and Willamette river migratory corridors.	Support with clarification that grasslands do not include areas where dredge material deposition has occurred.
Chapter 7	Culture, cultural has been introduced into this chapter: bullet 1, p7-1; paragraph 1, p7-3; Goal 7.B, p 7-9	Remove "cultural" and "cultural values" from this section. It lacks definition and context.

	Natural hazards are treated as something to be avoided in the policy section, p 7-10 when in fact they are a component of well-functioning ecosystems. A healthy natural system has a healthy occurrence of natural hazards.	Rewrite policy paragraph 2, p7-10 to clarify that natural hazards are a function of well-functioning ecosystems and should not be eliminated.
Policy 7.4.a	Added language covers wetlands and other water bodies	Remove addition of wetlands and water bodies as providing meaningful carbon sequestration function.
Policy 7.9 Habitat and biological communities	Bullet added states: Support recovery of species under the Endangered Species Act, and prevent new listings	Restate: Strike PREVENT, replace with "preclude the need for new listings."
		We are uncertain as to why the city would act to prevent new listings when they might be needed to protect or recover a species.
Policy 7.15 Brownfield remediation	Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.	Restoration should be tied to redevelopment, not remediation. The immediacy of remediation and its positive impact on the environment should stand alone. Change to: Improve environmental quality and watershed health by promoting and facilitating brownfield remediation. And promote and support redevelopment that incorporates ecological site design and resource enhancement.
Policy 7.25 Mitigation effectiveness		Remove policy 7.25. This detail is better suited for specific code sections in Title 33.
Policy 7.37 and 7.47 Contaminated sites	Ensure that plans and investments are consistent with and advance Promote and support programs that facilitate the cleanup and reuse, and restoration of the Portland Harbor Superfund site and other contaminated upland sites.	Change policy as follows: Promote and support programs that facilitate the cleanup and reuse of the Portland Harbor Superfund site and other contaminated upland sites.

7.49 Portland	New policy:	Support
International Airport	Protect, restore, and enhance natural resources and functions in the Portland International Airport plan district, as identified in the Portland International Airport/Middle Columbia Slough Natural Resources Inventory. — Accomplish this through regulations, voluntary strategies, and the implementation of special development standards.	
9.5 Mode Share Goals and Vehicle Miles Travelled Reduction	A goal should be added for reducing vehicle hours of delay.	Reducing vehicle miles travelled doesn't necessarily reduce emissions if vehicles are idling in traffic and spending more time to travel less miles. There is also an economic cost for Portland businesses associated with vehicle congestion.
TSP Project List	The City of Portland Major Projects and Programs List has some funding for freight mobility projects and programs but the majority of freight mobility projects are on the separate Other Agency Major Projects list.	For the City to be able to support the benefits derived from its role as a major freight hub and to be able to provide good access to industrial lands the City should cooperate with other agencies such as the Port in funding and implementing freight mobility projects.

Linaton Pol

June 21, 2015

Dear Mayor Hales & Commissioners,

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Linnton P2

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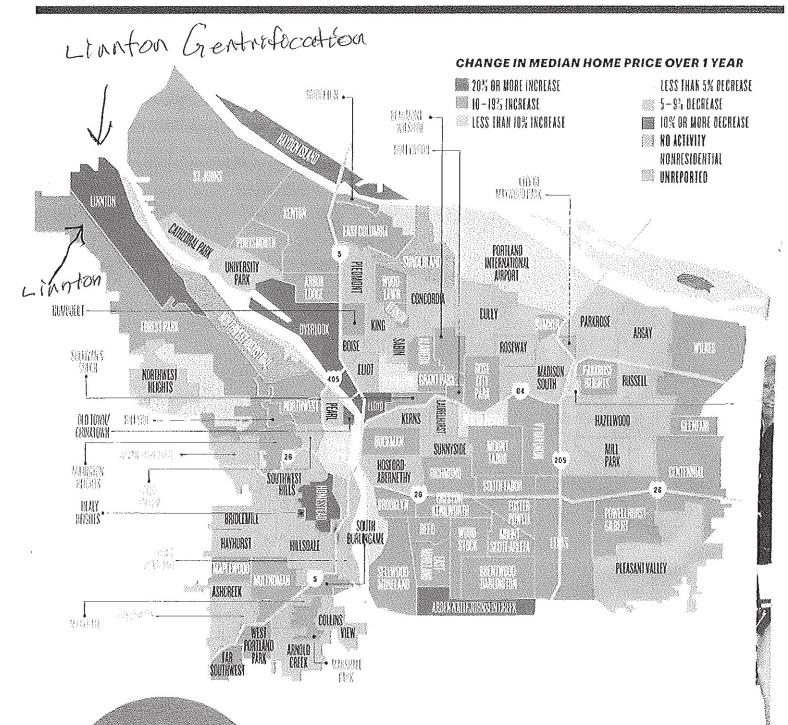
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Respectfully,

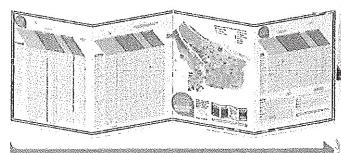
Pat Wagner

Pat Wagner Linnton



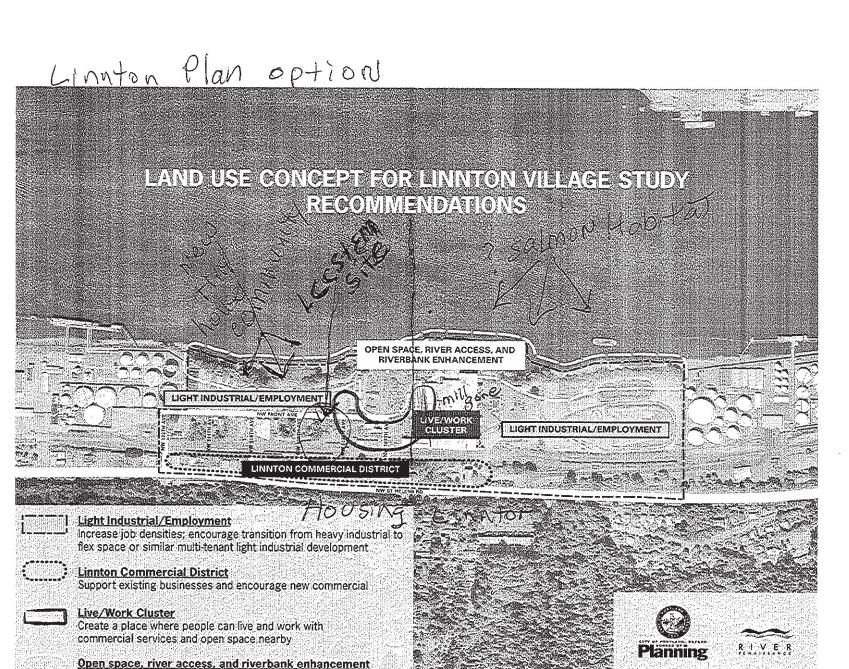
OUR ANNUAL MICK-REFERENCE 11 DE TO 122 NE PHERRHOODS AND SUBURBS

A new year brings new trends! We've annotated our grids to show you how to find the cheapest rents, plummeting crime rates, biggest price jumps, and lowest cost per square foot. Happy hunting!



FOLD OUT OUR SPREAD AND CETSTARIED

to be accommodated in redevelopment



Disclaimer: The subarea boundaries are conceptu for discussion purposes only.

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Linator people older

Ord. 187831, Vol. 2.3.A, page 5923

Dear Mayor Hales & Commissioners,

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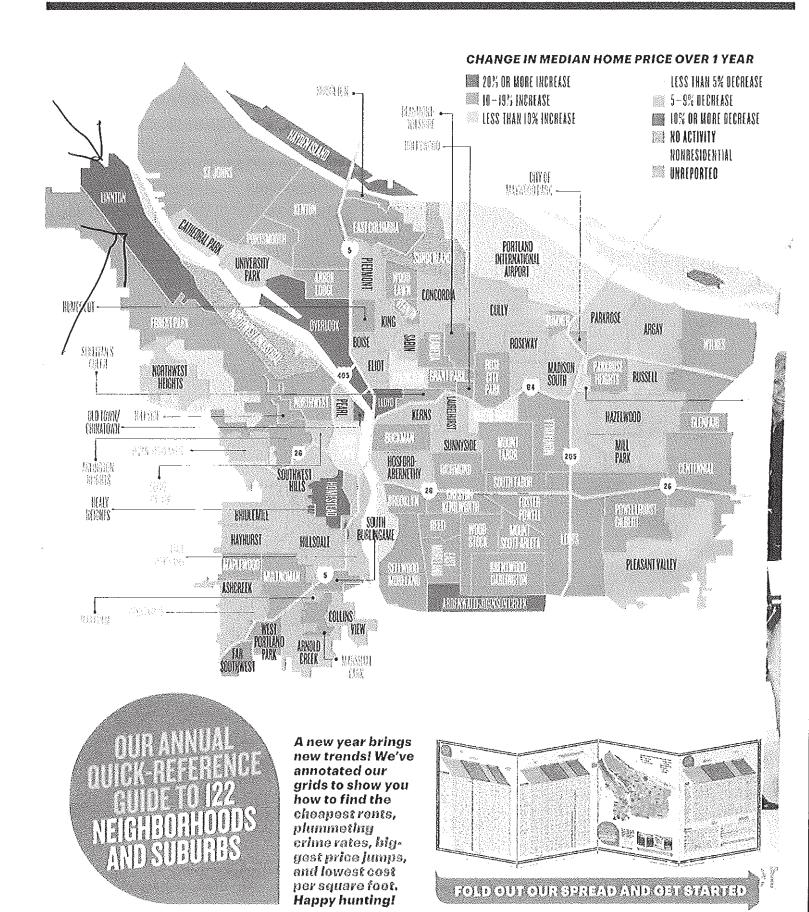
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Respectfully,

Pat Wagner

Pat Wagner Linnton



From: Sarah Kirk [mailto:saki212014@gmail.com]

Sent: Saturday, June 20, 2015 9:37 AM **To:** Planning and Sustainability Commission

Subject: Housing

I'd like to see more duplexes and multiplexes built and or houses partitioned to become housing for more than one family. They're often quite beautiful and don't change the skyline the way massive buildings do. Plus some look just like other houses in the neighborhood. Why are they illegal? They may not offer a lot of parking, but get real; there are many people like me who don't own a car at all and would prefer to bike or bus in to work. Please re-legalize multifamily housing of this sort.

Sarah Kirk

12100 SW Spur CT Apt C Beaverton, OR 97008 From: Jonathan Greenwood < jonathan.e.greenwood@gmail.com >

Date: June 19, 2015 at 1:47:52 PM PDT

To: "Reyes, Cindy" < <u>Cindy.Reyes@portlandoregon.gov</u>>, Commissioner Fritz

Subject: A follow-up due to lack of response regarding homeless issues.

Please be directed to this article at <u>bikeportland.org</u>: <u>http://bikeportland.org/2015/06/19/11-buildings-illegal-portland-144633</u>

We must allow for this middle ground to be built. Additionally, we must remove parking minimum requirements for all developments. Parking induces car ownership and car owners to move in. We must also remove density restrictions that don't allow apartments without parking along main corridors in East Portland or even off those corridors. We have a major housing shortage. Not supporting aggressive building and avoiding the systemic silencing of NIMBYs is an endorsement for land speculators who are profiting off our housing shortage. That is deplorable. The same may go to be said for parking garages or blacktop parking lots. Those must be taxed at a much higher property tax rate as they are using land as investment.

I am still disappointed I did not get a response about whom you believe deserves services in terms of the homeless in our city. A common fallacy I hear lately is that services attract "others." All human beings deserve services. Housing is a right.

Regarding Vision Zero, you must move forward with plans proven to work in other cities that adopted them. We must make multimodality upgrades whenever infrastructure is repaired. Protected bike lanes must be the norm, not what you believe is a luxury.

There seems lately to be a suburban grumbling about the urban growth boundary. I want to see commissioners take the stance that we should build up and never move the UGB again. The rest of the state should be permanent wilderness and farm. I'd also like the city to invest on real renewable infrastructure (give subsidies to those who add solar and more!) and urban vertical mechanical farms so Portland may be food independent and energy independent by 2035.

It is important, also, that Portland take the stance of increasing the gas tax to match inflation as well. A mile tax is a discouragement for electric vehicles. On the topic of automobiles, we should maintain the stance that Portland and metro have officially reached the saturation point for the city adding black top. The city commissioner's should espouse a stance of maintenance and aggressive increases in fixed transit. We need a subway, and the SW line must be MAX and have a tunnel servicing OHSU.

These ideals I feel are not options for you as representatives to the greater good of Portland and the rights our ecosystem deserves.

<amanda@portlandoregon.gov>, "Nick@portlandoregon.gov" <Nick@portlandoregon.gov>,

[&]quot;Steve.Novick@portlandoregon.gov" < Steve.Novick@portlandoregon.gov >,

[&]quot;dan@portlandoregon.gov" <dan@portlandoregon.gov>,

[&]quot;Mary.<u>HullCaballero@portlandoregon.gov</u>" < <u>Mary.HullCaballero@portlandoregon.gov</u>>,

[&]quot;mayorhales@portlandoregon.gov" <mayorhales@portlandoregon.gov>

If you are compelled to respond that the law makes some of these issues out of your jurisdiction, I am preempting that response. You should be advocating and actively circumventing the obstacles to positive change if you expect Portland to re-elect and support you.

Thank you, Jonathan Greenwood 2116 NE 49th Ave 97213

On Jun 10, 2015, at 2:56 PM, Reyes, Cindy < Cindy.Reyes@portlandoregon.gov > wrote:

Jonathan,

Thank you for your email. I am responding on the Mayor's behalf.

We understand your concern around what has become a widespread issue throughout the city. With roughly 2,000 people sleeping outside in Portland on any given night, and not enough indoor bed space to house virtually any of them, it will take quite a while to markedly reduce that number.

The city is taking several approaches, including extending foot patrols, creating more bed space, and keeping winter shelters open year round. These programs will be helpful, but we know that the ultimate solution will come when we can treat and house everyone who needs those services. In the meantime, please don't hesitate to continue to contact us to let us know what's happening so that we can continue to ensure a safe and comfortable city.

Again, thank you for your email.

Sincerely,

Cindy Reyes

Constituent Services Specialist
Office of Mayor Charlie Hales
P: 503-823-4120
E: cindy.reyes@portlandoregon.gov
www.portlandoregon.gov/mayor

From: Jonathan Greenwood [mailto:jonathan.e.greenwood@gmail.com]

Sent: Tuesday, May 26, 2015 11:44 AM

To: Commissioner Fritz; Commissioner Fish; Hales, Mayor; Commissioner Novick; Commissioner

Saltzman

Subject: War on the homeless

Hello,

I am appalled at the policy I have read about cleaning the streets of homeless camps. For one, all you are doing is shuffling the problem from one area to another in the metro. Secondly, there is a severe housing shortage in our metro area for even middle and low class people. How does it

make sense to all of you that we should be targeting the homeless in a way that makes their presence illegal when we aren't providing housing. Housing is a right! If we apply inclusionary zoning with linkage fees, we can provide affordable housing and housing for the needy.

If this policy of criminalizing the poor and homeless continues, I have no choice but to vote against each one of you for not speaking out loudly against such an abhorrent policy. Where is the progressive ideal of compassion? Where is the progressive ideal of applying aid instead of overt force? I'm disgusted.

Good day, Jonathan Greenwood 2116 NE 49th Ave 97213

Hello -

I'm writing to advocate to allow for more diversity in our housing stock, specifically more middle density-types such as duplexes and courtyard apartments buildings. These help create walkable neighborhoods and are likely to remain relatively affordable over time, without public subsidy. If we want to address the increase in population growth and Portland's affordability, we can't ignore these and need to ensure our zoning allows for them. I think more R1 and R2 zones are likely needed.

Thanks, Kelly

--

Kelly Rodgers
6325 N. Albina Ave #7
Portland, OR 97217
503-442-7165
portlandkelly@gmail.com
Coauthor, Cartopia: Portland's Food Cart Revolution

On Fri, Jun 19, 2015 at 2:06 PM, Brian K. Smith brian.k.smith@gmail.com wrote:

Hi Planning and Sustainability Commission,

I'd like to offer support for whatever efforts you can make to improve the options for moderate density housing, which feels like a big missing piece in the current development landscape.

I will be referencing the diagram and terminology from http://missingmiddlehousing.com/.

I live at 924 NE 65th Ave. in the North Tabor neighborhood. We have a variety of housing stock in the neighborhood that was built before the building code changed to solidify the divide between single family homes (SFH) and large apartment complexes. Because we have some R2.5 and are close to the NE 60th Ave MAX station with a special overlay, we also have some nearby examples of more recent infill development templates. Finally, we are in the process of developing a backyard ADU, which has exposed me to many of the details of that piece of the housing puzzle.

When I think about these issues, I often do so in the context of the lot next door at 914 NE 65th Ave. This is a double lot (100x100). When we moved into our house five years ago 914 was in rather poor condition. It was redeveloped and is currently very nice, but if we were one block over in the R2.5 there may have been a different outcome. I think about what would I be happy to see on that lot next door. (These are lots 1600 and 1700 near the middle of http://www.portlandoregon.gov/bps/index.cfm?&a=55734)

The style of development I would be most happy to see next door is a one to 1.5 story garden courtyard apartment/condo/co-housing situation. That would fit well with the existing structures nearby, not block a ton of light, give residents and neighbors some green space to enjoy and increase the number of people housed on the lot by a factor of four or five. I would be ok with anything in the range of duplex up to 2.5 story townhouse/multiplex.

The units nearby at NE 63rd and NE Oregon (<a href="https://www.google.com/maps/@45.528407,-122.598666,3a,75y,74.87h,92.05t/data=!3m7!1e1!3m5!1sEMGcfErz4NPgTNVY0BoQ0Q!2e0!6s%2F%2Fgeo2.ggpht.com%2Fcbk%3Fpanoid%3DEMGcfErz4NPgTNVY0BoQ0Q%26output%3Dthumbnail%26cb_client%3Dmaps_sv.tactile.gps%26thumb%3D2%26w%3D100%26h%3D80%26yaw%3D99.330139%26pitch%3D0!7i13312!8i6656) are nicer than many other developments of similar density, but are a little denser/closer to the lot line than I would be excited about having next door.

The Binford Garden Townhomes a little ways north of here are another example of the kind of moderately denser development that has stopped being built but I would be happy to live next to.

In terms of ADU restrictions, the two biggest frustrations with our current project were the 18' height and the five feet from the lot line restrictions. For the height, 18' was too short for a two-story unit with a ground floor at the same elevation as the main house. This was an important design goal for me to improve wheelchair accessibility, as I have wheelchair bound family members, so we did get a height variance. I think if the limit were increased to 22' it would make

many more perfectly reasonable two-story designs viable.

For the 5' from lot line, it was frustrating because we are replacing an existing garage structure that is 6" (yes, inches) and 3' from the line at a four corner border where there are three other garages at a similar distance. While we probably could have received a variance in this scenario if time and money were no object, we were able to work with the architect to figure out a solution that works for us within the 5' restriction. I wonder how many others have not been able to do so. I think a rule that an ADU could freely encroach within 2' of the lot line for no more than 10% of the total linear feet of lot boundary (or something like that) would give a little more flexibility in placement without dominating the neighbors.

I applaud your efforts to help more people live in the same amount of space harmoniously, affordably, safely, and comfortably.

Cheers, Brian K. Smith 924 NE 65th Ave. PDX, 97213 Andre Baugh, Chair Portland Planning and Sustainability Commission 1900 SWE Fourth Avenue, Suite 7100 Portland, Oregon 97201

Dear Chair Baugh and Planning and Sustainability Commissioners:

Thank you for the opportunity to comment on the Draft Portland Comprehensive Plan (July 2014), Draft Transportation System Plan (TSP) and subsequent work session memos from Portland Bureau of Planning and Sustainability (BPS) staff. The Port of Portland (Port) has been an active participant in the Comprehensive Plan process. We have provided written testimony on earlier versions of this document and supporting materials in May and December 2013, as well as oral testimony during the recent slate of Planning and Sustainability Commission hearings. Port staff has also played a role on a number of technical advisory committees.

Our current comments on the draft Comprehensive Plan and related BPS staff memos are consistent with comments we have raised in earlier communications. Our concerns can be organized under three themes: adequacy of economic policy, equity and growth, and balance. All three themes broadly embrace and are reinforced by the Port's sustainability policy whereby:

"... we make business decisions that support long-term economic health, integrate community concerns into our work and reflect a deep and broad commitment to environmental stewardship for the benefit of future generations." (Port Administrative Policy Sustainability 7.4.19, May 2014)

As the Port pursues new avenues for growth, communication and partnership, as outlined in our Strategic Plan FY 2016 – FY 2020, the success of a sustainable Port is dependent on ensuring adequate revenue to fund operations, make capital improvements, address legal obligations such as the Portland Harbor Superfund site, and deliver on our mission to state and regional stakeholders.

The State Legislature created the Port in 1891 for the original purpose of improving, dredging and maintaining the harbors and channels of the Willamette and Columbia Rivers. Over time, the Port's responsibilities were expanded by the State to include promoting the general maritime, shipping, aviation, commercial and industrial interests of the Port (Oregon Revised Statute 778.015). With overlapping interests but different missions, it is our hope the City's Comprehensive Plan would complement and support this legislative mandate. It is with this in mind that we offer the following comments.

ADEQUACY OF ECONOMIC POLICY

The Portland Plan emphasized the role of economic prosperity and affordability as one of three strategies, with a framework of equity integrated into all three as a foundation for greater alignment and collective action among public agencies in Portland. The vigor and intensity of economic prosperity goals, policies and their ultimate implementation is the foundation upon which Portland achieves success. The Port's comments on economic policy are based on our vision; "...to be a prominent, innovative economic development engine while stewarding the region's community and environmental best interests."

Even with the recent good job growth news, we still find that Portland wages are not keeping up with other major cities. The most recent analysis of the Portland Region's Economic Health 2014 by Eco Northwest indicates that Portland's median household incomes are \$4,400 below pre-recession levels and that Portland's per capita income is 4.6% below the national average for metropolitan areas. This issue is of particular concern when our state is so reliant on income taxes to fund the public's expectations for services.

The emphasis on trade in the Portland Plan was reflective of the Brookings Institution's recognition of the strength of trade activity in the Portland region. It also reflected the fact that 95% of consumers live outside of the U.S. and tapping into those markets is an important strategy for businesses to grow. Greater economic well-being is generated by the traded-sector economy than by those serving only the local economy. According to the Brookings Institution, one traded-sector job is equal to three local jobs; companies that export (or sell outside the region) experience higher sales, generate greater employment, and offer higher wages than firms which do not export.

Trade and transportation is of critical importance to the Portland-Vancouver region. While investment in harbor businesses has continued to be robust following the deepening of the Columbia River shipping channel, the Comprehensive Plan and Economic Opportunity Analysis (EOA) downplay and may even impact the viability of this investment. The level of investment in new, expanded or more efficient facilities in the Portland-Vancouver Harbor and on the entire Columbia suggests that there is a much greater demand for Harbor Access Lands than is being accounted for or planned for.

For these reasons, and because the Comprehensive Plan sets the 20 year direction for the City of Portland (and the region), the Port believes it is prudent to have a policy calling for the future annexation of West Hayden Island "for a combination of open space and deep-water marine industrial uses" through a process that "ensures mitigation of impacts and provision of public benefits". As such, West Hayden Island should remain a key component of the City's industrial land inventory and the City EOA. This policy is supported by City Council Resolution 36805 and action taken by the PSC in the fall of 2013. Policy 6.41 should be limited to that direction provided by City Council. This policy dovetails with other City initiatives such as the Greater Portland Export Initiative, led by the Office of the Mayor and the Portland Development Commission, to double the region's exports in five years.

A supportive West Hayden Island annexation policy also has a direct connection to other policies contained in the Comprehensive Plan, including land supply, traded sector competitiveness,

equitable household prosperity, industrial and employment districts, preservation of open space, and enhancement of various habitat types critical to listed species.

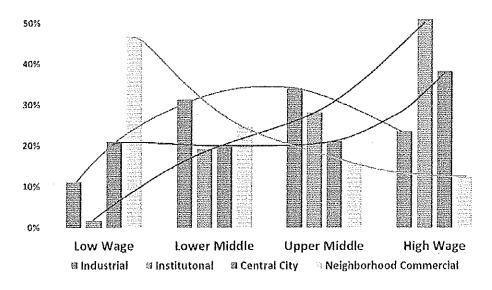
The provision for additional industrial lands, especially harbor access lands, is critical to the future of Portland. We commend staff for inclusion of several significant policies that, if properly implemented, would go a long way toward ensuring Portland's economic prosperity through greater equity based on strong growth in accessible middle-income jobs.

EQUITY AND GROWTH

Certain elements of disparity in equity can be tied to income inequality and the lack of well-paying employment opportunities for under-served and under-represented populations. The Port's role of providing access to markets results in public infrastructure expenditures and facilities that serve all job classes, but largely result in growth in middle-wage jobs. Although Oregon is creating jobs, they tend to be at the two ends of the spectrum: very high paying jobs and very low paying jobs. Strengthening every element of the Comprehensive Plan that addresses job growth, especially middle-income job growth continues to be a priority for the Port.

Using the Comprehensive Plan as a tool, the City has an opportunity to focus its efforts on supporting middle-income job growth. As shown in the wage quartile comparison of Portland's employment geographies developed by BPS staff, middle-wage occupations are concentrated in industrial employment and in the City's industrial geographies, especially the Portland Harbor and the Columbia Corridor. Policies that support economic growth in these geographies, such as brownfield redevelopment, intensification and expansion of existing uses and Willamette Superfund site cleanup are to be applauded.

Figure 35. Wage Quartile Comparison of Portland's Employment Geographies, 2012, (BPS, EOA, 2015)



Brownfield Redevelopment

While brownfield redevelopment affords one of the best opportunities for new industrial land capacity and associated middle income job opportunities, there are a number of unresolved challenges to realizing this potential. Brownfield redevelopment is an important goal for our region and state and the Port has brought back to use one of the largest industrial brownfields in the state in Troutdale. Based on that work, and the recent Portland and Metro brownfield redevelopment studies, industrial brownfield redevelopment has the greatest return on investment to the public yet is one of the most difficult to achieve given industrial land prices and remediation costs.

Without policies to support and incent this type of brownfield redevelopment, and partnerships among many stakeholders, it will be challenging for the City to achieve the goal of 60% redevelopment of industrial brownfields by 2025 outlined in the current draft EOA. The Portland Development Commission (PDC), the agency historically in the lead on brownfield redevelopment with its Harbor ReDI Program and the Willamette Urban Renewal Area, has drafted a Strategic Plan 2015-2020 that does not include any mention of brownfield redevelopment. Reaching 60% redevelopment of brownfields by 2035 seems that much more insurmountable without a stronger commitment from all bureaus in the City.

Public resources will be needed to support this effort. While new tools are being proposed, only limited loan funds are currently available. Redevelopment of Portland Harbor lands will be even more challenging and require partnerships and creative solutions. The specific policy in Chapter 7 that will make brownfield redevelopment (as envisioned in Chapter 6 policies; 6.14, 6.39, and 6.40) difficult if not impossible to achieve is 7.46. This policy suggests grasslands and floodplains must be protected and enhanced within the Willamette River watershed. Grasslands as shown on the current City Natural Resources Inventory map includes many fallow areas consisting of barren and weedy fill on existing developed industrial sites and underdeveloped brownfield sites not currently regulated within industrial districts. Floodplains are currently regulated for flood protection, not as a habitat feature. It is hard to imagine how both outcomes can be accomplished with these conflicting policies.

Transportation

The Port sees similar challenges with implementation of transportation policies that are intended to support middle-income employment area geographies (Harbor Access Lands and the Columbia Corridor). The Portland Plan identified the advantages of Portland as a freight hub and international port City. From our perspective, transportation continues to be both a strategic advantage for the City and region and a potential vulnerability. Maintaining and growing that advantage is critical to equity and growth. Oregon is a relatively small, trade-dependent market, and good access to markets beyond our region is critical for the businesses that locate here and for business expansion, retention and job growth. Robust market access is critical to businesses that rely on the timely delivery and shipment of products to the national and international marketplace.

As reinforced by statewide shippers' reaction to the recent departure of Hanjin container service to Asia, the Portland freight hub is critical to the state and local economy. Distillers depend on glass bottles shipped by low-carbon methods from factories in Asia, while blueberry growers depend on the same mode to export perishable products to Japan. Having direct-

calling service (both ocean and air) for moving cargo adds to the quality of life in our region. Local exporters have reduced shipping costs and are more competitive the marketplace, creating jobs for Portland residents. Lower costs are also enjoyed by importers such as Fred Meyer and Les Schwab. In turn, they are able to reduce prices to their customers, affording greater access to consumer goods to a wider range of Portland residents. Decisions in Portland have implications for other counties in the region and state that rely on the Portland freight hub. This rural-urban economic linkage should be acknowledged in the Comprehensive Plan.

Strategic freight investments in all parts of the transportation system are essential to address choke points, excessive congestion and poor connections. In order to address business and passenger transportation market access and freight bottlenecks, improvements that address these needs must be prioritized and included in the Transportation System Plan (TSP).

Freight and goods movement is important to accommodate the anticipated increase in Portland's population and economy, approximately 280,000 new residents and 140,000 new jobs by 2035.

Efficient freight movement is also a key element to providing an adequate industrial land supply (as described in Policy 6.12), in part by increasing throughput on existing industrial sites (as described in Policy 6.38).

Portland's economy is far more dependent on freight movement than most other U.S. cities. The Portland region has the third highest percentage of total employment in the distribution and logistics sectors in the U.S., comprising 11% of the region's workforce. According to the Oregon Department of Employment, one out of nine jobs in the Portland area are in the transportation sectors.

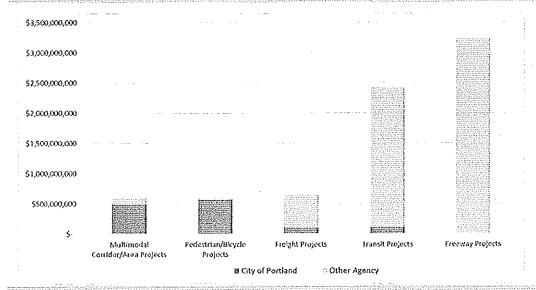
In consideration of the above, the Port appreciates and supports the addition of the economic benefit criteria for opportunity access, freight access and freight mobility that was used to prioritize the City's transportation project list. These criteria appropriately reflect our diverse, multi-modal system needs, provide the greatest return on our investment, and offer the greatest opportunity for higher wage jobs for our workforce.

However, it seems that the prioritization and funding for freight improvements on the project list proposed by the City is not in line with the importance of the freight network to the economy of the region. As shown by the slide in the Portland Office of Transportation presentation at the February 24th PSC hearing on the TSP, the City is allocating a minimal amount of expenditures to freight when compared to other transportation modes.

From February 24 PBOT presentation at PSC:



Constrained Investments by Mode & Agency



33 PORTLANDOREGON:GOV/TRÄNSPORTATION

The region has set a five-year goal to double export trade volumes to support a strong and growing economy. A related goal is to sustain a vibrant and prosperous regional economy that generates middle income jobs and sufficient tax revenues to support critical public services that can address other social equity issues. Our concern is that the proposed implementation of the TSP will leave a significant segment of transportation system users and the traded-sector economy behind.

The strong connection between economic growth, equity and access to middle income jobs is acknowledged in the Comprehensive Plan, but implementation actions seem insufficient. The PDC Strategic Plan 2015-2020 also makes this connection:

Leverage and maintain Portland's economic competitiveness and create access to high
quality employment by supporting traded-sector business growth, access to new
domestic and foreign markets, and connections for Portland residents to quality
employment opportunities across both traded-sector and local serving industries;

While a strong connection between economic growth, equity and access to middle income jobs is acknowledged in the comprehensive Plan, implementation actions seem insufficient. A stronger commitment to freight transportation would reinforce goals in the Comprehensive Plan, Portland Plan, Climate Action Plan, and PDC Strategic Plan. The Port recommends updates to the TSP balance the emphasis on active transportation with the freight and commercial vehicle mobility needs of industry engaged in trade. We also urge the City to continue to review how the transportation hierarchy will be administered and how it should apply to freight routes.

Port of Portland

We have attached a Port recommended TSP project list that supports economic development oriented initiatives that reinforce the connection between growth, equity and access to middle income jobs.

Finally, in consideration of the importance of auto and freight mobility to the economy of the City and job access, we encourage the use of a measure of vehicle hours of delay in addition to reduction of vehicle miles travelled as proposed in Policy 9.39.

BALANCE

The Port encourages the City to consider the recommendations around word choice as it relates to Chapters 6 and 7. We are aware of the challenge of writing findings when the word emphasis is applied differently from one chapter to another.

The Guiding Principles seem to elevate some specific approaches to prosperity over others, such as support of a "low-carbon economy" to meet reduced carbon emission goals, while not mentioning growth in the City's overall export values.

There are multiple instances where language (verb) choices are inconsistently attached to policy statements. We urge additional efforts to understand the "on balance" approach and the hierarchy ascribed to certain policies.

We appreciate your consideration of our comments and look forward to working with you to resolve these issues prior to adoption of the Comprehensive Plan.

Sincerely,

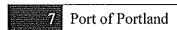
Susie Lahsene
Senior Manager, Transportation and Land Use Policy

Attachments

- Detailed Comments on the TSP (reference in letter if included)

cc: Susan Anderson, Bureau of Planning and Sustainability Eric Engstrom, Bureau of Planning and Sustainability Kristen Leonard, Port of Portland

Attachment - Port of Portland Recommendation for the TSP project list:



TSP ID 40032: Columbia/Alderwood/Cully Intersection improvements

This project is listed as funded but it is only partially funded. It should be moved to Major Projects and Citywide Programs list.

TSP ID 40009: NE 47th Ave Corridor Improvements

Consider revising the project description to note that the intersection improvements at 47th/Columbia are complete but 47th Avenue between Columbia and Cornfoot still needs to be improved.

TSP ID 110190: Killingsworth/I-205 Interchange Improvements

Remove the Port as a lead agency. The Port listing dates back to the first Colwood plan amendment but the Port no longer has any involvement in this project.

TSP ID 40102: Columbia Blvd. Street Widening

Consider moving this project from the Unconstrained list to the Constrained list.

TSP ID 30055: North Portland Junction: Undoing the X

Replace the Port as lead agency with Region. This project was identified as part of the I-5 Rail Capacity Study and again as part of the Port Rail Plan but the project is regional in nature and benefit.

TSP ID 40001: 11th/13th Ave. Rail Overcrossing

Change lead agency from Port to Region. This and other grade separations associated with the Kenton Line are of regional scale and benefit.

TSP ID 40025: 82nd and Airport Way Grade Separation

Change estimated cost to \$50,000,000.

TSP ID 40085: Kenton Rail Line Upgrade

Change lead agency from Port to Region. This and other components of double tracking the Kenton Line are of regional scale and benefit.

TSP ID 103750: Cathedral Park Quiet Zone

Add the City as a co-lead agency and move the project to the Major City projects list.

TSP ID 113090: Cully Blvd. Rail Overcrossing

Change lead agency from Port to Region. This and other grade separations associated with the Kenton Line are of regional scale and benefit.

Port of Portland

Add the following Other Agency Projects with Port of Portland as Lead Agency:

Bonneville Rail Yard Build Out - Construct two interior yard tracks and complete the double track lead from the wye at the east end of the yard to Barnes Yard. Add rail staging capacity for South Rivergate. Cost: \$3,600,000

Widen Airport Way Outbound east of 82nd- Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$3,335,000

Deplaning Curbside Roadway Lanes – Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$2,976,000

Airport Way Westbound Approaching Return Road - Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$1,080,000

Terminal Exit Roadway at Post Office Curves - Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$1,500,000

Terminal Exit Roadway at Parking Plaza - Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$1,104,000

PDX Light Rail Station/Track Realignment – RTP# 10364 Realign light rail track into terminal building. Cost: \$16,330,700

Add the following Other Agency Projects with Region as lead agency:

Willamette River Channel Deepening - Deepen the portions of the Willamette River with deep draft infrastructure to -43' where appropriate. Allow Willamette River terminals to also benefit from the Columbia River's new controlling depth. Cost: \$200,000,000

worry this would just end up increasing the air pollution from diesel particulates. The people who will suffer most from this pollution are the children of nearby Woodlawn Elementary whose population consists of many low income families as well of those of color. This is already an under served part community who have enough pollution from the current trains and tracks.

Comment ID

3506 MapApp ID 2182 Commenter

Gary Rule

Date Received:

3/9/2015

Address:

7326 se 27th ave, Portland, OR

District:

Southeast

Comment:

I support rezoning Eastmoreland for several reasons. The city should strive to maintain diverse neighborhoods and housing opportunities. The city's plan should accommodate everyone regardless of income bracket. Large lots and craftsman homes are a draw for middle to upper income families who want to live close in. Many of the arguments against rezoning Eastmoreland are simply discriminating against another group of people.

Comment ID

MapApp ID

Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

District:

West Central City

Comment:

Huge priority, connecting the highest density residential neighborhood in the state to the central city. Other routes are either dangerous our circuitous, due to the Everett-Glisan couplet intersecting with the 1-405 ramps. Would be great to see this in the next five years.

Comment ID

MapApp ID

2150 Commenter

2153 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

West

Comment:

Please prioritize. This link is a major enhancement for users of the regionally significant Washington Park trail system. Consider seeking philanthropic contributions, and possible bridge naming opportunities, to accelerate the projects.

Comment ID

MapApp ID

2151 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

Central City

Comment:

Please prioritize these improvements in the near term. Burnside can be a great street if we improve safety and street frontage, with an emphasis on pedestrians!

Comment ID

MapApp ID . 2152 Commenter 3510

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Ave #718

District:

Central City

Comment:

This is a critical improvement that will provide redundant pathways to the greenway trail, which is not a particularly strong transportation route for bikes (in part due to sharp curves and conflicts with pedestrians).

Comment ID

3511 MapApp ID

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District: West Northeast Central City Southeast

Comment:

Please prioritize as soon as possible. We are falling far behind peer cities.

Ord. 187831, Vol. 2.3.A, page 5944

Comment ID

3512

MapApp ID

Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

West Central City

Comment:

Consider four-way stop signs along the North Park Blocks, to slow traffic and prioritize the pedestrian.

Comment ID

3513 MapApp ID Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

West Central City

Comment:

Please consider impact to Couch Street, which is currently a slow-traffic street that favors pedestrians. The eastside Burnside-Couch Couplet shows that one-way streets facilitate movement of traffic at the expense of free-flowing pedestrian movements. NW Couch is and can continue to be a great pedestrian street without changes.

Comment ID

MapApp ID

2156 Commenter

2155 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

Central City

Comment:

This is a hugely significant and catalytic project that is regionally significant. Please prioritize funding and completing in the near term.

Comment ID

MapApp ID

2180 Commenter Stephen Grieco

Date Received:

3/9/2015

Address:

1745 NE Highland Street, Portland, OR

District:

Northeast

Comment:

Those with decision making responsibility and power need to ensure any capital project 1) improves public safety through improvements to air quality and protective measures on toxic freight transported through the corridor, 2) addresses the long standing issue of \"noise pollution\" (train homs) and 3) otherwise improves quality of life metrics for all residents. As our neighborhood is taxed at ever higher levels, local and state governments that benefit from the increased revenue have increased responsibility to uphold the social contract. Property taxes on our parcel recently increased from roughly \$800/year to over \$3,500/year. With that increase my family and I have higher expectations for improved quality of schools, and protection from all dangers, including those that would result from increased industrial freight traffic. As you may be aware:- Multnomah County has the 4th highest concentration of diesel exhaust of all US counties. Near transportation comidors or rail yards, levels of diesel pollution are over10 times health benchmarks. Although there are no areas of Multnomah County with safe levels of diesel pollution, the pollution ââ,¬Â"hot-spotsââ,¬Â are in neighborhoods v color and/or low-income. The Health Departmentââ, ¬â, ¢s most recent analysis of racial and ethnic health disparities found that areas of the county with higher proportions of

communities of color have concentrations of diesel pollution 2-3 times that of areas that are majority non-Latino white. - Exposure to diesel engine exhaust causes cancer, increases the risk of heart attack, stroke, and cardiovascular disease, exacerbates asthma and can lead to low-weightand preterm births. There is also a growing body of evidence linking trafficrelated air pollution, including diesel exhaust, to neurodevelopmental disorders like Autism Spectrum Disorder.- Children are especially vulnerable because their lungs are still in the developmental phase and they breathe, on average, 50 percent more air per pound of body weight than adults. Please focus on investment in green infrastructure and jobs, not freight focused industries that adversely and unfairly impact the health of our community. Do not double track the Kenton line if it means more diesel-powered trains or hazardous material transport near our neighborhood and our school.

Comment ID

3516

7730 N. Crawford St

MapApp ID

2181 Commenter Stephen Blanton

Date Received:

3/9/2015 District:

North

Address: Comment:

All commercial truck traffic should be required to use the Columbia Blvd route. The roads are design to handle the heavy loads as compared to Lombard and Fessenden, Allowing increased truck traffic through the ever increasing dense neighborhood is short-sighted and will lead to conflicts between growth and safety. The saving in commute times between Columbia route and the Fessenden/Lombard route is not worth the design and safety improvements required. Nor is it worth the adverse impacts to the growth of the neighborhood.

worry this would just end up increasing the air pollution from diesel particulates. The people who will suffer most from this pollution are the children of nearby Woodlawn Elementary whose population consists of many low income families as well of those of color. This is already an under served part community who have enough pollution from the current trains and tracks.

Comment ID

MapApp ID

2182 Commenter Gary Rule

Date Received:

3/9/2015

Address:

7326 se 27th ave, Portland, OR

District:

Southeast

Comment:

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Comment ID

3507 MapApp ID 2149 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

West Central City

Comment:

Huge priority, connecting the highest density residential neighborhood in the state to the central city. Other routes are either dangerous our circuitous, due to the Everett-Glisan couplet intersecting with the I-405 ramps. Would be great to see this in the next five years.

Comment ID

MapApp ID

Commenter

2151

Nolan Lienhart

Date Received:

District:

3/6/2015

Address:

420 NW 11th Avenue #718

West

Comment:

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Comment ID

MapApp ID

Commenter Nolan Lienhart Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

Central City

Comment:

Please prioritize these improvements in the near term. Burnside can be a great street if we improve safety and street frontage, with an emphasis on pedestrians!

Comment ID

3510 MapApp ID

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Ave #718

District:

Central City

Comment:

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Comment ID

MapApp ID

2153 Commenter

2152 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District: West Northeast Central City Southeast

Comment:

Please prioritize as soon as possible. We are falling far behind peer cities.

Comment ID

3512 M

MapApp ID

215

54 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

West Central City

Comment:

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Comment ID

3513 MapApp ID

2155 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

District:

West Central City

Comment:

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Comment ID

3514 MapApp ID

2156 Commenter

Nolan Lienhart

Date Received:

3/6/2015

Address:

420 NW 11th Avenue #718

oldii Eloliilait

District:

Central City

Comment:

This is a hugely significant and catalytic project that is regionally significant. Please prioritize funding and completing in the near term.

Comment ID

515 MapApp ID

2180 Commenter

Stephen Grieco

Date Received:

3/9/2015

Address:

1745 NE Highland Street, Portland, OR

District:

Northeast

Comment:

material transport near our neighborhood and our school.

7730 N. Crawford St

Comment ID

3516

MapApp ID

2181

Commenter

Stephen Blanton

developmental phase and they breathe, on average, 50 percent more air per pound of body weight than adults. Please focus on investment in green infrastructure and jobs, not freight focused industries that adversely and unfairly impact the health of our community. Do not double track the Kenton line if it means more diesel-powered trains or hazardous

Date Received:

3/9/2015 District:

North

Address: Comment:

All commercial truck traffic should be required to use the Columbia Blvd route. The roads are design to handle the heavy loads as compared to Lombard and Fessenden. Allowing increased truck traffic through the ever increasing dense neighborhood is short-sighted and will lead to conflicts between growth and safety. The saving in commute times between Columbia route and the Fessenden/Lombard route is not worth the design and safety improvements required. Nor is it worth the adverse impacts to the growth of the neighborhood.

Ord. 187831, Vol. 2.3.A, page 5947

COMMUNITY-BASED ANTI-DISPLACEMENT RECCOMMENDATIONS TITLE PAGE

SECTION 1: Equity

<u>RECOMMENDATION 1-A:</u> Strengthen the "community involvement" section in Chapter 2 of the Proposed Draft by integrating an emphasis on equity and inclusion.

SECTION 2: Assessing and mitigating displacement impacts of development and land use actions

<u>RECOMMENDATION 2-A</u>: Strengthen and add detail to the "impact analysis" tool introduced in Chapter 5 of the Proposed Draft; apply to the entire Plan.

<u>RECOMMENDATION 2-B</u>: Require mitigation for anticipated affordability and displacement impacts.

<u>RECOMMENDATION 2-C</u>: Community Benefits Agreements and anti-displacement measures.

<u>RECOMMENDATION 2-D</u>: Capture windfall real estate profits as funding for anti-displacement measures.

SECTION 3: Housing

<u>RECOMMENDATION 3-A</u>: Add emphasis on "permanently affordable" homeownership; support shared-equity and cooperative forms of ownership.

RECOMMENDATION 3-B: Use land-banking as an anti-displacement tool.

<u>RECOMMENDATION 3-C</u>: Create permanently affordable units in market-rate housing developments.

RECOMMENDATION 3-D: Tenant Protections.

SECTION 4: Zoning Projects

<u>RECOMMENDATION 4-A</u>: Reconstruction Opportunity Area Overlay Zone.

RECOMMENDATION 4-B: Mixed-Use Zones Project.





































February 24, 2015

Chair André Baugh and the Planning and Sustainability Commission Bureau of Planning and Sustainability, City of Portland 1900 SW 4th Avenue, Suite 700 Portland, Oregon 97201

Dear Chair Baugh and Planning and Sustainability Commissioners:

As a coalition of organizations and individuals profoundly concerned with preventing displacement and expanding access to affordable housing in Portland, we are proud to present you with the following policy proposals for the Comprehensive Plan update. Our organizations have carefully deliberated over and crafted these proposals for your consideration, and we stand united in calling for their immediate inclusion in the Comprehensive Plan.

These recommendations are <u>not</u> conceptual proposals. Rather, they are specific policies that must be incorporated into the Comprehensive Plan before it is submitted to City Council. We urge the Planning and Sustainability Commission to explicitly direct BPS staff to incorporate these specific policies into the Comprehensive Plan, and to share an updated draft of the plan with us before it is finalized. We are eager to support BPS staff in any way that would be helpful as they carry out this work. Additionally, these policies should guide the various zoning implementation projects that are associated with the Comprehensive Plan, including the Mixed Use and Institutional Zoning projects, as well as guidance to the Transportation System Plan.

As you know, the improvements to Portland's neighborhoods envisioned throughout the Comprehensive Plan will inherently lead to increased higher property values and housing costs, and, therefore, the displacement of people of color and low-income residents. The policy proposals included in this document provide a framework by which the Comprehensive Plan can mitigate these displacement pressures and ensure that the growth and development of our city benefits, rather than further burdens, the communities that would otherwise bear the brunt of displacement.

We strongly believe that the inclusion of the following anti-displacement measures will create the foundation for a truly equitable Portland. We appreciate your continued commitment to improving outcomes for Black communities, communities of color, renters, and those of very-low and deeply-low incomes. The Commission's leadership in this regard has been invaluable, through its stewardship and adoption of a holistic equity framework for Portland's strategic plan. Action 5 of the Portland Plan is a clear call to action: "Where disparities in service delivery and community development programs are found, change policies and priorities to mitigate disparities...." Now is the time to live up to that commitment — to "change policies and priorities" — by incorporating the following policies into the Comprehensive Plan. Doing so will make this plan a powerful tool for eliminating housing disparities and increasing opportunity for communities of color and low-income Portlanders.

SECTION 1: Equity

<u>RECOMMENDATION 1-A:</u> Strengthen the "community involvement" section in Chapter 2 of the Proposed Draft by integrating an emphasis on equity and inclusion. (Proposed new language in <u>Italics</u>).

The goals and policies in this chapter convey the City's <u>commitment to equity and inclusion and</u> <u>intent to</u>:

- Provide a wide range of opportunities for involvement in land use decisions, with targeted access and inclusion in decision-making for those with the potential to be adversely affected by the results of those decisions.
- Foster ongoing positive relationships between communities and the City in support of positive land use decision outcomes <u>by ensuring accountability for improving community well-being and inclusion, and by ensuring adherence to community benefit agreements.</u>
- Recognize that the City has a responsibility to plan for the needs of and engage with
 <u>disparately</u> under-served and under-represented communities, <u>and to prioritize policy</u>
 <u>mandates based on need, so as to</u> achieve greater equity <u>for the most negatively</u>
 <u>Impacted</u>.

Portland Plan, 2012, Bureau of Planning and Sustainability, City of Portland p 19.

- Expand opportunities for meaningful community engagement in land use decisions, from issue identification and project scoping through implementation, <u>monitoring</u>, <u>evaluation</u>, <u>accountability and enforcement</u>.
- Require transparent, well-designed, thoughtful, <u>culturally specific and relevant</u>, <u>representative and responsive public processes for land use decision-making</u>, <u>implementation and monitoring</u>.
- <u>Build community capacity to</u> increase the community's meaningful participation, <u>innovation, solution-making and leadership in land use decisions and monitoring.</u>
- <u>Utilize</u> public comment on land use decisions <u>as part of an equity-based community</u> <u>impact assessment</u> to promote thoughtful consideration of and <u>mitigation for land-use</u> policies that cause a negative disparate <u>impacts</u>, <u>irrespective of intent</u>.

WHERE IN THE PLAN? Chapter 2: Community Involvement

WHY IS THIS IMPORTANT? Driven by a commitment to social justice, equity and meaningful community involvement, the City's land use policy must ensure that the needs of the most vulnerable, impacted and underserved will be the focus of public policy in the next iteration of the Comprehensive Plan. In the land use arena, a commitment to equity is a promise to enact and implement ameliorative policy that will benefit residents and communities that have historically been disparately impacted by harmful outcomes. This recommendation ensures that the City will prioritize the participation and leadership of these residents and communities in land use decision-making, and that equity will be articulated at the outset as an overarching goal of land use decisions.

SECTION 2: Assessing and mitigating displacement impacts of development and land use actions

RECOMMENDATION 2-A: Strengthen and add detail to the "impact analysis" tool introduced in Chapter 5 of the Proposed Draft; apply to the entire Plan.

Much like an Environmental Impact Analysis assesses the projected environmental impacts of proposed infrastructure and development projects, an "Affordability and Displacement Impact Analysis" will assess the impacts of public-sector actions on residential and commercial displacement, and on the long-term affordability of housing and commercial space. This analysis will take into account specific details of the development or land use action in question, as well as the context of the housing and real estate markets in the surrounding area - including historic policies, practices, and development patterns that have contributed over time to the displacement of residents and businesses. The analysis will assess three distinct impacts:

- 1. Added displacement pressure on existing low-income and elderly residents, people of color, and other disparately-impacted groups;
- 2. Added displacement pressure on existing minority-owned and other small businesses; and
- 3. Long-term impact on the affordability of housing and commercial space for low-income households, communities of color, and minority-owned businesses.

Actions triggering an Affordability and Displacement Impact Analysis could include the following, regardless of location:

- Planning decisions, including zoning changes and designations such as Neighborhood
 Centers, that will spur development and/or increase property values and housing costs;
- The designation or extension of urban renewal districts;
- Infrastructure and other significant public investments that may lead to increased property values -- including but not limited to roads and transit, street treatments, active transportation improvements, parks, urban renewal projects, and brownfields remediation;
- Issuing significant permits for private-market developments; and
- Disposal or development of publicly owned land.

WHERE IN THE PLAN? Chapter 1: The Plan and Guiding Principles, Policy 1.8: include "Affordability and Displacement Impact Analysis" among implementation tools; include in Chapter 5: Housing Access.

WHY IS THIS IMPORTANT? The <u>entire</u> Comprehensive Plan should be covered by an umbrella policy that requires an Affordability and Displacement Impact Analysis when the City and other public entities (including PDC and TriMet) take actions in the City of Portland that will potentially affect the real estate and housing markets, including issuing permits for development. The City should work with community partners to develop the methodology for conducting this analysis.

<u>RECOMMENDATION 2-B</u>: Require mitigation for anticipated affordability and displacement impacts.

Learning valuable lessons from NEPA case law, stronger mitigation direction is necessary. When an Affordability and Displacement Impact Analysis (see 2-A) finds that public-sector actions (including issuing permits for private-market developments) are projected to contribute to displacement and loss of affordability for the low-income residents, communities of color and minority-owned businesses, the Impact Analysis must also identify mitigation strategies. Implementation of these strategies must be tied to the Implementation and budget of the project or policy being assessed. Potential anti-displacement strategies include those listed in Recommendation 2-C below.

WHERE IN THE PLAN? Chapter 3: Citywide Design and Development, Policy 3.3.a add "mitigate impacts of displacement."

WHY IS THIS IMPORTANT? While naming displacement as an undesired outcome is an essential first step toward preventing displacement, the City needs tools that move beyond analysis. Requiring that displacement impacts be mitigated will ensure that the City's growth and development does not come at the expense of low-income residents and communities of color.

<u>RECOMMENDATION 2-C</u>: Community Benefits Agreements and anti-displacement measures. After conducting an Affordability and Displacement Impact Analysis (see 2-A), the City should require developers of new developments to enter into Community Benefits Agreements which are:

- 1. Directly responsive to mitigation needs identified by the Impact Analysis;
- 2. Negotiated prior to permits being issued;
- 3. Legally binding; and
- 4. Created in collaboration with organizations and individuals embedded in communities at risk of disparate and adverse impact by the development in question.

Potential anti-displacement measures include, but are not limited to:

- Permanently affordable housing for low-income households;
- Land or money contributed to affordable housing development;
- One-for-one replacement of affordable homes (multi-family and single-family) that are lost:
- Relocation assistance for low-income renters who are displaced;
- A right of return for previously displaced neighborhood residents;
- Affordable rents for minority-owned commercial tenants, with long-term rent stability;
- Living wages;
- Employment opportunities for individuals enrolled in apprenticeships or other trades programs;
- Local-source job training and hiring;
- Contracting targets for minority- and women-owned businesses;
- Hiring targets for minority and women employees; or
- Labor neutrality agreements signed by developers and commercial tenants.

WHERE IN THE PLAN? Add in Chapter 3: Citywide Design and Development, Policy 3.3.c "Community Benefits and Anti-displacement"; Chapter 4: General development principles include a policy for "Community Benefits Agreements" that favor community development practices as a part of the City's overall development strategies; ensure implementation in Mixed Use and Institutions Zone Projects, and guidance to the Transportation System Plan.

WHY IS THIS IMPORTANT? Community benefits agreements can be powerful tools to mitigate displacement pressures and ensure that development equitably benefits, rather than burdens, the communities where it takes place. These binding agreements provide community members a voice to shape development and guide its impacts. By encouraging the use of these agreements, other cities have been able to leverage private funding for the construction of

parks and public space, and to increase living wage job opportunities close to where people live.

<u>RECOMMENDATION 2-D</u>: Capture windfall real estate profits as funding for antidisplacement measures.

When property owners realize windfall profits from real estate sales or rentals as a direct result of public-sector actions — including the upzoning of properties, infrastructure investments and urban renewal projects —such profits should be captured by the City in order to fund anti-displacement measures such as those listed in the Community Benefits Agreement proposal (see 2-C).

Tools that should be considered for capturing windfall real estate profits include a capital gains tax on land value increases, linkage fees, and a speculation tax. However, windfall property value increases should <u>only</u> be captured when property owners realize profits by renting or selling their property — and not through a traditional property tax on assessed value. In this way, homeowners who have not yet gained additional income as a result of their windfall property value increases would not be burdened.

WHERE IN THE PLAN? Add in Chapter 3: Citywide Design and Development, Policy 3.8.a the intent to recapture increased property values for public benefits; and/or as funding source option in Chapter 5: Housing Affordability, Policy 5.28.

WHY IS THIS IMPORTANT? This measure will counteract the displacement effect that results when upzoning or new infrastructure provides property owners with the chance to rent or sell real estate at inflated prices. These windfall profits result from public-sector actions and investments, and not from any effort or investment by the property owners who benefit. Therefore, these profits should be recaptured by the City in order to fund measures that mitigate the displacement pressure caused by rising real estate values and housing costs.

SECTION 3: Housing

<u>RECOMMENDATION 3-A</u>: Add emphasis on "permanently affordable" homeownership; support shared-equity and cooperative forms of ownership.

WHERE IN THE PLAN? Chapter 5: Housing Affordability, Policies 5.34, 5.35 and 5.36 "support" and "encourage" homeownership. These policies should specifically refer to "permanently affordable homeownership" models (e.g. community land trusts, limited-equity cooperatives) that remove housing from the speculative market.

WHY IS THIS IMPORTANT? Permanently affordable models of homeownership ensure that lower-income households will continue to have access to those homes even after the initial

owners sell them, and that initial homeownership subsidies continue to benefit subsequent owners. This is an important long-term anti-displacement strategy.

RECOMMENDATION 3-B: Use land-banking as an anti-displacement tool.

Use land-banking as a proactive anti-displacement tool to remove properties from the private market, particularly in neighborhoods that are now experiencing or are projected to experience rising housing costs. Such properties should be reserved for permanently affordable housing and commercial spaces, and their specific uses should be guided by robust community-based planning processes.

Explore a variety of strategies to acquire properties, including eminent domain, right of first refusal on for-sale properties, acquisition of foreclosed properties, and acquisition of underused properties owned by institutions and public agencies. Develop sustainable funding mechanisms to enable non-profits and government to acquire land and manage land banks. Support and coordinate with community-based organizations that wish to use land-banking to gain control of property for community-serving purposes.

WHERE IN THE PLAN? Add as a new policy in Chapter 5: Housing Affordability.

WHY IS THIS IMPORTANT? Land-banking sets aside properties in gentrifying neighborhoods for affordable housing and other community-defined priorities. This practice provides a means for neighborhoods to remain inclusive and equitable, even as real estate and housing prices outpace the incomes of many neighborhood residents. Only by removing residential property from the speculative market can we preserve housing opportunity for Portlanders of low incomes.

<u>RECOMMENDATION 3-C</u>: Create permanently affordable units in market-rate housing developments.

Aggressively use all available tools to mandate or incent the inclusion of affordable housing units in private-market developments. Toward this end, adapt effective models being used in other jurisdictions, lobby at the state level to authorize tools that are currently preempted (such as inclusionary zoning and rent control), and explore new land use tools. Prioritize housing developed through these programs for members of communities disparately impacted by housing discrimination and involuntary displacement.

WHERE IN THE PLAN? Add a new policy in Chapter 5: Housing Affordability.

WHY IS THIS IMPORTANT? Public-sector and non-profit housing investments are vital, yet do not provide enough affordable housing to meet the needs of our city. Therefore, Portland must also take advantage of well-known, proven tools that create affordable units in private-market developments. Increasing the number of units available at federal affordability levels for very

and deeply low-incomes provides more options for households of any configuration or background. These policies can also compliment transit-oriented development and mixed-use objectives, ensuring housing options for households of diverse incomes and backgrounds in areas with high-quality transit, infrastructure, and services.

RECOMMENDATION 3-D: Tenant Protections.

Strengthen protections for residential tenants in order to prevent their displacement and improve their living conditions. Specific provisions to be considered include:

- Prohibit no-cause evictions;
- Limit rent increases and require landlords to document the reasons for rent increases;
- Discourage demolitions and condo conversions, and provide relocation assistance for low-income tenants who are displaced;
- Ensure strict and consistent enforcement of fair housing laws, and of codes that protect the safety and health of tenants; and
- Provide tenants with effective recourse when their rights are violated.

WHERE IN THE PLAN? Add a new policy in Chapter 5: Housing Access.

WHY IS THIS IMPORTANT? Tenants make up nearly 47% of Portland households, from a diverse range of races, ethnicities, ages, and abilities (ACS 2013). By supporting a fair and affordable rental market, the City can impact affordability for all income levels. Enacting these basic protections allows the City to improve housing stability, general health and habitability of homes, and provide residents the opportunity to thrive in place without the disruption of serial displacement or relocation.

SECTION 4: Zoning Projects

RECOMMENDATION 4-A: Reconstruction Opportunity Area Overlay Zone.

Create a Reconstruction Opportunity Area Overlay zoning designation which either commemorates neighborhoods of historic housing discrimination, or identifies areas with medium or high risk of displacement based on "City of Portland Gentrification Risk Study" standards. The Overlay should favor development patterns that create neighborhood stabilization for historic and existing Black communities, other communities of color, and low-income households. Such an Overlay includes first opportunity contracting and hiring practices, targeted living-wage job creation, preservation and creation of opportunities for minority-owned small businesses to grow in place, increasing the supply of permanently affordable housing units for various household configurations, culturally appropriate supports to households seeking homeownership, and ensuring affordable and accessible transportation and public space for residents. With the support of the Planning and Sustainability Commission, areas in which the Overlay is designated would convene community-based oversight to ensure that resident needs are met through Overlay activities.

WHY IS THIS IMPORTANT? The Reconstruction Opportunity Area Overlay focuses on measures to restore and stabilize communities that have historically been displaced or under-developed, as well as those areas at risk of displacement. The impacts of displacement have already rippled through Portland, in some cases disrupting the social, cultural, and political development of individual leaders and their communities. Over time these disruptions can contribute to adverse health outcomes such as low birth weights and increased asthma rates - outcomes often connected to spatial and environmental exposures that are linked to disparities in income, lack of access to infrastructure and services, and lack of participation in public decision making. The Reconstruction Overlay is a code-oriented tool that introduces community development approaches as a part of the Comprehensive Plan.

RECOMMENDATION 4-B: Mixed-Use Zones Project.

The Mixed-Use Zones project should be seen as an opportunity to immediately and aggressively implement the anti-displacement measures identified in this document. Development in Mixed-Use Zones should generate significant community benefits that:

- 1. Increase opportunities for Black communities, other people of color and very low-/deeply low-income households to access stable housing in these areas; and
- 2. Preserve and create opportunities for minority-owned small businesses to operate and grow.

WHY IS THIS IMPORTANT? The proposed Mixed Use designations offer developers more flexibility and help Portland meet the housing needs of its growing population. However, absent the robust anti-displacement measures proposed in this document for inclusion in the Comprehensive Plan, development in mixed-use zones will not address the need for affordable housing and, in fact, will contribute to the displacement of low-income families and small businesses by raising property values and rents. We support the Comprehensive Plan Mixed Use Zones project on the condition that new development in these zones be governed by our proposed anti-displacement policies and provide concrete community benefits (for example, those benefits listed in Recommendation 2-B above).

Organizations endorsing these proposals (in alphabetical order)

Asian Pacific American Network of Oregon

Center for intercultural Organizing (persists)

Community Alliance of Tenants

Community of Practice

Cully Association of Neighbors

Groundwork Portland

Housing Land Advocates

Living Cully (Habitat for Humanity Portland/Metro East, Hacienda CDC, NAYA, Verde)

N/NE Neighbors for Housing Affordability

OPAL, Environmental Justice Oregon
Oregon Opportunity Network (period - Carron)
Portland African American Leadership Forum
Portland Burn Survivors
Portland Harbor Community Coalition
REACH Community Development (pending - Cameron)
Right 2 Survive
Right 2 Dream Too
Rose Community Development Corporation
Upstream Public Health
Urban League of Portland
1000 Friends of Oregon

Individuals in support
Cat Goughnour, Radix Consulting Group LLC
Elisa Harrigan
Andrew Riley

Portland Planning and Sustainability Commission Public Hearing

2-24-2015

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Address:	045 N A15				•
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Comment2942_2015.02.04_Peterson

From: Planning and Sustainability Commission Sent: Thursday, February 05, 2015 11:20 AM

To: Kovacs, Madeline

Subject: FW: Provisional Boundaries Information Request

Eric emailed a response to him, but let's include this message in the record. Thanks.

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
www.portlandoregon.gov/bps

To help ensure equal access to City programs, services and activities, the City of Portland will provide transportation, reasonably modify policies/procedures and provide auxiliary aids/services/alternative formats to persons with disabilities. For accommodations, translations, complaints and additional information, contact me, City TTY 503-823-6868, or use Oregon Relay Service: 711.

From: customwoodworking@msn.com [mailto:customwoodworking@msn.com] On Behalf Of James
Peterson
Sent: Wednesday, February 04, 2015 5:34 PM
To: Anderson, Susan
Cc: Hales, Mayor; Planning and Sustainability Commission; anne.debbaut@state.or.us; Commissioner
Fritz; Commissioner Fish; Commissioner Novick; Commissioner Saltzman; jredden@portlandtribune.com; mnachair@gmail.com; Bogert, Sylvia; Gibbon, John Subject: Provisional Boundaries Information Request

James F. Peterson

Land Use Chair Multnomah 2502 SW Multnomah Blvd. Portland, Oregon 97219

Susan Anderson, PBS Director susan.anderson@portlandoregon.gov

Re: Information Request
Provisional Boundaries Of Centers

Ms Anderson

Your staff included maps showing provisional boundaries of the centers in recent documents to the Planning and Sustainability Commission for their work session on the 2035 Comprehensive Plan. As far as I know this is the first time these boundaries have been made public. These boundaries are inconsistent with some of the material presented at the Mixed Use Page 1

Comment2942_2015.02.04_Peterson

Project and some of the polices in the Draft of the 2035 Comprehensive Plan on centers. I am requesting all staff reports and consultant reports that created the concept and criteria of the provisional boundaries of the centers.

I am requesting this information under provisions of $Goal\ 1$, $Metro\ Charter\ and\ ORS\ 192$.

Thank you for your attention to this mater.

Please add this to the record of the Comprehensive Plan

Thank you,

Please add this to the record

Thank you,

James F Peterson Land Use Chair Multnomah

CC:
Anne Debbaut, DLCD, Portland Regional Representative, anne.debbaut@state.or.us
Elissa Gertler, Metro Regional Planning Director, elissa.gertler@oregon.metro.gov
Amanda Fritz, Commissioner, amanda@portlandoregon.gov
Nick Fish, Commissioner, nick@portlandoregon.gov
Steve Novick, Commissioner, novick@portlandoregon.gov
Dan Saltzman, Commissioner, dan@portlandoregon.gov

January 27, 2015

James F. Peterson Land Use Chair Multnomah 2502 SW Multnomah Blvd. Portland, Oregon 97219

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov
André Baugh, PSC Chair
psc@portlandoregon.gov
Susan Anderson, PBS Director
susan.anderson@portlandoregon.gov

Re: Request Neighborhood Center to Neighborhood Corridor

Below is the letter requesting that designation of Multnomah Village be changed from a Neighborhood Center to a Neighborhood Corridor in the Draft of the Comprehensive Plan. This request was endorsed in a letter from SWNI which is a coalition of Neighborhood Associations that comprises twenty percent of all Neighborhood Associations in the city of Portland. The details and the rational for the change of designation were left out of the staff report.

James F. Peterson Land Use Chair Multnomah 2502 SW Multnomah Blvd. Portland, Oregon 97219

Planning and Sustainability Commission 1900 SW Fourth Ave Portland, Oregon 97201-5380

October 28, 2014

Re: Request Neighborhood Center to Neighborhood Corridor

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission change the designation of Multnomah Village from a

Neighborhood Center to a Neighborhood Corridor in the Draft of the Comprehensive Plan. Multnomah Village is classified as Mainstreet in the current Comprehensive Plan. The regional planners have described Multnomah as the model Mainstreet. The village is more linear in nature and thus the characteristics are better defined by the Neighborhood Corridor designation. Since Multnomah Boulevard is designated a Neighborhood Corridor the change would make the business district of the Village contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capital Highway. The Neighborhood Center designation with the ½ mile radius defined in the Comprehensive Plan would overlap with the 1 mile radiuses of the two adjacent town centers leaving little room for the existing single family zoning. The Mainstreet designation had a prescribed depth of 180 ft which is more consistent with the definition of a Neighborhood Corridor. The Bureau of Planning and Sustainability has projected the capacity with their proposed changes to Mixed Use zoning in Multnomah Neighborhood to increase 28%, thus there is no need for the Neighborhood Center designation. Neighborhood Corridor designation better fits the design and character of the village.

Please add this to the record of the Comprehensive Plan

Thank you,

James F Peterson Land Use Chair Multnomah

ce: City Council
Bureau of Planning and Sustainability

The staff report also omitted the one half mile radius outlined in the Draft of the 2035 Comprehensive Plan.

Below is exerts from the staff report envisioning how a center is projected to develop but it is inconsistent with the analysis in the email from Joan Frederiksen which show a 28% increase in capacity outside the defined one half mile radius of the proposed Neighborhood Center in the Mixed Use Zones along Barbur Blvd. It appears that staff is adding policies and modify procedures to the Draft of the 2035 Comprehensive Plan that have not had any public involvement.

While there will be change in residential neighborhoods as Portland grows, focusing growth in centers and on corridors will help residential neighborhoods continue to have the character

they have today. Growing in compact Centers and Corridors also helps preserve the rest of our land for other uses, like industrial commerce and jobs; and natural areas, parks and opens spaces.

The success of our Centers and Corridors requires that they have well-designed buildings and streets, good parking solutions, access to high quality transit, and new public spaces to meet and gather. They should be designed to meet the needs of the entire community – including residents and businesses already here, as well as Portlanders yet to come.

The proposed Comprehensive Plan Map was based on a 30-50-20 residential growth strategy, with 30% of the anticipated household growth allocated to the Central City, 50% to other Centers and Corridors, and 20% to other residential neighborhoods outside of the Centers and Corridors. Attachment A provides a summary of that anticipated allocation.

From: Joan.Frederiksen@portlandoregon.gov

To: customwoodworking@msn.com; carolmcc@amerimailbox.com

CC: Eric.Engstrom@portlandoregon.gov; Derek.Miller@portlandoregon.gov;

Neil.Loehlein@portlandoregon.gov; Kevin.Martin@portlandoregon.gov Subject: Comp Plan update - Multnomah Neighborhood Center details

Date: Tue, 9 Sep 2014 22:12:07 +0000

Hi Jim and Carol -

Here are the most up to date numbers we have in terms of existing and anticipated household units for the ½ mile Multnomah Neighborhood Center as well as the whole Multnomah Neighborhood geography:

Old Plan (Default **Existing Households** Scenario) Proposed Plan Projected Projected New HH 2010 HH in HH in Full Build-Full Buildsince Households 2010 Out/Capacity 2035 Out/Capacity Geography 2035 3,814 5,042 Multnomah NH 157 5,894 7,557 5,070 1/2 Mile Buffer from village 2,553 23 3,466 3,122 2,657 center 2,266

This chart shows that there are 264 new units projected for the Multnomah Neighborhood Center ½ mile area by 2035. The projected new unit number is lower than under the current plan. This is because a 2.5:1 Floor Area Ratio (FAR) was used for Neighborhood Centers and Corridors in the model as opposed to 3:1 FAR assumed previously.

The numbers for the whole Multnomah Neighborhood geography show an increase, which reflects changes to the assumptions used in the modeling. Specifically, in the modeling a higher FAR (4:1) was used for commercially designated properties in the greater neighborhood that fall within the West Portland Town Center (roughly within half a mile from the "Crossroads" and along Barbur Blvd.). These are shown on the Comp Plan Map with the "Mixed Use — Urban Center" designation.

Here is a break down on the unit numbers by designation for the ½ mile buffer from Village center – though this number is a little off (20 units less) due to having to break it down by designations:

Proposed Designation	Existing SFR Capacity	Existing MFR Capacity	Existing Employment Capacity	New SFR Projecte d	New MFR Projecte d	New Employment Project
MU2 (current commercial zones)	0	119.168006	385.665382	0	83.41765	169.846831
R1	20.044819	40.697058	0	16.166505	19.041596	0
R2	24.309237	44.721559	0	19.926872	23.847001	0
R2.5	4.7	0	0	3.910689	0	0
R5	14.179337	0	0	12.251513	0	0
R7	99.937293	0	0	66.214993	0	0
OS	0	0	0	0	0	0
Grand Total	163.17068 6	204.586623	385.665382	118.470572	126.306247	169.846831

SFR: Single Family Residential MFR: Multi Family Residential

Here are links to:

the methods report: https://www.portlandoregon.gov/bps/article/408232;

the official adopted Buildable Lands Inventory (BLI): https://www.portlandoregon.gov/bps/article/408231; and

the Scenarios Report: https://www.portlandoregon.gov/bps/article/449300.

On the above information, I would be happy to set up a meeting, inviting other staff as necessary, to go over any of these numbers.

I also wanted to confirm that Barry Manning, with the Mixed Use Zoning Project, and I will be able to attend the Monday September 15th meeting if that is still something you want to plan on. Please send us any agenda or questions /topics you want us to be prepared to cover.

Thank you for your patience on this information. I hope it will be informative. Let me know if there is something I missed, if there are other questions, or you need other information.

Best regards,

Joan

Joan Frederiksen | West District Liaison

City of Portland Bureau of Planning and Sustainability

1900 SW 4th Avenue | Suite 7100 | Portland, OR 97201

p: 503.823.3111

f: 503.823.5884

e: Joan.Frederiksen@portlandoregon.gov

www.portlandoregon.gov



Please consider the environment before printing this e-mail

For some reason the posted staff report is missing the attachments **Attachments**

- A Summary of job and housing allocation by center
- B Revised center and corridor diagram
- C Map of provisional center boundaries
- D Location of recommended Comprehensive Plan Map changes
- E Preliminary Mixed Use Concept handout
- F "Inner Ring" policy addendum

A request has been made for the attachments.

Please add this to the record

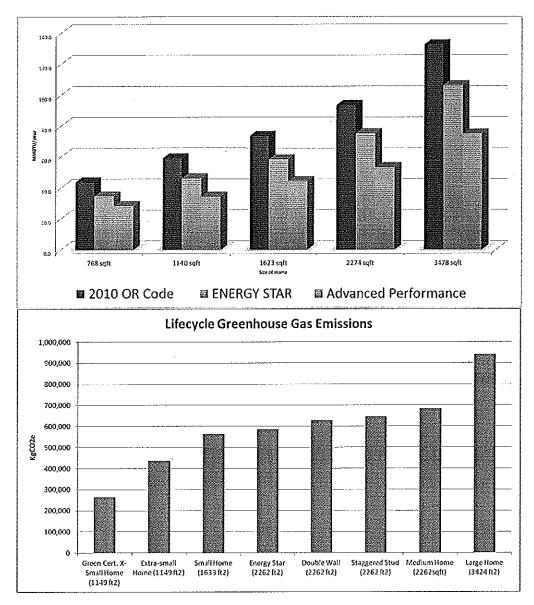
Thank you,

James F Peterson Land Use Chair Multnomah

cc:

Anne Debbault, DLCD, Portland Regional Representative, anne.debbault@state.or.us
Elissa Gertler, Metro Regional Planning Director, elissa.gertler@oregon.metro.gov
Amanda Fritz, Commissioner, amanda@portlandoregon.gov
Nick Fish, Commissioner, nick@portlandoregon.gov
Steve Novick, Commissioner, novick@portlandoregon.gov
Dan Saltzman, Commissioner, dan@portlandoregon.gov

DEQ research shows that reducing house size is the most effective way to reduce both material and energy-related impacts of residential homes.



The Executive Summary for the April 2012 Portland Plan states that: "Together, Portlanders cleaned the river, improved air quality and became the first city in the U.S. to adopt a plan to lower carbon emissions. Portland . . . promoted new ways of managing waste and stormwater ... Over the past 40 years, Portland has shown it could grow a vital local economy, protect the natural environment and support vibrant places to work and live"

The Comprehensive Plan is intended to help implement the Portland Plan, yet as currently drafted, the implications of the zoning and development strategy would directly contradict these goals and achievements.

The Portland Plan claims that "high-quality basic services are fundamental to success. We cannot make Portland prosperous, educated, healthy and equitable without providing reliable and quality basic services like public safety, clean water and sewer services."



SW Hume Street, facing west at SW 14th Avenue

Public Safety

Due to a lack of sidewalks, South Burlingame has very few routes for pedestrians where they are not required to share the street with automobiles. Our neighborhood is comprised of many young families. Many have children who walk to one of two grade schools located within, or abutting the neighborhood boundaries. Since the roads are already narrow and poorly drained, as density increases due to the infill possible with the R5 designation, traffic volume will increase on already unsafe roads. This mix of vehicles and pedestrians is currently causing conflicts. In-fill to the R5 level will make the matter worse due to increase traffic and an increase of cars parked on the narrow roads.

As illustrated in the photos above, many of the roads are narrow and lack the adequate width for emergency vehicles to pass if cars are parked on both sides of the road. If in-fill is allowed to the current R5 level, emergency vehicle access could be restricted due to increase street parking.

Steep Terrain and Landslide Hazards

There are many areas in South Burlingame that have steep terrain. Additionally the area is currently labeled a "landslide hazard" on maps found at www.portlandmaps.com. Increased density caused by in-fill could increase the risk to new and existing residents and property. The City code requires new homes with increased impervious surfaces to mitigate storm water on-site. Mitigation is most often handled by the addition of swales or dry wells. While these approaches may account for water quality, and possible peak flow, they in no way replace lost vegetation and trees present prior to the construction of the in-fill homes. This is especially true when the infill homes are built to the maximum allowed by code and the current trend of developers is to build the largest home allowed. Larger setbacks with lower overall height would allow for the addition of larger over story vegetation and more shrubs and garden beds. This additional vegetation would help stabilize the slope and obsorb the additional water.

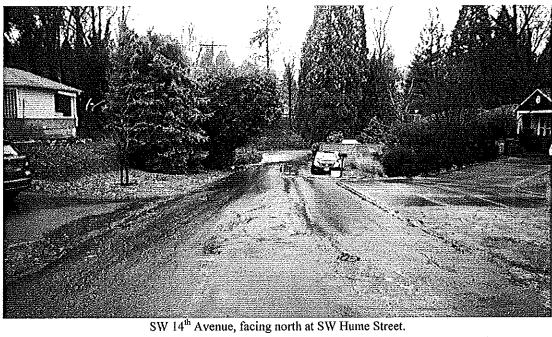
Maintenance of the dry wells and the swales has also proven to be a problem. Many of these systems fail over time, with the loss of the vegetation on steep, landslide prone areas could end in disaster. To protect the public the City should not continue to allow in-fill to the R5 levels in areas designated as land slide prone.

Sustainability

Just recently the City of Portland was awarded the Presidential Award for Climate Action. Portland's Climate Action Plan has set a goal to reduce carbon emissions by 40% by 2050. However, the majority of the homes currently under construction in the Burlingame Neighborhood, as allowed by the R5 zoning designation, would work against, and subsequently prevent the achievement of this goal.



SW 12th, facing north at SW Hume Street. Under-improved, narrow, and lacking curbs, gutters and sidewalks.



Portlar	nd Planning and Sustainabil	lity Commission Publi	c Hearing	
Date: NOV 4	2014			
Name: Carol A	Marshy	-	(Please print legibly)	
Authorized Spokesperson repr	esenting:	Suf'	(if applicable)	
Address: 4311	SW Freem	an st	·	
City: Pornand	Zip: 9726	Phone:	·	
Email Address and/or Fax No.:		<u>, </u>		•
What agenda item do you wish	to comment on?			
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Authorized Spokesperson repr	. 17	<u> </u>	(if applicable)	
Address: <u>4504</u>	Mult. Bld	· · · · · · · · · · · · · · · · · · ·		
City: <u>Pornand</u>	Zip: <u>9121</u>	7 Phone:		
Email Address and/or Fax No.:				
What agenda item do you wish	to comment on?			
Site Address, if different from	above:			

Address:

302 SE 105th Ave Apt 26 Portland OR 97216

District:

East

Comment:

How about some sidewalks and ped crossings on 162nd while you are about it? Lots of children waiting for the Reynolds school bus in the area. Wilkes Elementary is on 167th, just off the map in Gresham.

Comment ID

2255 MapApp ID

1535 Commenter

David Hampsten

Date Received:

12/12/2014

Address:

302 SE 105th Ave Apt 26 Portland OR 97216

District:

East

Comment:

NE Fremont needs a ped/bike connection from 122nd to 162nd, including through the Giustina farm (145th to 148th). It however does not need an auto connection.

Comment ID

2256 MapApp ID

1536 Commenter

Ryan Murphy

Date Received:

12/12/2014

Address:

4410 SW Kanan Dr.

Tryan marphy

District:

West

Comment:

After witnessing the fatal pedestrian accident, and with my kids attending preschool at the corner of Shattuck and Beaverton-Hillsdale for the past 3 years I believe it is only a matter of time until another fatality happens in this intersection/area. The traffic there moves too fast, and the pedestrian access is poor. I would love to see \'school zone\' signs as well as a bike lane and sidewalk. I don\'t bike my son to school because there is no practical way to avoid this area due to the hills and lack of bike lanes. Thanks!

Comment ID

2257 N

MapApp ID

1546 Commenter

Jan Wilson

Date Received:

12/13/2014

Address: 4790 SW S

4790 SW Seymour Ct., Portland

uson

District:

West

Comment:

Good change - will help with stormwater issues in the area; already too much impervious surface in this neighborhood, so need to allocate existing open space to stormwater management and habitat enhancement.

Comment ID

2258

MapApp ID

1537

37 Commenter

Emily Young

Date Received:

12/12/2014

Address:

2173 NE Multnomah St

District:

Northeast

Comment:

This property has been for sale for decades. It seems obvious the seller wants more money if it has this zone change.Ã, I object to a change to CX.It is highly appropriate for high density housing. Since I have lived in this neighborhood for over 40 years there is no need for a zone change to make it highly commercial. There is so much of highly commercial (Lloyd Center, Broadway/Weidler) surrounding the Sullivan\'s Gulch neighborhood that there is no need for that on this property. This part of Multnomah Street cannot support such commercial activity. I worry that this kind of zone change will only encourage more demolition to our neighborhood. This residential neighborhood is a treasure to the people and the city of Portland and should be honored as a neighborhood and not another commercial area. Sullivan\'s Gulch neighborhood should not change from a more residential feel to a mixed use commercial classification. ÃÂ

Comment ID

2259

MapApp ID

1538 Commenter

Emily Young

Date Received:

12/12/2014

Address:

2173 NE Multnomah St

District:

Northeast

Comment:

This property has been for sale for decades. It seems obvious the seller wants more money if it has this zone change. Â, I object to a change to CX.It is highly appropriate for high density housing. Since I have lived in this neighborhood for over 40 years there is no need for a zone change to make it highly commercial. There is so much of highly commercial (Lloyd Center, Broadway/Weidler) surrounding the Sullivant's Gulch neighborhood that there is no need for that on this property. This part of Multnomah Street cannot support such commercial activity. I worry that this kind of zone change will only encourage more demolition to our neighborhood. This residential neighborhood is a treasure to the people and the

city of Portland and should be honored as a neighborhood and not another commercial area. Sullivant's Gulch neighborhood should not change from a more residential feel to a mixed use commercial classification, Ä,Â

Comment ID

2260 MapApp ID

ID 1547 Commenter

Jan Wilson

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

I have concerns about either high-density residential or commercial on Shattuck Rd. in this area. The pedestrian safety issue is dire, the stormwater challenges and landslide risks are extreme, and more impervious surface is not going to help. This whole site (both parts) should be down-zoned to protect the public (not to mention nearby and future residents) from the impacts of developing anything more than whatt's already there (which is already precariously perched on the side of the steep slope).

Comment ID

2261 Ma

MapApp ID

1548 Commenter

Jan Wilson

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

Same as comment for other site, between SW 42nd and 39th. Good change - will help with stormwater issues in area that already has too much impervious surface and other risks.

Comment ID

2262

MapApp ID

39 Commenter

Emily Young

Date Received:

12/12/2014

Address:

2173 NE Multnomah St

District:

Northeast

Comment:

ÃÂ I object to a change to CX.It is highly appropriate for high density housing. Since I have lived in this neighborhood for over 40 years there is no need for a zone change to make it highly commercial. There is so much of highly commercial (Lloyd Center, Broadway/Weidler) surrounding the Sullivan\'s Gulch neighborhood that there is no need for that on this property. This part of 21st ave cannot support such commercial activity. I worry that this kind of zone change will only encourage more demolition to our neighborhood. This residential neighborhood is a treasure to the people and the city of Portland and should be honored as a neighborhood and not another commercial area. Sullivan\'s Gulch neighborhood should not change from a more residential feel to a mixed use commercial classification, ÃÂ

Comment ID

2263 MapApp ID

1543 Cor

Commenter

Daniel Pirofsky

Date Received:

12/12/2014

Address:

2173 NE Multnomah Street

District:

Northeast

Comment:

Please refer to my comments in three parts on the proposed change for adjoining property #21. Those comments pertain exactly to this property as well. However, this property has already been given a commercial \"Office\" designation. It should be returned to a residential designation to be consistent with the adjoining properties as well as the long-standing character of the neighborhood that surrounds it. This property should be changed to a High Density Residential zoning. It has only a very small profile on 21st Avenue immediately before the NE 21st Street bridge over the Banfield Freeway. Thus, it does not offer much in the way of commercial access and could only add to the mounting traffic problems on this major north/south commuting route. With pedestrian access to mixed use and commercial areas on all sides of Sullivan Gulch neighborhood, there is no need for commercial use at this location. The City needs much more affordable housing in close proximity to commercial activities. This is the perfect location for new low-rise or mid-rise residential development.

Comment ID

2264 MapApp ID

ID 1549

Commenter

Jan Wilson

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

Same as comments for other sites along Fanno Creek and area tributaries. Good change - will help with stormwater issues in an area that already has too much impervious surface.

Comment ID

2265

MapApp ID

1551 Commenter

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

Shattuck between Hamilton and B-H Hwy desperately needs better pedestrian and bike facilities, and it seems the challenges to doing it there are fewer than along Hamilton. Still, the slopes are steep and the stormwater issues are significant. I also have concerns that widening straight streets generally encourages drivers to drive faster, so consider including traffic calming devices in the design.

Comment ID

2266 MapApp ID

1552 Commenter

Jan Wilson

Jan Wilson

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

Very good change, as sidewalks tend to just end in random places along B-H Hwy, making bus access difficult and pedestrian travel to area grocery stores and other commercial centers hazardous.

Comment ID

2267 MapApp ID

1540 Commenter

Daniel Pirofsky

Date Received:

12/12/2014

Address:

2173 N.E. Multnomah Street

District:

Northeast

Comment:

Part 1 of 2Two issues concern me with the proposed zone change for this property:1) the need for mixed use versus the need for high-density housing;2) design of appropriate transition from commercial to residential use.1) Needl quote from the proposal to expand the extent of an existing mixed use area and the Proposed Comprehensive Plan Designation as a Mixed Use \$\tilde{A}\phi\tilde{A}\phi\tilde{A}\phi\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi^\tilde{A}\phi\tilde{A}\phi^\ti

Burnside Street.All these areas are perfectly walkable for Sullivanââ,¬â,¢s Gulch residents. Many residents have been walking to Fred Meyer and back with grocenes for years. They are now walking a block or two farther to the new New Seasons in Grant Park Village. We visit businesses all along Broadway and Weidler. So we donââ,¬â,¢t need even more storefronts along Multnomah Street west of 21st Ave.; and we certainly donââ,¬â,¢t need higher intensity commercial development. Appropriate uses for this area should be either single-family homes, small condominiums, or high-density residential buildings. For example, townhouses would be a perfect fit with the needs as well as the aesthetics of this neighborhood. (see next part)

Comment ID

2268 MapApp ID

Jan Wilson

Date Received:

District:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

1553

1554

West

Comment:

Why? There is already a pedestrian trail connecting 45th with Admiral just a couple lots north, and if the B-H Hwy ped/bike improvements are done, this would be redundant. The problem in this area is that the apartments are built too close to / falling into the creek. Adding more impervious surface is not going to help. (And I doubt, given the stormwater challenges, \$90,000 would be adequate.)

Comment ID

2269 MapApp ID

Commenter

Commenter

Jan Wilson

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

Agree with other commenters - would love to see this proposed project get high priority. Definitely needed. Would be nice if you could get Beaverton / Washington County to coordinate to get it extended all the way to B-H Hwy.

Comment ID

2270

MapApp ID

55 Commenter

Jan Wilson

Date Received:

12/13/2014

Address:

4790 SW Seymour Ct., Portland

District:

West

Comment:

Yes, definitely! Too many houses already built over and through stormwater drainages, so we need to prioritize these restoration projects and not build any more density in the meantime.

Comment ID

2271

MapApp ID

1550 Commenter

Jan Wilson

Date Received:

12/13/2014 District:

West

Address:

4790 SW Seymour Ct., Portland

Comment:

I agree that we need better pedestrian facilities in the Bridlemile neighborhood, and especially along Hamilton and Shattuck. But like some of the other commenters, I am also concerned that excessive widening of the pavement, with its necessary loss of trees and cutting into the steep hillsides, will result is MORE safety concerns - many studies have shown that drivers drive faster on wide straight roads, and the significant stormwater issues in this area could foreseeably cause slope failures, which are especially a hazard of road widening. So I would prefer some sort of off-street pedestrian/bike path, if possible. Otherwise, I fear we\'il be coming back and asking for traffic calming measures (speed bumps or whatever) once the widening is done.

Comment ID

2272

MapApp ID

1541 C

Commenter Daniel Pirofsky

Date Received:

12/12/2014

Address:

2173 NE Multnomah Street

District:

Northeast

Comment:

Part 2 of 3However, according to the description of the proposed Central Commercial (CX) zone: ââ,¬Á"development is intended to be very intense with high building coverage, large buildings, and buildings placed close together.ââ,¬Â

Iodalizanty/thicoisingttthithityplessfritzionicuirithien/Kaippobl/sete to this

Ä¢å,¬å€œ Urban Center designation: Ä¢å,¬Ä"The designation allows a broad range of commercial and employment uses, public services, and a wide range of housing options.Ä¢å,¬Å

ervlælsoæfiggestutble velticularseuries yvællidt berælle invedtivettilreadtssandramercial parking.

wholesale, industrial service, manufacturing, and major event entertainment. Among these allowed uses, only small storefronts with retail sales and services would be remotely acceptable at this location. The possibility of industrial, vehicle repair, and manufacturing uses at this location is practically unthinkable. Opening up the range of commercial uses as such makes this proposed change unacceptable. In fact, the current designation as High Density Multi-Dwelling in a High Density residential (RH) zone perfectly describes the need and prevailing use at this location. Why change it?2) DesignThe Proposed Comprehensive Plan Designation as a Mixed Use ¢ā,¬ā€œ Urban Center suggests the following: Ā¢ā,¬Ā*The range of zones and development scale associated with this designation are intended to allow for more intense development in core areas of centers and corridors and near transit stations, while providing transitions to adjacent residential areas. Ā¢ā,¬Â

location is certainly welcome in Sullivanâà,¬å,¢s Gulch. However, there is already a very compatible, attractive, and welcoming transition from a commercial area (Lloyd Center and Regal Cinemas) to a residential area (Sullivanâà,¬å,¢s Gulch) along this Multnomah Street corridor. On the south side of Multnomah, the Marriott Residence Inn and the apartment building with Property ID R316808 are low-rise, residential-style buildings, east of which are all single-family homes. Since Sullivanâà,¬å,¢s Gulch contains a mix of single-family detached homes with apartment complexes, these two properties already fit in nicely.

Comment ID

2273

MapApp ID

556 Commenter

Jennifer Daunt

Date Received:

12/13/2014

Address:

1923 SE 50th Ave. Portland

District:

Southeast

Comment:

traffic impact has not been measured, already gridlock happens both in morning and evening rush hour along 50th near hawthorne/harrison/lincoln, when all new contraction along 50th that is proposed comes to light, traffic and parking issues will become serious, current infrastructure cannot withstand high density planning, neighborhood requests more responsible/less density planning along with height consideration.

Comment ID

MapApp ID

Commenter 1557

Joanne Kahn

Date Received:

12/14/2014

Address:

3620 SW 60th Place

District:

West

Comment:

I strongly support sidewalks on Shattuck. But we also desperately need a sidewalk on the south side of Patton from 60th Place to at least 57th so that we can GET to Hamilton and Shattuck!!

Comment ID

MapApp ID

1542 Commenter

Daniel Pirofsky

Date Received:

12/12/2014

Address:

2173 NE Multnomah Street

District:

Northeast

Comment:

Part 3 of 30n the north side of Multnomah, Holladay Park Plaza and The Fontaine are high-rise condominiums, east of which are several low-rise condominiums, which are then followed by several blocks of single-family homes. Behind these homes on Multnomah are four blocks of homes in Sullivanââ, a,¢s Gulch. In other words, once you are east of The Residence Inn, all buildings on Multnomah are residential. This is essentially a residential neighborhood that adjoins the Lloyd Center district, but with high-density housing and hotel services already existing between them. Development of this property should continue this transition with low-rise or mid-rise residential uses. Allowing commercial or storefront uses would actually degrade the existing transition, forcing an abrupt change from commercial to residential use at 21st Avenue. Changing the zoning east of the Marriott Residence Inn to a mixed-use designation could mar an already elegant transition with development that is clearly not residential. As a neighbor in SullivanA¢â, a. &s Gulch, I strongly oppose the idea of a mixed use designation for this property. I do not oppose significant development of this property for high-density residential use. It is also important to point out that the residents of SullivanA¢a, -a, cs Gulch have generally been uninformed regarding the proposed zone and plan changes for this property. In fact, the elected Board of the Sullivana ¢a, ¬a, ¢s Gulch Neighborhood Association submitted their recommendation to consider this property for mixed use without any serious or lengthy discussion among its members. Essentially, its Land Use Committee made this recommendation at the request of the property owner, who has been interested in a zone change for commercial use for years, obviously to increase the value of the land upon a timely sale. Repeated attempts to confront this issue at General Meetings of the association have been stymied by the Board and its Chariperson, who believe that all policy should be made by the board, and members can only elect or un-elect the board and make changes to its by-laws. This is an issue of great contention in the neighborhood at the present time. The recommendation of our Board to consider mixed use as appropriate for this location was never made with broad support in the neighborhood. Thank you for considering the comments of residents in this area.

Comment ID

MapApp ID

Commenter 1544

Daniel Pirofsky

Date Received:

12/12/2014

Address:

2173 NE Multnomah Street

District:

Northeast

Comment:

Please refer to my comments in three parts on the proposed change for property #21. Those comments pertain exactly to this property as well. However, this property has already been given a commercial designation. It should be returned to a residential designation to be consistent with the adjoining properties as well as the long-standing character of the neighborhood that surrounds it. This property should be changed to a High Density Residential zoning. It has only a very small profile on 21st Avenue immediately before the NE 21st Street bridge over the Banfield Freeway. Thus, it does not offer much in the way of commercial access and could only add to the mounting traffic problems on this major north/south commuting route. With pedestrian access to mixed use and commercial areas on all sides of Sullivan Gulch neighborhood, there is no need for commercial use at this location. The City needs much more affordable housing in close proximity to commercial activities. This is the perfect location for new low-rise or mid-rise residential development.

Comment ID

MapApp ID

1545 Commenter

Daniel Pirofsky

Date Received:

12/12/2014

Address:

2173 NE Multnomah Street

District:

Northeast

Comment:

Please refer to my comments in three parts on the proposed change for property #21. Those comments pertain exactly to this property as well. However, this property has already been given a commercial designation. It should be returned to a residential designation to be consistent with the adjoining properties as well as the long-standing character of the neighborhood that surrounds it. This property should be changed to a High Density Residential zoning. It has only a very small profile on 21st Avenue immediately before the NE 21st Street bridge over the Banfield Freeway. Thus, it does not offer much in the way of commercial access and could only add to the mounting traffic problems on this major north/south commuting route. With pedestrian access to mixed use and commercial areas on all sides of Sullivan Gulch neighborhood, there is no need for commercial use at this location. The City needs much more affordable housing in close proximity to commercial activities. This is the perfect location for new low-rise or mid-rise residential development.

Site Address, if different from above:

To: David Yarnold President of National Audubon Society.

Dear David,

I have lived on Hayden Island, in Portland, Oregon for 7 years, and over this time I have become very attached to the undeveloped western side of this Island. It Is 825 acres which consists mostly of bottomland hardwood forest, wetlands, meadows and floodplains. It is a very important area for eagles, bats, salmon, and other wildlife. There are presently three Bald Eagles nests located on West Hayden Island. One of these eagles became famous last year because she was found seriously injured by a hiker, rescued by Bob Sallinger, and successfully rehabilitated by the staff at Audubon Society of Portland over a 6 month period. http://koin.com/2014/05/25/audubon-society-releases-rehabilitated-eagle/ We are so very grateful to have Bob Sallinger here fighting hard for protection of West Hayden Island and the wildlife that depend on it.

The Port of Portland presently own West Hayden Island and they have been trying to change the zoning from Farm and Forest so that they can industrially develop 300 acres or more of the area. One of the Bald Eagle nests is located right in the middle of the Port of Portland's deep water marine terminal proposal plan. This active eagle nest is only 700 feet from the Columbia River. The port's recent activities such as road work and putting in a public path for people and their dogs has already created quite a lot of disturbance in the area of the nest. Added to this, Bonneville Power and PGE drive within 40 feet of this nest. Then there is the seasonal hunting for waterfowl and deer that take place fairly close to this nest. I strongly believe that these eagles need better protection, especially during nesting season.

The Yakima Nation Treaty extends along the Hayden Island shore lines. The amount of toxic, uncapped, dredged river spoils that have been dumped by the Port of Portland on West Hayden Island has received a title from the Tribes called Fugitive Dust. ("Fugitive Dust" - A Particulate emission made airborne by forces of wind, man's activity, or both. Unpaved roads, construction sites, and tilled land are examples or areas that originate fugitive dust. Fugitive dust is a type of fugitive

emission.)http://yosemite.epa.gov/r10/airpage.nsf/283d45bd5bb068e68825650f0064cdc2/f9b43b

d79fa13e3c88256a6800728268/\$FILE/yrcaasip.pdf

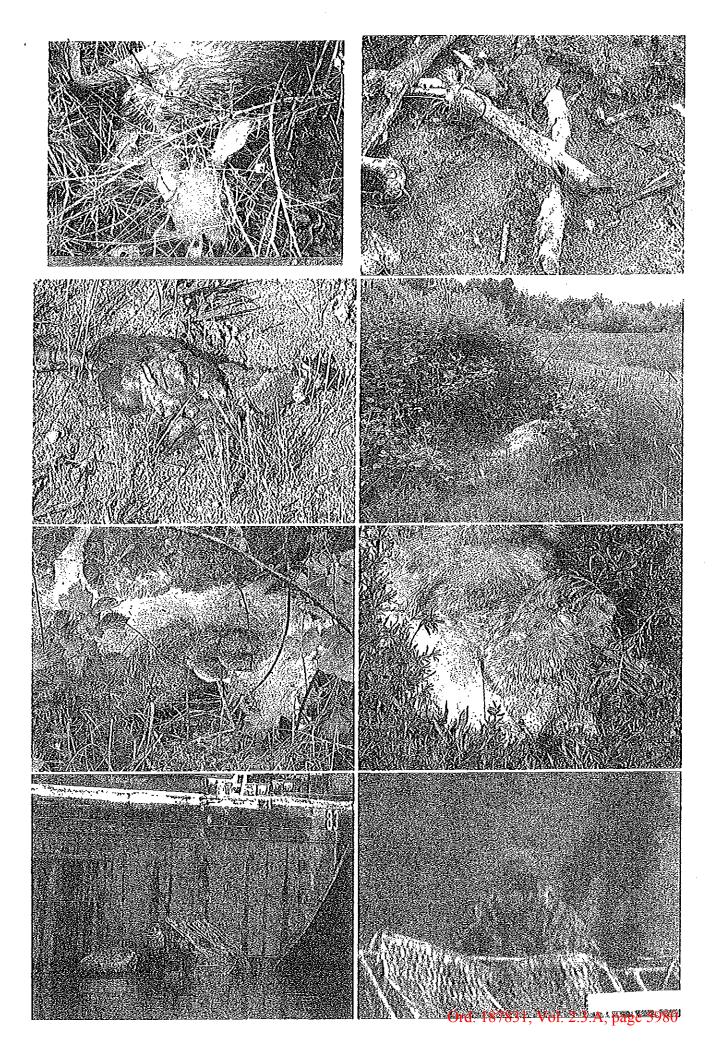
This dumping of tons of contaminated river dredgings (with PCB's and heavy metals) is of concern, and its impact on all the wildlife is not known. What is known is that resident fish from the Columbia River are not healthy for people to eat because of toxins. These toxins must be having some effect on the Bald Eagles, Osprey, Merganzers, herons and other fish eating birds. I am in constant contact with the US Fish and Wildlife about my concerns. I wanted to also reach out to you after I read the "Speak Up For Bald and Golden Eagles Audubon Action Alert.

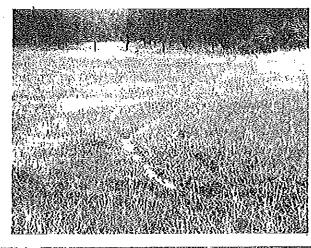
Thank you for all you and Audubon all over the country are already doing to help protect birds and the environment. Please keep West Hayden Island in your thoughts.

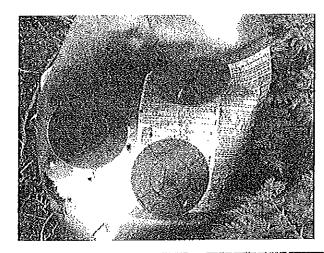
Respectfully,

David RedThunder
Hayden Island,

Ward Ald Number

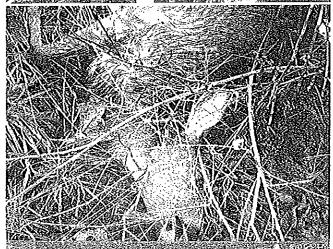


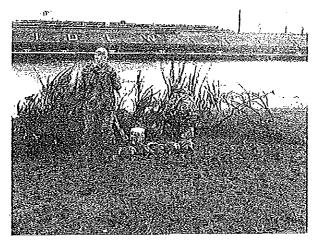






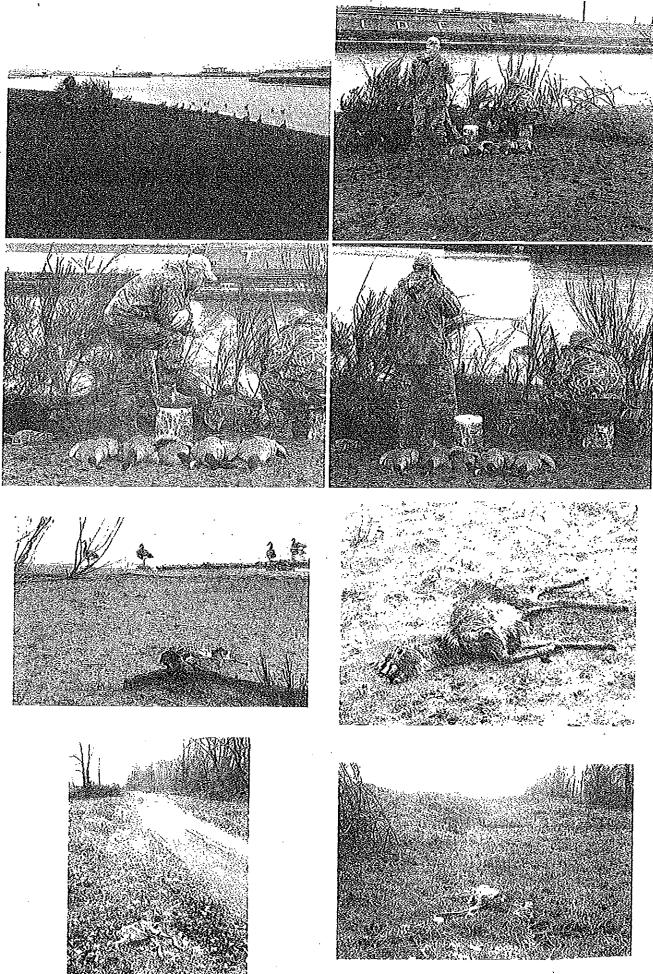




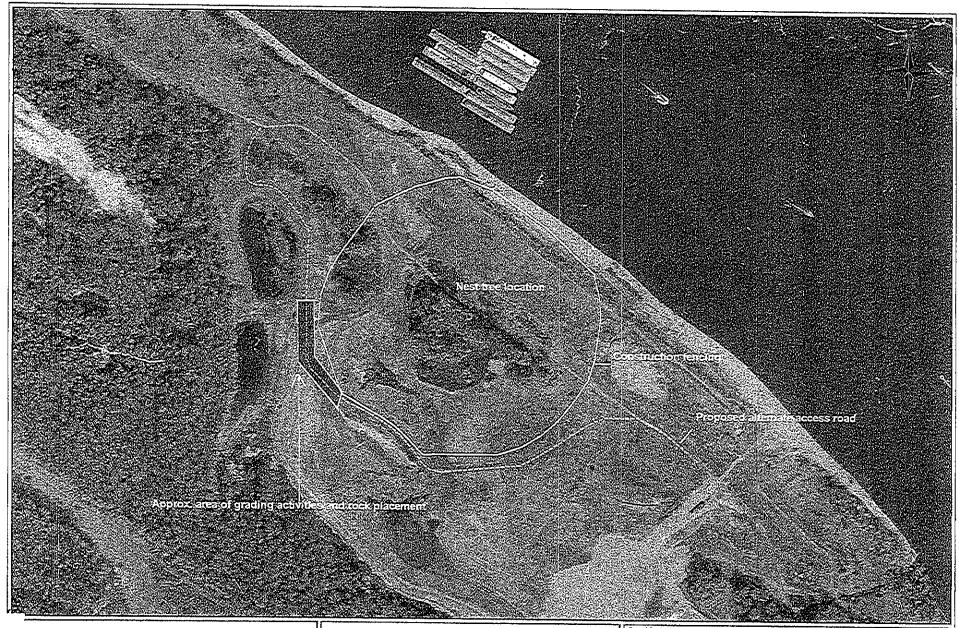








Ord. 187831, Vol. 2.3.A, page 5982





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Please pass this email along to David Redthunder. Thank you.

Hello David -

Thank you for your call and your commitment to protect West Hayden Island and the resources that depend upon the Island. I understand that you plan to meet with ODEQ representatives to discuss the dredge spoils on WHI. The following are the items of interest I have regarding how dredge spoils will be managed in the future:

- 1) Future Disposal. Does ODEQ have a position on permitting or allowing the disposal of dredge spoils on WHI? (The disposal of dredge spoils on WHI has long been established. As long as the contaminant levels in soils meet open upland disposal requirements, I don't believe ODEQ can disallow this activity on WHI. However, my expertise in this matter is lacking, so it would be good to get clarification on this matter from the ODEQ rep or someone who knows OR requirements/law.)
- 2) Analysis of Dredge Spoils. Since there is a long history of disposing material on WHI, has ODEQ conducted a thorough analysis of the dredge disposal area? The concern would be less with recent activity and more concerns about historical dumping on the Island. Can ODEQ conduct the analysis or require the Port to conduct the analysis so that future decisions about the management of this area can be fully informed with baseline conditions of the area?
- 3) Fugitive Dust. What are ODEQs requirements for management of fugitive dust, or the resuspension of soil, at this location? Is the Port in compliance with the requirements? Fugitive dust is a human health and environmental concern, are there plans to cap and revegetate the dredge spoil area?

Good luck with your meeting!

Rose Longoria Regional Superfund Project Coordinator

COLUMBIA RIVER | Honor. Protect. Restore.

Yakama Nation Fisheries PO Box 151 Toppenish, WA 98948 509-865-5121 x6365 rose@yakamafish-nsn.gov

PORTLAND HARBOR CONTAMINANTS		Manganese	Phthalates & The Mark 1997	Sum DDE
·		Mercury	венр	Sum DDT
Contaminants are risk for humans		Nickel	Butyl benzyl phthalate	Total DDx
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	arsenic	Selenium	Di-n-octyl phthalate	Beta HCH
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		Benzo(a)pyrene	• •	Cis-1,2-Dichloroethene
Benthic Invertebrate, Fish, Wildlife, and Amphibian and Aquatic plants COPCs		Benzo(b)fluoranthene	4-Nitrophenol	Ethylbenzene
		Benzo(g,h,i)perylene	Pentachiorophenoi	Isoprophylbenzene
		Benzo(k)fluoranthene	Phenol	Styrene
M	letais	Chrysene		Toluene
	Aluminum	Dibenzo(a,h)anthracene	PCBs (Polychlorinated Biphenyls)	Trichloroethene
	Antimony	Fluoranthene	Total PCBs	m,p-Xylene
	Arsenic	Fluorene	Dioxin and Furans	o-Xylene
	Barium	Total HPAHs	2,3,7,8-TCDD	Total xylene
	Beryllium	Indeno(1,2,3-cd)pyrene -	Pesticides	TPH (Total Petroleum Hydrocarbon)
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(Chromium	Naphthalene	2,4'-DDT°	Gasoline-range hydrocarbons
•	Cobait	Total PAHs	4,4'-DDD3	Residual-range hydrocarbons
	Copper	Phenanthrene	4,4'-DDE ^a	Other contaminants
	Iron	Pyrene	4,4'-DDT	Cyanide
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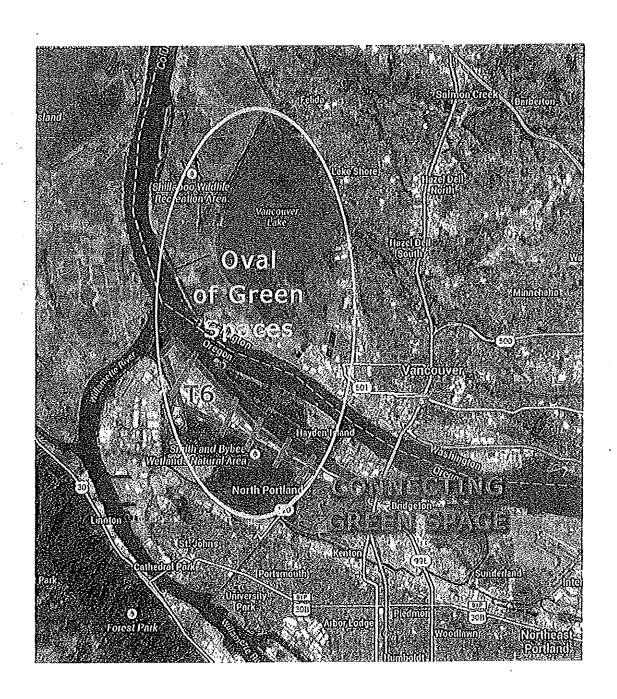
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Don Vandeberg. Staff, Big Game, ODFW. Phone 503-621-3488



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COMMENTS FROM THE LINNTON NEIGHBORHOOD ASSOCIATION ON PORTLAND'S COMPREHENSIVE PLAN: November, 2014

This document is a refinement of the document filed by the Linnton Neighborhood Association as a comment on the Working Draft of Portland's Comprehensive Plan.

1. THE NEIGHBORHOOD ASSOCIATIONS HAVE BEEN LEFT OUT OF THE COMPREHENSIVE PLAN

The draft fails to acknowledge the contribution the neighborhood associations can make to the achievement of the Community Involvement Goals. Many of those goals could best be achieved by enhancing the role neighborhood associations play in the planning process. The neighborhood associations are the best path to creating positive relationships between the city government and local communities, the best path to engagement with the under-served and under-represented, and the best path to thoughtful consideration and meaningful participation by the public in the land use process. It should be an explicit goal of the plan to strengthen the neighborhood associations. Instead the plan seems to support an alternative process, and offers no more than a "tip of the hat" to the neighborhoods. A proclaimed "one size doesn't fit all" approach to planning demands an explicit commitment to neighborhood participation in planning, yet the draft makes no such commitment.

In particular, and just to start with, the plan needs to set realistic timelines for participation in the planning process by the neighborhood associations. The LNA has general membership meetings every other month, timelines which call for comments or appeals within 10 or 30 days are unworkable; they send a strong message that the city doesn't value what the neighborhoods bring to the process or care what the neighborhood associations think about the land use issues.

2. HILLSIDE DENSITY

Linnton was platted in an era when a twenty five by one hundred foot lot was considered spacious. Many residences in Linnton occupy multiple such lots and there are many other empty but buildable narrow lots available. The potential for infill is

Page 1 - COMMENTS FROM THE LINNTON NEIGHBORHOOD ASSOCIATION ON PORTLAND'S COMPREHENSIVE PLAN: November, 2014 substantial, and the number of homes that could be built far exceeds the infrastructure needed to support them. A first step towards resolution of this problem was taken when the Council approved the Linnton Hillside Plan which rejected higher density zoning, but the problem remains one which will become critical when a substantial upturn in the housing market occurs.

The plan does take some small steps towards addressing these long held Linnton concerns about appropriate hillside development by down zoning four large properties to Residential 20,000 (R20). Another 16 sites throughout the neighborhood are proposed to be rezoned as open space (OS) to acknowledge current or future open space use on existing publicly-owned land. In addition the Comp Plan Mapp App designation of Linnton as a "Stormwater Management Challenge Area" is a move in the right direction, but far from sufficient.

LNA supports controlling hillside development though management tools such as stormwater, landslide and habitat regulations. The draft moves in the right direction in acknowledging the constraints facing Linnton, including soil types and steep slopes that limit stormwater infiltration into the ground, lots that cannot easily connect to existing stormwater pipes, and landslide and wildfire hazards. Combined with the limitations on the existing infrastructure these natural hazards and drainage constraints make Linnton specific growth management a critical need.

3. THE LINNTON BUSINESS DISTRICT SHOULD BE A NEIGHBORHOOD CENTER

The LNA would like the Linnton Business District to be recognized as a "Neighborhood Center" even though it acknowledges that under the current definition of a neighborhood center our "center" doesn't qualify. The problem is with the definition rather than with the Linnton Business District. The LNA has long advocated for the long promised restoration of Linnton's business district, either on the highway or down on the riverfront and prior to the destruction of half of Linnton's downtown buildings (when the highway was widened back in 1960) Linnton would have qualified as a "Town Center" similar to St. Johns. Unfortunately for Linnton, under current rules, the business district rates as little more than a wide spot in the road. The plan needs to incorporate provisions encouraging the growth of the Linnton Business District, either as a Neighborhood Center or some newly

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devised functional equivalent.

4. REZONING LINNTON'S BUSINESS DISTRICT TO STOREFRONT COMMERCIAL

Currently the narrow strip of business land along St. Helens Rd. from NW 107th to 112th is designated as general commercial (CG), a designation suited to car oriented shopping districts. The proposal is to changing this designation to "Urban Commercial/Storefront commercial" (UC/CS), a designation that would allow future mixed-used development. The LNA supports this small step towards the goal of rebuilding Linnton's downtown into a vibrant neighborhood center. Community questions remain, however, regarding the full implications of the proposed change in zoning.

5. ST. HELENS RD. SHOULD BE A CIVIC CORRIDOR IN LINNTON

At least in the area where it passes through Linnton's downtown, St. Helens Road needs to be recognized as a civic corridor. According to the draft language, civic corridor policies are intended to transform those areas into, "premier streets that are enjoyable places to live, work and gather; serve as safe mobility corridors for all types of transportation and pedestrians..."

Designation as a civic corridor would be another step in the slow but steady success achieved over the past 20 years in restoring a sense of place in Linnton's business district. Continued efforts at traffic calming and new improvements for pedestrians and business district customers are the next steps in the restoration of Linnton's downtown economic vitality and livability. The neighborhood would like to be considered for inclusion in the Main Street program, the civic corridor designation would be good step in that direction.

Currently the Mapp App lists St. Helens Road as a "Regional Truckway," which is defined in the Portland Transportation System Plan as primarily serving, "heavy freight activities for interregional and interstate freight movements." Linnton is happy to share the road with industrial users, but expects more from the highway and the city than truck traffic.

There is no reason St. Helens Rd can't carry the traffic it does and still be much

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more pedestrian friendly that it is. Steps can be taken to visually narrow roadway with landscaping, pedestrian bulb outs, and extended medians. These improvements would make the district safer and more inviting to pedestrians.

Designation as a neighborhood center and a civic corridor would assist in moving other traffic related projects forward. For example:

- 1. A local circulation study in the Linnton area to evaluate the potential for improving safe access to and from local streets to St. Helens Rd.
- 2. The implementation of a Whistle-Free zone in Linnton (perhaps in conjunction with the various North Portland neighborhoods facing this same issue), or other steps towards controlling intrusive nighttime switching by the railroads on both sides of the river.
- 3. Improving traffic flow by adding a left turn lane through the Willbridge area on St. Helens Rd.
 - 5. Adding a traffic signal at NW 112th St.
- 6. Improving bike access to the St Johns Bridge (this is a list project, map ID#6004) and link that to a separated grade bike path alongside the existing rail tracks connecting the North Greenway Trail, across the BNSF rail bridge, and extending out to Sauvie Island. Both bikes and the greenway need to be separated from St. Helens Rd.

6. RIVER ACCESS IN LINNTON (POLICIES 3.54, 55, 56, 64 AND 65)

In the earliest days Linnton was a river focused town. Everything was tied to the river. In more recent years a string of industrial users have closed off the river almost entirely, the west side of the river in the North Reach is an uninterrupted row of no trespassing signs. The city ought to require, in the plan, that there be access points to the river (at least a viewpoint and ideally a spot where people can get their feet wet) every half mile, on the average. These access points could be along property lines and

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¹ See PBOT project #60020, Transportation Investment Areas, Transportation Infrastructure Analysis, Draft Working Harbor Reinvestment Strategy, 2007. It calls for "Visually narrow roadway, including landscaping, pedestrian bulb outs, and median at various locations within Linnton."

not interfere with industrial activity. These access points would also provide habitat connections between the river and the upland forests as called for in Policies 3.54, 55 and 56. While human use of the access points has be controlled to insure that wildlife can also use them, the combination of human and wildlife access is both possible and useful. Political support over the long term is needed to preserve wildlife access, support is built by participation, which is created and encouraged by controlled public access.

Linnton provides an ideal location for such an access point. At the north end of the mill site, NW 107th almost extends to the river and could link up with an existing Greenway, if the city obtained public access across the mill site. The concept is already included in the currently stalled North Reach Plan and is identified in the Parks Investment Layer as a future improvement. Attached to this document (Exhibit A) is a 1976 letter from Linnton to then mayor Neil Goldschmidt. It advocates for precisely the river access that ultimately was included in the stalled North Reach Plan and which remains unachieved today, 40 years after the letter.

7. THE IMPACT OF PORTLAND'S INDUSTRIAL LAND POLICY ON LINNTON

Portland's industrial land policy, despite good intentions and reasonable success in other areas of the city, has not worked well in Linnton.

The Linnton waterfront was home to industrial activity long before zoning or comprehensive plans existed. Modern river related industrial activity, however, requires more than the Linnton waterfront provides and the land between the tank farms has remained underutilized by river related industrial activity for decades. Unfortunately the unsuitability of the site for modern industry has not been acknowledged in the planning or zoning process and the site remains frozen, not useful for industry and not available for other uses.

Particularly problematic for Linnton has been the incorporation of the notion of "industrial sanctuaries" into city wide planning. In 1996 the Northwest Industrial Sanctuary Working Group was created by City Council Resolution #35534. It included representatives from the LNA, and NINA, NWDA and PDNA, and achieved agreement about which neighborhood parcels of industrially zoned land should be provided long term sanctuary protection. As part of that agreement, the

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various associations, the city, and the adjacent industrial stakeholders all agreed to make the northern boundary of the sanctuary the St. Johns Bridge (see discussion in Exhibit B). The agreements reached by the Working Group evolved into the Guild's Lake Industrial Sanctuary Plan which was approved by the city in 2001. The exclusion of land north of the bridge was intended to allow for further planning in Linnton. Unfortunately for Linnton, that planning has yet to be completed. It stalled after the city council rejected a proposal from the Planning Commission in 2006 and has not been restarted.

Whatever its value in other areas of the city the sanctuary policy has failed in Linnton, leaving only unused land and unhappy property owners. No investment has occurred and no jobs have been created. A project currently under development² will cut the available industrial land in Linnton more than by half, leaving only a small area technically available for industrial activity. The city should acknowledge the pointlessness of preserving the industrial designation of this remaining piece of the waterfront and open the area to other kinds of development.

The city should impose a standard for sanctuary protection for industrial property based on more than the property's history as an industrially zoned site and the raw number of acres of industrial land available within the city. Rather than just counting the acres, regardless of current usefulness, the city should measure the prospective usefulness of industrial property on a jobs per acre basis, imposing an obligation upon industrial users to maximize the density (in improvements and employment both) of their projects. This would assist in Linnton's redevelopment because it would reduce the concern that acknowledging that a particular parcel of land (for example, Linnton between the tank farms) was unsuited to industrial use might undermine industrial land policy city wide. The current system provides incentives for sprawl rather than incentives for density. The city doesn't subsidized residential sprawl and should not subsidize industrial sprawl. Density should be a concern for all.

In addition, the city needs to take a regional approach to supplying industrial land. Existing sites in Clark County and likely to be created sites in Columbia County need to be factored into the supply question. It may serve the Port of Portland's

² RestorCap has agreed to purchase the plywood mill site and convert it into habitat to address mitigation needs in the North Reach. The LNA supports this plan based on the promises of RestorCap to provide the long sought community access to the river.

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interests to add to the stock of industrial land within Portland, but it may not be in the city's interest. Regional growth will bring benefits to Portland and those benefits will come with much smaller costs if development is financed by other jurisdictions.

The fear that higher income uses will drive industrial users off their land without a sanctuary policy to protect them is real. The policy should continue to forbid zoning changes that are justified merely by proof of a higher return on investment. But when allegedly marketable industrial land sits on the market for decades without a buyer, that message should be heard. Simply put, the Linnton waterfront hasn't been, isn't now and never will be useful industrial land. The failure of the land use process to acknowledge that reality has compromised the development of Linnton in particular and the city in general.

The city should have the courage to acknowledge that current industrial land policy fails to address the need for thoughtful evaluation of the suitability of specific parcels of land for industrial use. The need for regional growth should not be a bar to the wise use of the Linnton waterfront. Upzoning the Linnton waterfront would not compromise regional industrial land use goals and would better serve the needs of the city and the neighborhood.

8. SUPERFUND REMEDIATION SITES IN LINNTON

The Comp Plan needs to recommend sites along the Willamette River in the North Reach that are suitable as future mitigation sites as part of the Portland Harbor Superfund project. The Map App appears to recognize some of the above sites within Linnton but conspicuously leaves out the Linnton Plywood Mill site on the "Habitat Corridor" map layers.

The Portland Harbor Natural Resource Trustee Council released their recommendations for mitigation sites in April 2012 in their Portland Harbor Natural Resource Restoration Portfolio. Several of the Trustee Council's sites are within Linnton that would be ideal candidates for such corridors, several of which would "daylight" streams that were long ago piped underground due to industrial development.

Those sites include the former Linnton Plywood Mill site, Miller Creek confluence (near the floating home marinas), Doane Creek Railroad Corridor (where the BNSF rail bridge is), Owens Corning floodplain, and PGE site at the confluence

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with the Multnomah Channel, and Powerline Corridor (where the high towers cross the Willamette.)

If the plan fails to take a more aggressive approach to the creation of these corridors another generation will pass and opportunities will be lost.

9. AIR, WATER QUALITY AND HEALTH

The superfund process focuses on the river, but the river is not the only source of industrial health risks. Linnton, like the larger North Portland area, has many sources of air, water and ground contamination and pollution which are not being monitored. Other north Portland neighborhoods seek a "health overlay" as part of the plan and the LNA supports the creation of such an overlay and the inclusion of Linnton within it. An overlay will provide some structure for efforts to evaluate the industrial impacts on health in our community.

As part of its commitment to improving community health the City should aggressively oppose the creation of a toxic waste dump, or confined disposal facility (CDF) at Terminal Four in North Portland. The proposal is inconsistent with the goals of the plan, imposes new burdens on a part of the city already host to more than its fair share of industrial pollution, and the project cannot be built with any assurance that it can withstand the expected major earthquakes and related flooding.

10. REMOVING IVY AND OTHER INVASIVE SPECIES FROM FOREST PARK

The Comp Plan should support the new Greater Forest Park Conservation Initiative, a 20 year plan covering 15,000 acres, with the goal of restoring a habitat corridor along Forest Park and the Tualitan Mountain range to the coast range improving wildlife and native plant diversity.

The Initiative is a collaboration including the Forest Park Conservancy, Metro, Audubon, West Multnomah Soil and Water Conservation District, Friends of Trees, City of Portland, and the Linnton and Forest Park Neighborhood Associations.

Investing in the removal of invasives needs to be called out as a priority for restoration programs in order to preserve Forest Park for future generations. The plan should state that the city will work with the parties to the Greater Forest Park

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Conservation Initiative to control invasive species in Forest Park.

11. WILDLIFE IN LINNTON, FOREST PARK AND THE RIVER

Red legged frogs and their problems getting from the park to their breeding ponds near the river have become a recent issue in Linnton but are merely one example of the challenges faced by wildlife in the North Reach. Industrial and residential development has compromised the ability of wildlife to survive and the plan needs to commit to solving the problem. There is a regulatory gap between the park and the river which needs to be closed. A healthy park needs a healthy river and the health of both depends on the linkage between them. Access to the river is not needed merely for the human population; it must be provided for other creatures as well.

12. EARTHQUAKES AND OTHER NATURAL HAZARDS

Linnton is designated at high or moderate risk for earthquakes and landslide hazards, as is much of the Willamette River corridor. Linnton's oil tank farms are identified on the Mapp App as "High Potential Loss Facilities." While no amount of planning can eliminate all the risks associated with earthquakes and other natural hazards, those risks can be managed.. Given the concentration of energy related facilities in Linnton, risk reduction there is not merely a matter of local or even city concern; it is a matter of regional survival.

But instead of taking an aggressive position on risk reduction, the draft merely refers to the City's Natural Hazard Mitigation Plan (2010), which recommends mitigation strategies to address high risk assets such as the tank farms, but does so only in general terms, stating "resilient infrastructure must be adaptable to social and economic shifts as well as natural and climatic changes."

The plan should explicitly call for moving the tank farms and the pipelines to safer locations away from the river. If the draft isn't going to provide a long-term vision of moving Oregon's fuel storage and pipelines out of this high risk earthquake area it should, as an alternative, call for infrastructure investments to ensure existing facilities, including the Linnton tanks, are updated to survive the anticipated liquefaction of the ground they stand on during the expected major earthquake.

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Nor is liquefaction the only unaddressed risk. Linnton's hillsides have a history of landslides, modern radar mapping has revealed the extent of that history, but little has been done to identify the risks attached to specific hillside properties. The plan needs to commit to identifying and addressing the landslide risk.

In addition to mitigating existing risks, the city should avoid creating new risks. The city should resist siting a toxic waste dump on the river bank at Terminal Four. Placing contaminated sediment dredged out of the river next to the river is an invitation to future problems.

13. CLIMATE CHANGE (POLICY 7.2)

There is no longer any doubt that climate change will have an impact on many of the issues contained in the plan. While the concept gets repeated mention in the draft, it does so mostly in the context of study or intergovernmental cooperation. The plan needs to take a more aggressive stance on managing climate change.

14. THE NORTH REACH PLAN

The LNA invested considerable time into the drafting of the North Reach Plan. Some of those efforts were devoted to pressing for the inclusion in the NRP certain non-controversial projects that had died with the Linnton Village Plan in 2006. Those items, with the rest of the NRP, now linger, victims of legal squabbles unrelated to the parts of the plan important to the Linnton neighborhood. The Comprehensive Plan needs to save those twice orphaned parts of the North Reach Plan and move them forward. In particular, the LNA wants to see the river access called for in the NRP appear in the new plan.

15. CONCLUSION

The Linnton neighborhood, sitting on a hillside, on a fault line, caught between Forest Park and the industrial waterfront, with rail and highway and pipeline corridors within it, presents unique challenges from a comprehensive plan perspective. Issues of minor import to other residential neighborhoods, such as industrial land policy, or the protection of frog populations, will directly shape

Page 10 - COMMENTS FROM THE LINNTON NEIGHBORHOOD ASSOCIATION ON PORTLAND'S COMPREHENSIVE PLAN: November, 2014

Linnton's future. On many issues, Linnton's situation makes it the exception that tests the rule.

The LNA therefore welcomes this opportunity to address concerns about the plan and hopes the city will take advantage of the insight gained by our examination of the draft as it applies to our neighborhood.

This document incorporates many Linnton neighborhood voices, past and present. The Board of Directors thanks all those whose work has contributed to growth of our neighborhood and the production of this document.

THE LINNTON NEIGHBORHOOD ASSOCIATION BOARD OF DIRECTORS

Ed Jones, Chair Shawn Looney, Vice-Chair Rob Lee, Secretary Darise Weller, Treasurer Doug Adams, Board member Doug Polk, Board member Brian Hoop, Board member Art Wagner, Board member

Page 11 - COMMENTS FROM THE LINNTON NEIGHBORHOOD ASSOCIATION ON PORTLAND'S COMPREHENSIVE PLAN: November, 2014

LINNTON COMMUNITY CENTER 10614 N.W. St. Helens Road Portland, Oregon 97231 Telephone (503) 286-1344

MAY 1 7 1976 MAYOR'S OFFICE

Mayor Neil Goldschmidt 1220 SW 5th Portland, Oregon

Dear Mayor Goldschmidt,

I am writing to you as a member of the Linnton Community Center, Community Action Committee.

We have in our area a parcel of undeveloped riverfront property which we would like to see developed into a park under the Greenway Program.

Below are listed some of the reasons the people of our community feel the project should be undertaken:

- 1. Linnton is one of the oldest and most historic communities as shown by the excerpt included with this letter.
- 2. There is very little public access to the west side of the Willamette River in the Portland area. The people of the area are in need of a place to be able to enjoy the river, walk at its edge, and wade in the water if they wish. The area requested would allow for this.
- 3. There is no public access to the west side of the Willamette River where the public may view, free of charge, the commercial commerce of the river. The people of Portland need a spot to be able to sit docking and undocking, international cargo of all kinds being loaded and unloaded. The port is a vital part of Portland's economy, this industry. The area requested for a park, located directly opposite Terminal #4 would allow the public to see the port in action.
- h. The site mentioned for a park would allow the many bicyclists on route to Sauvies Island, or the beach, a place to pull off the busy highway and rest.

5. A park such as the one proposed would allow one of the few remaining pieces of riverbank in the Portland area to remain in its natural state, so that the people of the area might enjoy it as it was and enjoy it forever.

Also enclosed is a brief history of the area and, a letter from the

In past years our town's business district has been virtually wiped out by the widening of Highway 30 and traditionally Linnton has been low on Portlands list of priorities for basic services.

We feel it is time to put something back into our community.

The property in question is located at N. W. 107th and Front Avenue. If you have any questions, feel free to call me.

Sincerely,

Doug Adams

10131 NW Wilark Portland, Ore. 97231 286~2000

The see 2

NW Industrial Sanctuary Working Group

Joe Zehnder
Bureau of Planning
1900 SW Fourth Avenue
Portland, Oregon 97201

June 30, 2005

RE: 1999 NW Industrial Sanctuary Agreement

Dear Mr. Zehnder,

Pursuant to Resolution 35534 passed by the Portland City Council on July 3, 1996, presidents and other representatives of the four northwest neighborhood associations who had industrial zoned land within their boundaries met regularly as the Northwest Industrial Sanctuary Working Group (SWG) until 1999 when they achieved agreement as to which of their industrial zoned lands should be preserved for long term industrial sanctuary protection. This well defined area, its boundaries agreed upon by LNA, NINA, NWDA and PDNA, was designated as the Northwest Industrial Sanctuary Plan District.

At that time the Linnton Neighborhood Association was in the process of developing a neighborhood plan which would create a Linnton Plan District and establish "a zone designation" that would allow the property owners of industrial zoned land between the Arco Oil Terminal and the GATX Oil Terminal various options.

This element of the Linnton Plan District was developed with the input and agreement of the adjacent industrial stakeholders and with the advice of a senior planner from the BOP.

Since this area, the Linnton Plan District, was within the boundaries initially proposed by NINA for the new Northwest Industrial Sanctuary Plan District, the SWG coalition agreed that the northern (downriver) boundary for the NWIS Plan District would be redrawn to the St. John's Bridge.

Eventually, with continued input from the SWG coalition, the Northwest Industrial Sanctuary Plan District became the Guild's Lake Industrial Sanctuary Plan which was adopted by City Council on November 21, 2001.

As representatives of our neighborhood associations we understood that SWG's charge from the City was to define those industrial zoned lands within our neighborhoods that were to be preserved for long term industrial sanctuary protection. We further agreed that industrial zoned lands outside of the GLIS would be subject to options developed by our respective neighborhood plans.

We expected that neighborhood-developed options would receive support of other SWG coalition members in moving through the Planning Bureau, Planning Commission and City Council process. We expected the subsequent neighborhood plans would be adopted provided the SWG agreement was not contradicted.

We hope this clarifies the agreement reached by the SWG coalition. We ask you to acknowledge the value that the City of Portland places on the volunteer work of concerned citizens by honoring the agreement reached by the SWG coalition. You can do this by utilizing the agreement in assisting the Planning Commission and the City Council in adopting the Linnton Neighborhood Plan.

Sincerely,

Doug Polk, Kitsy Brown-Mahoney, Al Solheim, Frank Bird, Neilson Abeel NW Industrial Sanctuary Working Group

Cc: Mayor Tom Potter Gil Kelley, Julia Gisler, BoP NWDA, NINA, PDNA, LNA, NWNW

> Page 1 F Ord. 187831, Vol. 2.3.A, page 6002

NW Industrial Sanctuary Working Group

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Linnton Neighborhood Association President 1999

Kitsy Brown-Mahoney NW Industrial Neighborhood Association President 1999

Al Solheim

Pearl District Neighborhood Association Vice-President 1990

Frank Bird

NW District Association President 1999

Neilson Abeel

Pearl District Neighborhood Association President 1920

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Portland Planning and Sustainability Commission Public Hearing
Date: $11-4-14$
Name: $\frac{Doug}{K(o+z)}$ (Please print legibly)
Authorized Spokesperson representing: (if applicable)
Address: 1908 SE 3544 Place
City: \$ Portland zip: 97214 Phone: 503-233-916/
Email Address and/or Fax No.: dougunt @ Amail. com
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Name: IERRY CITUR & (Please print legibly)
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Address: 3056 ME Alamda Terrs C
City: PORTLAND Zip: 97212 Phone: 503-288-3519
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Address: 13737 SE EUIS
City: Portulad Zip: 97236 Phone: 503.760.4264
Email Address and/or Fax No.: PCNA BOARD @ GHAIL, COM
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James F. Peterson
Land Use Chair
Multnomah
2502 SW Multnomah Blvd.
Portland, Oregon 97219

Planning and Sustainability Commission 1900 SW Fourth Ave Portland, Oregon 97201-5380

Re: Request Neighborhood Center to Neighborhood Corridor

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the Draft of the Comprehensive Plan. Multnomah Village has always been considered a model Mainstreet. The village is more linear in nature and the characteristics are better defined by the Neighborhood Corridor designation. Multnomah Boulevard is designated a Neighborhood Corridor. The business district of the Multnomah Village would then be contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capital Highway. If Multnomah Village was designated a Neighborhood Center the 1/2 mile radius defined in the Comprehensive Plan would overlap with the 1 mile radiuses of the two adjacent town centers thus the single family zoning would be more compatible with a Neighborhood Corridor designation. The Bureau of Planning and Sustainability has projected the capacity with their proposed changes to mixed use zoning to increase 28% thus there is no need for the Neighborhood Center designation. Changing the Neighborhood Center designation to a Neighborhood Corridor better fits the design and character of the village that the neighborhood is trying to protect.

Please add this to the record of the Comprehensive Plan

Thank you.

James F Peterson Land Use Chair Multnomah

Junes Al Cherry

ce: City Council

Bureau of Planning and Sustainability

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Zip:

Address:

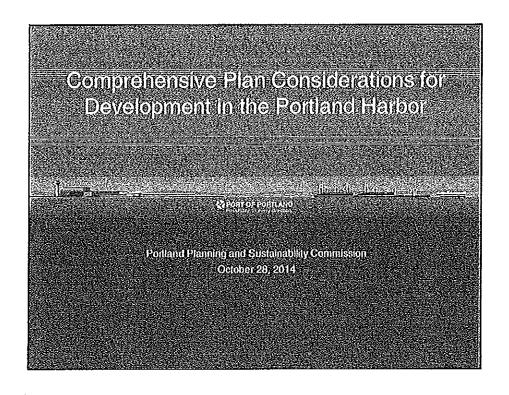
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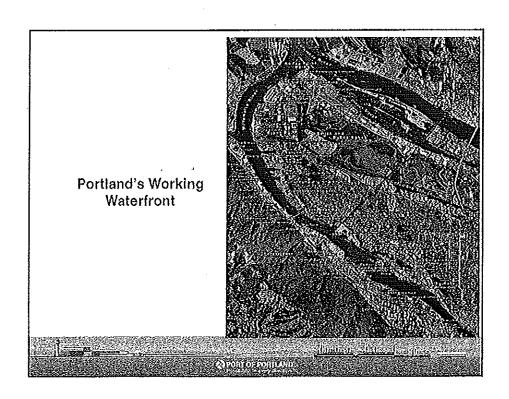
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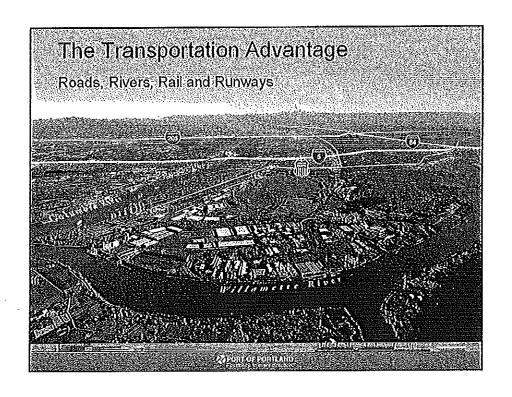
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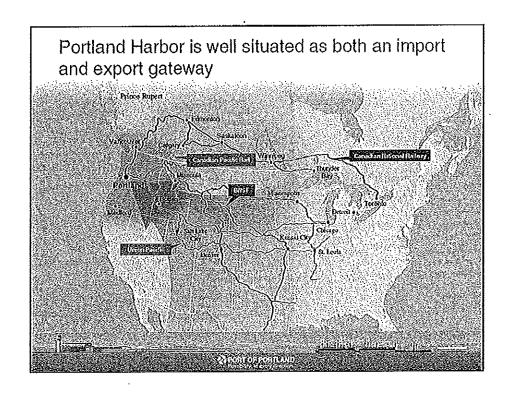
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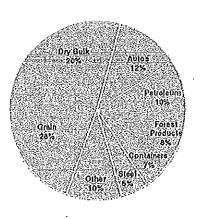




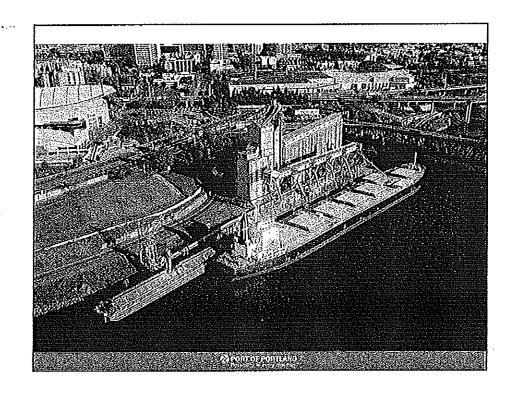


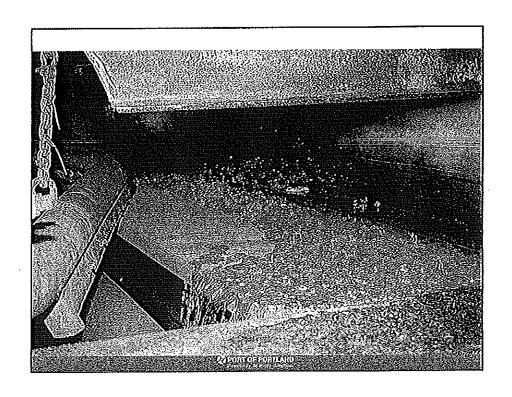
The numbers: Columbia River Traffic CY 13

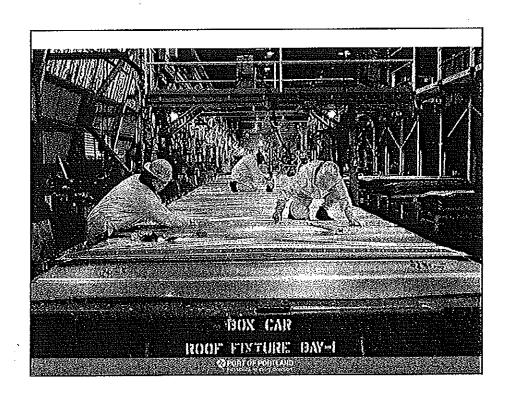
- Over 1,500 ocean cargo vessels travel up the Columbia River every year
- River system continues to support diversified cargo base
- Total traffic:
 - 38 million tons (Columbia River)
 - 27 million tons (Portland Harbor)
 - 12.4 million tons (Port of Portland)

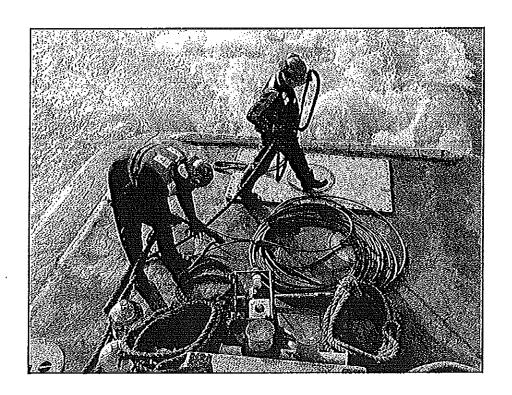


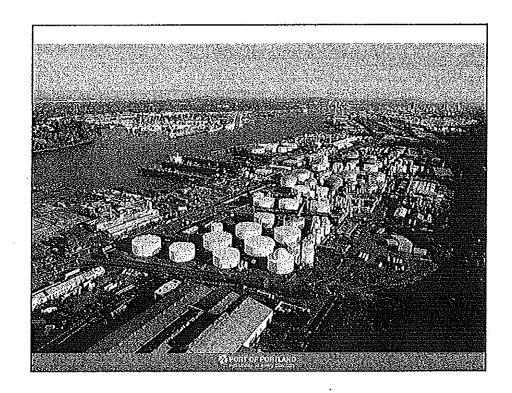
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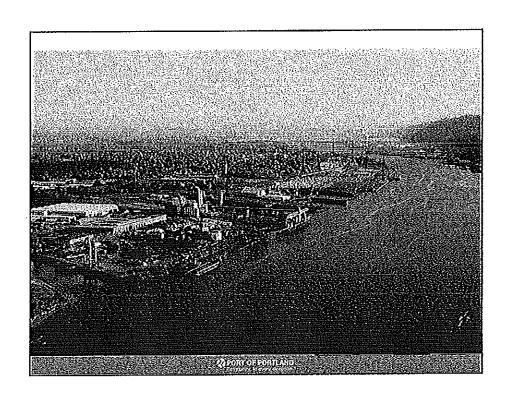


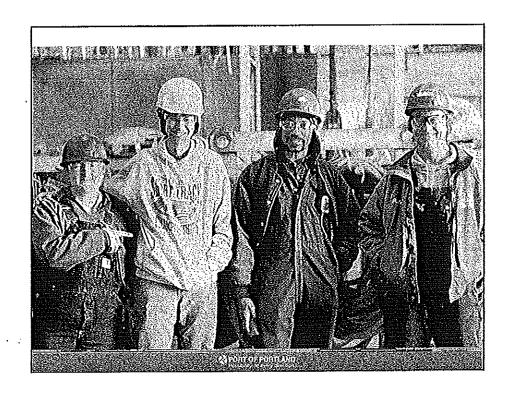




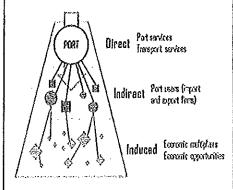








Portland Harbor as Funnel for Economic Development



Portland Harbor Economic Impact

- 18,080 jobs created (direct, Indirect, Induced)
- \$1.46 billion in personal income and consumption expenditures (direct, indirect, induced) annually
- \$1.5 billion in business revenues annually
- \$430 million in local purchases by businesses annually
- \$140 million in state and local taxes annually

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Maritime Capital Investment Tax Impact Analysis

- · Assume moderate investment of \$100M
 - Expansion of existing facility or development of a new facility
 - Construction will take two years to complete
 - Moderate Job creation
- · Capital investments benefit property taxes
- · Non-property tax benefits include:
 - · State of Oregon Income and Corporate Excise Taxes
 - Multnomah County Business Income Tax
 - · City of Portland Business License Tax
 - · Tri-Met Payroll Tax

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State of Oregon - Corporate Excise, Personal Income Tax	\$5.874
City of Portland – Business License, Property Tax	5,514
Portland Public School District - Properly Tax	5,474
Multnomah County - Business Income, Property Tax	3,915
Urban Renewal - Property Tax	1,921
Tri-Met - Payroll Tax	647
Portland Community College - Properly Tax	482
Metro - Property Tax	310
Multnomah County ESD - Property Tax	301
East/West Solf/Water - Property Tax	68
Port of Portland - Property Tax	47
Total	\$24,554

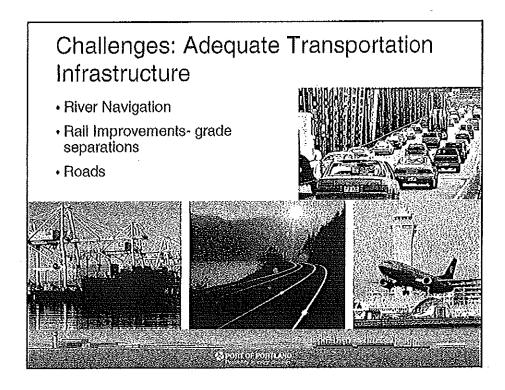
Annual Tax Revenues Impact in Budget Terms		
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City of Portland (\$650,000)	6 Police Officers or Firefighters (salary and benefits)	
Multnomah County (\$450,000)	4.5 Deputy Sheriffs (salary and benefits)	
Portland Public Schools (\$600,000)	6 Teachers (salary and benefits)	
State of Oregon (\$322,000)	2/3 of Oregon Parks & Recreation Department General Fund budget allocation (2013-15 biennium)	
Tri-Met (\$34,000)	1 part-time operator (salary only)	
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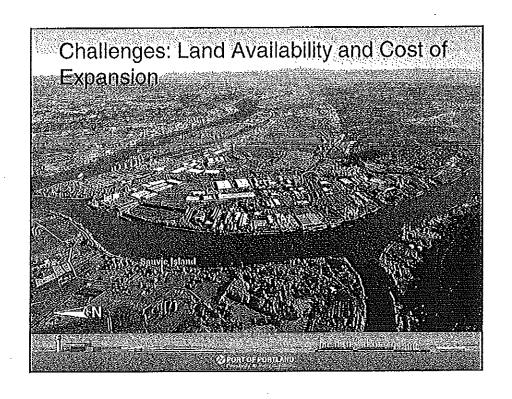
Opportunities

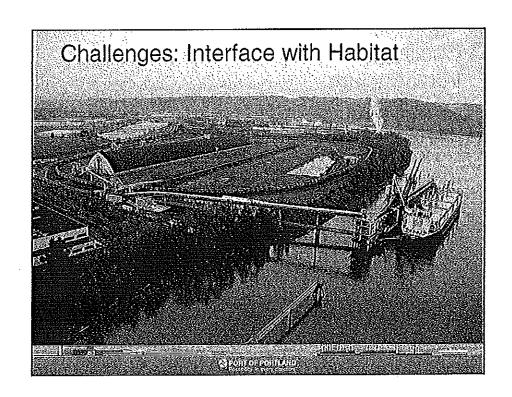
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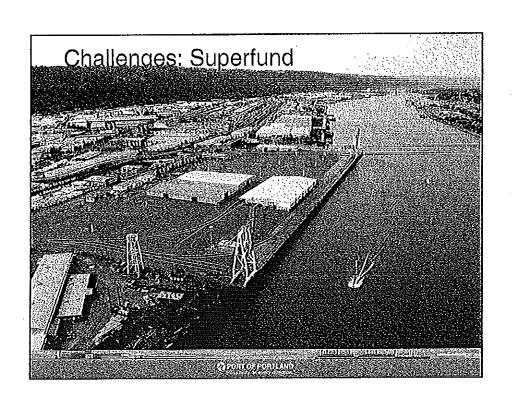
- Growth of maritime revenues generates taxesenabling investment in state and local priorities
- Revenue spent from harbor business on materials, capital goods and services largely flows to local small/medium businesses
- Harbor jobs are middle income and offer substantially higher wage than the region average

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Portland Planning and Sustainability Commission Public Hearing

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PSC-DCP Hearing: Testimony from David Red Thunder, West Hayden Island

I am David Douglas Red Thunder, an American Indian, member of the Sisseton-Wahpeton Sioux Tribe, and am named after the great Scottish botanist, David Douglas, who's honored by the conifer species, Douglas Fir, that bears his name.

After years of expert testimony before this Commission, the facts are well established that West Hayden Island will not succeed economically as a marine industrial development. And the Port agrees; it said it was just too expensive to build there, and withdrew its proposal to the city for annexation and re-zoning.

That Commission testimony also established that West Hayden Island is a high-value urban natural wildlife habitat. Along with its 81 bird species, nine different mammals, four kinds of amphibians, and important forest areas, it also is a critically important river shallows for juvenile salmon and other migrating fish.

For me as an American Indian, I practice Animism as my spiritual tradition. We believe that non-human entities – animals, birds, plants, rocks, trees, sands, waters, as well as humans – all possess spiritual essence, and I embrace the Judeo-Christian tenets of faith as well. For me, West Hayden Island is my sanctuary, my place of worship, a place where the spirits teach me more righteous ways.

My tribal brothers and sisters of the Yakama and Grand Ronde Federations share these traditions with me. And for us, the Columbia River's conditions surrounding West Hayden Island support us spiritually and physically through our ancient fishing practices, protected by treaty with the United States.

Many argue WHI must be developed for more jobs and greater world trade, while others argue development will degrade livability for all islanders, and the environment. For me and mine, it is a spiritual place, one of the very few left for us to practice our faith in communion with the full range of our spiritual teachers.

Over the next several months, as you consider how the Draft Comprehensive Plan categorically excludes your carefully researched and written requirements, have the courage of your wisdom, and re-affirm that any development of West Hayden Island must also include all mitigations you recommended last year, or it must be completely removed from the DCP's industrial lands inventory.

Come next spring, when you are writing your decisions again, please remember me, David Douglas Red Thunder, and know that West Hayden Island is my sanctuary. It can and should be a sanctuary for us all.

Thank you.

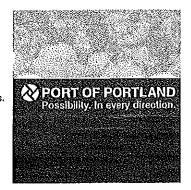
David Douglas Red Thunder

Portland Planning and Sustainability Commission Public Hearing

Date: 10-28-2014	
Name: Doug Klotz	(Please print legibly)
Authorized Spokesperson representing:	(if applicable)
Address: 1908 SE 35th P	lace
City: Portland Zip: 972	214 Phone: 503-233-9161
	ugurb@gmail-com
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Date: 19-28-19	
Name: MARIL WHITE	(Please print legibly)
Authorized Spokesperson representing:	N/A (if applicable)
Address: 12215 SE 19 Ayrhams	550222
City: Pollian Zip: 97	7236 Phone: 503-761-0222
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City: Part of CR zip: 97208 Phone: 503 415-6615
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Portland Planning and Sustainability Commission Public Hearing
Date: 9/23/14 Name: Graffie Theisen (Please print legibly)
Authorized Spokesperson representing: 150 at 150 (if applicable)
Address: PO BOX 3529
City: Portland, OR zip: 97208 Phone: 503 459-2202
Email Address and/or Fax No.: 9 reg. Theiser@ 20 Tot 20 Tod Com
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Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.



Portland Planning and Sustainability Commission

Comprehensive Plan Hearing 9/23/2014

Commissioners:

Thank you for the opportunity to appear before you today to discuss the draft Comprehensive Plan. My testimony today is specific to West Hayden Island. As a planner for the Port, I am aware of the long tradition of trade on the Willamette and Columbia Rivers. I am concerned that the major policy and direction setting document for the city support and encourage investment in that economic engine. Among the several policies in chapter 6 that do support the maritime future of the city- the policy on West Hayden Island addresses the longer-term future.

Policy 6.41 calls for the future annexation of WHI. Future annexation is supported by City Council resolution 36805 and action taken by this commission in the fall of 2013. Thank you for supporting annexation of this key piece of maritime and riverine land resource.

Future annexation is supported by the Planning and Sustainability Commission and City Council passed Economic Opportunity Analysis, which identified a need for an additional 550 acres of rall yards and marine terminal facilities. The future annexation of WHI is critical to meeting that land demand.

Annexation provides a place where middle income jobs could grow for Portland residents in support of the equity goals for job diversity in the Portland Plan. These types of jobs are characterized by low barriers to entry and are disproportionally held by residents of east Portland.

Future annexation and development would trigger millions of dollars of infrastructure investment. A capital intensive development, of approximately \$100 million, would generate more than \$20m in tax revenue over 10 years. The largest gains would go to the State, the City of Portland and Portland Public Schools. These revenues help pay for the services this community values.

Portland's future hinges on our success of linking to the international market place. Because 95% of the world's consumers live outside of the US, Portland business growth can be achieved with good international access. The harbor is an important link to international markets- as much for the direct access as for "internationalizing" Portland. West Hayden Island is an important element of that future.

> 7200 NE Airport Way Portland OR 97218 Box 3529 Portland OR 97208

Portland Planning and Sustainability Commission Public Hearing

Date: 9/23/2014 Name: JANET ROXBURGH			- ((Please p	rint legibly)	
Authorized Spokesperson representing:				applicabl	e)	
Address: 1503 N HAYDEN ISLAN	VD DRIVE	-	<u>#860</u>	·		
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Authorized Spokesperson representing:	(if applicable)
Address: 7134 SE 34 QVE	
City: Portland zip: 97202 Phone: So	03-329-4212
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City: Portland zip: 97214 Phone:	233-9161
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Name: John Gibbord	(Please print legibly)
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City: Zip: <u>47219</u> Phone: <u>5</u>	503-408-6768
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775

MapApp ID

MapApp ID

Commenter

Alex Reed

Date Received:

9/11/2014

Address:

6127 SE Bush St

District:

Southeast

Comment:

I disagree with a previous commenter and support the extent of this zoning off of Foster; storefront commercial areas on side streets for a block or two off of major shopping streets like

Hawthorne is a charming feature of Portland neighborhood business districts.

Comment ID

Commenter

Alex Reed

Date Received:

9/11/2014

Address:

6127 SE Bush St

District:

Southeast

Comment:

I disagree with a previous commenter and support the extent of this zoning off of Foster; storefront commercial areas on side streets for a block or two off of major shopping streets

Hawthorne is a charming feature of Portland neighborhood business districts.

Comment ID

MapApp ID

840 Commenter Christine Pashley

Date Received:

9/11/2014

Address:

5205 SE 33rd Ave.

District:

Southeast

Comment:

If our city leaders want to keep Portland looking livable, green, cool and hip so that citizens will want to live here then they should keep this unique neighborhood as it is. Tearing down

Portland's past ruins the future of this time capsule neighborhood for our children. What will our children see of Portland in decades to come? Will they want to stay in Portland or move out? Our children will want to raise their children in a neighborhoods like Reedwood because it\'s a clean well-loved part of Portland\'s past and future. Don\'t change the zoning to allow for more houses that make our neighborhood ugly.

Comment ID

778 MapApp ID Commenter

Christine Pashley

Date Received:

9/11/2014

Address:

5205 SE 33rd Ave

District:

Southeast

Comment:

This is part of the Reedwood neighborhood and should be zoned just like that other streets that feature these unique houses and lots. If our city leaders want to keep Portland looking livable, green, cool and hip so that citizens will want to live here then they should save this neighborhood. Tearing down Portland's past ruins the future of this time capsule neighborhood for our children. What will our children see of Portland in decades to come? Will they want to stay in Portland or move out? Our children will want to raise their children

a neighborhoods like Reedwood because it's a clean, well-loved part of Portland's past and future. Save Portland's past and future, change the zoning before more cool midcentury homes are destroyed.

Comment ID

779 MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

Northeast

Comment:

I would really like it if this area were zoned as dense as the Hollywood district. I feel like the street scape can really be integrated if we allow more development like the Whole Foods with ground floor retail and upper housing. Please consider making this area a connection to the thriving Hollywood district. It's close to transit and will support the additional population. Additionally, I would love to see the streetcar come out AT LEAST this far, if not to 82nd. Sandy Blvd has a tremendous amount of untapped potential as a pedestrian friendly

transit corridor.

780

MapApp ID

846 Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 ne 49th

District:

Central City

Comment:

The amount of surface lots in downtown Portland for cars is atrocious. I am aware it is a duopoly of two well-seated families that control the land and the parking. They are stifling development for their ongoing profit and I believe that is unethical. We must find a way to wrench these lands from our local oligarchs so we may move forward in densifying our downtown. I am tired of seeing fallow parking lots and knowing the potential that could be!

Comment ID

781

MapApp ID

842 Commenter

Jerry Powell

Date Received:

9/12/2014

Address:

1926 SW Madison St

District:

West

Comment:

This proposed plan amendment is a terrible idea. It's nearly in the middle of the Kings Hill National Historic District, bordered on two side with single family residential uses and on the third side by a multiple dwelling that's potentially historically significant in a third historic development period. The entire block (excepting one infill residential structure) in which this proposed plan amendment sits consists of historically significant single family homes that were permitted to be used as office commercial thirty years ago to avoid a threat of demolition and replacement with multiple dwellings. The quid-pro-quo at the time was that these homes would retain their single family character and be returnable to their original use as dwellings. The recent increased demand for dwellings like these has seen commercial and converted housing returning to it's original single family use elsewhere in the city... and a steady increase in house prices here in Kingl's Hill. To pre-empt that process by over-riding the housing market with this proposal would introduce a destabilizing feature in an historic district just recently recovering from decades of neglect and instability.

Comment ID

782

MapApp ID

843 Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th Ave

District:

Southeast

Comment:

This area is zoned for density, but I recently viewed a development with vast surface parking lots. How can this possibly allowed. It will destroy any potential to turn Sandy Blvd into an

expanding pedestrian/bike corridor linking Hollywood to Downtown and also further east in the other direction. Please, I ask that surface lots not be allowed any more along this stretch.

especially so close in to city center. We need to have buildings that engage the street with storefronts. If there is any parking, it should be underground or a podium under a building.

really want to see the Hollywood district expand out as a mixed use corridor. Housing, retail, office. Additionally, I would really love to see a push to connect the street car from city center to Hollywood.

Comment ID

783

MapApp ID

347 Commenter

er

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address: 2116 NE 49th

District:

Northeast

Comment:

I would like to say that all the car dealerships in this area are a blight on the city, and I would love to see them bought out and converted to mixed used DENSE residential. I will also add

that I love all the density being added on these close in North-south corridors like Interstate, Williams, Etc. Please allow for the transition from blighted surface lot dealerships in this area to residential.

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

Central City

Comment:

I would love to see plans for a subway included in the 2035 plan. I believe that our city is growing and that MAX is great, but would do so much better if we had an even more rapid subway under downtown to aid commuters. This should be balanced with increasing polycentric density in the region. Meaning that Beaverton, Gresham and Clackamas have to stand

up for increased density in their urban cores for this plan to work.

Comment ID

785

MapApp ID

845 Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

Central City

Comment:

I have read other comments here disparaging \"big box\" residential developments. I would like to add my thoughts on this. We are living in a growing city. We have a plan to protect

outlying farms and ecosystems of our state-- the urban growth boundary. That means infill, We need to allow people to add units on their property in their backyards. This way density

can happen without too much disruption. However, I must add that I am always for density over charm. Someone does not own the charm of their neighborhood. Nor do they have the right to create ghettos in other parts of the city to preserve charm. I want there to be less restrictions on demolitions. I want there to be increased density zoning in these close in neighborhoods. I want to see more multi-story multi-family developments. I want to see parking minimum requirements removed again from zoning. We need to encourage a car-free lifestyle! I want to see better connectivity for transit. Some of these \"quaint\" neighborhoods will now be served by the Orange Line, It would be a travesty to prevent development because someone is worried about a shadow or losing a parking space they don't even own. We should simply make it easier for someone to put in a driveway if they are so concerned

about their personal vehicle that is substantially subsidized in all ways in this country. Please, please, allow for density in the city center, We must not go the way of San Francisco and

end up with absurd rent rates because land owners get to speak up above renters. We need more supply, point blank. That means density because I refuse to believe that sprawl at

hinterlands is better for us than density in places like Eastmoreland.

Comment ID

786 MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

West

Comment:

I want to encourage microapartments in this area with no parking requirements. This is a neighborhood close to downtown and transit. It makes no sense to discourage density, whatsoever.

Comment ID

787 MapApp ID Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49

District:

Southeast

Comment:

I want to encourage more development here that doesn't include auto parking. I want dense residential with ground floor retail.

Comment ID

788 MapApp ID Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

Southeast

Comment:

I would like to second that opinion. I don't want to see close in neighborhoods with blighted surface lots. There shouldn't even be a parking minimum requirement! We need to continue to encourage density close in.

789

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

Southeast

Comment:

I want to see increased residential and mixed use density in this area. It already seems to be spilling over onto Glisan, which I love. Please encourage more multi-family mixed use mid

rises to be built here.

Comment ID

790

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

Southeast

Comment:

I want to see this corridor to become something akin to Williams or Division. We need to be removing the surface lots, slowing down traffic on 82nd, and allowing for much more pedestrian and bike use. 82nd is only blighted because it is a drive through region. We need to change that. We need mixed use residential, It is so close to the green line MAX that it is absurd that this is not being encouraged along 82nd. Also, and increase in density will mean an increase in the vigilance of citizens. The crime rate will fall,

Comment ID

791

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49

District:

East

Comment:

I believe this comidor should be zoned for maximum density. We should also add a street car to improve the mobility of people without an auto. We need to move away from auto-

planning in east Portland. It\'s absurd that it has been allowed to continue for so long.

Comment ID

MapApp ID

855 Commenter

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address: 2116 NE 49th

District:

East -

Comment:

It is absurd to down zone any residential area in this city when we are growing within a boundary set by law. Do not reduce density here. Encourage more density! More transit! More retail! More biking infrastructure! We cannot have enclaves that will cause the rents in the rest of the city to increase. There needs to be options for density even in locations such as this. Especially so close to 122nd, which is primed to be a transit corridor and should densify.

Comment ID

793 MapApp ID Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49th

District:

East

Comment:

It is absurd to down zone any residential area in this city when we are growing within a boundary set by law. Do not reduce density here. Encourage more density! More transit! More retail! More biking infrastructure! We cannot have enclaves that will cause the rents in the rest of the city to increase. There needs to be options for density even in locations such as this. Especially so close to 122nd, which is primed to be a transit corridor and should densify.

Friday, June 05, 2015

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Ord. 187831, Vol. 2.3.A, page 6031

794

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

.9/12/2014

Address:

2116 NE 49

District:

East

Comment:

It is absurd to down zone any residential area in this city when we are growing within a boundary set by law. Do not reduce density here, Encourage more density! More transit! More retail! More biking infrastructure! We cannot have enclaves that will cause the rents in the rest of the city to increase. There needs to be options for density even in locations such as this. Especially so close to 122nd, which is primed to be a transit corridor and should densify.

Comment ID

795

MapApp ID

858 Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address: 2116 NE 49th District:

East

Comment:

It is absurd to down zone any residential area in this city when we are growing within a boundary set by law. Do not reduce density here. Encourage more density! More transit! More retail! More biking infrastructure! We cannot have enclaves that will cause the rents in the rest of the city to increase. There needs to be options for density even in locations such as this. Especially so close to 122nd, which is primed to be a transit corridor and should densify.

Comment ID

796

797

MapApp ID

Commenter

Kevin mowrey

Date Received:

9/14/2014

Address:

6164 fernbrook st

District:

West

Comment:

Yes. Please do (extend that path).

Comment ID

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

2116 NE 49th

District:

Southeast

Address: Comment:

I disagree with this downzoning, I believe any neighborhood so close to center city should be encouraged to densify and provide commercial corridors if there aren't any currently.

fact that this is a sleepy neighborhood so close to the city center is absurd. There needs to be an allowance here for mid-rise, mixed-use development. We cannot continue to protect wealthy, close in neighborhoods while allowing the ghettoization of suburbs as a result. It is completely at odds to the urban growth boundary. Please encourage more density here, more transit, more pedestrian access, more retail, more bike infrastructure. Once again, I feel preserving a \"quaint\" atmosphere is absurd when we are talking about the ability of people to live affordably in the city. If we continue to stifle density, we will end up with absurd rents like in San Francisco. I understand homeowners seem to think they own their homes

and a ten mile radius around them, but they do not. We need to be thinking about equity for all, not just the few in these affluent places.

Comment ID

MapApp ID

Commenter

Jonathan Edwards Greenwood

Date Received:

9/12/2014

Address:

2116 NE 49

District:

Central City

Comment:

Please only consider the SW corridor as a MAX project. BRT is pointless and will be just as expensive if it were to be high capacity. We already have a MAX system in place that can handle adding the SW corridor. Tigard is in dire need of a MAX connection.

Friday, June 05, 2015

Page 139 of 459

Ord. 187831, Vol. 2.3.A, page 6032

MapApp ID

Commenter

Katie

Date Received:

District:

9/10/2014

Central City

Address:

Comment:

While I think it is hard to specify house architecture style I strongly support the proposal to re-zone Eastmoreland to R-7. I recently moved in to the neighborhood for the very reason that the lots were on average larger. The actions of developers (Renaissance seems like the big one) to cram huge house on small lots takes away from what made this neighborhood

somewhat unique from the start. Not to mention that the infrastructure (schools, roads, etc) seem to be bursting at the seams at the current density.

Comment ID

MapApp ID

Commenter

Margaret Davis

Date Received:

9/10/2014

Address:

3617 NE 45th Ave.

District:

Northeast

Comment:

I disagree with change of zoning to Mixed Use and advocate for this section of Fremont from NE 33rd to NE 57th to be Neighborhood Commercial (CN2). The primary reason is lack of good street connectivity due to Alameda Ridge terrain and, north of Fremont, few north-south thoroughfares (for example, streets from 43rd to 46th end at Beech). In that area,

are no continuous sidewalks along the south side of Beech, meaning that many children on their way to school, and other neighborhood residents, must walk in or cross the street at unregulated intersections. In addition, there are no continuous sidewalks along NE 47th north of Fremont so people who live in large swathes of Beaumont-Wilshire and Cully have no safe, direct access to the Fremont businesses meant to serve them. Rose City Cemetery further inhibits access to businesses and limits traffic/parking options. Mixed Use zoning would bring more traffic to an area with an overburdened street system, reduced transit, and few accommodations for pedestrian/cyclist safety. Rush hour traffic stretches east-west for

four blocks at the light at NE 41st Ave. Fremont business owners already complain about lack of parking for patrons and staff, exacerbated by recent construction of a 50-unit apartment building without parking A¢a, ae diges, those residents did bring cars. Lots of them. Many streets leading to Fremont are so narrow they become one-way when cars are

parked on both sides of the street. I have lived in this neighborhood since 1998 and have heard/seen an uptick in accidents with drivers entering Fremont with low visibility, despite a reduction in the speed limit to 20 mph. Fremont has parking where normally it would not be permitted (for safety reasons? worth investigating), per Matthew Machado at PBOT. The area in question is along south side of Fremont opposite where Northeast 45th meets it on the north (where the yellow square is on the map-not sure what the yellow square signifies.

however). TriMet no longer provides direct service to downtown from the neighborhood via the Fremont bus, and the bus does not run on weekends, and infrequently on weekdays, making neighborhood residents and businesses more car-dependent than most. Numerous homes in this area are modest one-story bungalows âà,¬à€ □i.e., the last of our \"affordable

housing\"ââ,¬â€

aland states demonstrate the analysis and states are seen and deprive the

Comment ID

769

MapApp ID

Commenter

Doug Klotz

Date Received:

9/10/2014

Address: 1908 SE 35th Place District:

Southeast

Comment:

I don't see the difference between large lots here and large lots in other parts of the city. All parts of the city have a responsibility to accept greater density to reduce the need for UGB

expansion, to allow more compact neighborhoods and 20-minute neighborhoods. The R-5 Comprehensive Plan designation should remain, for these reasons, and for equity with the rest of the city. \"Characten" is used everywhere to keep neighborhoods exclusive, and should not be a valid reason to avoid policies that serve the rest of the city.

770

MapApp ID

Commenter

Doug Klotz

Date Received:

9/10/2014

Address:

1908 SE 35th Place

District:

Southeast

Comment:

The comments from the Eastmoreland homeowners here reek of exclusivity, snobbery, and privilege. Of course, they are couched in acceptable terms like \"neighborhood character\".

\"architectural achievement\", and proximity to the \"revered\" Reed College. I don\t believe Eastmoreland is more important that the rest of the city, and should not be exempt from doing their part toward furthering city goals. Is this an Historic District? If not, then \"neighborhood character\" should not be preserved by keeping out others who wish to live there with artificial zoning restrictions,

Comment ID

771

Commenter

Doug Klotz

Date Received:

9/10/2014

Address:

1908 SE 35th Place

Southeast

Comment:

Do some research on the Urban Services Boundary, and you will see how the city can apply zoning outside the city.

Comment ID

MapApp ID

MapApp ID

835 Commenter Doug Klotz

Date Received:

9/10/2014

Address:

1908 SE 35th Place

District:

District:

Southeast

Comment:

We should hope that the land along Powell becomes something more than a Civic Corridor, and becomes indeed an Urban Center. This designation will allow more needed density along Powell, depending on how the Mixed Use zone definitions develop.

Comment ID

773 MapApp ID 836

Commenter

Nick Falbo

Date Received:

9/11/2014

Address:

7931 SE Raymond Ct

District:

Southeast

Comment:

This stretch of Foster road has many street-facing structures, which could be supported with stricter storefront commercial style zoning. There are many empty lots, and when they are

redeveloped, lets make sure they develop in a way that supports pedestrian activity and a main-street style feel.

Comment ID

774 MapApp ID

Commenter

Alex Reed

Date Received:

9/11/2014

Address:

6127 SE Bush St

District:

Southeast

Comment:

I would prefer this area to be zoned CS or CX. CG requires 15% of the land area to be landscaped and I believe has a minimum parking requirement where CS and CX have none. In

major-street context like Foster, that usually means buildings further from the street, an often-neglected strip of lawn or plants, parking lots fronting the street, and more of an autooriented street feeling than a pedestrian-street feeling. For example, the Burger King at 50th and Foster probably has 15% of its land area landscaped and lots of parking. Do these elements really add to the neighborhood and/or City? On the other hand, George Morlan has no landscaped area and no parking - and these elements make walking by it feels

because the building is right at the sidewalk, with windows and a sidewalk-oriented entrance. The George Morlan parcel is the little gap-tooth area between 54th and 56th to be zoned

CX because it would be a non-conforming use under CG. More CX and CS please!

yards with trees, shrubs and gardens. There are great parks, nearby shopping districts, public transportation, and quality schools. Zoned R-5, nearly all lots were 5000 square feet or larger with considerable lot differences from block to block. A variety of houses were built over the years (half before World War II), many one story and low two story houses, and some large houses. Ladd Estates and zoning required a 25 foot set back, and houses (big or small) comfortably fit on the lots. Sometime in the 1990s, the city changed the rules for the zones allowing for the use of smaller lots and the division of some lots into smaller lots. Just outside the neighborhood, several ¢ā,¬Ā*skinny housesĀ¢ā,¬Ā\$ Since then we have seen:Ā¢ā,¬Ā¢ A 2976 square feet empty lot was developed with an ugly tall/narrow house and neighbors were not happy, but accepted it. Ā¢ā,¬Ā¢ An old one story

□ appeared.

house was torn down and a two and a half story house was built dwarfing neighboring houses in height and size and leaving small back and side yards. Neighbors complained. Ģå,¬Å¢Another one story house built in 1926 was purchased for \$425,000; the developer wanted to divide the lot, build two large million dollar houses on lots of 3800 square feet with

little back and side yards. It would not have been allowed under the old rules; it was approved under current rules; it would not be approved under the proposed R-7 rules. ¢ā,¬Â¢ A

farmhouse from the 1920s was torn down and two houses were built towering over the neighbors. ¢ā,¬Ā¢ A quaint little house was remodeled into a huge house. For three years residents and the Eastmoreland Neighborhood Association have been suggesting changes to the city on housing height, percent of property covered, setbacks, compatibility, lot division, and change to the R-5 rules or a change to R-7. The city has proposed only a change to R-7 if the neighbors show their support. I support the change to R-7. It will prevent the worst lot divisions without affecting any already existing homes. It will reestablish some order. It will assist in maintaining a diverse housing stock.

Comment ID 465 MapApp ID 458 Commenter Noah Lynch Date Received: 8/11/2014
Address: District: Central City

Comment:

I cannot support this enough. It would be a vital connection for people movement between two surging districts.

Comment ID 466 MapApp ID 460 Commenter Doug Klotz Date Received: 8/11/2014

Address: 1908 SE 35th Place District: Northeast

Comment:

It seems like a step in the wrong direction to down-zone areas that are close to the central city, and have capacity to grow, and have shown economic viability of growth.

 Comment ID
 467
 MapApp ID
 461
 Commenter
 Doug Klotz
 Date Received:
 8/11/2014

 Address:
 1908 SE 35th Place
 District:
 Southeast

Comment:

I agree that CG is the wrong zone for 50th, north of Haig. The auto-oriented zoning on Powell should not extend north on 50th. CS or the new equivalent would be a better fit. Yes, it will potentially impact some houses. An even better site for CS is the lots on the east side of 50th from Clinton south to Woodward. Half that block is apparently abandoned, and it is

anomaly of industrial zoning in this neighborhood.

Comment ID 468 MapApp ID 447 Commenter Bill Wagner Date Received: 8/10/2014

Address: 7717 SE 36th Ave Bill Wagner District: Southeast

Comment:

I think that moving to R7 is a good idea. Developers are taking advantage of the R5 zoning to tear down perfectly good houses and replace them with 2 goofy looking, down-right weird

skinny houses in their place. Small houses can be very well done, but not any of these skinny houses they are putting in here. They don't fit the lots, they don't fit the neighborhood, they

Good evening,

My name is Sarah Taylor

I have come to see you tonight from the small village of Linnton; a place nestled between the Tualatin Mountains, Forest Park, Willamette River and Sauvie Island.

For tens of thousands of years, humans recognized the value of this landscape with its confluence of two major rivers, rich wetlands, and wildlife as a perfect place for settlements. It was indeed the first European settlement in the Portland area in the 1800's.

Linnton's place in the area's natural and political history has slowly been eroded, as this once idyllic piece of bottomland has been transformed into highway, railroad and industrial storage.

We believe that Linnton is poised to offer Portland a remarkable refurbished, riverfront community with access to natural areas, commercial zones for employment and affordable housing.

When I wander First Street, I can see that "downtown" Linnton is not a working waterfront. The once busy piers are empty and cut off from the village. It is now a vast display of empty lots, deserted vehicles, and industrial storage. Nothing is dependent on a once vibrant waterfront. Our small, hillside roads are clogged with people driving to work in St Helens and Beaverton. A walk, ride and bike culture to Swan Island and Portland is not possible.

In a city, that is begging for more small communities and affordable housing I ask you to consider Linnton. Dream with us as we work to transform the area from 107^{th} to 112^{th} into a historically and environmentally significant town center with opportunities for housing, employment and recreation from St Helens Road to the Willamette Greenway.

Clear this greenway of industrial storage with few jobs and replace it with a model neighborhood. We made this request in 2005 and stand before you making it once again. I invite you to walk with us and see what has become of the once proud villages of Linnton. Walk with me and see what can be.

Sarah Taylor sarahsojourner@mac.com 503-805-4680

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3	Goughnour, Cat	6/23/2015	http://youtu.be/UGR0of2iwUI	00:51:44
4	Gibbon, John	6/23/2015	http://youtu.be/UGR0of2iwUI	00:55:05
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18	Heltzer, Tim	11/4/2014	https://www.youtube.com/watch?v=gw14idFCL7M	01:35:01

19	RedThunder, David	11/4/2014	https://www.youtube.com/watch?v=gw14idFCL7M	01:38:24
20	Gibbon, John	11/4/2014	https://www.youtube.com/watch?v=gw14idFCL7M	05:08:00
21	Sanchez, Linda	11/4/2014	https://www.youtube.com/watch?v=gw14idFCL7M	05:06:21
22	Klotz, Doug	11/4/2014	https://www.youtube.com/watch?v=gw14idFCL7M	03:40:44
23	Chung, Terry	11/4/2014	https://www.youtube.com/watch?v=gw14idFCL7M	04:31:52
24	Peterson, James	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	03:28:46
25	Dixon, Richard	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	03:31:00
26	Lahsene, Susie (Port of Portland)	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	1:33:00
27	Wax, Ellen (Working Waterfront Coalition)	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	01:31:39
28	RedThunder, David	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	01:17:31
29	Spevak, Eli	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	01:14:15
30	Klotz, Doug	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	03:40:44
31	White, Mark	10/28/2014	https://www.youtube.com/watch?v=S- vdeg5BXkQ&feature=youtu.be	03:37:37
32	Theisen, Greg (Port of Portland)	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	01:41:48
33	Boullion, Tom	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	01:38:24
34	Roxburgh, Janet	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	00.40.23

35	RedThunder, David	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	00.43.35
36	Klotz, Doug	9/23/2014	<pre>https://www.youtube.com/watch?v=gEBkKehYjrc&featur e=youtu.be</pre>	01:52:46
37	Sternberg, Bruce	9/28/2014	<pre>https://www.youtube.com/watch?v=gEBkKehYjrc&featur e=youtu.be</pre>	01:51:07
38	Gibbon, John	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	02:04:09
39	Ferguson, Pamela	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	02:08:21
40	Peterson, James	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	01:07:41
41	McCarthy, Carol	9/23/2014	https://www.youtube.com/watch?v=gEBkKehYjrc&feature=youtu.be	01:10:04