

**Arevalo, Nora**

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**From:** mary batson <batsonmary081@gmail.com>  
**Sent:** Wednesday, April 27, 2016 5:36 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Email submitted from Paul van Orden I am in complete agreement with the issues outlined in Paul's testimony to you. I have lived in my neighborhood for most of my 63 years and find my opinions about the changes affecting my neighborhood entirely igno...

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

## HI NoON

Hayden Island NeighborhOOd Network  
Jeff Geisler, Chairman

[jeffgeisler@msn.com](mailto:jeffgeisler@msn.com) 503 936-2425 Cell/Text

Website: [myhaydenisland.com](http://myhaydenisland.com)

Dear Mayor Hales and members of the City Council,

On behalf of the members of HiNOON (Hayden Island Nghbrhd. Network) I would like to submit the following comments regarding the proposed Comprehensive Plan amendments.

### Oppose Amendment M70 by Mayor Hales:

**No to a Local Access Only Hayden Island Bridge.** The CRC never presented a Local Access Bridge Plan that solved the congestion around Hayden Island, especially during morning and afternoon commuter hours with or without a new I-5 Bridge. However, as the need for a seismically designed bridge built to today's standards remains a safety issue, HiNOON suggests support for a Light Rail Bicycle-Pedestrian Bridge like the Tilikum Crossing Bridge; which would land on LOTTERY ROW.

Note that below HiNOON accepts the designation of Neighborhood Center which would allow more commercial and residential development in that zone up to a 45foot height.

### Accept Amendments P19 and P25 By Fritz and Hales respectively:

**Yes to the designation of Neighborhood Center for Hayden Island.** Hayden Island would benefit from the additional Mixed-Use business-residential development, especially via a Tilikum Crossing Light Rail style bridge to this proposed Neighborhood Center area and restore our commercial center where Lottery Row exists. Additional benefit of this bridge would open another north bound auto lane to Hayden Island via the existing bicycle-pedestrian lane located on the east side of the bridge from the Marine Drive clover-leaf.

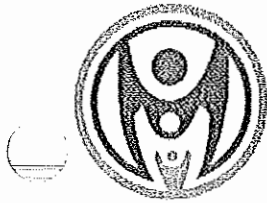
**Yes on P48** Please PRESERVE Manufactured Home Parks. However HiNOON rejects a 30'+ wide Pedestrian-Bicycle Trail around our Manufactured

Home Community as proposed in the 20 Year Comp Plan. This Trail would eliminate 112 Manufactured Homes in the Manufactured Home Park.

**No on P32** HiNoon enjoys our few Dive-through businesses: Starbucks; Taco Bell; Burger King and Wells Fargo.

**No on P81 Proposed Trail around Hayden Island** HiNoon opposes any Bicycle-Pedestrian Trail on the Island which would jeopardize 112 existing manufactured Homes and create exposure of private business and residential properties to potential criminal activity by transients and roaming burglars. All housing on Hayden Island is controlled by individual Home Owner Associations that have limited money for security.

Thank you  
Jeff Geisler  
Chair of HiNOON  
[jeffgeisler@msn.com](mailto:jeffgeisler@msn.com)  
11614 N Island Cove Lane  
Portland, OR 9727  
503-936-2425



**OPAL**  
Environmental Justice Oregon

opalpdx.org

2407 SE 49th Ave. Portland, OR 97206 | 503-342-8910

April 27, 2016

RE: Comprehensive Plan Policies 2.11, 8.117, 8.118

Members of City Council,

OPAL Environmental Justice Oregon builds power for environmental justice and Civil Rights in our communities. We develop leadership within low-income communities and communities of color around issues of environmental and social justice through grassroots organizing and policy advocacy. We address the intersection of transit, housing and health equity through an environmental justice framework focused on both distributive and procedural outcomes, utilizing popular education, policy and power analyses, issue briefings, and strategic alliances to advance issues that have been prioritized by our constituents and, more broadly, low-income communities and communities of color in the metro region.

The Comprehensive Plan update offers groups such as OPAL an opportunity to weigh in the fundamental framework that determines where we live, work, play and learn in the City of Portland. As an organization, we have weighed in on a number of issues that pertain to specific aspects of livability in the Comprehensive Plan, however it has come to our attention that one key aspect of our modern lives is up for debate.

During its consideration of the Comprehensive Plan, the Planning and Sustainability Commission developed several policies that fit under the broad heading of Digital Inclusion. These include Policy 2.11 "Open Data" and Policies 8.117 and 8.118 which are generally targeted at "Broadband Equity". There are objections to these policies as being beyond the scope of what should be in the Comprehensive Plan. Amendments to these policies, specifically P11, P68 and P85, would significantly weaken these policies recommended by the Planning and Sustainability Commission. We urge you to reject these amendments in the final adoption of the plan.

Being forced to choose between paying for food and housing or having Internet access makes it difficult for many low-income families to rise above their current circumstances. This inequality of access to the online world is an issue that has a profound effect on academic success and economic opportunity.

Thank you for your consideration,

Vivian Satterfield  
Deputy Director

Building Power for Environmental Justice  
and Civil Rights in Our Communities

Ord. 187832, Vol. 1.3.B, page 3554

**Arevalo, Nora**

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**From:** M Sean Green <seangreen@mac.com>  
**Sent:** Wednesday, April 27, 2016 4:47 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive plan testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear City Council,

I am writing regarding the proposed amendments to the comprehensive plan. My primary concern is regarding TSP # 40166, the 9th Ave greenway plan that is to be split off with a 7th Ave alignment from Weidler to Sumner.

I urge city council **not** to accept this amendment, and to retain as a **priority** the planned NE 9th Ave Greenway.

I previously submitted some testimony regarding this project, but new information has come to light that merits mention. I would like to mention to the Council that I had great difficulty obtaining information from PBOT and other responsible city departments, all of whom have completely ignored by requests for public records made in January of this year. Information regarding public testimony has either been withheld or provided to interested parties mere days before relevant deadlines. I get the distinct impression that city planners do not want to consider public input - a stance that I believe is understandable, but short-sighted and mistaken.

Since my previous testimony, I have found out that the most recent traffic data for this segment of 7th Ave date to 2013. Those counts and vehicle speeds are wildly incompatible with 7th Ave becoming a greenway.

I have also found that the estimates provided by PBOT for the costs of this project are (by their own admission) "rough" and unlikely to be accurate, they also do not include the costs of removal of the five median rounds present - which are a clear hazard for bicyclists already. Since 9th Ave would not need diverters, removal of median rounds, speed bumps, etc - I have great difficulty understanding why the current estimates indicate that 9th Ave alignment would be double the cost of the 7th Ave alignment.

The other portion of this project - the 9th Ave portion through Lloyd - is to be split off as TSP # 20122. There is no information about how the 7th Ave alignment would be connected to the Lloyd 9th Ave project; presumably this would require additional study and funds.

Although others have stated that the amendment has the support of neighbors and various associations, it is far from clear what affected residents actually think. My own neighborhood association (ICA) apparently agreed to support this without any quorum or vote, and the decision was taken before neighbors were informed of either the original or modified plans. Many of us believe that this change in alignment will be dangerous and damaging to our neighborhood. An earlier statement of concern had ~ 80 signatories, and a recent [change.org](http://change.org) petition in 2 days has garnered 48 supporters.

[https://www.change.org/p/portland-or-support-a-ne-9th-ave-greenway-in-portland-regon?recruiter=532245560&utm\\_source=share\\_petition&utm\\_medium=copylink](https://www.change.org/p/portland-or-support-a-ne-9th-ave-greenway-in-portland-regon?recruiter=532245560&utm_source=share_petition&utm_medium=copylink)

Petition reproduced below:

We support the original plan to create a greenway along NE 9th Avenue. We oppose changing the alignment to NE 7th Avenue, and believe that this change would be ill-advised and dangerous.

City council is about to consider a change to the existing plan for a 9th Avenue Greenway. Currently planned for the first or second decade of the 2035 comprehensive plan (TSP #20122), this greenway will be split into two projects - in the first decade the proposed 9th Ave greenway (now split off as tsp #40166) would be moved to 7th Ave from Weidler to Sumner, and the 9th Ave bikeway from Lloyd to Tillamook (remaining TSP #20122), would be pushed back to the second decade. Planning staff indicate the entire rationale for this change on p. 105 of the amendments document:

"Public comments indicated strong support for the 7th/9th Bikeway project to the north of the Lloyd District, but the segment of 9th Ave through the Lloyd District itself was heavily opposed by key stakeholders. Staff recommendation is to split the project into two segments, project 20122 (see page 1) and project 40116. Public comments from Eliot, Irvington, Boise, King, and BTA also supported a 7th Ave alignment from Lloyd District to Sumner."

We support the original plan to create a greenway along NE 9th Avenue. We oppose creating a greenway along NE 7th Avenue, and believe that this new alignment is ill-advised and potentially dangerous. The city defines these boulevards or greenways as:

"Neighborhood Greenways are residential streets with low volumes of auto traffic and low speeds where bicycles and pedestrians are given priority."

and further explains the character of these streets:

" Vehicles should travel 20 mph or less; There should be a daily average of approximately 1,000 cars per day with the upper limit set at 2,000 cars; There should be ample opportunities for people bicycling and walking to cross busy streets, at least 50 crossing opportunities per hour, with 100 crossing opportunities per hour the preferred level of service."

Although greenways have been proposed at both locations, 7th Avenue is inappropriate for this type of use. NE 7th Avenue is a two-lane + parking street designed as a neighborhood artery or collector - that in 2013 accommodated up to 5500 cars daily, 417 cars/hr, with ~ 60% of cars exceeding the posted limit (25 mph).

This volume of traffic is simply not compatible with the safety, much less priority, of bicyclists and pedestrians. In an attempt to reduce traffic flow and speeds to anywhere near acceptable levels, multiple diversions preventing through-traffic on 7th Ave are needed. Additionally, there are median rounds at five locations along this segment of 7th Ave that already endanger bicyclists, by forcing them into the path of autos and trucks at these choke points - the proposed change does not take into account the high cost of removing these dangerous features.

The proposed 7th Ave alignment would divert ~4000 of those cars onto adjacent, one-lane residential streets, both small east/west neighborhood streets and the adjacent N/S 8th Ave. The current proposal does not offer any way for those streets to protect their residents from this overflow traffic. Already, whenever there is construction on 7th avenue, the rest of the neighborhood sees an enormous documented increase in traffic and speeding cars along their narrow streets.

In contrast to 7th Ave, traffic on NE 9th Ave is light enough that there are no traffic counts available at all. Speeds appear to be much lower. The existing alignment along 9th Ave will be much, much safer; will not result in damage to adjacent streets; will probably be less expensive (diverters and removal of median rounds

are not needed); and will be more easily reconciled with the existing Lloyd segment plan (TSP #20122).

We agree that the residents of NE 7th Avenue need more traffic-calming measures to lessen and slow overflow traffic from MLK (the adjacent N-S Boulevard) on their street. The solution, however, is not to turn 7th into a greenway; this would be unsafe, and would create far more problems than it would solve. Instead, we support the original proposal: to make it a priority to convert NE 9th Avenue into a greenway in the first decade of the 2035 plan.

We urge city council not to accept this amendment, and to retain as a priority the planned NE 9th Ave Greenway.

Sean Green

2618 NE 8th Ave  
Portland, OR 97212

**Arevalo, Nora**

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**From:** Jeremy Keith Spencer <jeremy.k.spencer@gmail.com>  
**Sent:** Wednesday, April 27, 2016 4:30 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Please make NE 7th Ave. a "major city bikeway"

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

I ride all over Eastside, especially NE, all year long and have done so for almost a decade. As a prime "major city bikeway" in the making, NE 7th makes so much more sense. And, as for NE 9th, I can't understand why the city would even consider running a bikeway thru a park vs. alongside it. [Not to mention crossing the park and then crossing Fremont, sans light, is much slower, and the path thru Irving Park wiggles up, down, and around past a playground and off-leash area.] I've ridden the lengths of NE 7th and NE 9th countless times, and I've always wished 7th was a cycling superhighway and that you didn't have to divert to 12th to cross the Banfield. And 7th already has speed humps, multiple four-way stops, lights, and lots of cycling traffic. I have also read that NE 7th would cost \$1 million less than the proposed NE 9th option.

Please make NE 7th Ave. a "major city bikeway." It's the most logical choice and will provide the most long-term benefit to the neighborhoods and the city.

Thank you,

Jeremy Spencer  
4316 NE 7th Ave.  
Portland, OR 97211



**Arevalo, Nora**

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**From:** Scott Fernandez <scottfernandez.pdx@gmail.com>  
**Sent:** Wednesday, April 27, 2016 4:29 PM  
**To:** Moore-Love, Karla; BPS Comprehensive Plan Testimony; Scott Fernandez  
**Subject:** RE: Comp. Plan Testimony - Recommend Policies that allows the City to act on Toxic Air Quality

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Karla ,please enter this into public testimony for Portland Air Quality testimony.

Thank you,

Scott

#### PORTLAND'S TOXIC AIR- A PUBLIC HEALTH CRISIS

By Scott Fernandez M.Sc. Biology chemistry/ microbiology

Oregon has the third largest population at risk of excess cancer due to air pollution behind only California & New York. (USEPA National Air Toxics

Assessment). 117 Oregon schools fall into the worst 10% nationally for exposure to industrial pollution. (USEPA). Diesel particulate matter (from trucks,

construction equipment and rail yards) is responsible for approximately 460 premature deaths a year in Oregon. That's more than those who die from

homicide and drunk driving, (USEPA) (Neighbors for Clean Air).

When Southeast Portland residents heard there could be toxic metals in the air they breathe they were understandably angry and concerned for their health and their family. Thank you US Forest Service for your efforts in identifying these toxic and carcinogenic chemicals.

The Oregon Department of Environmental Quality (DEQ) and city officials have known about these toxic and carcinogenic chemicals i.e., cadmium for over a decade; such as hot spots in North/Northeast Portland. It was testified at the Tubman School town hall that little had been done by officials to address the issue. State environmental regulators have been criticized since public disclosure of results February 3, eight months after learning about the heavy metal discoveries such as arsenic, then chromium, lead, and nickel in addition to cadmium.

Public health and wellbeing have been placed at high risk while state and city officials have done little to address these issues. Being 3<sup>rd</sup> worst in the nation in air quality, state officials should have

strengthened our regulations to meet the needs of the community and told polluters to provide absolute-removal filtration systems.

The most important policies the state was not aggressively pursuing were the advancement of stronger air quality regulations. This would have allowed reducing, and eventually eliminating toxic chemicals through permitting and tightening filtration engineering improvements. Now, we are caught in a critical public health dilemma that did not need to happen as we discover more toxic contaminants.

EPA has recognized that the “one size fits all” approach is outdated. In 2012 a *Federal Register* notice to California EPA provided a waiver as part of their State Implementation Plan (SIP) allowing stronger air quality standards; providing cleaner air by moving away from the one size fits all. Revision of the Oregon State Implementation Plan and help from elected officials can move us into a direction to also obtain a waiver allowing tighter air quality regulations. This could lead us to a zero tolerance maximum contaminant level for healthier air quality. For this to happen elected officials must hear community voices speaking up for healthy air quality.

City of Portland (Comprehensive Plan Update August 2015) and State of Oregon use “ambient benchmark concentration” as their “one size fits all” standard. All ages of community members comingled together does adequately provide meaningful individual specific risk assessments. EPA Safe Drinking Water Act clearly and distinctly acknowledges differences between children and adults. So should the state and the city and dismiss this “one size fits all” approach. Children are not smaller versions of adults. They have increased respirations per minute compared to adult allowing greater contaminant exposures per body weight. Children also have developing immune, nerve, and bone systems much different than adults. Chemicals such as cadmium, lead, etc. can cross the placenta negatively impacting fetal development milestone processes. Chemicals can also be found in breast milk.

The chemicals chromium, cadmium, lead have been identified as **metalloestrogens**. These toxic and carcinogenic chemicals interfere with estrogen pathways and can be associated with breast cancer, etc. The City of Portland and state officials need to stop industrial exposures of the heavy metals, fluorine, Volatile Organic Compounds, petroleum emissions, and other harmful air contaminants. We have had enough of toxic and carcinogenic heavy metal chemical exposures, inadequate air filtration, information withheld from community, along with the uncertainty and deep concern for children’s health in the City of Portland and the State of Oregon. Portland needs to begin process of establishing Regional Air Quality Authority.

Scott Fernandez

1821 NE 65th

Portland, Oregon

503.282.1894

**Arevalo, Nora**

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**From:** PATRICK HILTON <patrickhilton@yahoo.com>  
**Sent:** Wednesday, April 27, 2016 4:11 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Testimony on Amendment 45  
**Attachments:** Patrick Hilton-Testimony on Amendment 45.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Day,  
My name is Patrick Hilton. I am a Portland resident, urbanist, architectural designer, and micro-housing advocate. I was signed up to speak at the commission meeting on April 20, 2016 but the time ran out and I couldn't testify.

I would like to express my testimony that I am against Amendment 42 and 45 as I have read and understood them. I would like to talk about 45 in particular.

I feel that there is a very large bulldozer sized loophole in this amendment that will have horrible consequences for Portland's disappearing legacy of great places.

All of the new apartment construction that has taken place in Portland has not resulted in lowered rents, but it has resulted in a lower quality of life for working class residents of Portland. Overbuilding is not the answer.

The economy of Portland is dependent on historic neighborhoods being preserved. The inner, historic neighborhoods are tourist destinations. Tourism brings millions and millions of dollars directly into the local economy. To allow the removal of these neighborhoods to be replaced by generic buildings with no style will result in a loss of tourism that can never be recouped.

These neighborhoods are Portland's only "authentic" places. They ARE the Portland brand. This Portland "brand" is what entices tech companies and others to invest and move their locations here. Without these places, Portland does not have much to offer that is different from any other generic suburban location in the U.S.

"Charm" is worth lots of money to our local economy and it is being squandered for short-term development profits. Only time and history can create authentic, charming places that create the best new ideas of tomorrow. You cannot reproduce it. Stumptown Coffee, VooDoo Donuts, Pok Pok, etc. all started and grew out of old buildings. To quote urbanist Jane Jacobs, "Old ideas can sometimes use old buildings but new ideas must use old buildings"

Gentrification is when you take a building and fix it up to increase its value. Degradation is when you take away the value of something. Portland's historic core is being badly degraded. The long-term value of these neighborhoods is at risk with this amendment if the existing houses can be demolished to build multiple new units on a property.

THIS IS AN EQUITY ISSUE....

The working class cannot afford new construction and with this amendment affordable housing that is already in these neighborhoods will vanish at an astounding rate.

I believe this amendment would be GREAT if....

- 1) You must keep the existing home on the property. This will keep the scale and character of the neighborhood intact despite adding units to the neighborhood.
- 2) Protections for renters of the existing home on the property so they cannot be displaced by new development on the property.
- 3) A city program to provide ownership opportunities for micro-housing that will be allowed by this amendment. Allowing for overpriced units to be built and rented does not help anyone except landlords. Ever more rentals and fewer homes available that families can buy keep us all indentured servants of the 1%.

PLEASE DO THE RIGHT THING AND STOP THE DEGRADATION OF PORTLAND'S TREASURE OF HISTORIC PLACES!!!!  
STOP THE DISPLACEMENT OF PORTLAND'S WORKING CLASS RESIDENTS THROUGH INNOVATION!!!!

DO NOT SELL OUT PORTLAND'S ECONOMY TO PROVIDE FOR FUTURE RESIDENTS THAT AREN'T EVEN HERE YET.  
...PROVIDE FOR THOSE HERE NOW AND THE FUTURE WILL BE SECURE...

Good Day,

My name is Patrick Hilton. I am a Portland resident, urbanist, architectural designer, and micro-housing advocate. I was signed up to speak at the commission meeting on April 20, 2016 but the time ran out and I couldn't testify.

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**PLEASE DO THE RIGHT THING AND STOP THE DEGRADATION OF PORTLAND'S  
TREASURE OF HISTORIC PLACES!!!!  
STOP THE DISPLACEMENT OF PORTLAND'S WORKING CLASS RESIDENTS  
THROUGH INNOVATION!!!!**

**DO NOT SELL OUT PORTLAND'S ECONOMY TO PROVIDE FOR FUTURE RESIDENTS  
THAT AREN'T EVEN HERE YET. ...PROVIDE FOR THOSE HERE NOW AND THE  
FUTURE WILL BE SECURE...**

**Arevalo, Nora**

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**From:** Robin Tovey <robin.tovey@gmail.com>  
**Sent:** Wednesday, April 27, 2016 4:01 PM  
**To:** BPS Comprehensive Plan Testimony; Hales, Mayor  
**Subject:** Comprehensive Plan Testimony: zoning amendment M74

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To the city council members considering amendments to the Draft 2035 Comprehensive Plan:

I write to you in support for zoning amendment M74 to change Eastmoreland zoning from R5 to R7. I live and work in the neighborhood, and it is my hope that this amendment will help avert further home demolitions and residential infill. I was recently informed of an "intent to demolish" the home directly behind mine, and I fear that two narrow houses will be built to fill the entire lot. If such homes were to be reasonably affordable by my friends and coworkers at Reed College, I'd be all for it; however, if other recent development in Eastmoreland is any example, this won't be the case (I suspect that they'll each cost more than the existing home!). The influx of high-end houses going up weekly changes the livability of the neighborhood, threatens historic preservation, and does not enhance diversity. This last aspect is the most distressing. There is little to be gained by resisting change for the sake of preserving status quo, yet accepting this kind of change serves nobody except the profit-driven developers. Support for R7 zoning is not a vote for privileged exclusivity, it is actually a vote for more realistic and more diverse socioeconomic access.

Thank you for your consideration of the difference.

Sincerely,

Robin M. Tovey  
3678 SE Woodstock Blvd

**Arevalo, Nora**

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**From:** Rob Harper <robharper@gmail.com>  
**Sent:** Wednesday, April 27, 2016 3:59 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Written Testimony Opposing Amendment M42 to the Draft 2035 Comprehensive Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am a Boise neighborhood home owner and I oppose amendment M42 to the Draft 2035 Comprehensive Plan. I support much of the dense mixed use development our neighborhood has experienced over recent years, but strongly believe that redesignating this portion of the neighborhood to mixed-use CM2 would overwhelm an already rapidly growing neighborhood.

I would like to highlight that the stretch of North Fremont included in this amendment is already zoned R1 - perfect for accommodating significant dense residential development bridging our neighborhood's main street corridors at Mississippi Ave and Vancouver/Williams.

Additionally, the Comprehensive Map Street Design Classifications designates this section N Fremont as a Local Street. This 'Local Street' is already experiencing significant congestion as our neighborhood welcomes continued growth in the high density developments along Vancouver/Williams and Mississippi Avenue. In fact, PBOT recently limited the scope of a development at N Fremont and Mississippi due to traffic impacts of N Fremont at N Vancouver - one block from the proposed change in amendment M42.

As a home owner that supports growth and development in my neighborhood, I oppose M42 because it imposes an unnecessary burden on a stretch of N Fremont already perfectly situated to provide the sort of dense residential R1 development this city needs to be a more equitable and prosperous place to live.

Robert Harper  
3427 N Gantenbein Ave  
Portland, OR 97227

**Arevalo, Nora**

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**From:** Washington, Mustafa  
**Sent:** Wednesday, April 27, 2016 3:29 PM  
**To:** cschar@comcast.net  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Please vote No re Broadmoor for Industrial

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Cathy,

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

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

Thanks again,

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

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**From:** cschar@comcast.net [mailto:cschar@comcast.net]  
**Sent:** Sunday, April 24, 2016 9:57 PM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Please vote No re Broadmoor for Industrial

Mayor Hales....PLEASE. Vote No on this bad idea.  
Cathy Schar  
SE Portland



**Arevalo, Nora**

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**From:** Washington, Mustafa  
**Sent:** Wednesday, April 27, 2016 3:21 PM  
**To:** cohenalicia1 .  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: People's Co-op and the Comprehensive Plan designation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Alicia,

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

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

Thanks again,

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

**From:** cohenalicia1 . [mailto:[cohenalicia@gmail.com](mailto:cohenalicia@gmail.com)]  
**Sent:** Sunday, April 24, 2016 2:47 PM  
**To:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>; Anderson, Susan <[Susan.Anderson@portlandoregon.gov](mailto:Susan.Anderson@portlandoregon.gov)>; Commissioner Novick <[novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)>; Commissioner Fritz <[amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)>; Commissioner Fish <[nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)>; Commissioner Saltzman <[dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)>; Stockton, Marty <[Marty.Stockton@portlandoregon.gov](mailto:Marty.Stockton@portlandoregon.gov)>  
**Subject:** People's Co-op and the Comprehensive Plan designation

Dear Mayor Hales and Commissioners Fish, Fritz, Novick, and Saltzman,

My neighbors and I are strongly opposed to the proposal to change the Comprehensive Plan designation and zoning for People's Co-op from residential non-conforming to commercial. We believe that such a change would negatively impact the neighborhood, and is incompatible with the residential character of the site.

People's location is a historical quirk; there is little to recommend the site for commercial use. It sits on the corner of two local service streets, and is surrounded on all sides by residential properties. While we are happy to have the co-op as our neighbor, if it were to close, we would prefer to see the site put to residential use rather than open it to further commercial development.

As a non-conforming residential property, there are operational restrictions placed on People's regarding operating hours, outside noise, and increases in intensity of use, which are reasonable given its residential location. Conversion to commercial zoning would remove these restrictions, and the site could be redeveloped to increase the commercial intensity in a way would no longer be a good fit for the neighborhood. A new business could be open much later and make more noise than is currently allowed. We want to avoid the serious conflicts we have seen at other small commercial sites that changed use, in one case leading to violence and neighbors moving from the neighborhood.

The Hosford Abernethy Neighborhood Association (HAND) board reviewed the situation in November 2015, and voted overwhelmingly to oppose changing the site's zoning or Comprehensive Plan status. They heard from People's staff and board, the planner who made the original recommendation, and concerned neighbors, and concluded that the current status quo balances the needs of all parties.

Finally, I believe there are many other sites similarly situated around the city. I would ask that unless there is support from neighbors, you proceed cautiously when changing the zoning of these isolated commercial sites from non-conforming residential to commercial. There can be far-reaching impacts for residents, and it would be a pity if these commercial sites, which help provide services to residents and texture to the urban fabric, were to become points of contention as rules governing their use were removed.

Sincerely,  
Alicia Cohen  
2240 SE 24th Ave.  
Portland, 97214

**Arevalo, Nora**

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**From:** ALAN BROWN <ALANLBROWN@msn.com>  
**Sent:** Wednesday, April 27, 2016 3:18 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** ALAN BROWN  
**Subject:** Argay Terrace Neighborhood Association Hearing Testimony Attached  
**Attachments:** Argay Terrace NA Testimony for 4-27-16.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Our Association president was at the April 20th hearing but signed up too late to be heard at that time. He is out of town this week, and I just found out that he apparently did not arrange to have anyone take his place today. I can't get down in time to testify, but have included the testimony I could have presented.

I'm not sure quite how all of this would work, but I have attached the ATNA testimony to this email. If someone else did testify on behalf of ATNA, this attachment should be discarded, otherwise please consider it as the ATNA testimony on S9, F72, and M68.

Thanks,

Alan Brown  
Land Use and Transportation Chair

Argay Terrace Neighborhood Association 2035 Comprehensive Plan Testimony for April 27, 2016

The Argay Terrace Neighborhood Association opposes (Amendment S-9) for the K-Mart location on 122nd and Sandy and (Amendment F-72) the Rossi Farms property at SEC of 122nd and Shaver. If adopted these amendments would completely change the character of our nearly 60 year old family neighborhood. As Portland increases density, no more neighborhoods like ours will ever again be built in Portland.

Just as inner city neighborhoods deserve your protection, ours does as well. We have seen many accommodations made throughout the planning process to other neighborhoods in order to retain the residential character of those neighborhoods. We only ask the same consideration for Argay Terrace. We think the quality of life of our residents should be placed ahead of the profit oriented motives of the current owners of the still available vacant areas of our neighborhood. If people matter to the City of Portland, then our neighborhood should be allowed to remain a great family oriented neighborhood it has always been.

We recognize the need for each neighborhood to do its part. From the beginning, we have supported Mixed Employment, and Commercial uses on some of the vacant land along the eastern edge of Argay Terrace, and Mixed Employment for the Kmart site; and we support Amendment M68 for the Parkrose Post Office. We accept that we have to do our part, and we have.

We only disagree with planners on the property at NE 122<sup>nd</sup> and Shaver. Blessed with a new major city park and located a few short blocks from K-12 schools, this area should not turn into just another massive set of apartment blocks and join our inventory of historically underused commercial space.

Argay Terrace is a well maintained, largely traffic free neighborhood which by all major measures of diversity (household income, age, ethnicity) is one of the city's most diverse and is far more diverse than the city as a whole. Our opposition to the development of more apartment complexes comes from the following facts:

- At 45% apartments, our neighborhood already has one of the highest concentrations of apartments of any suburban Portland neighborhood.
- The vast majority of those apartments fall within the City's definition of "affordable housing".
- New apartment development will likely include a substantial number of families which will overload the Parkrose School District. We do not want to face the problems now found in the David Douglas District, problems which city planners are attempting to help relieve by down-zoning. Argay Terrace should be down-zoned now to prevent that problem from developing.
- In the late 1960s, Multnomah County planners saw a great demand for apartments and condominiums in outer east Portland and they re-zoned all remaining farm property in Argay Terrace R-3 to meet that demand. But, no new condominiums or apartments were built, only a retirement center and a religious facility. The rest remains as property tax subsidized farm fields.
- What the 1960s R-3 zoning did accomplish was to bring to an abrupt halt any new single family home construction in Argay Terrace. The number of unfinished dead-end streets are physical evidence of this. The subdivisions were planned out, zoning changed, development stopped - not due to a lack of demand but due to a lack of available sites.

The city has as major goals diversity and maintaining the character of established neighborhoods. All we ask is that you not destroy the established character of one of Portland's most diverse neighborhoods. Allow Argay Terrace to build out to the plans our original developers envisioned.

We ask you to reject Amendments S9 and F72, keep the Kmart site Mixed Employment, leave the commercial portion of the Rossi Farm site as configured today and designate the remaining R-3 vacant farm properties (Rossi-Giusto- and Garre) R-5 Residential to allow our neighborhood to continue to serve Portland as a good quality family neighborhood.

The Argay Terrace Neighborhood thanks you for your consideration.

Ord. 187832, Vol. 1.3.B, page 3570

**Arevalo, Nora**

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**From:** Washington, Mustafa  
**Sent:** Wednesday, April 27, 2016 3:05 PM  
**To:** Diane Chonette  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Citizen opinion re: Amendment M74 Portland Comprehensive Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Diane,

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

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

Thanks again,

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

**From:** Diane Chonette [mailto:[dianechonette@gmail.com](mailto:dianechonette@gmail.com)]  
**Sent:** Wednesday, April 27, 2016 12:08 PM  
**To:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>; Commissioner Novick <[novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)>;  
Commissioner Fritz <[amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)>; Commissioner Saltzman <[dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)>;  
Commissioner Fish <[nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)>  
**Cc:** McCullough, Robert <[Robert@mresearch.com](mailto:Robert@mresearch.com)>  
**Subject:** Citizen opinion re: Amendment M74 Portland Comprehensive Plan

Hello-

I'm a homeowner and parent in the Eastmoreland neighborhood living just beyond the proposed boundary for Amendment 74 to the Portland Comprehensive Plan. For this reason, I'm in partial support of the amendment. I feel it should be extended to cover the entire Eastmoreland neighborhood.

In the 2 years I've lived in the neighborhood, I've watched as historic homes have been leveled and the remaining modest

sized lots have been crammed with oversized, characterless houses without any yards. It's incredibly disappointing for those in adjoining lots--not only is their privacy being stripped but it's affecting property values and diminishing the overall neighborhood appeal. I've already experienced what that firsthand as a homeowner living just off bustling Division street on 32nd avenue--the very reason my family moved to the charming and quiet Eastmoreland neighborhood.

Please do your part to ensure the preservation of this historic Portland neighborhood and rezone the ENTIRE Eastmoreland neighborhood to R7.

Thank you for your time,

Diane Chonette  
3651 SE Rex Street  
Portland, OR 97202  
503-358-7578

**Arevalo, Nora**

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**From:** Washington, Mustafa  
**Sent:** Wednesday, April 27, 2016 3:04 PM  
**To:** Redisch, Meryl  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: rezoning of Broodmore Golf Course

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Meryl,

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

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

Thanks again,

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

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**From:** Meryl Redisch [mailto:merylaredisch@gmail.com]  
**Sent:** Wednesday, April 27, 2016 12:12 PM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** Fwd: rezoning of Broodmore Golf Course

Dear Mayor Hales

I am writing to express my strong objection over learning that the Broodmore Golf Course may be re zoned from open space to industrial use. As a member of the Urban Forestry Commission, I clearly need to make my views known to you and the other Council members.

In addition to the potential of losing critical natural habitat and open space that supports large canopy trees, sensitive species, and serves as an important buffer to the Columbia Slough, i am floored by this last minute effort by the owner to capitalize on this property after a mutual deal had already been made.

I have been very impressed with the environmental policies and actions that you have advanced during your term. However, i was very disappointed to learn that this amendment was brought forward by you and two Council Members. I truly hope that you will change your mind and your vote after reading and hearing from the community who are against rezoning open space to industrial use.

Thank you for considering this letter.

Sincerely,

Meryl A. Redisch



**Arevalo, Nora**

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**From:** P Vo <pvossicles@gmail.com>  
**Sent:** Wednesday, April 27, 2016 2:58 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan Testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Emailed to :

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

Subject line of email: Comprehensive Plan Testimony

April 27, 2016

Paul van Orden

52 NE Fremont Street

Portland Oregon 97212

**RE: Written testimony on Comp Plan for “Kaiser Towers” at NE Fremont And N Williams; Equity Issues with selective up zoning for past City Commissioners; and Concerns with a lack of real transportation data to back Up-zoning for selected white developers**

My name is Paul van Orden. I’ve been a resident at 52 Northeast Fremont, just East of N Williams for the last 19 years. I am a Quaker and represent my personal beliefs and perspectives as a Quaker and a citizen in this testimony and I am not speaking in any manner from my professional role in law enforcement in our community.

I am in support of the Planning staff and the communities original logical down-zoning recommendation at these lots from RX to RH formed over a long duration in the Comp Plan process now before you today. **I am not in support of RX or CM3 at this location, or EX zoning , if EX lasts through the Mixed Use Zones process in this alignment along NE . Northeast Coalition of Neighbors (NECN) has taken a strong stance that CM3 Zoning should not be instituted at this location. You have a letter in the file from them as well**

I am writing to testify and ask Council to offer no additional up zoning on the parcels at the SE corner of NE Fremont And N Williams commonly known in the community as the “Kaiser Towers Lots”. They are legally known by the County as lots: R103345 ( 32 NE Fremont St.); R103346 ( 24 NE Fremont St.), R103347, R308624 (19 NE Ivy St.), and R 308626 (3410 N Williams Ave.). These lots were R1 zoning just two and half years ago.

I am also pointing out the ethical concern that long term neighbors, and in particular my neighbors who are African American have had no rights offered to them to gain giant fiscal benefits from Council's decision to randomly choose to Up Zone locations when properties have changed hands to wealthy white developers and to past appointed City Commissioners from the Portland Planning Commission and your BDS Design Commission.

I respectfully ask the elected officials, who have tight personal ties and friendships with folks like Ex-Planning Commissioner Rick Michaelson, to recuse yourself and remove the clear Conflict of Interest in the matter. Please decline offering fiscal favors to friends and close personal colleagues and recuse yourself from offering these fiscal benefits when you have not ethically and equitably done the same for my fellow neighbors and I. It appears that both Commissioner Steve Novick and Mayor Charlie Hales have friendships and a unusually close rapport with Rick Michaelson, the self described partner with Ben Kaiser at the lots I have described above.

Please also note that your last minutes attempts to offer up zoning on North Fremont are an embarrassing panacea to the lack of equitable fiscal opportunity for my community. The last minute move to throw a tiny bit of equity, (in the form of a little up zoning on North Fremont evidenced in the Council amendments to the Comp Plan), to our neighborhood at the final hours has served to create racial tension between long time neighbors. It has taken the general public's focus away from the fact that you are offering folks outside our community giant fiscal winnings with no real benefit for the actual community.

As background to this long standing issue of a lack of equity in City Development opportunities: In the summer of 2013 my involvement in my neighborhood changed radically as I found myself impacted by a land use decision made by three members of City Council, (Novick, Hales and Saltzman) to up-zone a series of lots for two term appointed City Design Commissioner Ben Kaiser.

These lots went from R1 Zoning to the Downtown Central City zoning of RX.

The directly impacted neighbors were left out of that process at the key point to legally have full standing at the Land Use Board of Appeals, I am here today to preserve any legal right to appeal any change by City Council to up-zone this set of properties. Anything more than the RH zoning, as is currently recommended by your own Planning Commissioners and staff under the Comp Plan recommendations, at this late date in the game is not reasonable. It is not based on the facts of the case. And it is out of character with all the community involvement to date.

I understand the complexity and intensions of crafting community balance in the Comp Plan from numerous hours of volunteering at the the NE Coalition of Neighbors on their Executive Board and their Land Use Committee, and also from sitting on the Eliot Neighborhood's Land Use Committee.

I would respectfully ask our elected leaders to not support further up zoning momentum for a particularly connected developer, or his partners, like who sold Council on a bill of goods that they were building a dense housing environment in a 85 to 95 foot tower, and are now filing permit requests with the State of Oregon to build only 14 residential units in a 8 to 9 story out of scale tower.

As an important note in the decision making processes that originally radially up zoned thees lots, Commissioner Novick was specifically concerned at the we need to save the earth and stop global warming by giving Ben Kaiser a super high density 8 to 9 Story tower at this lot. Blocking less affluent neighbors from fiscally valuable solar access was seen as a sacrifice to density.

Now, We are only getting 14 high end condos in 8 stories of building. I do not believe that Commission Novick intended to save the earth with only 14 units of housing in a 8 story out of character glass phallic Kaiser Tower.

— please consider the impacts of your potential up zoning efforts on my neighborhood and the less affluent and the once diverse community you have only fractured further. My son's de facto godfather , Lawrence Lowery, was in the neighborhood in close proximity to the Kaiser Towers lots. He chose to sell and move after 63 years in the our community. A primary factor was learning he had little rights in his own neighborhood and Council was dumping an 8 to 9 story out of character monster next to his house.

It appears to date that your decisions at this lot only serve to benefit wealthy and connected developers and do not meet the community goals of the Albina Plan, the Eliot Neighborhood Community plans, or the goals of the Comp Plan itself. Up-zoning further at this location is out of character and out of line with the Comp Plan Goals 2A, 2B, 2C, 2D , 2E and 2F.

**This issue was eloquently elaborated to you at the recent hearing la at SEI (Self Enhancement Initiative) by long term neighbors who worked to open up the meeting with real world stories about the impacts of your decisions on long term community members.**

#### **TRANSPORTATION CONCERNS:**

**Adequate Transportation planning is lacking in the selected Eliot and Boise Neighborhood area slated for Up-zoning.** There is a lack of findings addressing the traffic impacts of the zoning change in the prescribed area or lots noted above from R1 to RX to the proposed Mixed Use Zoning or CM2 or CM3, the proposed up zoning suggested by two City Commissions is not supported by substantial evidence. LUBA is authorized to reverse or remand the decision if it is "not supported by substantial evidence in the whole record." ORS 197.835 (9) (a) (C). Substantial evidence is evidence on which a reasonable person would rely in reaching a decision. City of Portland vs. Bureau of Labor and Ind., 298 Or 104, 119, 690 P2d 475 (1984); Bay vs. State Board of Education, 233 Or 601, 605, 378 P2d 558 (1963); Carsey vs. Deschutes County, 21 Or LUBA 188, aff'd 108 Or App 339, 815 P2d 233 (1991).

I am hopeful you see the equity issues posed by your selective up zoning approach in our neighborhood and will be watching the process closely to see the outcome of a process devoid of adequate real community

Respectfully,

Paul van Orden

## Arevalo, Nora

---

**From:** Alan Kessler <alankessler@gmail.com>  
**Sent:** Wednesday, April 27, 2016 2:54 PM  
**To:** BPS Comprehensive Plan Testimony; Commissioner Fish; Commissioner Fritz; Hales, Mayor; Commissioner Novick; Commissioner Saltzman

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor and Commissioners:

I oppose S-20, S-21, and S-22. The PSC proposal allows less than the existing density in Buckman and there is no reason to encourage housing to go away over time.

I oppose downzoning anywhere in the city, especially in Eastmoreland (M-74, M-75, M-51, and B-88). This is totally inappropriate in a growing city, and more-so anywhere within walking distance of a Max line.

I support any extra-density overlay (like the one described in the Mayor's April 11 memo #1) applied to any part of the city, but:

1) it needs to be realistic about encouraging increased density any time a structure is likely to be redeveloped (because it's small, poorly maintained, etc). This focus on preservation-at-all-costs, especially at the cost of encouraging density, is a huge mistake. It is harmful for economic development and environmental impact in Portland.

2) I don't think design review is the appropriate tool to encourage density bonuses. It's time consuming, expensive, and uncertain enough that it will probably be ignored in favor of a "sure thing," thus costing the city potential new housing.

I support P-45 to enable the development of more middle housing everywhere in the city. Middle housing is really best created in R2 and R1 zones, as opposed to R2.5 and R2, but this is a huge step in the right direction.

I oppose P-99, which adds the language "Provide adequate but not excessive off-street parking where needed" to Policy 9.57. This is inconsistent with our mode share and climate goals.

Alan Kessler  
2725 SE 36th Ave  
Portland, OR 97202

## Arevalo, Nora

---

**From:** Washington, Mustafa  
**Sent:** Wednesday, April 27, 2016 2:47 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Thomas Karwaki  
**Subject:** FW: University Park Neighborhood Association Comments on Agenda Items 423 and 424 (Street Vacation: UP applicant)  
**Attachments:** UPNA Comments on UP requested Street Vacations Agenda Items 423 and 424 final.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Thomas,

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

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

Thanks again,

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

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

**From:** Thomas Karwaki [<mailto:karwaki@yahoo.com>]  
**Sent:** Wednesday, April 27, 2016 9:47 AM  
**To:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>  
**Subject:** Fw: University Park Neighborhood Association Comments on Agenda Items 423 and 424 (Street Vacation: UP applicant)

Thomas Karwaki  
253.318.2075

--- On Wed, 4/27/16, Thomas Karwaki <karwaki@yahoo.com> wrote:

> From: Thomas Karwaki <karwaki@yahoo.com>  
> Subject: University Park Neighborhood Association Comments on Agenda  
> Items 423 and 424 (Street Vacation: UP applicant)  
> To: "mayorhales@portland gov" <mayorhales@portland.gov>,  
> "novick@portlandoregon gov" <novick@portlandoregon.gov>,  
> "nick@portlandoregon gov" <nick@portlandoregon.gov>,  
> "Amanda@portlandoregon gov" <Amanda@portlandoregon.gov>,  
> "dan@portlandoregon gov" <dan@portlandoregon.gov>  
> Cc: karla.moore-love@portlandoregon.gov,  
> cctestimony@portlandoregon.gov  
> Date: Wednesday, April 27, 2016, 9:45 AM Attached are the comments and  
> testimony of the University Park Neighborhood Board and Land Use and  
> Transportation Committee concerning Council Agenda items 423 and 424  
> which will be considered by the City Council on April 27. The Board  
> has voted three times in 2012, 2015 and 2016 to support these street  
> vacations after hearing from over 250 residents. The Board feels that  
> these street vacations will increase the safety of pedestrians and  
> vehicles and will reduce the parking and traffic concerns of  
> neighbors.  
>  
> Thomas Karwaki  
> Vice Chair, University Park Neighborhood Association Chair, Land Use  
> and Transportation Committee



April 26, 2016

RE: Council Agenda Items: 423 and 424 (April 27, 2016 Council Meeting)

Mayor and Commissioners:

After months of community meetings with over 200 residents, the Board of the University Park Neighborhood Association voted unanimously in October 2012 to support the vacation of the streets involved in Council items 423 and 424 as part of the University of Portland's Conditional Use Master Plan. Stacey Mercer, a Board member from 2010-13 voted to support the street vacations.

The Board of the University Park Neighborhood Association on July 13, 2015 passed the following resolution in support of the University of Portland's application for a street vacation with the conditions set forth by the Portland Bureau of Transportation and testified at the Planning and Sustainability Commission in support of the street vacation.

Resolved: The University Park Neighborhood Association supports the street vacation proposed by the University of Portland with the conditions requested by the Portland Bureau of Transportation and Water Bureau.

On April 11, 2016 the University Park Neighborhood Association Land Use Committee recommended and the Board approved a motion to support the University of Portland's application to vacate portions of N Portsmouth Ave, N Van Houten Ave, N Monteith Ave, N Warren St, N Strong St, and two unnamed alleys covered by the ordinance in Agenda item 423. The Board also

supported the vacation of portions of N Van Houten Court, N McKenna Avenue, and three unnamed alleys which is being considered in Agenda item 424.

The UPNA Board and Land Use Committee has long supported these vacations with the conditions set forth by the Hearings Examiner and the City Bureaus. Private ownership by the University will **ENHANCE** and **IMPROVE** the safety of the streets and facilities for pedestrians and vehicles. It will also improve any parking and traffic concerns of the neighborhood and property owners who are surrounded by the University.

The UPNA Board and Land Use Committee also supports the second ordinance covered by Council Agenda Item 424. The non-University owned properties are addressed as 5815 N Warren Street, 5801 N Warren Street, 5516 N Willamette Boulevard, 5422 N Strong Street, 5410 N Strong Street, and 5402-5408 N Strong Street. PBOT's Right-of-Way Acquisition staff contacted these property owners who expressed support for this vacation.

This has been a complex set of street vacations for roads and alleys that are lightly used or are impassable. **We urge the City Council to adopt the ordinances and to process these street vacations quickly.**

Thomas Karwaki  
Vice Chair and Chair of the Land Use Committee  
University Park Neighborhood Association  
2209 N. Schofield St. Portland, OR 97217



## Arevalo, Nora

---

**From:** Schwab Mary Ann <e33maschwab@gmail.com>  
**Sent:** Wednesday, April 27, 2016 2:37 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** James Peterson; McCullough, Robert; Coleman-Evans Claire; Hull Caballero, Mary; Sollinger, Margie  
**Subject:** Public's written Testimony will close at the end of today's meeting estimated to be about 5:00 p.m., today, Wednesday, April 27th. Send to: cputestimony@portlandoregon.gov

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Luck Carol in getting the Mayor to keep the written comment record open. Like SWNI, SE Uplift found it impossible to respond to X# Comp Plan amendments within 41 calendar days, when ONI 95 neighborhood associations guidelines required 60-days to notify their constituents that an action will be taken during the next meeting. As for the City of Portland Public Involvement Principles Adopted by the City of Portland, Oregon on August 4, 2010 reads well; however, it lacks enforcement when dishonored.

The clock is ticking too fast even for SE Uplift Board of Directors meeting today at 5:00 p.m. -- to consider responding to lack of enforcement within Goal 1 public involvement, when ignored by elected officials and bureau directors. Take for example where Claire Coleman-Evans is alerting us, that "These loopholes need to be fixed! Otherwise What's the point of a even having a historical registry? This so called process is working against us in every way shape and form. Who side is the city on anyway... It's pretty clear they don't want citizen input...or involvement. Goal 1 not being addressed yet again. <http://restoreoregon.org/historic-no-more/> Like Claire, I want to know why aren't more older homes under this ordinance? It's too darn easy to remove homes from the historical register. Homes need better protection. Removal of the 120 day delay has done nothing but given the green light. <http://www.portlandchronicle.com/historic-1925-kenton-home-demolition-triggers-120-day-delay/it>

Lastly, be sure to read this article on Peacock Lane!! It's not looking good for 522 SE Peacock Lane.

<http://www.antiquehomestyle.com/primary-sources/american-builder/peacock-lane.htm>

Granted, I have not been paying close attention to this 120-day-delay notification demolition time-line issue - until the Grinch stepped in to steal Peacock Lane's Christmas.

**Portland Oregon - Peacock Lane - History - 1925 American Builder Magazine - 1920s** It breaks my heart, knowing no one living in the Sunnyside ever thought about declaring Peacock Lane "historic" until learning that buyer was the same Developer who also attempted to cut-down three sequoias in Eastmoreland. I'm guessing without his hammer hitting a two-penny nail, drove laughing to the bank. Property owners are feeling anxious when hearing that he has no plans to demolish her house; in that someone's someone's in-laws-will be living in her beautiful tutor-style house, on Peacock Lane's largest lot. Like the phoenix rising from ashes, today's Developers continue to access turn-of-the-century lot lines...

I support Mt. Tabor Neighborhood Association and PSC recommendations on Portland Nursery, the 'back half' of their property in residential zoning should stay a conditional use.

Respectfully yours,

Mary Ann Schwab, Community Advocate  
605 SE 38th Avenue  
Portland, OR 97214-3203

"Sometimes you just have to take the leap, and build your wings on the way down." -- Kobi Yamada

**Arevalo, Nora**

---

**From:** Susan Stringer <sstringer22@gmail.com>  
**Sent:** Wednesday, April 27, 2016 2:31 PM  
**To:** Hales, Mayor; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; Commissioner Fish; BPS Comprehensive Plan Testimony  
**Subject:** Please vote in support of Amendment TSP40116 for NE 7th Ave Greenway

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mayor and Council Members,

I would like to personally ask for your support and for you to vote in favor of Amendment TSP40116 for the proposed NE 7th Avenue Greenway. As I stressed in my testimony to you last week, a safer 7th Avenue is important for everyone who uses 7th Ave not just for the residents that live on that street. With the hundreds of cyclists and pedestrians, including children walking to school, trying to compete with the thousands of cars driving to fast and refusing to yield, the proposed greenway and the traffic calming measures installed will insure that everyone will be safer and be able to enjoy the north-south route through Southeast and Northeast Portland.

Thank you and I look forward to working with the city in the design phase of the project.

Sincerely,

Susan Stringer  
Eliot neighborhood resident

Received

APR 21 2010

Richard H. and B. Diane Wheatley  
14322 N E Beech St.  
Portland, Oregon 97230

April 15, 2106

Mr. Charlie Hales, Mayor  
Portland City Council  
1221 S W 4<sup>th</sup> Ave., Room 110  
Portland, Oregon 97204

Dear Mr. Hales:

We are writing you about items in the 2035 Comprehensive Plan which have implications for residents in our neighborhood, Argay Terrace, for which Council approval is scheduled in its April 20<sup>th</sup> meeting

In summer 1974, we were attracted to Argay by its appeal as a single family home area, a place to raise our children in a safe and secure environment, a place where people visibly cared for their property, a community of pride. We think those values should continue to be the hallmark of Argay,

We urge your support of Amendment 68 regarding the U S Post Office site at NE 122d and Shaver, which would maintain it for present and future similar use.

We urge you to support a motion to reject Amendment 59 regarding the K-Mart site located at NE 122d and Sandy Blvd. as recommended by the Portland Bureau of Planning and Sustainability.

Finally, we ask for your support in rejecting Amendment F72. Staying the course for use of the land involved would keep Mixed Employment land status in the west half of the Rossi - Giusto farm property running along NE 122d Ave. Further, re-designating the east half of that property from R3 to R5 single family housing, would respect the wishes of the residents of Argay and those of nearby neighborhoods.

Respectfully yours,

*Richard H. Wheatley*  
*B. Diane Wheatley*

RICHARD WHEATLEY  
14322 NE BEECH ST  
PORTLAND, OR 97230

1311340

Mr. Charles Hales, Mayor  
Portland City Council

1221 SW 4th Ave Rm. 110  
Portland, Oregon 97204

POSTAGE WILL BE PAID BY ADDRESSEE  
NO POSTAGE NEEDED IF MAILED IN THE UNITED STATES



57204190021



## Arevalo, Nora

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**From:** Planning and Sustainability Commission  
**Sent:** Wednesday, April 27, 2016 2:14 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: Testimony, April 27, 2016  
**Attachments:** Letter to City Council April 27, 2016.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Julie Ocken  
City of Portland  
Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201  
503-823-6041  
[www.portlandoregon.gov/bps](http://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:** Elizabeth Moore [mailto:beth.moore503@gmail.com]  
**Sent:** Wednesday, April 27, 2016 1:18 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Testimony, April 27, 2016

Commission Coordinator, would you please accept and distribute my testimony concerning the proposed updates to the Comprehensive Plan, Portland for the PSC meeting today?  
Thank you, Elizabeth Moore

attached PDF

April 27, 2016

Good afternoon. My name is Elizabeth Moore. I reside in the Concordia Neighborhood. Our home is in the proposed rezoning area north of Killingsworth, south of Jarrett, between Alberta Park and 33<sup>rd</sup> Ave. We are in a single resident R.5 zoning however the Comprehensive Plan calls for conversion to R2.5 along the length of these blocks. It is a quiet area with the majority of homes, owner occupied.

I cannot accept the lot divisions of 25' x 100' as being the best alternative for our neighborhood. I believe that at this critical point in the planning for density in the Portland Area, we have an opportunity to address many issues with a different lot dimension. This change addresses many responses to the Residential Infill Project Survey. 50' x 50' lot splits.

#### **50 x 50 Lots**

Keeps the continuity of older viable housing in the neighborhood by utilizing back lots to alleyways.

Ends demolition of these homes for skinny lot development.

Owner has option of selling back lot for appropriate affordable housing.

Family able to stay in existing home and neighborhood with supporting revenue.

Expands home ownership opportunities in the form of smaller homes.

Develop alleyway access with walking and biking and infrequent auto access.

Addresses the identified transit route of Killingsworth with increased ridership on transit.

#### **Consequences of 25 x 100**

Loss of neighborhood identity, disrupts visible connection with neighbors/safety

Demolition of viable houses, setbacks and green space and mature trees.

Two expensive houses built does not meet any long range affordability goals.

Speculative investments have fueled production of cheap unworthy Portland houses.

The consequence of this building typology produce towers that artificially shades neighbors.

Increased heating costs for neighbors, loss of trees and visible connection with sidewalks.

Majority of existing homes do not have driveways. The interruption of our sidewalks for new driveways do not meet the character nor safety that this neighborhood enjoys presently.

I am not against density in our neighborhood however I do not want a R2.5 conversion if it means 25 x 100 lots. I will petition against this 25 x 100 lot split proposal. I do not want this type of home built on my street. I do not want my property taxes to rise. Ours is not a speculative venture. This is our home. Will the city of Portland allow development of large expensive homes on 25 x 100 foot lots or consider first its citizenry and engage in this alternative? In the evolution of our neighborhoods, we must invite opportunity of home ownership and retention of generational Portland families. This could be a start.

Thank you for listening.

Elizabeth Moore, 5706 NE 25<sup>th</sup> Ave. 503.284.8404

## Arevalo, Nora

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**From:** Planning and Sustainability Commission  
**Sent:** Wednesday, April 27, 2016 2:13 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: North Tabor's Support of the "Missing Middle" housing  
**Attachments:** R1.5-the Missing Middle SEUL v2 North Tabor.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Julie Ocken  
City of Portland  
Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201  
503-823-6041  
[www.portlandoregon.gov/bps](http://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:** Terry Dublinski-Milton [mailto:terry.dublinski@gmail.com]  
**Sent:** Wednesday, April 27, 2016 2:10 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>; zCharlie Hales <charlie@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>  
**Cc:** board@northtabor.org; McCullough, Robert <Robert@mresearch.com>; Leahf@seuplift.org  
**Subject:** North Tabor's Support of the "Missing Middle" housing

Attention: City Council and the Portland Sustainability Commission  
Re: the "Missing Middle" housing concept

From: North Tabor Neighborhood Association,

The board of the North Tabor Neighborhood association on Tuesday April 25 unanimously approved the following proposal for implementation of the Missing Middle housing. We feel that this approach of building onto structures, where seismically upgrading them for the future while adding workforce house would be a sustainable and non intrusive way to disperse needed density through the city. Condo-izing these properties would make them affordable to the growing Portland workforce.

Implementation would be particularly useful for saving larger structures on parcels where the R1.5 zone could be tailored to build around the tree canopy and mesh with the surrounding community. This would create a much better housing stock instead of clear cutting, lot splitting and building skinny houses, particularly in the inner pattern area of Portland experiencing the most demolitions.



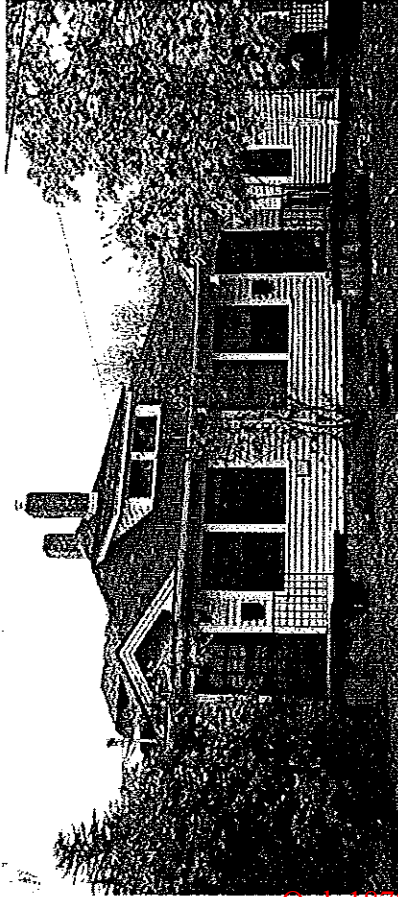
We also approved the concept of the "missing middle" more generally as a concept for the future of Portland housing.

Thank you for your time and work on this important issue,

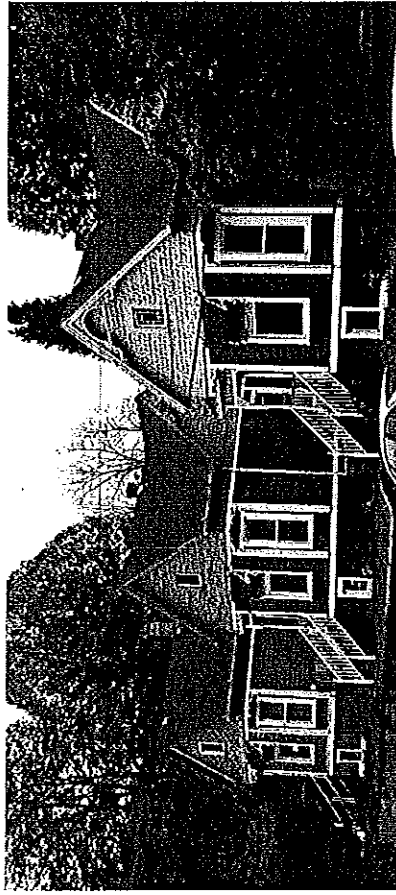
Terry Dublinski-Milton  
North Tabor Transportation and Land Use Chair  
503 867-7723

# "SUMDD"

## Seismically Upgraded Multifamily Dispersed Density



SE Harrison – duplex

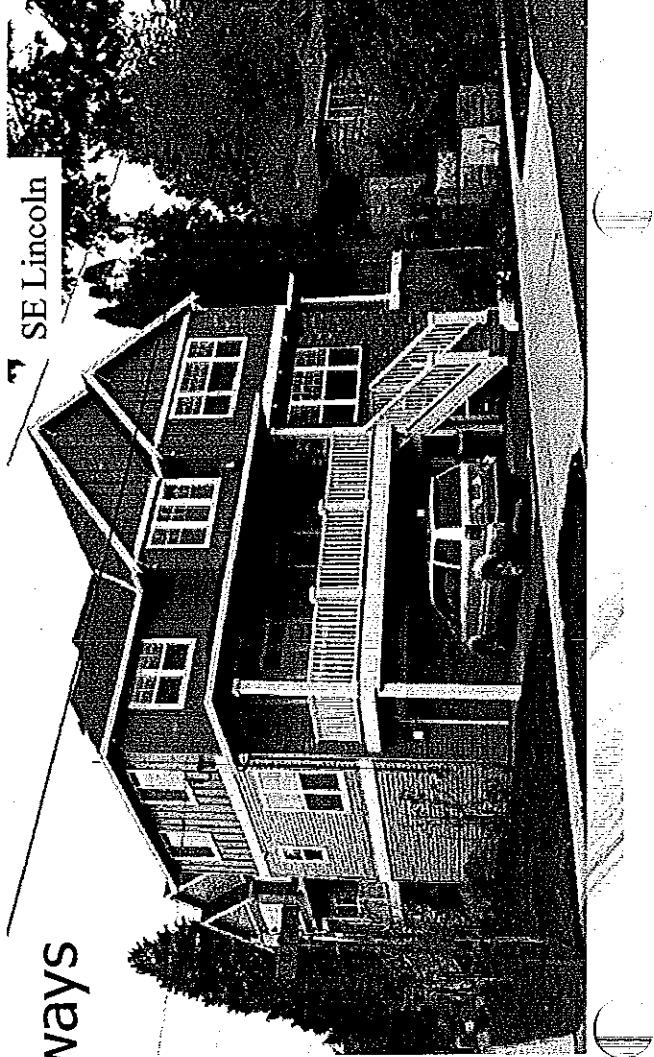


SE Belmont – 19th century skinny houses

## Keeping Portland Livable for Future Generations

# Single Family Housing Problems

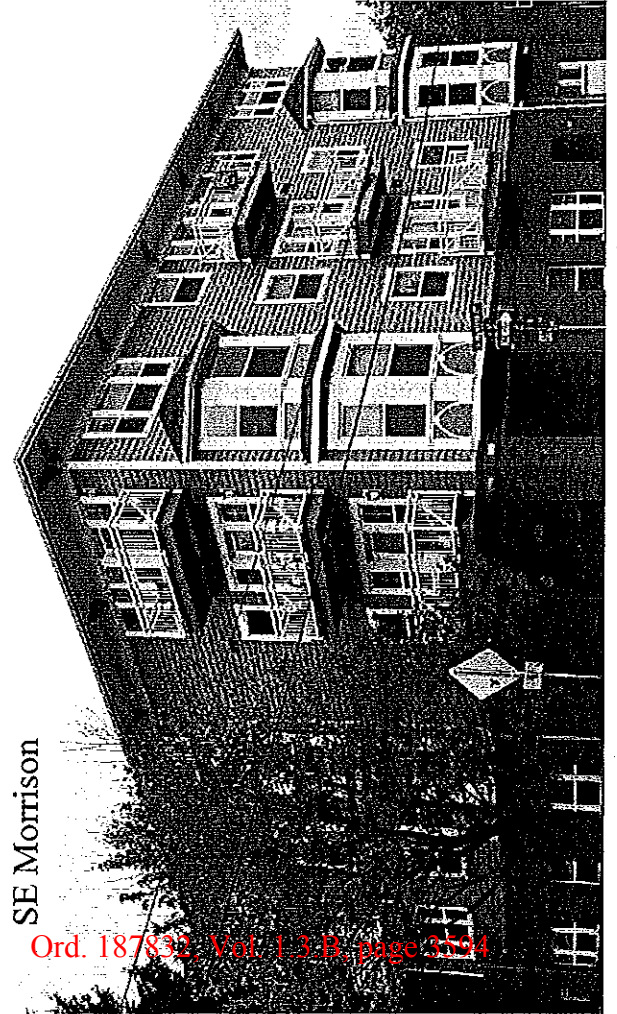
- Demolitions of historic structures
- Affordable units being replaced by "McMansions"
- Minimal step-down from new R1 developments to existing R5 structures
- R2.5 zoning resulting in widely disliked "skinny houses"
- New development commonly clear-cuts tree canopy
- Required parking and driveways dominate new structures
- Seismically unsound foundations in old houses will result in significant loss of housing stock in case of a seismic event



# Multi-Family Housing Problems

- Most newly constructed multi-family housing is in large cookie-cutter developments along arterial streets
- Most new units are too small for families with children
- Housing on corridors experience increased air, light, and noise pollution relative to traditional residential streets
- Most new multi-family developments in SE located far from city parks

SE Morrison

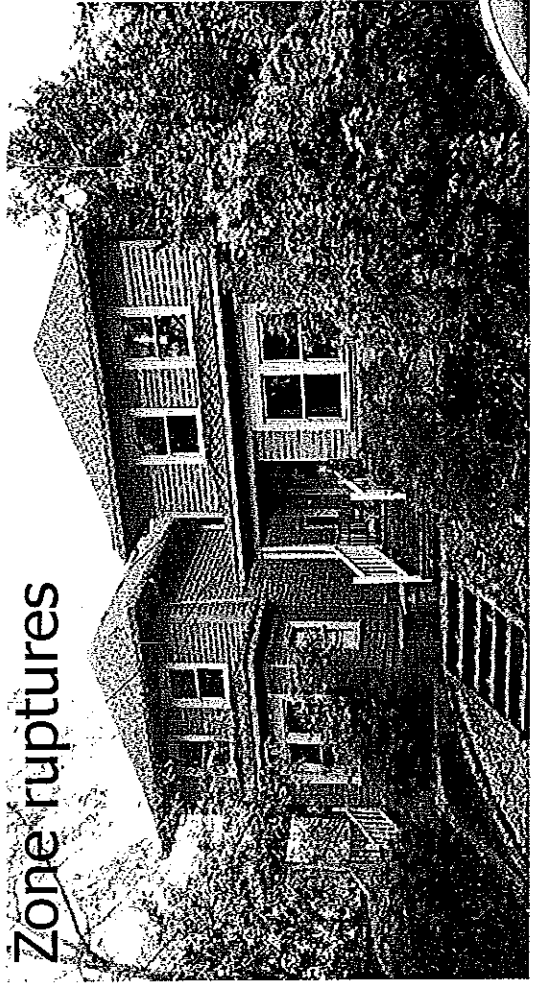


- Current zoning regulations prohibit multi-family housing in most areas of SE
- Multifamily housing is being "ghettoized" along commercial corridors

# Seismic and Economic Resiliency

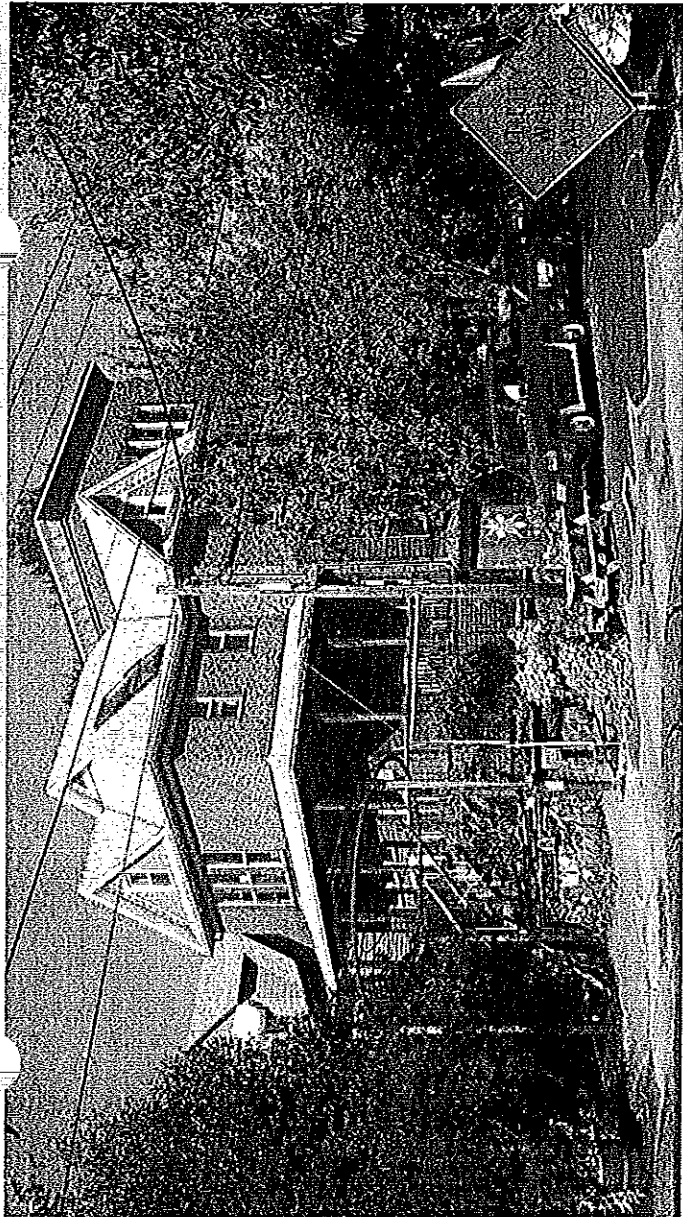
## Problems

- Most old structures will require full foundation replacement to survive “the big one” as habitable structures
- Many smaller houses lack proper foundations completely
- The more buildings retrofitted, the quicker the rebound
- ~~Portland needs an alternative~~ **Zone ruptures** to the philosophy that “if old homes are going to be destroyed in the earthquake anyway, it’s better to raze and replace them with new construction now”

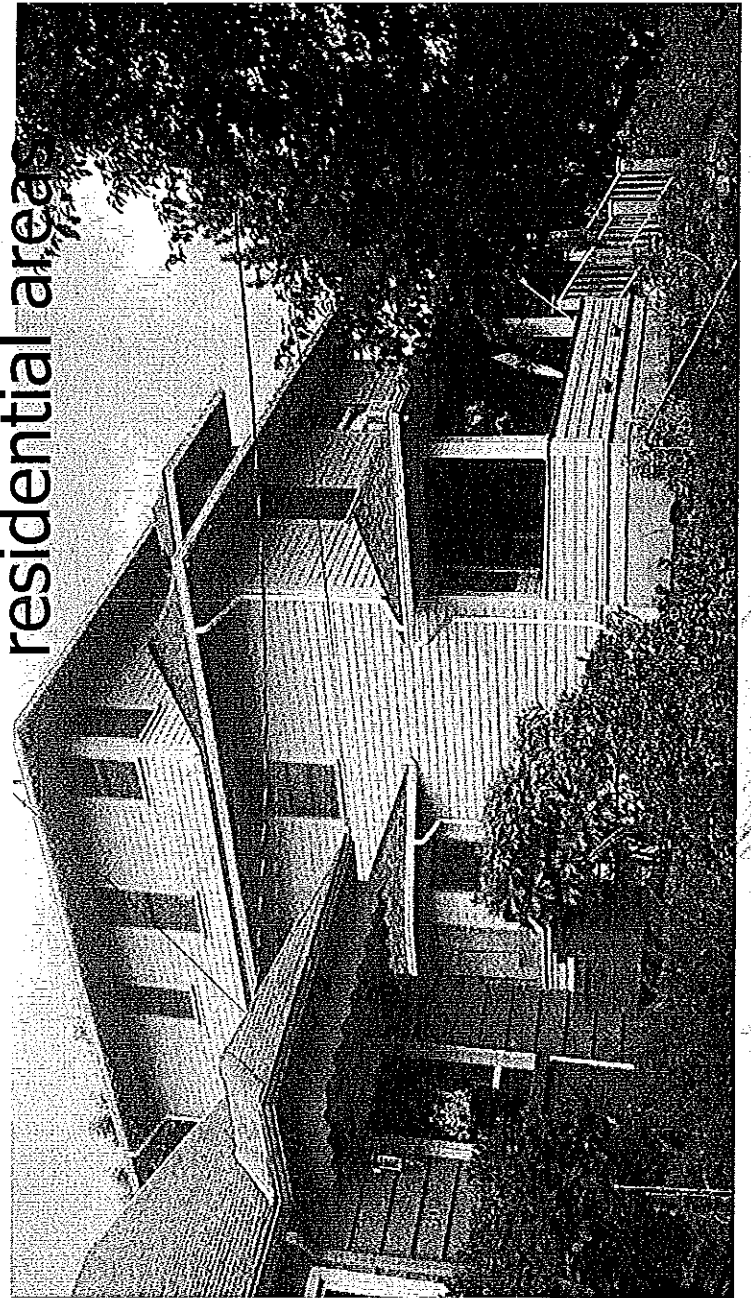


SE Ankeny – built in 1904, 4 units (twin duplexes) on 5000 sq ft lot

Examples of  
"non-intrusive"  
infill within  
primarily  
residential areas



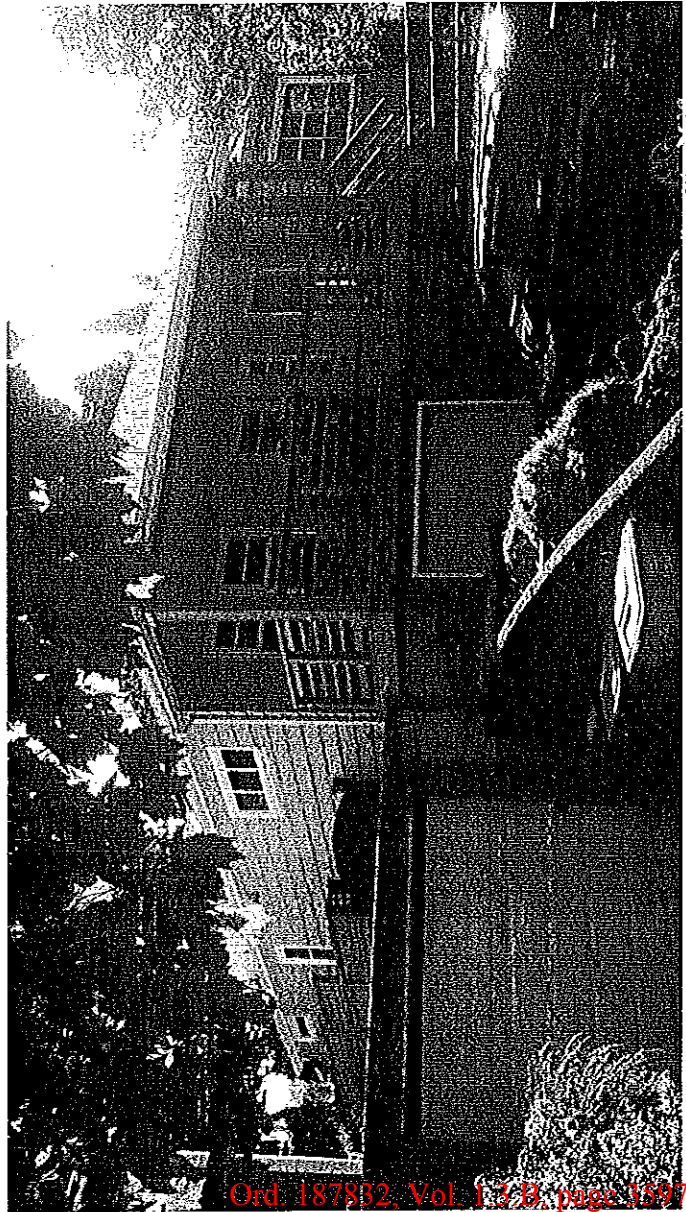
SE Yamhill



NE 62nd

Further examples  
of "non-intrusive"  
infill within  
primarily  
residential areas

NE Davis



SE Clinton

# Extra livable floor = room for workforce housing





# R1.5: The New "Missing Middle"

**Proposal:** the creation of an R1.5 (1 unit per 1500 sq ft) zone, to be used for a residential design overlay. It would apply to residential areas zoned R2-R5 in inner neighborhoods with old houses in need of seismic upgrades.

**Purpose 1:** increase affordable density in a non-intrusive way by integrating it into existing residences and neighborhoods

**Purpose 2:** reduce pressure for mixed use zones to absorb most of the city's increased residential density

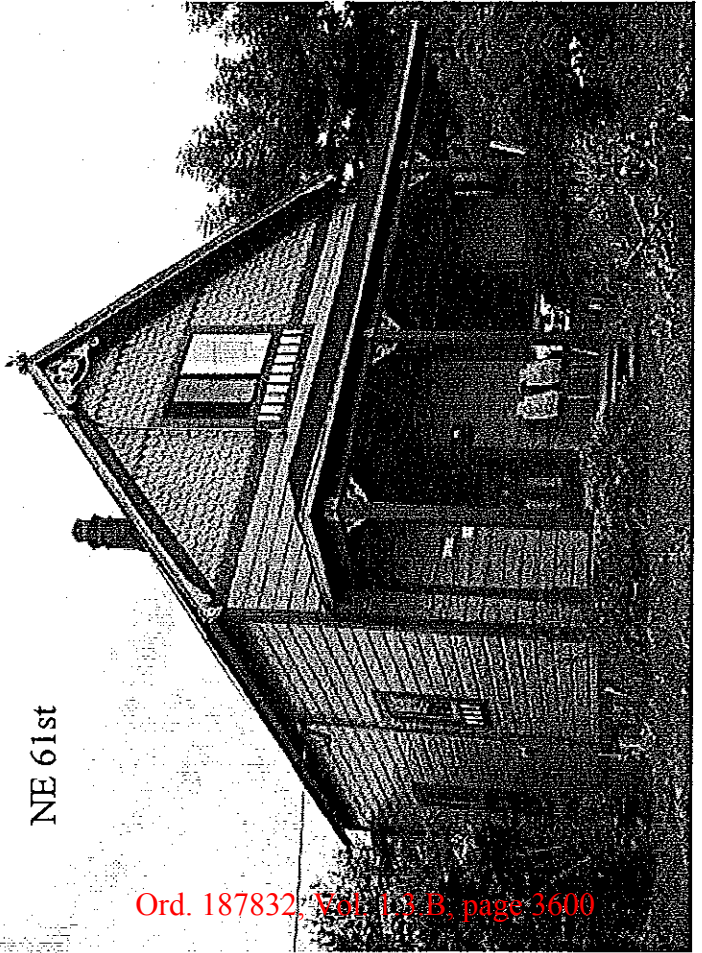
**Purpose 3:** protect older residential structures against seismic events by exchanging the development of extra units in the structure for seismic upgrade subsidies

**Purpose 4:** protect residential tree canopy from clear-cutting

# "SUMDD R1.5" Overlay Zone Requirements

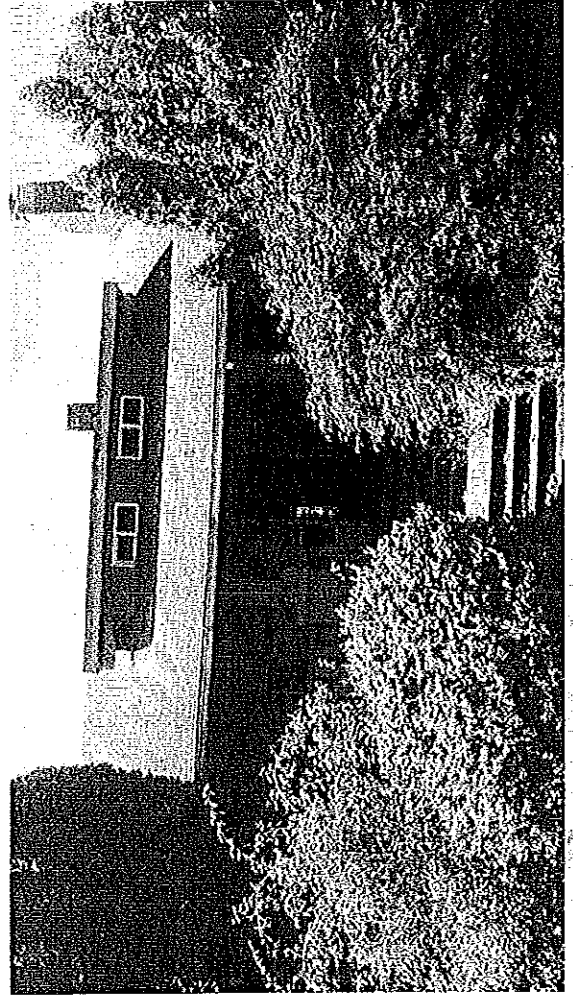
- Salvage an existing historic structure; retrofit structure to withstand and be habitable following a seismic event
- Require additional unit to convert to full duplex, triplex, etc; encourage side units, basement, and top floor additions
- Protect large trees on property
- Maximum units: one unit per 1500 sq ft (=3 units for a typical 5000 sq ft lot), opportunity for bonus units
- Minimum units: one additional non-ADU unit

NE 61st



# What can the city do to encourage "seismically upgraded multifamily dispersed density" (SUMDD)?

- Offer city subsidies: permit and development fee discounts
- Loosen regulations regarding: internal subdivision, parking, auxiliary dwelling units, etc.
- Encourage banks to offer cooperative mortgages, low-interest loans, etc.
- Integrate R1.5 overlay into existing increased-density zoning overlays that are currently underutilized

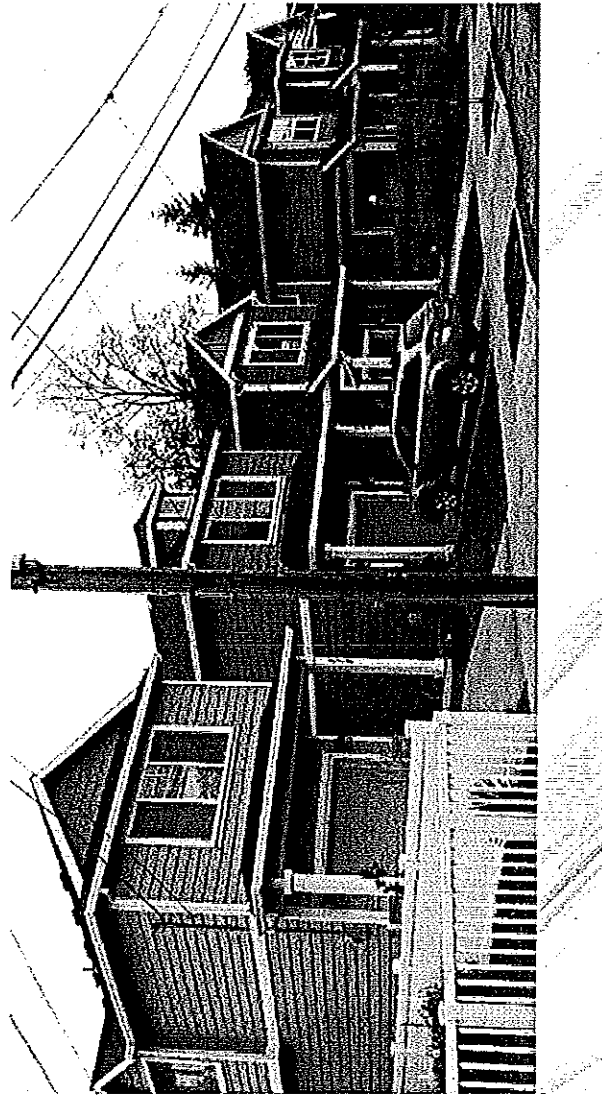


NE 57th – Century-old bungalow and trees replaced by the skinny houses on the next slide

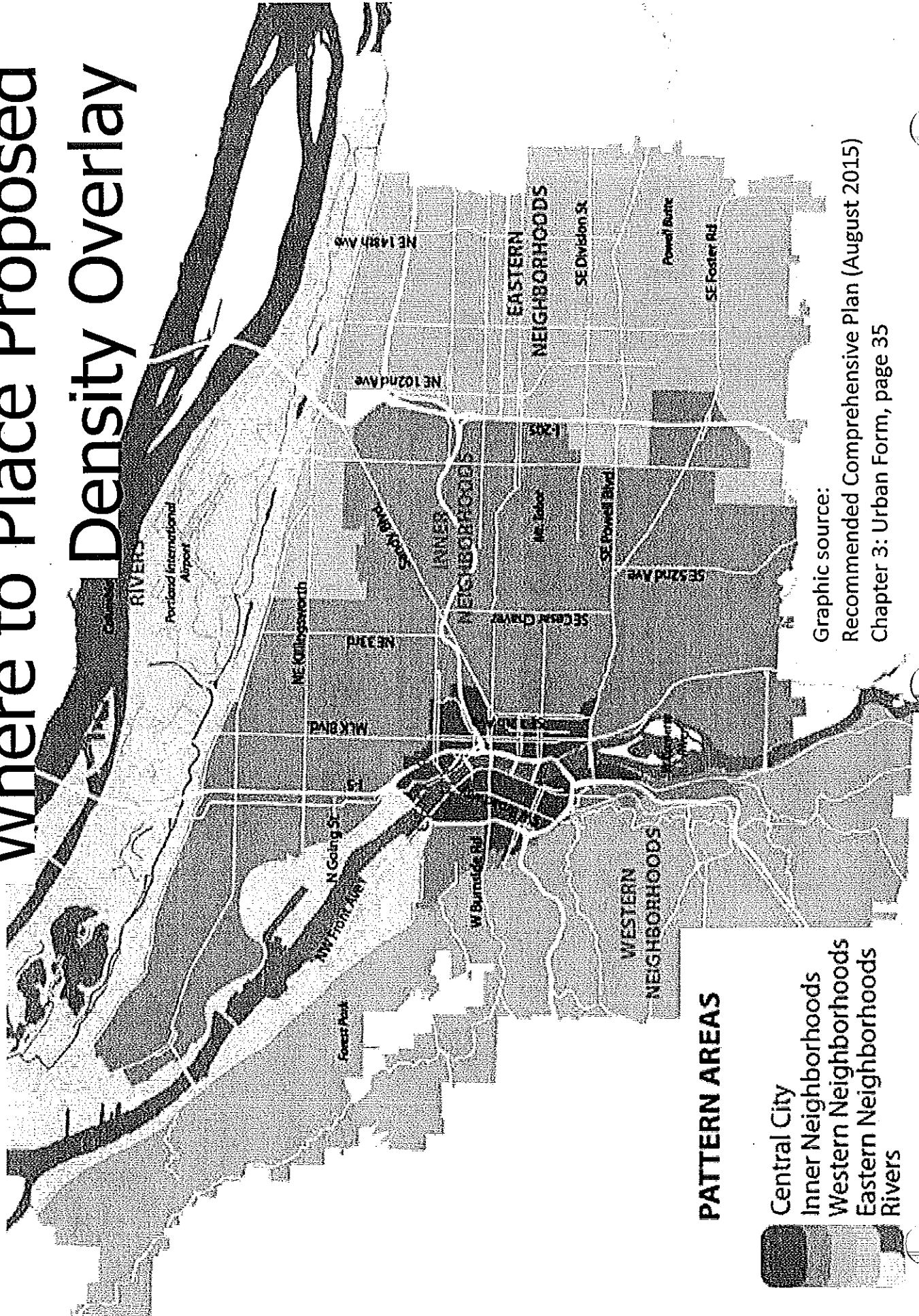
# SUMDD Long Range Benefits

- Allowing more varied, scale-appropriate buildings along mixed use corridors by better distributing density
- Providing multiple housing types for rent and purchase
- Protecting historic structures throughout the city, from both demolition and seismic events
- Keeping people in rapidly gentrifying areas in their homes and neighborhoods
- Dispersing rental housing versus “ghettoizing” it
- Creating market for local architects and designers

NE 57th — former site of a completely habitable bungalow (previous slide); bulldozed for skinny houses



# Where to Place Proposed Density Overlay



## PATTERN AREAS

- Central City
- Inner Neighborhoods
- Western Neighborhoods
- Eastern Neighborhoods
- Rivers

Graphic source:  
 Recommended Comprehensive Plan (August 2015)  
 Chapter 3: Urban Form, page 35

How do we finance this?

Portland Development Commission could finance through low interest Loans creating land trusts. This would create long term workforce Housing, which creating small communities.

A public city financial system

Small construction loans through credit unions

Easing of SDC changes combined with affordable housing

**Arevalo, Nora**

---

**From:** Gerald Fittipaldi <fit884@gmail.com>  
**Sent:** Wednesday, April 27, 2016 2:07 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Support for making NE 7th Ave a major city bikeway

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,

I'm writing regarding TSP amendment number 40116. It's listed on page 105 of the "amendments report."

I live in the Vernon Neighborhood in NE. Whenever I need to bike to locations near the Lloyd Center or in the vicinity of the Buckman Neighborhood I find it very difficult to choose a route for biking. 7th Ave has the potential to be a direct and calm bikeway on a gradual grade. 9th involves a lot of zigzagging, so I doubt many people would bike on 9th if they need to get around Irving Park. Streets east of 9th are not great for biking because they involve offset streets at Fremont.

Making 7th a calm Neighborhood Greenway will benefit people of all ages who are walking and biking. Safety needs to be a top priority. I don't feel safe with the current setup.

Thank you for your hard work as well as your time and consideration.

Gerald Fittipaldi  
[fit884@gmail.com](mailto:fit884@gmail.com)  
mobile: 732-322-4769

April 27, 2016

Michael C. Robinson  
MRobinson@perkinscoie.com  
D. +1.503.727.2264  
F. +1.503.346.2264

**VIA EMAIL**

Charlie Hales, Mayor  
Portland City Council  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

**Re: Testimony by Providence Health & Services—Oregon (“Providence”) Concerning Draft 2035 Comprehensive Plan; March 18 and April 11, 2016 Amendments**

Dear Mayor Hales and Members of the Portland City Council:

This office represents Providence Health & Services—Oregon (“Providence”). I am writing this letter on behalf of Providence concerning the Draft 2035 Comprehensive Plan City Council Amendments contained in the March 18 and April 11, 2016 list of amendments.

**1. Map Amendment #M67 (page 60 of March 18, 2016 Amendment List).**

Providence supports proposed Map Amendment #M67 at 4609-4615 NE Hoyt Street. Maintaining the current multi-dwelling zone assures that the existing multi-family dwellings will remain at conforming use. The Bureau of Planning and Sustainability (“BPS”) recommends that the City Council support the proposed map amendment.

**2. Policy Amendments (page 29 of March 18, 2016 Amendment List).**

Providence supports Policy Amendment #P58, Policy 6.57. Providence appreciates the proposed Policy amendment because it formalizes the concept of collaboration between Providence Portland Medical Center and its neighbors.

**3. Additional Policies Requested.**

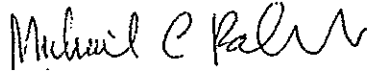
Providence would appreciate the opportunity to continue to work with City Council and Staff on Plan policies that will shape the transportation regulations in the forthcoming Campus Institution land use regulations and Transportation System Plan. The regulations and policies related to Transportation Demand Management (“TDM”) measures should be efficient and workable while striving to meet the 2035 Climate Action Plan. Providence encourages the City Council to consider the Policy previously suggested by Providence in its January 7, 2016 letter.



Charlie Hales, Mayor  
April 27, 2016  
Page 2

Providence appreciates the City Council's support and the time that Staff has spent on these matters.

Very truly yours,



Michael C. Robinson

MCR:rsr

cc: Ms. Michelle Bernard (via email)  
Mr. Jeff West (via email)  
Ms. Karen Weylandt (via email)  
Ms. Dana White (via email)  
Mr. David Bodine (via email)  
Ms. Krista Farnham (via email)

**Arevalo, Nora**

---

**From:** Stephen Judkins <stephen.judkins@gmail.com>  
**Sent:** Wednesday, April 27, 2016 1:41 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** "Missing middle" housing

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,  
I'd like to voice support for any amendment to the comprehensive plan that allows and encourages the development of so-called "missing middle" housing. It's one of the only types of new market-rate housing that could potentially be affordable to a working-class family, and is a great way to increase density with relatively minimal neighborhood impact.

Thanks,  
Stephen Judkins



April 27, 2016 (Transmitted this day to the e-mails cited)

City of Portland  
City Council - cctestimony@portlandoregon.gov  
1221 SW 4th Avenue, Room 130  
Portland, OR 97204

CC: Susan Anderson, BPS Director, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
Leah Treat, PBOT Director, [Leah.Treat@portlandoregon.gov](mailto:Leah.Treat@portlandoregon.gov)  
Joe Zehnder, Long Range Planning Manager, [Joe.Zehnder@portlandoregon.gov](mailto:Joe.Zehnder@portlandoregon.gov)  
Eric Engstrom, Comprehensive Plan Manager, [Eric.Engstrom@portlandoregon.gov](mailto:Eric.Engstrom@portlandoregon.gov)  
Nan Stark, BPS NE District Liaison, [nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov)  
Alison Stoll, Executive Director Central NE Neighbors, [alisons@cnncoalition.org](mailto:alisons@cnncoalition.org)

Subject: RCPNA Recommends Comp. Plan Amendment to p45 Middle Housing

Honorable Mayor Charlie Hales and fellow Commissioners:

Thank you for the opportunity to testify on the Recommended Comprehensive Plan. On April 21<sup>st</sup>, 2016 the RCPNA LU & TC met and recommended the following amendment to Plan policy p45:

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

The Committee's reason for this recommendation includes:

1. Lack of Public Notice. Lack of public notice to the neighborhoods and the opportunity for the majority of the neighborhood associations to make a comment. This policy first was published on April 11th, 2016, as a possible amendment to the Comprehensive Plan and the final public hearing on this Plan is scheduled for April 27th, 2016.
2. Locational Equity. The detail contained in this policy fails to meet the locational equity that is required by the Plan. By isolating the middle housing in a banded form around Centers (that did NOT not had a defined boundary until the April 5th, 2016 Residential Infill Project meeting) it forms a banded ghetto of sorts. The assumption of making this implementation form a priority through its inclusion totally precludes numerous, more equitable options that may emerge through public involvement.

3. Property Notification. The language, as is written in the last sentence, serves as a directive for rezoning land and therefore is in violation of the public notification requirements outlined by ORS 197.047. This Statute requires public notification to all properties affected by this policy/comprehensive plan zone amendment.

Thank you for your time and consideration.

My best,



Tamara DeRidder, AICP  
Chair, RCPNA  
Co-Chair, LU & TC  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213  
503-706-5804

Note: The RCPNA LU & TC has the authority to make recommendations on behalf of their Board when there are time sensitive planning decisions to be made, as in this case.

**Arevalo, Nora**

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**From:** Marianne Fitzgerald <fitzgerald.marianne@gmail.com>  
**Sent:** Wednesday, April 27, 2016 1:12 PM  
**To:** Council Clerk – Testimony; BPS Comprehensive Plan Testimony  
**Cc:** Frederiksen, Joan  
**Subject:** Comp Plan Comment on Amendment P45

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

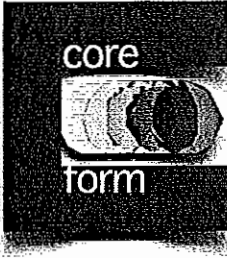
Regarding Policy #P45, Middle Housing

It is clear that the City of Portland needs more affordable housing options, but I agree with the staff commentary that this policy will need further vetting to evaluate the meaning of the phrase “where appropriate”.

Density is more appropriate where there is infrastructure to support it. Eric Engstrom’s 2/2/2016 memo, page 2, notes that there needs to be **walkable** access to complete communities. In Southwest Portland, where the transit service is limited and sidewalks are few and far between, there is little opportunity to walk to complete communities and use transit. Without safe sidewalk and bicycle infrastructure and frequent transit service, people opt to drive, which makes the combined housing and transportation costs less affordable. In places (including Southwest Portland) where there are sidewalks and safe bicycle infrastructure and good transit service that allow people to meet their needs without depending on auto ownership, it makes sense to expand affordable housing options.

The Comprehensive Plan must consider the availability and safety of alternative transportation infrastructure as a locational requirement when encouraging “middle housing” near centers and corridors, and make public investments to improve the infrastructure where needed.

Sincerely,  
Marianne Fitzgerald  
10537 SW 64th Drive  
Portland OR 97219



# CoreForm

**Building Ideas to BIM**

1722 NW Raleigh Ste. 102  
Portland, OR 97209

T 503-224-5117

wbadrick@hevanet.com

[ozone6.wix.com/coreform](http://ozone6.wix.com/coreform)

April 26, 2016

Mayor Charlie Hales  
Commissioner Amanda Fritz  
Commissioner Nick Fish  
Commissioner Steve Novick  
Commissioner Dan Saltzman

Dear Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman

We are requesting a zoning change as part of the Comprehensive Plan process. Our property, located at 2410 N Mississippi (and 2 adjacent properties without addresses) are zoned IG1. These lots are all facing N. Interstate Avenue one block s.e. of Widmers. They are quite under-used and have been vacant since the turn-of-the-century hotel that was originally on the site was demolished. [R102631 / R102632]

Although we are allowed to apply for a conditional use for this property, we feel it is better suited to be rezoned as CX or EX. There are several properties adjacent to ours that are already zoned EX. It is across the street from a MAX Light Rail Yellow Line Station, on a bus line, and a major bike route. We are in advanced discussions with a progressive hotel corporation who would like us to build a facility on the 3 properties for them. We believe that this is a higher and better public-oriented use for this prominent and accessible property.

If you have any questions, please feel free to contact us at 503 224 5117 or wbadrick@hevanet.com

Sincerely, Bill Badrick

# Eastmoreland Neighborhood Association

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April 27, 2016

Mayor Charlie Hales  
Commissioner Amanda Fritz  
Commissioner Nick Fish  
Commissioner Steve Novick  
Commissioner Dan Saltzman

Portland City Hall  
1221 SW 4th Ave  
Portland, Oregon 97204

Re: Comprehensive Plan Amendment M74

Dear Mayor Hales and Commissioners Fish, Fritz, Novick, and Saltzman:

The letter recently filed by André Baugh and associates on April 20, 2016 has so many errors that it would be inappropriate not to correct the misimpressions that it might cause. At the heart of the letter is an argument that any exceptions to city zoning codes based on Eastmoreland's careful researched and documented application for R7 should be rejected on racial and equity grounds. The reality is that while virtually identical cases were granted on May 12, 2015, Eastmoreland was the exception to the criteria applied elsewhere. We do not know why since staff materials behind the decision are missing – in spite of extensive efforts to find them – and the chief planner's only explanation to his colleagues was "Cuz."<sup>1</sup>

Issue 1: The authors of the letter are under the mistaken impression that R5 sets a minimum lot size of 5,000 square feet. The authors are also under the impression that the minimum lot size for R7 is 7,000 square feet. This is a curious error for Mr. Baugh and his colleagues to make. Even the minutes of the May 12, 2015 meeting make clear that the minimum lot sizes are 3,000 square feet for R5 and 4,200 square feet for R7.<sup>2</sup> This is a reasonably important factual error to make and calls into question the authors' understanding of the zoning regulations.

Issue 2: The authors apparently believe that the integrity of only ten lots in the area subject to Amendment M74 are endangered by leaving the R5 designation. Armed with the above misinformation such a judgement might be true but as Planning and Sustainability staff stated during the May 12, 2015 hearing, this is impossible to determine without devoting considerable staff time.<sup>3</sup> We have devoted the considerable volunteer time and know this estimate to be wildly in error.

Issue 3: This is the most important. The authors claim that Eastmoreland request was not supported on technical grounds, but instead is asking for an exception. This is quite remarkable in that it suggests that they never bothered

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<sup>1</sup> Email from Joe Zehnder to BPS Leadership, June 1, 2015. This is the same email which contained insulting references to Eastmoreland residents for participating in the Comprehensive Plan.

<sup>2</sup> Portland Planning and Sustainability Commission Tuesday, May 12, 2015, 12:30 p.m. Meeting Minutes, Julie Ocken, May 18, 2015, page 5.

<sup>3</sup> May 12, 2015 Planning and Sustainability Commission Transcript, page 21.

# *Eastmoreland Neighborhood Association*

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to examine our over one hundred pages of testimony and reports. In reality, Planning and Sustainability staff reviewed downzoning requests on thirty five different Portland neighborhoods.<sup>4</sup> Only Eastmoreland and Burlingame were singled out for special treatment.

In a lengthy paragraph the authors argue that approving the R7 change is an equity issue based on their assumptions concerning racial composition and income. The facts are entirely different. In the Reed neighborhood R7 change that was approved. Reed is a close match to Eastmoreland in land use characteristics as well as demographics. The Planning and Sustainability Commission approved R7 for Reed while simultaneously failing to approve it for Eastmoreland. Only two neighborhoods were rejected. Burlingame and Eastmoreland – Burlingame for planning reasons.

Issue 4: In proposing some form of racial and economic profiling in zoning decisions, the authors depart abruptly from land use law and good public policy. Everyone would agree that this is inappropriate. The bizarre comment that “Eastmoreland is 93 percent Caucasian” has no role in Comprehensive Planning.<sup>5</sup> This is all the more amazing given the approval of the zoning change for the neighboring Reed neighborhood – where many “Caucasians” have also been observed.

There are no records explaining why the Planning and Sustainability lobbied the Planning and Sustainability for rejection of Eastmoreland’s well documented request for R7 while recommending virtually identical requests for approval. The letter by André Baugh and his colleagues simply confuses the issue with simple factual errors and an unprofessional mention of racial and economic profiling.

Yours on behalf of the Eastmoreland Neighborhood Association,

Robert McCullough, President

Rod Merrick, Land Use Committee, Co-Chair

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<sup>4</sup> DownDesignationNeighborhoods\_medianIncome.xlsx, Tabitha Boschetti, February 20, 2015.

<sup>5</sup> Re: Council Comp Plan Amendment M74 – Eastmoreland. May 20, 2016, André Baugh and associates, page 1.



**Arevalo, Nora**

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**From:** Ellen Bailey <ellen361@gmail.com>  
**Sent:** Wednesday, April 27, 2016 12:23 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** change of zoning on NE Fremont from residential to commercial

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I oppose the proposed change of zoning of NE Fremont Street, Near N Williams Ave., from residential to commercial. I have a plot in the Boise Elliot Community Garden that would be lost if this goes through. Fremont already has too much traffic for its width, buses have great difficulty turning onto Mississippi Ave. from Fremont, and more business would not improve the quality of the neighborhood. The shops on Williams and Mississippi are enough for the area. I believe this change of zoning would be a big mistake.

Sincerely,

Ellen M. Bailey  
7016 N Haight Ave  
Portland OR 97217

**Arevalo, Nora**

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**From:** Warwick, Mike <mike.warwick@pnnl.gov>  
**Sent:** Wednesday, April 27, 2016 12:22 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comp Plan/Residential Zoning testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am confused. The new version of the Map App has a Comp Plan link and a Residential link and the information on each is different. The Eliot Neighborhood proposed a large number of zone changes to make existing zoning consistent with the Comp Plan vision to preserve existing neighborhoods and direct growth along corridors and in centers. Planning staff altered our proposal, primarily to limit our requested R2 to R2.5 downzone to the boundaries of the Eliot Historic Conservation District. Fair enough. They also changed zoning on parcels in the existing R2 zoned areas outside of the Conservation District. Again, fair enough. What is confusing is the different records for the proposed changes to zoning and on the Comp Plan. For example, one of the changes proposed by staff was for 435 NE Stanton and the adjacent lot R101963. The revised proposal from staff proposed to rezone the parcels to R1 to provide a transition between a change in the Mixed Use zone to lower density residential areas (R2 zoning). These parcels are sandwiched between the new Mixed Use zone and previous R1 development on Stanton. This proposed zone change doesn't show up on the "Residential" map, but does on the "Comp Plan" map. Hence my confusion. Does the proposed R1 density use in the Comp Plan include a zone change once the Plan is adopted or is that just a "future use" envisioned by the Plan as the FAQ suggests? In any case, this is a zone change the PSC should support.

**Arevalo, Nora**

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**From:** Linda Nettekoven <linda@lnettekoven.com>  
**Sent:** Wednesday, April 27, 2016 11:37 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** #P45 Middle Housing

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor Hales and Commissioners,

I am very supportive of Middle Housing, but I am concerned that it be done well, in a way that encourages density and affordability but also enhances the look and feel of our neighborhoods. I live in Ladd's Addition, a neighborhood that has for decades (legally and illegally) included most of the forms of Middle Housing being discussed. However, I think there might be a better approach to moving this concept forward than the policy language currently under consideration in Item #P45.

The current policy moves too quickly to define where such housing should be allowed. The commentary on this item states the "implementation of this policy will entail extensive consultation with the public on the form, amount and location of middle housing appropriate to meet Comprehensive Plan goals." Yet the final line of the proposed policy specifically states "Apply zoning that would allow this within a quarter mile of designated centers, where appropriate, and within the Inner Ring and the Central City" How will BDS decide "where appropriate" if consultation with the public has not occurred? If the RIPSAC (or some other body) is able to commend guidelines to foster (ideally to ensure) compatibility with surrounding housing, I would like to see Middle Housing considered for broader inclusion across the City assuming the existence or provision of appropriate infrastructure, especially access to transit. I think it is too early for the policy language to limit or specify where zoning should be applied. **Please see possible alternative language at the end of this message.**

My longer range wish list for Middle Housing includes the following:

- 1) Ensure compatibility with surrounding neighborhoods by a) Requiring setbacks that mirror the setbacks of surrounding structures, i.e., on the remainder of a block as well as those of houses across the street (taking an average perhaps if there is significant variation). There may be instances where mature trees are at risk and could be saved if a structure were allowed to edge into existing setbacks. Consider appeals where this might be allowed with the concurrence of near neighbors, b) Requiring height, mass and scale that is similar to adjacent as well as nearby residences, e.g., limit height to one and a half times that of a nearby, one-story structure or utilize other design strategies that step a building down to its next door neighbors.
- 2) Avoid allowing Middle Housing to change the character of a neighborhood, i.e, inserting multiple forms of middle housing into a block of single family homes such that the existing character is changed.
- 3) Avoid strategies to encourage Middle Housing that lead to further demolition of existing affordable housing.
- 4) Pilot these zone changes in selected areas and evaluate impacts before extending them more broadly.

Thank you for your consideration of my concerns.

Linda Nettekoven  
118 SE Ladd Ave  
Portland, OR 97214

"Middle Housing. Enable and encourage development of middle housing. This includes **compatibly designed (or contextually sensitive) infill** of multi-unit or clustered residential buildings that provide relatively smaller, less expensive units; ~~more units~~ **allowing higher density** with appropriate transitions in height, mass and scale. Consider zoning for a variety of options, including but not limited to, ~~Apply zoning that would allow this within a quarter mile of~~ **near** designated centers, where appropriate, and within the Inner Ring around the Central City."

# Eastmoreland Neighborhood Association

April 26, 2016

City Hall  
1221 SW 4th Ave  
Portland, Oregon 97204

SUBJECT: M74, M75, B88, P34-P40 inclusive.  
All of these amendments apply zoning designations not only *consistent* with the goals of the CP but, equally important, *consistent* with the zoning code intent and standards.

Dear Mayor Hales and Commissioners Fish, Fritz, Novick, and Saltzman:

Thank you an opportunity to respond to comments from Andre Baugh and some members of the PSC who wrote to defend a misinformed vote and now to oppose M74 based on presumptive repetition of misinformation and the doubly false claim that this is an equity issue.

**Their Claim:** The Change will affect 10 lots.

**Our Response:** The number is baseless. Last May 17 staff provided a similar verbal guess after explaining that it was impossible to calculate without deep research. Already our neighborhood has lost many more than 20 modest and more affordable houses based on "non-complying" narrow and skinny lot creation not including the loss of larger houses of significant architecture to wasteful demolition and lot splitting.

After analyzing a portion of the neighborhood using the complex methodology for confirming historic underlying lots (the extent to which we brought to the attention of the BPS), we estimate that the damage is likely to exceed the staff "guess" by a *factor* of 10 or greater. If only 10 lots were at issue, we would not have wasted hundreds of hours of time in research, expense, a volume of testimony on this point. The technically incorrect "R5" designation for Eastmoreland is at the heart of the demolition and lot splitting. It has and will continue to do great harm to Eastmoreland. We care about this place and we care about its future as one of the green jewels of the city.

**Their Claim:** "These real concerns will be mitigated through code changes, not down-zoning."

**Our Response:** We agree with the authors that "down zoning" will not fix or diminish all of the problems either in Eastmoreland or across the city. "One size does not fit all" along with many other important aspirational statements in the Comprehensive Plan are subsequently ignored in writing and enforcing the zoning code. *Crumbling* is the credibility of the single dwelling residential code so complex and confusing that almost no one is able to interpret it correctly.

Is down-zoning not a code change? The Comprehensive Plan zoning map casts in stone the future of every lot for 20 years. To change from the CP designation to the zoning designation is merely a technical process rarely refused. M74 will result in a code change that will address a real problem.

**Their Claim:** "It appears that Portland is selecting a neighborhood to downzone not on technical grounds...but in a more spot-to-spot way."

**Our Response:** This is an unfounded insinuation that supporters of the M74 amendment are violating principles of "equity" while ignoring technical criteria. The caveat "it is unclear what makes Eastmoreland different from other neighborhoods" makes clear that the authors themselves are uncertain. Taken as a whole, Eastmoreland's lot patterns and underlying lots are *not* comparable to Lents, Portsmouth or Kenton or "many other neighborhoods".

# Eastmoreland Neighborhood Association

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Average density and the lot patterns do *not* match those of Eastmoreland. The concentration of scattered historic lot lines is *not* typical of any other neighborhood.

Our analysis has been mischaracterized but not challenged for technical accuracy. As currently defined, the lot pattern in 75% of the neighborhood and overall density for the neighborhood as a whole *meets and exceeds* the R7 standard for new subdivision density. That is a fact - not a question of "equity". Spot-to-spot is the cherry picking that staff provided to find other lots in the city to down-zone by creating false equivalencies.

**Their Claim:** "Our greater concern is...the potential crumbling of a cornerstone principle of the Comprehensive Plan: equal treatment of all Portlanders..."

**Our Response:** In misconstruing the purpose of the density standards and grasping for a justification of their hastily rendered vote, the authors now insinuate that approving M74 would confer the *perception* of favoritism toward high income levels and racial mix. Perceived or real, reducing income inequity as a basis for zoning map designations is *not* a criteria discussed in the CP or the zoning code. Why was this "research" considered? Average incomes do *not* represent the wide spectrum that has traditionally existed within our boundaries. Zoning regulations, including the R5 designation, drive out economic and age diversity in our multi-generational neighborhood. Developers out-compete families for modest houses and encourage developers to build larger houses for those of higher income. Economic diversity in the neighborhood is diminished. Clearly this is not about "equal treatment".

Perhaps unwittingly, the authors' opposition to M74 plays mainly to benefit developers as further incentive to tear down the crown jewels of Portland: one of Portland's historic and established streetcar neighborhoods.

**More Crumbling Cornerstones:** Public confidence that their voices are being fairly considered is very low. Planning policies are displacing city wide those with lower and middle incomes in the name of increasing density without regard to context. This is a city-wide "equity" problem. "Equity" is also playing by the rules. Eastmoreland and Reed submitted timely requests for downzoning for the same reasons – they fit the technical criteria. With one exception, other neighborhoods either were unaware or did not believe the issue was significant. We hope that reforms for accountability to fairly and fully consider public testimony proposed for inclusion in the CP will be approved.

Another "crumbling cornerstone" is the failure to plan and provide resources to implement plans for density around centers. We don't agree that inserting multi-family dwellings in every R5 and R7 single dwelling zones across the city, as some are advocating, will address the problems of affordability, sense of community, confidence in government, zoning for context, preservation of historic resources or equity. We strongly oppose such amendments.

The ENA deeply appreciates the Mayor's and other Commissioner's support for the proposed amendments listed and for your support of zone designations consistent with preservation standards and "truth in zoning". Credibility and equity are both at stake.

Yours on behalf of the Eastmoreland Neighborhood Association,

Rod Merrick, Land Use Committee, Co-Chair

Robert McCullough, President

To: Portland Planning and Sustainability Commission  
Re: PSC Residential Zones Testimony  
From: Susan Z. Whitney  
1535 SE 47<sup>th</sup> Avenue  
Portland OR 97215  
Date: April 26, 2016

The BPS has proposed to rezone a large swath of our close-in SE and NE historic neighborhoods, telling us that R2.5 zoning will address the affordable housing issue by allowing affordable “missing middle” housing.<sup>1</sup> But this is not what happens when one house is demolished and two new units are built.

BPS has not produced any actual evidence that demolishing an existing single-family home and replacing it with a duplex or a four-plex or two rowhouses will promote affordable housing. In fact, the evidence proves the exact opposite.

A new project at 4513 SE Madison in Sunnyside is an extreme example. An old single family home was purchased for \$500,000 in 2015 and demolished. The developer is building a duplex on the lot, and is listing the units for \$699,900 each! There are many many similar examples, as developers make huge profits and actually drive up the cost of housing while destroying the character of our old neighborhoods.

On SE 37<sup>th</sup> Avenue - the same result - R2.5 did NOT create affordable housing.

- Four 1600 sq ft rowhouses were built on 2 lots in 1992.
- The one at 1527 sold recently for \$445,000.
- The one at 1521 sold in 2006 for \$390,000. This is not affordable housing.

On SE Madison, same result - zero affordable units:

- Two rowhouses were built in 2002.
- 3621 SE Madison - 1300 sq ft - sold in 2014 for \$517,000.
- 3627 SE Madison - originally sold for \$385,000.

On SE 19<sup>th</sup> - same result - NOT affordable:

- Two rowhouses built in 2008 with R2.5 zoning.
- 2711 SE 19<sup>th</sup> sold in 2010 for \$575,000.
- 2715 SE 19<sup>th</sup> sold in 2011 for \$545,000.

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<sup>1</sup> The PSC-recommended Plan included policy support for more housing choices to accommodate greater diversity of family sizes, incomes and ages, as well as the changing needs of households over time. ...

Commissioners Novick and Saltzman have introduced amendments that take this a step further, putting greater emphasis on the “middle” scale of housing. This “missing middle” concept, coined by urban planner Daniel Parolek, includes multi-unit or clustered residential buildings that provide relatively smaller, less expensive units (think the older two-story courtyard apartment buildings in Buckman and Irvington, or fourplexes). This type of housing also creates a transition between the scale of four- and five-story mixed use apartment buildings (e.g., Division and Williams) and surrounding single-family areas. Increasing this type of housing will help bridge the gap between apartment living and entering the housing market; for example, it may help families who have outgrown apartments or millennials to buy their first home.

At 1618 SE 76<sup>th</sup> Avenue in more modest Montavilla, the same price inflation is the result:

- The property was sold in May 2015 for \$243,000.
- A duplex was built in 2016.
- The units are listed for \$519,000 and \$539,000.

And now they are going after our wonderful Peacock Lane - it is happening right now to the 1924 home at 522 SE Peacock Lane, apparently with the City's blessing, but it certainly won't create any affordable housing.

I am shocked that the City thinks that rezoning to R2.5 is the first critical step in creating affordable housing in our old neighborhoods,<sup>2</sup> or that the market will voluntarily build affordable housing in these established neighborhoods. The EVIDENCE is that the market will build and sell at market prices, and the public will continue to buy at market prices.

I am not sure that there even is a single neighborhood in Portland where low-income, "middle" housing and more expensive and desirable older homes are mixed together in the same neighborhood, because such a mix does not happen organically in a free market. If the neighborhood is seen as desirable, the lower-priced homes ones will be improved or rebuilt so they too will sell at market rates and make a profit for the developer. This is called gentrification and so far the City has not been able to halt it through rezoning or any other means.

I challenge the Commission and the Council and their members to cite real-life instances where the two new replacement units were "affordable." I haven't found any. Before the City undertakes a wholesale change to the character of our existing fully-built city neighborhoods, it should make sure that the means will actually accomplish the end. The goal is laudable, but unless the City imposes strict restrictions on developers, creates financial incentives, or provides subsidies to buyers and renters, rezoning alone will NEVER provide affordable housing. If the neighborhood is desirable, new housing will always sell for at or above market. This is free market economics 101. Why would a developer buy an existing property for \$500,000, tear down the structure, build two new units, and sell them for \$300,000 each? When buyers would fight each other to pay \$600,000 for each unit?

Please get off this false bandwagon and do not rezone my property or the other properties in my neighborhood. All it will do is INCREASE property values and property taxes!

Susan Whitney  
Richmond Neighborhood, SE Portland  
1535 SE 47<sup>th</sup> Ave  
Portland OR 97215  
503-223-4951

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<sup>2</sup> Parolek's oft-cited "Missing Middle" does not advocate for the destruction of existing urban neighborhoods. His emphasis is on new development and on rebuilding strip malls, parking lots and out-moded suburban housing developments into walkable town center neighborhoods.



## Arevalo, Nora

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**From:** J C <johnpaul.castiaux@gmail.com>  
**Sent:** Wednesday, April 27, 2016 10:54 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** I support the NE 7th Bikeway

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello there,

I am writing today because I am strongly in favor of classifying NE 7th as a major city bikeway. This change is long overdue. NE 7th is by far the most direct route between the Lloyd area and the Alberta area. I ride it frequently and it is filled with bike riders. There are many aggressive drivers and it makes it a dangerous route to take, but it is the most intuitive, has the best slope, and it is simply the most direct. We have needed traffic calming there for a while as there is a ton of cut through traffic. I hear that most of the surrounding neighborhood associations support this, so it seems non-controversial to me, especially given that we need to think long term about ways to cut car ridership in this town.

There are other options besides 7th - but they aren't good ones at all. I really don't like how so many bike routes in NE Portland require a map and (for me at least) many trips to memorize all the twists and turns to simply go in one cardinal direction. I believe indirect routes are a big reason why more people don't ride bikes in this town.

9th street is listed as an option to 7th but it doesn't connect well at all to the Lloyd area and it is steep. People wouldn't use it honestly (and I would keep using 7th). It also seems like it would require expensive signals and a re-paving but I am not a traffic engineer. Seems like a more expensive option.

I hope the city has some backbone against the small but vocal crowd that opposes all active transportation improvements. It reeks of short-sighted NIMBY-ism and is not in line with the Portland values this city has been built on.

Thanks for your consideration,

John Paul Castiaux  
1026 N Kerby Ave  
Portland, OR  
97227



**Arevalo, Nora**

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**From:** Jon Walker <jonwalker@gmail.com>  
**Sent:** Wednesday, April 27, 2016 10:45 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** comment on zoning along Division ST.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I would like to submit this follow testimony about the comprehensive plan map.

I believe it is a mistake to not zone all of SE Division from 20th to 50th commercial mixed use 2. The whole street should all be made CM2. It is one of the easiest ways to add more housing stock to the city.

Making only most of it CM2 hinders maximum walkability and needlessly complicates development in one of the places it should be heavily encourage. It also leaves home owners on the street in the weird position of not being able to build new single family homes but also not being able to fully develop to produce significant density gains. It has all the drawbacks of being on the commercial street without the potential benefits. As soon to be owner of one of the few houses on the street that would still be R1 (4411 SE Division ST) I would strongly support this zoning change.

I would also recommend zoning all or at least more of Cesar E Chavez and 49th/50th from Belmont and Powell commercial mixed use to improve walkability between the main commercial streets. Creating true connections between these commercial streets would improve public safety, add much needed housing, and create synergistic gains for most businesses. It would turn the SE from several separate neighborhoods into one unified space.

Jonathan Walker  
8924 N Fiske Ave  
Portland, OR 97203  
Soon moving to 4411 SE Division ST.

**Arevalo, Nora**

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**From:** Washington, Mustafa  
**Sent:** Wednesday, April 27, 2016 10:32 AM  
**To:** Myrria Quintana  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Oppose Amendment M33 and TSP Project 473

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Myrria,

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

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

Thanks again,

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

**From:** Myrria Quintana [mailto:[myrriاق@gmail.com](mailto:myrriاق@gmail.com)]  
**Sent:** Tuesday, April 26, 2016 9:50 PM  
**To:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>  
**Subject:** Oppose Amendment M33 and TSP Project 473

Dear Mayor Hales,

**Please do NOT allow M33 to pass.** Imagine one day you wake up to find that your house has been hit with an industrial overlay. You happen to live on and near habitat that holds some of Portland's most beloved animals and though it is not a perfect habitat its existence is being threatened by a small committee of people with the power and money to turn your home and your neighborhood into a stinking, polluting industrial plot of asphalt

and cement. Please, do not allow the forces like the Port of Portland to lay their hands on any property they please.

The people who own the Broadmoor golf course might want this overlay so that they might sell to the highest bidder but the neighbors of Sunderland do NOT want this. We want the wildlife: the herons and the osprey, the chinook salmon and the cutthroat trout. We do NOT want more pollution and blight in our neighborhood.

Don't let the hard work put into restoring the middle Columbia Slough be negated with more development on land that holds huge environmental value and further, has been sighted as too steep for industrial development. I see empty lots and vacant industrial buildings all over this area, why not use what is already there rather than playing into the hands of developers who stand to make a lot of money while we lose property value and any faith in those running our city.

Shame on any of you who would elect to further industrialize such an essential habitat.

Portland and Oregon are known for the beauty and preservation of their lands. This is an opportunity to show that this is what we care for as a city. Portland is changing quickly as a city, away from the heavy industry it once knew to a fast growing tech industry. We don't need another industrial development in a place where people and wildlife still reside.

I hope you will consider this written testimony along with my testimony given at the last city council. Please vote NO to M33.

Thank you,  
Myrria Quintana

## Arevalo, Nora

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**From:** Manning, Barry  
**Sent:** Wednesday, April 27, 2016 10:31 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: comment regarding zoning on Division st

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Barry Manning | Senior Planner  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Avenue #7100, Portland, OR 97201  
503.823.7965 (p) | 503.823.7800 (f)  
[barry.manning@portlandoregon.gov](mailto:barry.manning@portlandoregon.gov)

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**From:** Cole, John  
**Sent:** Wednesday, April 27, 2016 8:22 AM  
**To:** Manning, Barry <[Barry.Manning@portlandoregon.gov](mailto:Barry.Manning@portlandoregon.gov)>  
**Subject:** FW: comment regarding zoning on Division st

**From:** Jon Walker [<mailto:jonwalker@gmail.com>]  
**Sent:** Tuesday, April 26, 2016 11:24 PM  
**To:** Cole, John <[John.Cole@portlandoregon.gov](mailto:John.Cole@portlandoregon.gov)>  
**Subject:** comment regarding zoning on Division st

Dear John Cole,

I don't know if it is too late in the process to leave a comment on this matter but I believe it is a mistake to not zone all of SE Division from 20th to 50th commercial mixed use 2. The whole street should all be made CM2.

Making only most of it CM2 hinders maximum walkability and needlessly complicates development in one of the places it should be heavily encourage. It also leaves home owners on the street in the weird position of not being able to build new single family homes but also not being able to fully develop to produce significant density gains. It has all the drawbacks of being on the commercial street without the benefits. As the owner of one of the few houses on the street that would still be R1 (4411 SE Division) I would strongly support this zoning change.

I would also recommend zoning all of Cesar E Chavez and 49th/50th from Belmont and Powell commercial mixed use to improve walkability between the main commercial streets.

Thank you

Jonathan Walker  
[jonwalker@gmail.com](mailto:jonwalker@gmail.com)

**Arevalo, Nora**

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**From:** Ted Labbe <ted.labbe@gmail.com>  
**Sent:** Wednesday, April 27, 2016 10:25 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Please include P45 and P46 in comp plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello:

I am writing to ask you to include comprehensive plan amendments P45 (missing middle housing and near "designated centers") and P46 (at least 10,000 new price-regulated units) in the revised comp plan. In addition, I support efforts to extend P45 to all single-family residential neighborhoods city-wide, not just those near "designated centers."

Thank you,

Ted Labbe

--  
PLEASE NOTE MY NEW ADDRESSES!  
Ted Labbe  
Home: 3011 NE Hoyt St Portland, OR 97232  
Office: 1430 SE Water Ave #209 Portland, OR 97214  
[t.labbe@gmail.com](mailto:t.labbe@gmail.com)  
3-758-9562

**Arevalo, Nora**

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**From:** Selina Carter <scarter@bkgbmo.com>  
**Sent:** Wednesday, April 27, 2016 10:17 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** [User Approved] Written Testimony/Comments Re: April 27, 2016 Meeting For Comprehensive Plan Hearing

Good morning! It is my understanding that there is a hearing scheduled for today and that we can submit testimony regarding the Comprehensive Plan. Please accept this email as our submission regarding the proposed changes to drive-thrus in the City of Portland.

As a BURGER KING® franchisee we are an independent small business that makes our own business decisions for our restaurant locations. All BURGER KING® restaurants in the City of Portland (and State of Oregon) are franchised and owned by small business owners like us. As a company we are passionate about our amazing city and want to see improvements to help keep us moving forward as a community. However, as an employer who's business relies heavily on drive-thrus, the proposed changes will have a devastating effect on our business and employees. In this industry it is not uncommon for locations to have up to 60% of their business via drive-thru service.

If our drive thru business were to decline in a dramatic way, a reduction in workforce would likely follow and the ability for these employees to continue to provide for their families would likely be impacted. And unfortunately, it is not just our company that it would affect. Our competitors in the quick service industry would be impacted as well as other concepts such as some of our favorite coffee shops. The potential loss of income for a number of employees in our community as a whole is concerning. This loss of income will force the previously employed citizens to rely on an already stressed assistance system to provide housing and food for their families.

We hear the Mayor and his concern regarding negative pedestrian/bike interactions with vehicles; however, restricting, banning or reducing the number of drive-thrus in the city will not stop the potential negative interaction. Those same customers will still be using their vehicle to enter/exit the parking lots resulting in the same number of potential interactions.

**PLEASE DON'T BAN DRIVE-THRUS OR CREATE SEVERE RESTRICTIONS ON THEM!**

Thank you for your time and support in this matter.

Selina Carter  
GBMO, LLC  
522 SW 5<sup>th</sup> Avenue, Suite 925  
Portland, OR 97204  
503-906-1290 x207  
503-906-1297 fax

## Arevalo, Nora

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**From:** Broughal, Justine  
**Sent:** Wednesday, April 27, 2016 9:00 AM  
**To:** BPS Comprehensive Plan Testimony; Adamsick, Claire  
**Subject:** Comp Plan Amendment Testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Beverly Granado called our office and left a voicemail on 4/22/16. She asked that we reject amendment S9 and F72.

Her phone number is 503.252.4039, and she did not provide her address.

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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**Arevalo, Nora**

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**From:** Broughal, Justine  
**Sent:** Wednesday, April 27, 2016 8:56 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Broadmoor

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Erica Edwards opposes the proposal for Broadmoor Golf Course change of 57 acres from wildlife to industrial. She is a member of Collins View association, Audobon society, and Friends of Tryon Creek.

Her address is 9285 SW Viewpoint Terrace  
Portland, OR 97219

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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## Arevalo, Nora

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**From:** Broughal, Justine  
**Sent:** Wednesday, April 27, 2016 8:51 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Broadmoor Testimony

Victoria Wilkenson is opposed to the destruction of wildlife habitat at the Broadmoor Golf Course. She noted that we will regret putting industry above wildlife areas.

Her phone number is (503) 282-7040. She did not wish to provide her address.

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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HOSFORD-ABERNETHY  
NEIGHBORHOOD DISTRICT ASSOCIATION

Mayor Charlie Hales  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Steve Novick  
Commissioner Dan Saltzman

Dear Mayor Hales and City Council Members,

On January 7th, 2016, the HAND Board submitted Comprehensive Plan testimony supporting changing the Comprehensive Plan designation from non-conforming residential to commercial for three isolated, neighborhood commercial sites (3029 SE 21st Ave [People's Coop], 1996 SE Ladd Ave. [Palio's Café], and 1540 SE Clinton St. [Northwest Naturopath Clinic]) **ONLY** if the underlying zoning code were also changed to introduce protections for neighbors similar to the existing rules governing these properties. These sites all share the common attribute of being small, isolated commercial uses in an otherwise purely residential setting, and there may be other sites throughout the city to which these issues apply.

Changes to the zoning code to provide rules similar to those currently governing these sites have not yet been made, and what has been proposed to date as part of the Mixed Use Zones project falls well short of what we want to see.

The Mixed Use Zoning project now acknowledges that these sorts scattered commercial sites differ fundamentally from other commercial properties, and is proposing adding restrictions on operating hours similar to those that exist today. This is a start, but is not nearly enough. Critical omissions in the current proposal include:

- Existing regulations limit daytime noise emitted from non-conforming residential sites to 55dBA (nighttime noise limits are lower). [Portland regulation 18.10.010], but if they are granted commercial status, permissible noise levels will increase to 60dBA. Given that a 10dBA increase represents a doubling of volume, 5dBA is a significant increase. The code needs to be updated to specify that isolated commercial sites such as these would have the same noise emission limits as residential sites, which is the rule today.
- With commercial zoning, it would be possible to redevelop these sites for high-density residential use with no commercial component at all, an ironic outcome given that the reason for making them commercial in the first place is to make it easier for these sites to remain in commercial use and provide services to the surrounding residential areas. We want the zoning rules to require that, at a minimum, the ground floor must remain in commercial use should the site be redeveloped, or, alternatively, we ask that redevelopment pressure for these sites be reduced by limiting the amount of residential

that can be developed on them to be the same as the surrounding residential zoning. This would help minimize the potential for unintended consequences.

- There are currently restrictions on change-of-use that would trigger review if the cumulative impacts of a site would increase. This restriction is important to ensure a change in use would remain compatible with a neighborhood setting. This review mechanism needs to be added to the zoning code.
- The proposed changes to the zoning code would not even apply to 1540 SE Clinton St. because a proposed change to the surrounding zoning from R2 to R1 would disqualify that site from any isolated commercial restrictions. This oversight needs to be fixed.

Our support for changing the Comprehensive Plan designation and zoning for these three sites was conditional on retaining protections similar to rules currently in place (which are working well). Because these protections stand to be significantly weakened, we must once again reiterate our opposition to changing these three sites from non-conforming residential to commercial use. We would encourage you to put these changes on hold, and revisit them after the underlying weaknesses in the zoning code have been addressed.

Thank you,

Susan E. Pearce  
Hosford-Abernethy Neighborhood Association Chair

**Arevalo, Nora**

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**From:** Alan Kessler <alankessler@gmail.com>  
**Sent:** Tuesday, April 26, 2016 11:15 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Commissioner Fish April 12 Memo ("Potential Additional Comp. Plan Amendment.")  
**Attachments:** SE Caruthers Fish Amendment.pdf

To: Mayor Hales and Commissioners:

I am a member of the Richmond Neighborhood Association Board and resident of Richmond; however, this letter is on my own behalf. I recently received a copy of a memorandum dated April 12 from Commissioner Fish with the subject: "Potential Additional Comp. Plan Amendment." The memorandum proposes an amendment to the designation of certain properties on SE Caruthers on the few blocks west of Caesar E Chavez.

The properties affected by the proposed amendment have been designated as Commercial since 1981. There are already several commercial uses on Caruthers near the affected parcels, and each of the parcels backs up to commercially zoned properties on SE Division. These parcels are also a portion of the commercial node centered at SE Division and Chavez, and provide needed density near the intersection of two major bus lines.

Please leave the draft the way it was with respect to this important node.

Finally, it is unsettling that this amendment has been presented only after oral testimony has closed. As of the evening of April 26, the day before testimony is scheduled to close, it is not visible on the MapApp (<https://www.portlandmaps.com/bps/mapapp/maps.html#mapTheme=landUse>). If for no other reason, I would ask you to vote against this amendment on the grounds that it was submitted too late to be subject to public process.

Thank you, Alan Kessler

Alan Kessler  
2725 SE 36th Ave. Portland, OR 97202

Alan Kessler  
2725 SE 36th Ave.  
Portland, OR 97202

April 26, 2016

**Comprehensive Plan Update Testimony**

**Re: Commissioner Fish April 12 Memo ("Potential Additional Comp. Plan Amendment.")**

**To: Mayor Hales and Commissioners:**

I am a member of the Richmond Neighborhood Association Board and resident of Richmond; however, this letter is on my own behalf. I recently received a copy of a memorandum dated April 12 from Commissioner Fish with the subject: "Potential Additional Comp. Plan Amendment." The memorandum proposes an amendment to the designation of certain properties on SE Caruthers on the few blocks west of Caesar E Chavez.

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Thank you,  
Alan Kessler

## Arevalo, Nora

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**From:** Ovid Boyd <ovid@metamorphica.net>  
**Sent:** Tuesday, April 26, 2016 10:59 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** NE 7th Greenway

Hello Portland City Council,

Me and my husband live on NE 7<sup>th</sup> Ave. I would love for you to make it a neighborhood greenway.

I am a bike commuter, and I am comfortable biking on Oregon streets. My husband, however, is a recent immigrant from China. While he was a lifelong bike rider in China, he has not been willing to ride a bicycle in the US. As we do not own a car, this limits our transportation options to Trimet. Trimet's great, but being able to bike around would open up more opportunities for us to enjoy our lives.

A neighborhood greenway on NE 7<sup>th</sup> would be particularly good for us as it would be an ideal route for my husband to get to classes at PCC Cascade. I know there is the Williams/Vancouver corridor, and as a native Oregonian I am quite comfortable using the bike lanes on it. However, folks with different backgrounds, like my husband, find the thin American-style bike lanes next to car traffic quite intimidating.

I understand NE 9<sup>th</sup> Ave is also under consideration. I tried riding it before, but have never used it since. The pavement is simply terrible for bikes, and there's a hill you have to go over at Irving Park. To be honest, I can't see us using it unless the street is repaved (and I'm not sure what would be done at the park, a tunnel?) I worry that if it were designated as the neighborhood greenway instead, but didn't get the extensive rebuilding it would need, it wouldn't really be usable.

My husband is thinking of trying out biking once the bike share program starts this summer. I'm hoping to get him used to riding on neighborhood greenways once he has that bike to try out. I think he will find they aren't as intimidating as bike lanes. So, building a way for folks like him to get to PCC could be the impetus to inspire him to get a bike of his own. It'd be really great for us. I understand that you won't be building the neighborhood greenway for our needs specifically, but I wanted you to know that real people's lives it would improve if you elect to build.

Thank you,  
Ovid Boyd  
1088 NE 7<sup>th</sup> Ave, Apt #604, Portland, OR 97232  
+1 (541) 791-6843

**Arevalo, Nora**

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**From:** ralleywdx@gmail.com on behalf of Linda Ralley <casa.ralley@gmail.com>  
**Sent:** Tuesday, April 26, 2016 8:33 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Hales, Mayor; Commissioner Fish; Novick, Steve; Commissioner Fritz; Commissioner Saltzman  
**Subject:** comprehensive plan testimony

Linda and Tom Ralley

2615 SE 31<sup>st</sup> Ave.

Portland, OR 97202

503-481-6431

[ralleywdx@gmail.com](mailto:ralleywdx@gmail.com)

To: Mayor Hales and Council Members:

Re: Comprehensive Plan Testimony on

Commissioner Fish Amendment on SE Caruthers from 35<sup>th</sup> Place to 38<sup>th</sup>, dated April 12

We are long time residents of the Richmond neighborhood and oppose this amendment regarding properties on the South side of Caruthers between 35<sup>th</sup> Place and 38<sup>th</sup>. We like and approve of the additional density and development along SE Division and see this as needed for the city and as a vital component for the growth in Portland.

These lots are on the south side of Caruthers, and are directly north of commercial properties on Division St. They have had a Comprehensive Plan designation of Commercial (UC(b)), for over 30 years. Planners in 1981 were looking forward when they designated these lots commercial. They were also influenced by the three lots on Caruthers at 37<sup>th</sup> that were in Commercial uses already at that time.

The Division Design Initiative talks about clustering development at "nodes". It seems that these lots will allow larger development and reinforce the intersection of Cesar Chavez and Division with more intense



development. This will accommodate more growth at a intersection with excellent transit service, in an area where a 20-minute Neighborhood is rapidly evolving.

Please do not approve this amendment, and keep the "Comp. Plan designation" on the properties on the South side of Caruthers to the MU-UC recommended in the Recommended Draft of the Comprehensive Plan.

Thank you.

Linda and Tom Ralley

**Arevalo, Nora**

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**From:** Lisa Hamilton <lisahamiltonlmt@gmail.com>  
**Sent:** Tuesday, April 26, 2016 8:05 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Fwd: Potential NE 7th/NE 9th Neighborhood Greenway project

----- Forwarded message -----

**From:** Lisa Hamilton <lisahamiltonlmt@gmail.com>  
**Date:** Thu, Apr 14, 2016 at 8:29 AM  
**Subject:** Potential NE 7th/NE 9th Neighborhood Greenway project  
**To:** mayorhales@portlandoregon.gov, Nick Fish <Nick@portlandoregon.gov>, amanda@portlandoregon.gov, Steve Novick <novick@portlandoregon.gov>, dan@portlandoregon.gov  
**Cc:** tsp@portlandoregon.gov, ronalbina@aol.com

Hello,

I am writing to you to submit my support for a Neighborhood Greenway project on NE 9th Ave, to support traffic calming on NE 7th Avenue between NE Knott Ave and NE Broadway Ave with installation of speed bumps, as well as increasing traffic lights on NE MLK Blvd to mitigate rush hour auto traffic back ups and therefore lessen drivers cutting through the neighborhood to access NE 7th as an alternative route to MLK, and, most importantly, to oppose traffic diverter installation on NE 7th Ave.

I have lived on my street, NE Ivy at NE 7th for 21 years. NE 7th has always had traffic, but it also has always been a connection for those of us who live in Eliot neighborhood in the strip between NE 7th and MLK Blvd and bordered by NE Broadway and NE Fremont. Many of the neighbors on this strip need to commute to work daily by auto (Biking or public transportation just doesn't work for some folks) and putting in traffic diverters on NE 7th Ave to lesson our access to NE 7th would be a hardship.

The Albina Head Start program is across the street from my home at NE Ivy (and NE 7th Ave) and almost all of the parents travel by car to drop off and pick up the children attending the program. Most of the AHS employees drive to work as well. Traffic diverters on NE 7th would possibly be a hardship for parent and employees of Albina Head Start.

My other concern with traffic diverters being placed on NE 7th would be with emergency service first responders such as ambulance and fire department vehicles access. How are they supposed to access homes in our strip of Eliot neighborhood between NE 7th and MLK Blvd? With rush hour traffic backed up on MLK, we need unencumbered alternative access on NE 7th without first responders having to navigate around diverters. Seconds count, as we all know when an ambulance was not able to navigate the NE Rodney Greenway traffic diverters, and a woman died.

I support a NE 9th Ave Greenway project and oppose traffic diverters on NE 7th Ave. Please include my comments as public record.

Thank you for your time and consideration,

Lisa Hamilton  
616 NE Ivy St

Portland Oregon 97212  
[lisahamiltonlmt@gmail.com](mailto:lisahamiltonlmt@gmail.com)

2035 Comprehensive Plan Amendment Testimony  
April 26, 2016

This letter is in support the Comprehensive Plan Amendment # 2 proposed by Commissioner Novick and cosponsored by Commissioner Fritz in a memorandum dated April 12, 2016. This amendment covers the area between SE 26<sup>th</sup> and SE 30<sup>th</sup> Avenues from SE Stark Street to SE Belmont Street, excluding the area north of Belmont proposed for Mixed Use.

The area is currently zoned Single Family 2500 (R 2.5) and 5000 (R 5) and was proposed to be changed to the higher density Multi-Dwelling 1000 and 2000. Notice was sent to property owners in mid-October.

This potential change in increased density could radically affect the character of what is currently an area with a mix of single family residential, duplexes, triplexes and 2 story apartments by allowing 4 story structures. We are currently a middle housing area that Council has expressed a desire to create more of in order to increase density yet provide smaller scale and potentially more affordable wood frame plexes, attached housing, townhouses, etc. This concept works in Portland and we are an example. Just driving or walking up or down the streets in the area will show that there are many small scale projects of less than five units. There are some apartments with greater than 10 or 16 units. Many of the existing single family housing has in fact been converted to duplexes as well as, three or four units while maintaining the original structure. We have increased density organically over time and are still doing so. My neighbor added an Accessory Dwelling Unit recently.

We are fortunate to have maintained what was a skilled nursing facility on SE 28<sup>th</sup> Avenue. The property was renovated and is now know as "Our House". It, too, is part of the fabric of our middle housing area providing critical services and housing to residents who are part of our neighborhood.

Increased density is happening in our 4 block by 4 block area, but on SE Belmont Street which is a transit corridor. A proposed 5 story 46 unit apartment structure at 2731 SE Belmont will extend half way up the block toward SE Morrison Street. Another large scale project is planned between SE 26<sup>th</sup> and SE 27<sup>th</sup> on Belmont. Large multi-story apartment buildings are far more feasible, compatible and desirable along this corridor than dispersed throughout the area on smaller local access streets which are composed primarily of single dwellings. Under development standards, the zoning code indicates that "the regulations should provide certainty to property owners, developers and neighbors about the limits of what is allowed." Even though there is a mix of zoning in our area, it is the single family residences which match the existing zoning code so they should be protected. It seems unfair to use the fact that some of the buildings don't meet the current zoning as a reason to sacrifice or harm the ones that do meet the current zoning.

The memo that I referred to in the opening paragraph was created only 2 weeks ago. It is a relatively short time frame to respond to such a significant amendment, but I absolutely support it.

Thank you for your consideration.

Katherine Anderson  
808 SE 28<sup>th</sup> Avenue  
Portland OR 97214

# Gary Kunz

1611 NE Marine Dr • Portland, OR 97211 • Phone: (503)799-1803 • Fax: [Your Fax]  
E-Mail: garymkunz@comcast.net Web: [Web Address]

26 April 2016

Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman  
1221 SW 4th Avenue  
Portland, Oregon 97204

Dear Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman:

I'm writing today in support of amendment P 48 to the Comprehensive Plan now being discussed. Our neighborhood contains the Fox Run Mobile Home Park, located at 9000 NE Martin Luther King Blvd. This Park is home to over 400 residents living on 250 lots. The property has a base zone of EG2 and a Comprehensive Plan designation of Mixed Employment. The residents of this area are highly vulnerable and of the lowest income demographic in our neighborhood.

We urge Council to adopt this amendment and to additionally add a funding mechanism to the policy amendment so there are resources for the City to use in maintaining this affordable housing option.

Sincerely,

Gary M. Kunz

Chairman of the East Columbia Neighborhood Association

**Arevalo, Nora**

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**From:** Don Baack <baack@q.com>  
**Sent:** Tuesday, April 26, 2016 5:52 PM  
**To:** BPS Comprehensive Plan Testimony; Commissioner Fish; Fritz, Amanda; Hales, Charlie; Novick Steve; Saltzman, Dan  
**Cc:** Frederiksen, Joan; Grumm, Matt; Alpert, Josh; Pearce, Art; Igarta, Denver  
**Subject:** [Approved Sender] 2016 4 26 Comments on the Council Amendments to the Comp Plan by Don Baack  
**Attachments:** 2016 4 26 Council Amendments Comments.docx; 2015 1 15 joint SWT AARP EIA Ltr to MAbbatte 1 14 15.pdf

See the two attached files, the SWTrails/AARP/Elders in Action letter is referred to in the testimony.

--  
Don Baack  
baack@q.com  
503-246-2088 call if you need response quickly

#P24 Policy 3.103

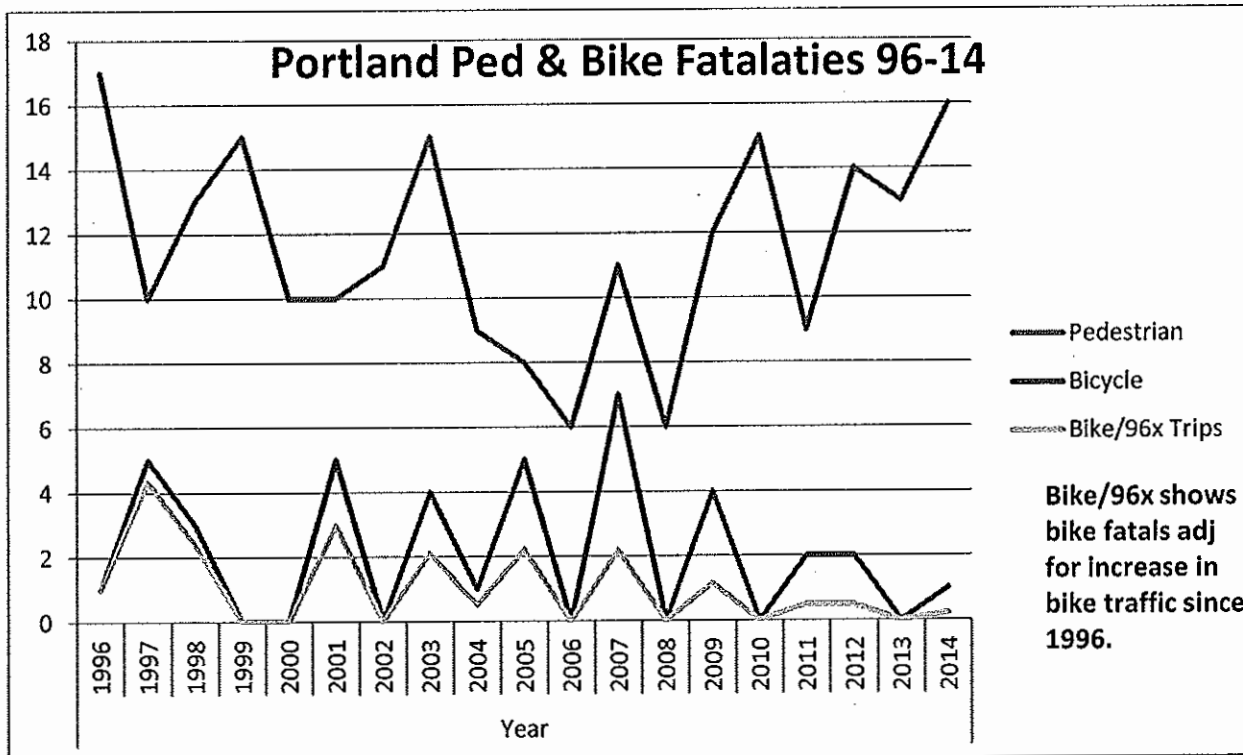
Western Neighborhoods trails. Develop pedestrian-oriented greenways and E enhance the Western Neighborhoods' distinctive system of trails to increase safety, expand mobility, access to nature, and active living opportunities in the area.

Staff recommendation: No change. PBOT does not support. The definition of greenway in Glossary and other parts of Chapter 3 – greenways are primarily for bikes with an “enhanced” pedestrian amenities.

Requested by: Fritz

Related testimony (for or against): Don Baack

Comments by Don Baack PBOT is stuck on a one size fits all approach to greenways. Well before bicycle greenways were conceived by PBOT, we planned and developed a system of Urban Trails in SW Portland that predated the concept of leading people via signage and maps to low risk streets and trails. Our system is built on low volume and lower speed streets and where necessary building short connections on mostly existing rights of way to make way for safe pedestrian passage. When PBOT was looking for support of the greenway legislation we supported it since we were told it would be for pedestrians as well. Note that many of our trail connections are not ADA compliant due to the terrain.



The above chart shows that bicycle fatalities have in absolute numbers and had dramatically decreased in term equivalent to vehicle miles traveled. The green lower line was generated by dividing the red line numbers by a number that is the measured summer bridge traffic, a guesstimate of the increase in general bicycle ridership in the city.

The key point here is Portland is doing a lot of good things to make bicycle travel safer, but is not

doing much to make it safer to travel as pedestrians. The PBOT rejection of our SW interest in designating our walking routes as greenways is just one example of a strong PBOT bias toward bicycles that some of us believe exists.

The question should be asked of PBOT "Why not allow the SW Urban Trails be designated as Greenways"? I have not heard a logical response, in fact I have not heard any response to our many requests for such a classification. We seek an overlay approach to the classification of a street for the designation. The key things that will help us is access to help with slowing done traffic for the walkers on these streets, most of which do not have sidewalks. Walkers are in more exposed situations than are bicycles, in fact bicycles are a hazard to pedestrians and we would prefer they have separate routes designated if feasible. The second benefit of being designated a greenway is it will allow our Urban Trails streets to be posted to 20 mph speed limit. I suggest walkers probably will be as or more injured by a car going 30 mph as will a bicyclist. Again, it appears to us that PBOT is not treating the walking public with the same care as they are offering bicyclists on their routes.

As to the PBOT statement in the Glossary and Chapter 3 "greenways are primarily for bikes with an "enhanced" pedestrian amenities. Sound like a lot of BS to this writer as we all know it will be years and years before most of our SW local streets are brought up to any sort of standard that will include "enhanced" pedestrian facilities.

Finally, staff supported the following in GP 8-16 and Policy 8.50 " Trails play a particularly important role in meeting pedestrian and bicyclist mobility and connectivity needs in western neighborhoods, see Western Neighborhood Pattern Area Policies 3.100 and 3.103. " Very true, and they are extremely low cost compared to other alternatives. However they deserve to have traffic calming and speed control offered by being designated greenways.

**Policy 8.93**

Recreational trails. Establish, improve, and maintain a complete and connected system of major public trails that provide recreational opportunities and that can serve transportation functions consistent with Policies 8.5 through 8.57 and other City trail policies and plans.  
BPS Staff Recommendation: Support

Requested by: Fritz

Related testimony (for or against): SWNI, Don Baack, University Park

Comment: For years Portland Parks has resisted addressing important trail linkages that go through parks. I am concerned that there may be outs hidden in the " Policies 8.5 through 8.57 and other City trail policies and plans." Give too much latitude to Parks to continue to block safe, economical bicycle linkages through parks. In SW we have two cases where is has been very difficult to get such important linkages through parks: Maricara park where the alternative bicycle route is not easily usable especially by children going to Jackson MS, and Gabriel Park where a safe bicycle route through the park will be much less expensive than a route up SW 45<sup>th</sup> and the great expense that will be involved in reconstructing the entire road.



**#P86 Figure 8-2**

Several changes to Figure 8-2, Future Public Trail Alignments. Also, rename to Figure 8-2, Major Public Trails. Corrected version attached.

BPS Staff Recommendation: Support

Requested by: Hales

Related testimony (for or against): Don Baack

Comment: The map in the Comp Plan is nearly unreadable and very difficult to interpret. Most of the changes we requested do not appear to have been included in the map, some things on the map do not make any sense to those of us who have walked the routes. It is not at all clear what staff's objectives are in generating the map. I recommend sending it back to the PSC for further input from all parties to get a better product as this one is of questionable use to citizens, and if I cannot understand what is being said, I highly doubt future staffers will understand and interpret what is intended. By the way, the PSC did not have any hearings on this map, as far as I know it has been developed by staff with a bit of input from me. That is not the way to figure out a future trail system that will guide us for 20+ years.

I think this map needs to be carefully parsed with the greenway map and then come up with a map that has bike greenways and pedestrian greenways that will include the SW Urban Trail Network. This needs to be done by the PSC and staff working with us citizens.

**#P89 Goal 9A**

The City achieves the standard of zero traffic-related fatalities and serious injuries. Transportation safety impacts the livability of a city and the comfort and security of those using City streets. This is achieved through comprehensive efforts to improve transportation safety through engineering, education, enforcement and evaluation. to eliminate traffic-related fatalities and serious injuries from Portland's transportation system.  
BPS Staff Recommendation: No change. PBOT prefers PSC recommended language.

Comment: The SW Urban Trail system was developed partly to help get people off our main streets and onto route that are less heavily traveled and that have vehicles moving at slower speeds. This should be a key part of vision zero. I suggest adding words to the effect of encouraging the development of alternative pedestrian and bicycle routes that reduce the danger to walkers and bicyclists. This is also missing from the Vision Zero work that is underway at present.

**#P91 New Policy after 9.8**

Accessible and age-friendly transportation system. Ensure that transportation facilities are accessible to people of all ages and abilities, and that all improvements to the transportation system (traffic, transit, bicycle, and pedestrian) in the public right-of-way comply with the Americans with Disabilities Act of 1990. Improve and adapt the transportation system to better meet the needs of the most vulnerable users, including the young, older adults, and people with different abilities.  
BPS Staff Recommendation: Support

Requested by: Fish, Novick

Related testimony (for or against): Elders in Action, AARP, Portland Commission on Disability, and Age-Friendly Portland and Multnomah County Initiative

While I like the thrust of this effort, there needs to be some exceptions where terrain (steep hills) prevents the construction of ADA facilities. Many of our SWTrails connections on public rights of way are built with stairs. An elevator will be required to get ADA folks from one level to the next within the confines of the right of way width. So if we follow the letter of what you are proposing, we stop making connections that many of our citizens can use and just ring our hands and complain that the city will not let us proceed.

Do not paint yourselves into a box on this one! Figure out a way to work with the terrain that we have. Suggested wording change: "...abilities, and that all TO THE EXTENT POSSIBLE improvements to the transportation system.." I want to point out a street with a sidewalk going up a hill at 35% can meet ADA standards but no one in a wheelchair would consider going down such a steep hill. If we try to put in just a sidewalk or a trail in the same environment we would not be able to do so. We would have to meet much lower grades, something that is frequently very difficult and expensive to do in a narrow right of way.

If you include this as written, you will not be able to accomplish several other goals relating to trails!

**#P94 New Policy after 9.18**

Pedestrian amenities. Provide facilities that enhance pedestrian enjoyment, such as transit shelters, garbage containers, benches, etc. in the right of way.

BPS Staff Recommendation: No change.  
PBOT notes that there is a similar objective already in the TSP (6.22) C, under separate cover. Or, this may be better in Chapter 8 as it relates to improvements in the right-of-way. If the Council wishes to elevate this to a policy, staff suggests using the verb "encourage" rather than "provide".

Requested by: Fritz

Related testimony (for or against): None

I support this, but it should also apply to trails in parks. See the attached letter from AARP, Elders in Action and SWTrails about a specific bench in a spot with a beautiful view and at a point where most people seek to sit down to catch their breath. I have no idea why Portland Parks is so opposed to providing a bench in the case cited.



January 14, 2015

Mike Abbaté, Director  
Parks & Recreation  
City of Portland  
1120 SW Fifth Ave., Suite 1302  
Portland, OR 97204

Dear Mike,

The three organizations signing this letter are supportive of building and maintaining trails throughout the City of Portland. As you are aware, walking is the least expensive exercise people can do. The SW Urban Trails and the 40 mile loop, on which the proposed bench would be located, are popular walking routes for all the citizens of Portland. They are accessible by public transit and are used by all, regardless of income level.

An Age-friendly city calls for outdoor and recreational spaces that consider varying needs and abilities. Older adults, individuals with disabilities, or with health issues also want to enjoy our beautiful park system, experience its relaxation, and enjoy the benefits of natural environments in an urban setting. We need to provide amenities which will encourage this participation and enjoyment of our parks as well as promote the opportunity for active exercise.

This is why we are supporting the installation of a bench on the SWTrail loop. Older adults, individuals with disabilities, or with health concerns, need a place to rest and refresh themselves along our many wonderful trails. The site where SWTrails proposes to fund a bench is of particular importance because it provides a spectacular view of Mt Hood and East Portland. Not only do we need benches, we need seats with arms allowing for additional supports and assistance to help us get back on our feet.

Parks are an integral part of urban life. It is vital that we sustain a healthy park and recreation system making Portland a great place for people of all ages. Benches are a key ingredient to make that happen for older people and for those needing additional supports.

We ask you to reconsider your decision in the placement of a bench in this location. SWTrails is committed to funding the purchase, installation and long term maintenance of this bench. We believe that this amenity will be a great benefit to people of all ages. It's what an Age Friendly city should do.

Sincerely,

Don Baack  
SWTrails

Barbara Bernstein  
Elders in Action

Jerry Cohen, JD, MPA  
AARP Oregon

## Arevalo, Nora

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**From:** Mike Westling <mwestling@gmail.com>  
**Sent:** Tuesday, April 26, 2016 5:34 PM  
**To:** BPS Comprehensive Plan Testimony; Shriver, Katie; Valderrama, Andrea; Bhatt, Pooja; Grumm, Matt; Elmore-Trummer, Camille; Hales, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; Dunphy, Jamie  
**Subject:** Re: Comprehensive Plan Testimony - Middle Housing

As a follow up, I wanted to share this op-ed from Seattle that walks through the potential impacts of adding one triplex to every residential block in the city: <http://www.seattletimes.com/opinion/add-housing-by-allowing-one-triplex-per-city-block/>

One triplex per block would add up to 31,480 additional housing units, 60% of the way to the city's goal of adding 50,000 housing units in the next decade.

While literally adding a triplex to every block is a fine goal, this is a great figurative way to illustrate the huge potential impact of the solution while also demonstrating the minimal impact to existing n'hood character and parking.

Thanks,

Mike

On Mon, Apr 25, 2016 at 8:07 PM, Mike Westling <mwestling@gmail.com> wrote:  
Dear City Commissioners and Staff,

Attached is written testimony in support of the middle housing amendment (P45) as part of the the comprehensive plan update. I am submitting this testimony as a representative of the City Club of Portland, which recently approved an affordable housing report that includes a recommendation for updating the city's zoning code to allow and encourage a variety of housing options in the city's residential neighborhoods.

Kind Regards,

Mike Westling  
503.498.8161  
mwestling@gmail.com

6226 NE 28th Ave.  
Portland, Oregon 97211

**Arevalo, Nora**

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**From:** Peter Forrest <pdxpete57@gmail.com>  
**Sent:** Tuesday, April 26, 2016 5:26 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Testimony on the Missing Middle

Mayor Hales and City Commissioners,

I have been Richmond Neighborhood Home Owner for 20 years. I live on SE Clinton one block south of SE Division and Salt & Straw where much has changed in the last four years. Some changes good. Some changes not so good. Back then I learned early on that nothing could be done with regard to any of the development of SE Division. The developers had meet all necessary considerations to receive permits under the current guidelines and comprehensive plan. So this is why I am writing know.

I agree in full on what my neighbor and friend Denise Hare has written you regarding her position on the purposed City Council Comprehensive Plan Amendment P45 Middle Housing, which is also mine.

As Denise writes" I understand the attraction of finding ways to blend more housing density into single family zoned areas of the city. I can appreciate why Eli' Spevak's ideas have generated such a rush of interest and support. However it seems premature to try to tack missing middle options onto the Comprehensive Plan without more inspection, and without allowing the Residential Infill Project to complete its work.

I feel that whatever consideration there is for the missing middle should be shared by all of the city of Portland with the same zoning. As many a city official has said when addressing the Richmond Neighborhood Association regarding traffic, diverters, development, "We all need to share in the growth and changes coming to our neighborhoods. I think that it should not only be these current developing areas also selected to develop the missing middle. All areas with the same zoning should share in the need to meet the missing middle. To vote on this amendment, not consider all same zoning areas, so quickly, lacks consideration for many developing areas who have are already shouldered the increase density and the changes to livability that have come with it for the last 4 years.

Do not rush to consider this amendment before the completing the Residential Infill Project. If you feel you need to include in the comprehensive plan than change amendment to include all same zoning property to be included. All of Portland needs to share in supporting increase density.

Peter Forrest  
3335 SE Clinton Street  
Portland OR, 97202-1448

503-236-7787

**Arevalo, Nora**

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**From:** Zachary Minick <zacharyminick@gmail.com>  
**Sent:** Tuesday, April 26, 2016 4:50 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Written testimony on Amendment M74 to the Portland Comprehensive Plan

Greetings, I would like to submit written testimony on Amendment M74 to the Portland Comprehensive Plan to be included in the record as follows:

I live at 3651 SE Rex Street in Eastmoreland with my wife and small boy. We specifically moved from our last home at SE Division and 32nd Ave to Eastmoreland because of the quiet neighborhood and charming houses.

In the 2 years that we have lived here, we have seen a blight of developers tearing down lovely old victorian houses to pack in huge ugly box houses that maximize profit while diminishing the character and value of the neighborhood.

I know you are all aware of the outcry from across Portland against this type of activity and I strongly urge you to take steps to protect what makes Portland a unique and wonderful place to live.

I am in partial support of Amendment M74 to the Portland Comprehensive Plan, however, it does not go far enough and should be extended to cover the entire Eastmoreland neighborhood.

Specifically lots between SE 36th Avenue and SE Cesar Chaves Blvd should be rezoned to R7. The street that I live on is very much a part of the Eastmoreland neighborhood and should absolutely be afforded the same protections as the rest of the neighborhood.

Please do your part to ensure the preservation of this historic portland neighborhood and rezone the ENTIRE Eastmoreland neighborhood to R7.

Thank you for your time and consideration,

Zachary Minick  
3651 SE Rex Street  
Portland, OR 97202  
415-425-1285



## Arevalo, Nora

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**From:** Travis Phillips <Travis@pcrihome.org>  
**Sent:** Tuesday, April 26, 2016 4:49 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Stark, Nan; Fitzpatrick, Maxine  
**Subject:** Comprehensive Plan Testimony - N Fremont Street

Dear Council and Planning Commission Members,

As a community development organization invested in the North and Northeast Portland neighborhoods for over 20 years, PCRI has seen our community grow and change, especially the areas around and including N Mississippi Avenue and N Fremont Street.

While change may be inevitable, planning and zoning regulations (as you know) can have a dramatic impact on how a neighborhood evolves. To this end, PCRI supports the changes proposed for N Fremont Street between N Mississippi Avenue and N Vancouver Avenue. We believe the change from current R1 zoning to the proposed CM2 zoning will not have a significant impact on the character of the neighborhood as the differences in zone type are evolutionary and not revolutionary. This change, which allows storefront commercial development, will allow for the economic advantage of commercial retail opportunity, which can support entrepreneurs and create jobs while providing services in close proximity to residential development. We also applaud the bonus provisions allowed with the inclusion of affordable housing, something that is in dramatically low supply compared to need.

We would be remiss if we did not take this opportunity to re-remind and encourage the Planning Commission to adopt anti-displacement measures proposed for the Comprehensive Plan. While some of these changes that have occurred in recent decades in this neighborhood have been an improvement, not everyone has benefitted from the changes. Low income residents, communities of color, and particularly the African American community have been involuntarily displaced disproportionately from neighborhoods they have called home for generations. Inclusion of affordable housing in this neighborhood and policies that prevent and mitigate displacement are essential to ensure historic residents of this and other neighborhoods are able to remain in their community as neighborhoods change and improve.

It is also worth noting that while PCRI owns a property within the area where zoning changes are proposed, we have no current plans to redevelop this property. If, at any time in the future, we do intend to make changes to this property, it is with our assurance that existing residents will not be displaced and that they, too, can reap the benefits of changes and improvements.

Thank you for your time and consideration. Please do not hesitate to contact me or PCRI Executive Director Maxine Fitzpatrick if you have any questions or concerns.

Best,  
Travis

Travis Phillips  
Director of Housing and Development



6329 NE Martin Luther King Jr. Blvd.  
Portland, OR 97211  
T: 503.288.2923 x116 | F: 503.288.2891

## Arevalo, Nora

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**From:** Angel York <aniola@gmail.com>  
**Sent:** Tuesday, April 26, 2016 3:06 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Please classify NE 7th as a major city bikeway

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I very strongly support classifying NE 7th as a major city bikeway from NE Weidler to NE Sumner. NE 7th is the most direct route from the Lloyd District to the Alberta Arts District and already sees heavy use by people on bikes. Neighbors have reported many instances of motor vehicle speeding, aggressive driving, and crashes onto sidewalks and trees. Traffic calming would improve safety and decrease air pollution and cut-through traffic on NE 7th. At a recent PBOT open house, the majority of participants as well as the Irvington, King, and Eliot neighborhood associations supported NE 7th as a neighborhood greenway over NE 9th.

NE 9th does not connect well with the Lloyd District, is indirect, requires jogs, has greater elevation gain, requires installation of signals, and has a truly awful road surface. Based on projections by PBOT at the recent open house, it would require twice as much money to turn NE 9th into a greenway instead of NE 7th. With money for transportation projects already severely limited, it would be most cost-efficient to use the signals and smoother road surface that are already in place on NE 7th.

NE 7th should be a safe neighborhood street, not a speeding cut-through for people to avoid Martin Luther King Jr. Blvd. I am very much in favor of a greenway on NE 7th St, rather than NE 9th.

Thank you,  
Angel York  
7707 N Fiske  
Portland, OR 97203

**Arevalo, Nora**

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**From:** Washington, Mustafa  
**Sent:** Tuesday, April 26, 2016 2:45 PM  
**To:** 11:15  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Broadmoore Golf Course

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Janis,

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

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

Thanks again,

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

**From:** 11:15 [mailto:[lamb4dogs3@aol.com](mailto:lamb4dogs3@aol.com)]  
**Sent:** Tuesday, April 26, 2016 1:27 PM  
**To:** Commissioner Fish <[nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)>; Commissioner Novick <[novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)>;  
Commissioner Saltzman <[dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)>; Commissioner Fritz <[amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)>; Hales,  
Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>  
**Subject:** Broadmoore Golf Course

Dear Sirs:

I will make this brief because I realize you are busy people and have probably had a ton of emails over this issue. I urge you to do whatever it takes to protect the natural habitat around Broadmoore! As it stands, this is a delicate ecosystem for the habitat in this area! Destroying this by allowing construction would have a devastating effect on the animals and plants that rely on this habitat for life! It would also destroy the surrounding protected habitat as well! This is a lose lose situation!  
Please vote to PERMANENTLY protect this land and keep it safe from Industrial use!

Thank you for your time,

Janis E. Lamberty

**Arevalo, Nora**

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**From:** TBadrick@aol.com  
**Sent:** Tuesday, April 26, 2016 11:13 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** [User Approved] [Zip File Attached]CPU Testimony  
**Attachments:** Comp Plan Eastside Vision zone change request.ZIP

This testimony is for the property located at 2020 NE 102nd Avenue, Portland, Oregon 97220. I am submitting this request and support letter on behalf of the property owner. Any written response can be sent to the above address. Any email correspondence can be sent to myself.

Thank you

Tom Badrick, Chair  
Parkrose Heights Assn. of Neighbors

\*\*\*\*\*  
\*\*\*\*\* Please Do Not Reply To This Message \*\*\*\*\*

As per the City of Portland email policy, the email security appliance (SonicWALL) has quarantined an email that contains a zip file attachment. To protect your computer, this file has been placed in your personal Junk Box.

As always, please exercise caution when retrieving attached zip files. Unsolicited email or emails from an unknown source may contain files containing malware, viruses, or other malicious computer code.

If you have questions, please call the BTS Helpdesk at 503-823-5199.

\*\*\*\*\*  
\*\*\*\*\*

April 25, 2016

Mayor Charlie Hales  
Commissioner Amanda Fritz  
Commissioner Nick Fish  
Commissioner Steve Novick  
Commissioner Dan Saltzman

Dear Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman,

We have operated Eastside Vision Source at 2020 NE 102<sup>nd</sup> since 1991. Our property has been zoned Residential since we became owners. Recently, we were informed of the 2035 Comprehensive Plan and the possibility of requesting a zooming change to better match the actual property use. We would like to request a zoning change to Commercial Mixed Use, CM1.

Our neighborhood association, Parkrose Heights Association of Neighbors supports this request.

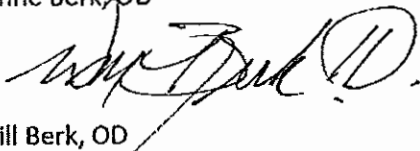
If you have any questions, please feel free to contact us at...

Bill Berk -- cell (503) 807-1983  
Anne Berk -- cell (503) 807-1995  
Eastside Vision Source -- (503) 252-2375

Sincerely,



Anne Berk, OD



Bill Berk, OD



April 25, 2016

Mayor Charlie Hales  
Commissioner Amanda Fritz  
Commissioner Nick Fish  
Commissioner Steve Novick  
Commissioner Dan Saltzman

Dear Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman

I am writing on behalf of Parkrose Heights Association of Neighbors in support of a zoning change request in my neighborhood through the Comprehensive Plan process. The property is located at 2020 NE 102<sup>nd</sup> and is currently zoned R-1 (residential). This property has operated as a non-conforming commercial use since prior to 1990. It will remain in commercial use for the foreseeable future. We support the property owners request to change the zoning from R1 to CM1.

If there are any questions about our position, please feel free to contact me at 971-325-9727 or [badrickt@gmail.com](mailto:badrickt@gmail.com)

Sincerely,

Tom Badrick, Chair  
Parkrose Heights Assn. of Neighbors



## Arevalo, Nora

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**From:** Doug X <dougurb@gmail.com>  
**Sent:** Tuesday, April 26, 2016 2:26 PM  
**To:** BPS Comprehensive Plan Testimony; Hales, Mayor; Commissioner Fish; Novick, Steve; Commissioner Fritz; Commissioner Saltzman  
**Subject:** Comprehensive Plan TSP testimony, NE 7th bikeway

Doug Klotz  
1908 SE 35th Place  
Portland, OR 97214

Re: TSP Amendment 40116 NE 7th Major City Bikeway

Mayor Hales and Commissioners:

I strongly support classifying NE 7th Ave. as a major city bikeway from NE Weidler to NE Sumner. NE 7th is the most direct route from the Lloyd District to the Alberta Arts District and already sees heavy use by people on bikes. Neighbors have reported many instances of speeding, aggressive driving, and crashes onto sidewalks and trees. Traffic calming would improve safety and decrease air pollution and cut-through traffic on NE 7th. At a recent PBOT open house, the majority of participants as well as the Irvington, King, and Eliot neighborhood associations supported NE 7th as a neighborhood greenway over NE 9th.

NE 9th does not connect well with the Lloyd District, is indirect, requires jogs, has greater elevation gain, requires installation of signals, and has a very bad road surface. Based on projections by PBOT at the recent open house, it would require twice as much money to turn NE 9th into a greenway instead of NE 7th. With money for transportation projects already severely limited, it would be most cost-efficient to use the signals and smoother road surface that are already in place on NE 7th.

NE 7th should be a safe neighborhood street, not a speeding cut-through for people avoiding Martin Luther King Jr. Blvd. I am very much in favor of a greenway on NE 7th St, rather than NE 9th.

Thank you.

Doug Klotz

**Arevalo, Nora**

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**From:** Yonit Sharaby <yonitsharaby@gmail.com>  
**Sent:** Tuesday, April 26, 2016 2:17 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Bikeway on NE 7th

Hello!

I am writing to voice my strong support for improved infrastructure for biking on NE 7th avenue. If traffic volumes were reduced on that thoroughfare, it would make a pleasant and direct N/S alternative to Williams and Vancouver.

I recently rode on both 7th and 9th with a toddler in tow. The grade differences felt significant -- 7th was noticeably flatter and easier to bike on.

Better bike facilities on this street would constitute a dramatic improvement in north-south connectivity for this area. Reducing traffic volumes in this neighborhood would also increase safety for everyone using the streets: motorists will be safer using existing thoroughfares at MLK/Grand and 15th, which are better-designed for high volumes of cars, and pedestrians will have a road that feels more like a pleasant neighborhood street than a high-stress cut-through route.

Thank you,

Yonit Sharaby

**Arevalo, Nora**

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**From:** Kerry Ryan <kerrysilvryan@gmail.com>  
**Sent:** Tuesday, April 26, 2016 1:49 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Testimony Regarding the Rezoning of People's Food Co-Op

Hello,

I am writing to ask that you do not move forward with proposals to change the Comprehensive Plan and rezone People's Co-op (3029 SE 21st Ave) from its current designation as non-conforming residential to commercial. People's is the quiet heart of our community, and I worry that changing the lot to commercial would encourage them to move. And then, in its place, we would likely get a much larger commercial impact with another business. If People's were to leave, we would much rather have the site revert to residential.

I realize that the city is just trying to clean up an anomaly, but changing the zoning for the site would have many unintended and detrimental consequences.

Thank you very much for accepting this testimony.

Sincerely,  
Kerry Ryan  
2227 SE Tibbetts Street  
Portland, OR 97202

**Arevalo, Nora**

---

**From:** Tamara DeRidder, AICP <SustainableDesign@tdridder.users.panix.com>  
**Sent:** Tuesday, April 26, 2016 1:23 PM  
**To:** cputestimony@portlandoregon.gov.  
**Cc:** Anderson, Susan; Zehnder, Joe; Engstrom, Eric; Stark, Nan; Stoll, Alison  
**Subject:** Comp. Plan Testimony - Recommend Policies that allows the City to act on Toxic Air Quality  
**Attachments:** TDRAirQualityPolicyTestimony04262016.pdf

Dear Honorable Mayor and Commissioners,  
(By way of Clerk Karla)

Thank you for the opportunity to submit testimony and propose amendments to the Recommended Comprehensive Plan. As you may remember, since 2008 I have actively testified before the Council on the need for the City to include air quality in the City of Portland land use actions. In the attached testimony I attempt to lay out policy language that allows the elected and appointed officials as well as city staff to link their actions to support improved air quality.

In the past I have testified that air quality was a key reason to keep the Colwood Golf Course from being rezoned industrial, that planners should not place high density residential against toxic traffic corridors - or to mitigate this action if they do, and that the addition of the PDX airport in the Plan also brings in the airplanes with their source of toxins that impact our communities.

For me, this testimony is both personal and professional. I suffer from asthma and the increase of these toxins may well shorten my life-span.

But it is also an ethical requirement on behalf of my profession as an AICP planner to speak out on planning issues that disproportionately impact our disadvantaged populations. A popular technique used by land use planners is to place high density residential and elderly housing next to high volume traffic corridors, as done in much of the Recommended Comp. Plan. This type of locational planning is largely to provide the greatest access to the highest number of residents. But, it also places the most affordable residential units right next to the sources of highly toxic air. Key among these toxins are diesel pm generated by older diesel vehicles, planes, trucks, cars, and trains.

My proposed language accepts the PSC's 2009 direction to have the city mitigate this type of locational planning rather than to reverse it.

This is my attempt to build a foundation of information on air toxins, via DEQ, and support measures that the city can take to offer means of mitigation as well as reducing these toxins at their source.

My best,

Tamara DeRidder, AICP  
Principal, TDR & Associates  
'Sustainable Planning and Design'  
1707 NE 52nd Ave.  
Portland, OR 97213  
503-706-5804  
and  
Chairwoman, Rose City Park Neighborhood Association

April 26, 2016 (Transmitted this day to the e-mails cited)

City of Portland  
City Council - cctestimony@portlandoregon.gov  
1221 SW 4th Avenue, Room 130  
Portland, OR 97204

CC: Susan Anderson, BPS Director, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
Joe Zehnder, Long Range Planning Manager, [Joe.Zehnder@portlandoregon.gov](mailto:Joe.Zehnder@portlandoregon.gov)  
Eric Engstrom, Comprehensive Plan Manager, [Eric.Engstrom@portlandoregon.gov](mailto:Eric.Engstrom@portlandoregon.gov)  
Nan Stark, BPS NE District Liaison, [nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov)  
Alison Stoll, Executive Director Central NE Neighbors, [alisons@cnncoalition.org](mailto:alisons@cnncoalition.org)

Subject: Recommend Policies that Allow the City to Act on Poor Air Quality

Honorable Mayor Charlie Hales and fellow Commissioners:

Thank you for allowing me to testify at the final public hearing on Portland's Comprehensive Plan. I testified to you on April 20<sup>th</sup> on the Plan's Finding of Fact that the Oregon Land Use Laws are broken when it comes to air quality and this is reflected in these documents. The OAR on Goal 6— Air Quality, 660-015-0000(6) says that land use planning "should include" air quality and carrying capacity. But, nothing forces cities or counties to integrate air quality into their comprehensive plans. As a professional planner it is my ethical obligation to identify where social justice fails and to plan for the needs of those who are disadvantaged. The poor, elderly, and disadvantaged are found to be the majority of the population in high density residential. Our current planning methodology predominately places high density residential uses next to high volume traffic corridors. Traffic in these corridors generate some of the highest amount of diesel and other toxins in our city.

In 2009 the Planning and Sustainability Commission discussed this issue based on similar testimony I provided on the Portland Plan. The PSC determined that instead of reversing the land use densities that mitigation would be used to protect this impacted population. Currently, no language has been included to promote mitigation nor have the most recent DEQ air quality maps been included to allow for a transparent and informed decision-making. Therefore, I proposed the following amendments:

Note:

Existing language = *italicized*

Staff proposed new language = *underlined and italicized*

My proposed new language = ***bold, underlined, and italicized***

The following language builds on the staff proposed additions to the existing Air Quality Policy contained as #3 in the April 11, 2016 staff proposed amendments.

*Policy 7.5 Air quality. Improve, or support efforts to improve, air quality through plans and investments, including reducing exposure to air toxics, criteria pollutants, and urban heat island effects. Consider the impacts of air quality on the health of all Portlanders.*

**7.5.a. Coordinate with the Oregon Department of Environmental Quality to incorporate up-to-date air quality information and best practices into planning and investment decisions.**

**7.5.b. Promote urban forestry's role in the use of vegetation for mitigating poor air quality and assisting in the creation of air quality buffers for schools and residential areas.**

**7.5.c. Collaborate with agencies such as ODOT, Union Pacific Rail Road, and Port of Portland in reducing sources of air pollution and in facilitating air quality mitigation buffers.**

**7.5.d Support best available science in urban design and construction to help combat poor air quality. This includes, but is not limited to, building and paving materials, structural orientation and landscape design, and indoor air quality facilities.**

**Policy 7.21.5 Air quality plans and regulations. Collaborate with Oregon Department of Environmental Quality to maintain up-to-date air quality studies in order to manage and mitigate potential community health impacts. See Figure 7-2 and 7-3 maps from DEQ PATS2017 Pollutant Modeling Summary, part.**

(Note: This policy is intended to fall after Policy 7.21 and prior to Policy 7.22)

Recommended Comprehensive Plan Figure 7-2



**PATS 2017  
MODELING RESULTS  
DIESEL  
PARTICULATE  
MATTER  
ALL SOURCES**

- PATS Study Area boundary
- Benchmark contour (0.1  $\mu\text{g}/\text{m}^3$ )
- Annual average concentration**
- <math>< 1/2 X</math> benchmark
- <math>1/2 X - 1 X</math> benchmark
- <math>1 X - 2 X</math> benchmark
- <math>2 X - 3 X</math> benchmark
- <math>3 X - 5 X</math> benchmark
- <math>5 X - 10 X</math> benchmark
- <math>> 10 X</math> benchmark



NOTE: Areas beyond the modeling domain (color-shaded region) are beyond the scope of this project.

REFERENCES:  
Concentration data from DEQ Portland Air Toxics Study (PATS)  
Basemap from Metro and ESRI data.

Recommended Comprehensive Plan Figure 7-3



**PATS 2017  
MODELING RESULTS  
BENZENE  
ALL SOURCES**

- PATS Study Area boundary
- Benchmark contour (0.13 µg/m<sup>3</sup>)
- Annual average concentration**
- < 1/2X benchmark
- 1/2X - 1X benchmark
- 1X - 2X benchmark
- 2X - 3X benchmark
- 3X - 5X benchmark
- 5X - 10X benchmark
- > 10X benchmark



NOTE: Areas beyond the modeling domain (color shaded region) are beyond the scope of this project.

REFERENCES:  
Concentration data from DEQ Portland Air Toxics Study (PATs)  
Baseline from Metro and ESRI data.



Finally, I offer my whole-hearted support for the April 11<sup>th</sup> staff-proposed addition to Policy 4.36 that addresses replacing older diesel engines. As follows:

*"Policy 4.36 Diesel emissions. Encourage best practices to reduce diesel emissions and related impacts when considering land use and public facilities that will increase truck or train traffic. Advocate for state legislation to accelerate replacement of older diesel engines."*

Thank you again for your time and consideration. Please let me know if you have any questions or I can be of further assistance.

My best,



Tamara DeRidder, AICP  
Principal, TDR & Associates  
'Sustainable Planning and Design'  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213  
And  
Chairwoman, Rose City Park Neighborhood Association

**Arevalo, Nora**

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**From:** Alex Gerace <alex.gerace@gmail.com>  
**Sent:** Tuesday, April 26, 2016 1:29 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** I support classifying NE 7th as a major city bikeway

Hi,

I commute to the Lloyd district everyday by bicycle and have found 7th Ave the best and fastest route for me to take. My alternative route is the The Rodney Greenway, which has certain benefits but ultimately is not the best option as it does not connect directly with the Lloyd district and has too many stops. And even if the city made 9th Ave a greenway, I would probably continue to use 7th. While I do not live directly on 7th, I can't imagine it being enjoyable to live on that street with cars whizzing by on a constant basis.

The city needs to make some tough choices. If we are going to meet our goals of commuting ridership by bicycle (around 20-25%), we need to create the infrastructure to match.

As the Lloyd District continues to dramatically change and as the city of Portland grows in population, we must encourage people to bicycle and/or use public transportation. We cannot support a model of single occupancy vehicles dominating our roads. Our roads were not designed for this much auto use and frankly we would be destroying the livability of the city if we tried to accommodate people's desire to drive.

Thank you for your time.

Sincerely,  
Alex Gerace  
4625 NE Rodney Ave  
Portland OR, 97211

**Arevalo, Nora**

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**From:** Tanja Olson <tanjaolson@gmail.com>  
**Sent:** Tuesday, April 26, 2016 1:05 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Missing middle

Please pass zoning reform that would allow "missing middle" housing in residential-zoned Portland neighborhoods throughout the city. Let's free up space to allow other options besides single-family and apartment buildings.

ALL urban centers need to have zoning that encourages mixed use on the major streets. ALL major streets should be zoned for high-density, mixed use with an exception for historical or significant structures or neighborhoods. Historical buildings of significance need to have more protection.

Thanks,  
Tanja

Tanja Olson  
711 SE 19th Ave  
Portland OR 97214  
cell 503.593.2692  
[tanjaolsonimages.com](mailto:tanjaolsonimages.com)

**Arevalo, Nora**

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**From:** Emily Guise <emilykguise@gmail.com>  
**Sent:** Tuesday, April 26, 2016 12:59 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** I support NE 7th Ave as a greenway

I strongly support classifying NE 7th as a major city bikeway from NE Weidler to NE Sumner. NE 7th is the most direct route from the Lloyd District to the Alberta Arts District and already sees heavy use by people on bikes. Neighbors have reported many instances of speeding, aggressive driving, and crashes onto sidewalks and trees. Traffic calming would improve safety and decrease air pollution and cut-through traffic on NE 7th. At a recent PBOT open house, the majority of participants as well as the Irvington, King, and Eliot neighborhood associations supported NE 7th as a neighborhood greenway over NE 9th.

NE 9th does not connect well with the Lloyd District, is indirect, requires jogs, has greater elevation gain, requires installation of signals, and has a truly awful road surface. Based on projections by PBOT at the recent open house, it would require twice as much money to turn NE 9th into a greenway instead of NE 7th. With money for transportation projects already severely limited, it would be most cost-efficient to use the signals and smoother road surface that are already in place on NE 7th.

NE 7th should be a safe neighborhood street, not a speeding cut-through for people avoiding Martin Luther King Jr. Blvd. I am very much in favor of a greenway on NE 7th Ave, rather than NE 9th Ave.

Thank you,  
Emily Guise  
335 N. Rosa Parks Way  
Portland OR 97217

--  
[emilykguise.com](http://emilykguise.com)

## Arevalo, Nora

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**From:** Kristin Shorey <knshorey@yahoo.com>  
**Sent:** Tuesday, April 26, 2016 12:45 PM  
**To:** BPS Comprehensive Plan Testimony; Frederiksen, Joan; Hales, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman  
**Cc:** SHNA Board  
**Subject:** Zoning Change Amendment Item #N 18 - 6141 SW Canyon Court (R326896)

Kristin Shorey  
4786 SW Elm Lane  
Portland, OR 97221

April 26, 2016

Comprehensive Plan Testimony c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 97204

Via email

to [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov); [joan.frederiksen@portlandoregon.gov](mailto:joan.frederiksen@portlandoregon.gov); [mayorhales@portlandoregon.gov](mailto:mayorhales@portlandoregon.gov); [Nick@portlandoregon.gov](mailto:Nick@portlandoregon.gov); [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov); [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov); [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)

RE: Zoning Change Amendment Item #N 18 - 6141 SW Canyon Court (R326896)

City Council Members,

I oppose this amendment proposed by Commissioner Novick. This amendment to the Comprehensive plan supersedes the process that was followed in November and December of 2015, and does not belong in the Comprehensive plan. A simple rezoning should follow the already existing process, the Standard Type III. This zoning change process requires notification to neighbors, pre-conference hearings and open hearings to allow for due process to be followed. I am perplexed on why this is included in the Comprehensive plan at all when a process already exists for a change like this to be approved.

As a neighborhood we are an evolving matrix of homes. As our older population moves on young families are choosing to move to our neighborhood because of its proximity to downtown, Nike and Intel. Developers are purchasing the larger lots and increasing the household numbers by transforming the properties to apartments, condos, multiple houses or by adding an apartment to an existing home. Our Neighborhood Association has a land use committee which is tracking these changes and hosts informational meetings for the affected neighbors. All of these changes have been done through the existing zoning codes.

It is a positive growth pattern that is being absorbed into our existing infrastructure, but our infrastructure is stressed. The traffic on Skyline, Burnside and Canyon Court has increased tremendously as people going to and from Washington County and Portland avoid the congestion of Highway 26. Yes, 6141 SW Canyon Court has access to public transportation. To the north we have the #20 which has an excellent schedule but is dangerous for our neighbors to get to as it requires walking on 57th (a busy, windy street with no sidewalks) with 20 minute walking time, up hill, from 6141 SW Canyon Court. To the East we have the MAX station, 1.4 miles from 6141 Canyon Court, a 30 minute walk. To the South we have the #58 which is referenced by the owner as the public transportation option. The #58 is a 10 minute walk from 6141 Canyon Court but its frequency is lacking. During rush hour it is every 20 minutes, off peak time is once or twice per hour and service begins at 5am and ends at 10:30 pm.

This information is exactly what is discussed during a Standard Type III process and is essential to the planning process. Please reject the Comprehensive Plan amendment #18 - 6141 SW Canyon Court and allow the existing process of Standard Type III to decide whether this is good for our neighborhood and the existing infrastructure.

Thank you for attention to this matter and your excellent work on the Comprehensive Plan.

Kristin Shorey  
Sylvan-Highlands

**Arevalo, Nora**

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**From:** Jesse Boudart <boudartj@gmail.com>  
**Sent:** Tuesday, April 26, 2016 12:22 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Install Diverters on 7th Ave

Hello,

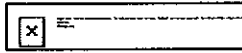
Please install diverters on 7th Avenue so I can have a safer north-south passage on my bicycle. There are seldom high quality north-south bike routes in Portland already!

Thank you,  
Jesse

**Arevalo, Nora**

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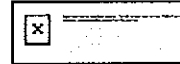
From: mail@changemail.org  
Sent: Tuesday, April 26, 2016 12:10 PM  
To: BPS Comprehensive Plan Testimony  
Subject: 10 more people signed "Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon"



New signatures

city of portland – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon



Petition by NE 9th Ave Greenway, PDX · 10 supporters

**10 more people signed  
in the last day**

[View petition activity](#)

RECENT SUPPORTERS



**Richard Nimby**

Portland, OR · Apr 26, 2016

I don't understand the 7th option. NE 9th is a Win-Win for everyone. The terrain is steeper on 9th, so thats better for the cyclists health. The city can market 9th as a premier bikeway without really having to spend any money on upgrades. Win-Win.



**Candace Laska**

Portland, OR · Apr 26, 2016

I travel on and around NE 7th between Broadway and Fremont, traffic is already a mess and that's before the huge apartment building is



completed, with the additional traffic it will bring. 7th is also used as an escape from the long lines of cars on MLK. 7th should definitely NOT be a greenway, doesn't meet the criteria.



**Jamie Dohrmann**

Portland, OR · Apr 26, 2016

i oppose 7th as the proposed greenway and believe 9th to be the best alternate route



**Vickie Stepper**

Portland, OR · Apr 25, 2016

NE 8th is a narrow street and already has high amounts of traffic. Seems like adding the large apt complex on 7th was a bad move as it has limited parking.



**Julie Lance**

Portland, OR · Apr 26, 2016

[View all 10 supporters](#)

CHANGE.ORG FOR DECISION MAKERS

On Change.org, decision makers like you connect directly with people around the world to resolve issues. Respond to let the people petitioning you know you're listening, say whether you agree with their call to action, or ask them for more information. [Learn more.](#)

This notification was sent to [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov), the address listed as the decision maker contact by the petition starter. If this is incorrect, please [post a response](#) to let the petition starter know.

Change.org · 548 Market St #29993, San Francisco, CA 94104-5401, USA

**Arevalo, Nora**

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**From:** Sara Morrissey <sara.morrissey07@gmail.com>  
**Sent:** Tuesday, April 26, 2016 11:23 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Letter of support - NE 7th Ave designation as a greenway  
**Attachments:** NE7thAve-BikeGreenway-LetterofSupport-Morrissey.pdf

Dear Portland City Council Members,

I would like to advocate that NE 7th Ave become a major bikeway and neighborhood greenway (with diverters). As a home owner on NE 7th And Shaver, I see cars speed through our local street daily and as a cyclist I have had many close encounters with motor vehicles that are using the roadway to avoid traffic on MLK. Over the past 5 years I have traveled on both NE 7th and 9th and believe NE 7th provides a better selection as a greenway as it has a much more:

- direct route
- more gradual elevation change
- cost effective (already has signalized intersections)
- more community destinations along its route

I have written a letter of support along with my partner to encourage this project. Please feel free to email or call me [\(503.440.4066\)](tel:503.440.4066) if you have any questions about our letter.

Best,

--

Sara Morrissey

Sara Morrissey & Dan Hynes  
3964 NE 7<sup>th</sup> Ave  
Portland, OR 97212

April 26, 2016

Dear Portland City Council Members,

Dan Hynes and I, who are home owners on NE 7<sup>th</sup>, would like to advocate for the designation of NE 7<sup>th</sup> as a north/south neighborhood greenway (utilizing traffic diverters and 20 mph designation) as well as a major city bikeway between Sullivan's Gulch and north of Alberta Street, in the city's Transportation System Plan. As home owners, we have seen traffic continue to grow on NE 7<sup>th</sup> as this local street is currently being used as a cut-through by motor vehicle uses in attempt to avoid rush hour traffic on Martin Luther King Blvd. and Interstate 5. NE 7<sup>th</sup> currently carries about 5,500 cars a day, almost twice the city's current target for the local street that it technically is classified as. During other hours, I can vouch that cars speed on the street, using it as an alternative to MLK. Additionally, it is also currently heavily used as a route for cyclists and pedestrians as it is the most direct and lower traffic roadway (than MLK) that travels north-south.

Although NE 9<sup>th</sup> has been proposed as an alternative north-south connector, this idea has been thoroughly discredited by surrounding neighborhoods and, in particular, cyclists. 9<sup>th</sup> has a steeper grade north of Broadway and also requires riding through Irving Park. Irving Park has inappropriate infrastructure for a greenway. I have also had a few interesting incidents with dogs at the dog park that borders the path. NE 9<sup>th</sup> is also challenging to cross at the following intersections: Knott, Fremont, Prescott, and Alberta – and I would like to point out that these are all existing signalized interchanges on NE 7<sup>th</sup>. Furthermore, 9<sup>th</sup>, south of Irving Park, has concrete pavement, resulting in jarring and sometimes dangerous encounters with uneven concrete. Additionally, the roadway past Broadway, has no infrastructure for bicycles while NE 7<sup>th</sup> does have this exiting amenity.

NE 7<sup>th</sup>, in contrast, has a gradual grade, is direct, and has existing bike infrastructure south of —and across— the Broadway/Weidler couplet. The existing signals at Knott, Fremont, Prescott, and Alberta, make these more heavily traveled roadways safer and easier to cross for both pedestrians and cyclists. Additionally, NE 7<sup>th</sup> provides direct access to multiple NE community assets such as: King School, King Farmers Market, Two Plum Park, Irving Park, the small cluster of shops and cafes at NE Knott, and Lloyd district amenities. Additionally, NE 7<sup>th</sup> is already being used extensively by both pedestrians and cyclists. NE 7<sup>th</sup> is also more cost effective to implement.

We believe that adding traffic diverters to 7<sup>th</sup> would most likely push non-local car traffic west to MLK or east to 15<sup>th</sup>. The city has done a wonderful job at making west-east greenways but falls short on north-south routes. NE 7<sup>th</sup> is already being used as a north-south route but needs additional city investment to ensure safety, further moving the city to achieve Vision Zero and incentivize more residents to bike or walk. This project is needed to ensure the city is able to provide alternative modes for residents and visitors. Additionally, making the corridor be an effective bicycle commuting corridor is going to reduce the number of cars, which is a goal that the city has identified in multiple plans. Lets not wait until there is a crash between motorists and cyclists / pedestrians on NE 7<sup>th</sup>. Lets act now and move this vision forward to provide Portland residents with the ability to select alternative modes of transportation and provide them with safe and direct routes to neighborhood and citywide destinations.

Please feel free to contact me directly if you have any questions about our letter.

Sincerely,  
Sara Morrissey & Dan Hynes  
[Sara.morrissey07@gmail.com](mailto:Sara.morrissey07@gmail.com)  
503.440.4066

## Arevalo, Nora

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**From:** Rob Erickson <rob.erickson@gmail.com>  
**Sent:** Tuesday, April 26, 2016 11:22 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** NE 7th/9th neighborhood greenway

(Resending to include mailing address).

Good morning. I would like to add my voice as strongly in favor of a neighborhood greenway on NE 7th Avenue.

I live in the Concordia neighborhood and work downtown and regularly commute by bicycle along the Vancouver / Williams Ave bike lanes. The traffic on these lanes is never pleasant, to the point that my partner will not make the same trip for on bike for fear of her life. A neighborhood greenway would be a wonderful change to our commutes.

There is some debate between 7th and 9th Avenues and I would like to support the 7th Avenue choice. My main reason is it does \*not\* go through Irving park.

While biking through a park is great for an outing, it is terrible for a commute. People, especially children should be able to walk and run freely in a park without having to look both ways for bikes. As a commuter I will go far out of my way to avoid heavy pedestrian areas - frankly if my choice is going through the park or being near car traffic, I will choose the cars.

Thanks for your consideration,  
Robert Erickson  
6126 NE 23rd Ave  
Portland, OR 97211

## Arevalo, Nora

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**From:** Kay Newell <Kay@lightlady.com>  
**Sent:** Tuesday, April 26, 2016 11:10 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Please enter as a support for Zone change--Kay Newell

Kay L Newell  
3901 N Mississippi Ave  
Portland, OR 97227

"the Lightbulb Lady"  
503-281-0453

Regards the requested Zone on Fremont between Vancouver and Mississippi Avenues in the Boise Neighborhood. from R1 to CM2.

### Reasons for:

1. The city is updating all zoning area of the city to meet future density goals.
2. The City prefers higher density along current business streets and neighborhoods.
3. Ben Kaiser, at his expense changed the zoning to include higher density in the same area.
4. The Office building Apartments and New Seasons have increased density. The area along Fremont should all have the higher density to support the walkable neighborhood.
5. Making all of Fremont C2 or higher density will most likely happen in the near future. Increasing that density now will allow Developers build without the cost of a zone change in the future.
6. All of those objections have been stated and dismissed as not a reason to deny Density development. For many years, people in the Mississippi Avenue and Williams/Vancouver saw developments impact them in the same style. Those objections did not often change the density outcome.
7. There are several affordable housing units in the area. The Developer requesting the zone change wants to create more affordable units. He can do so only if his cost are affordable.
8. With higher density, office space, a major store, on at Williams/Vancouver; a school, laundry, and other small stores now on Fremont, we are creating a small complete neighborhood that joins the larger community neighborhoods of Mississippi and Williams.
9. According to Nan Stark, the street can support a higher Density.
10. I believe by creating a full U of high density, we will help pull together the current businesses areas, creating a more complete 20 minute community.

### Rebuttals for not doing the higher Density.

1. The desires not to have any zoning change that will impact the current owners of properties is understandable.
2. People bought home with the thought that the current zone would remain to protect their rights.
3. A change of zoning will impact the dollar values of current home owners.
4. More lots than those owned by developers will be impacted.
5. A school on the street will experience more traffic as the developments are built along Fremont. There are large developments in planning and that are breaking ground now.
6. Mississippi and Williams are not yet fully built out. More development is to be expected on those streets.

Thank you,  
Kay Newell

**Arevalo, Nora**

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**From:** Kenner Swain <kennerswain@gmail.com>  
**Sent:** Tuesday, April 26, 2016 10:55 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive plan trigger warnings

Proposed preface: The Portland comp plan will be in effect unless and until a) Portland is utterly overrun with refugees from drought and plague in the Southwest and/or b) The Really Big One (see 2016 Pulitzer-prize article in *New Yorker* by Kathryn Schulz). As Mike Tyson said, everybody has a plan until I hit them in the face.

P.S. Very impressive and edifying testimony at recent public meetings, and heroic attentiveness by commissioners.

Kenner Swain  
SW Portland

**Arevalo, Nora**

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**From:** Mark Wheeler <mark@rootsrealty.com>  
**Sent:** Tuesday, April 26, 2016 10:50 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** NE 7th Bikeway

Hello,

I support the plan to make NE 7th Avenue a bikeway, including automobile diverters at frequent intervals. Thank you.

Mark Wheeler  
628 SE 58th Ave,  
Portland, OR 97215

## Arevalo, Nora

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**From:** Tom McTighe <mctighe.tom@gmail.com>  
**Sent:** Tuesday, April 26, 2016 9:44 AM  
**To:** BPS Comprehensive Plan Testimony; Hales, Mayor; Commissioner Fish; Novick, Steve; Commissioner Fritz; Commissioner Saltzman  
**Subject:** Comprehensive Plan Testimony

To: Mayor Hales and Council Members:

Re: Comprehensive Plan Testimony on Commissioner Fish's Amendment on SE Caruthers from 35th Place to 38th, dated April 26.

I oppose this amendment regarding properties on the South side of Caruthers between 35th Place and 38th. I am a Board Member of the Richmond Neighborhood Association, but I am only writing on my own behalf with this letter.

It is clear that we are in a housing crisis, and we need to act to avert a general affordability crisis in Portland.

These lots have had a Comprehensive Plan designation of Commercial (UC(b)), for over 30 years. To make progress as intended, we need to stick with the plan.

I agree with the the Division Design Initiative's recommendation to cluster development at "nodes" in places like the intersection of Cesar Chavez and Division. This neighborhood has the potential to become an ideal 20-minute Neighborhood.

Please do not approve this amendment, and keep the "Comp. Plan designation" on the properties on the South side of Caruthers to the MU-UC recommended in the Recommended Draft of the Comprehensive Plan.

Thank you,

Tom McTighe  
3004 SE Brooklyn St.  
Portland, OR, 97202



## Arevalo, Nora

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**From:** laurie.be <laurie.be@gmail.com>  
**Sent:** Tuesday, April 26, 2016 8:16 AM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Hales, Mayor; Anderson, Susan; Commissioner Novick; Commissioner Fritz; Commissioner Fish; Commissioner Saltzman; Stockton, Marty  
**Subject:** People's Coop Rezoning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor Hales and Commissioners Fish, Fritz, Novick, and Saltzman,

(I am copying and pasting a letter written by a neighbor here as it clearly outlines how I feel and is so nicely written.)

My neighbors and I are strongly opposed to the proposal to change the Comprehensive Plan designation and zoning for People's Co-op from residential non-conforming to commercial. We believe that such a change would negatively impact the neighborhood, and is incompatible with the residential character of the site.

People's location is a historical quirk; there is little to recommend the site for commercial use. It sits on the corner of two local service streets, and is surrounded on all sides by residential properties. While we are happy to have the co-op as our neighbor, if it were to close, we would prefer to see the site put to residential use rather than open it to further commercial development.

As a non-conforming residential property, there are operational restrictions placed on People's regarding operating hours, outside noise, and increases in intensity of use, which are reasonable given its residential location. Conversion to commercial zoning would remove these restrictions, and the site could be redeveloped to increase the commercial intensity in a way would no longer be a good fit for the neighborhood. A new business could be open much later and make more noise than is currently allowed. We want to avoid the serious conflicts we have seen at other small commercial sites that changed use, in one case leading to violence and neighbors moving from the neighborhood.

The Hosford Abernethy Neighborhood Association (HAND) board reviewed the situation in November 2015, and voted overwhelmingly to oppose changing the site's zoning or Comprehensive Plan status. They heard from People's staff and board, the planner who made the original recommendation, and concerned neighbors, and concluded that the current status quo balances the needs of all parties.

Finally, I believe there are many other sites similarly situated around the city. I would ask that unless there is support from neighbors, you proceed cautiously when changing the zoning of these isolated commercial sites from non-conforming residential to commercial. There can be far-reaching impacts for residents, and it would be a pity if these commercial sites, which help provide services to residents and texture to the urban fabric, were to become points of contention as rules governing their use were removed.

Thank you,  
Laurie Berkowitz  
3111 SE 22nd Ave  
Portland, Oregon

## Arevalo, Nora

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**From:** Arlene Williams <awilliams222@outlook.com>  
**Sent:** Tuesday, April 26, 2016 7:44 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan Testimony regarding P45

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I oppose #P45 at this time for the following reasons. #P45 states:

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

This is vague and it is rushed. Is this changing the zoning, or just setting up for a discussion of that zoning change to happen later after the Comprehensive Plan is settled? What does "where appropriate" mean and at one point in the process would any building permit get reviewed for appropriateness? My fear is that the City of Portland is doing so much so quickly that many unintended consequences could result, and citizens will not have enough time to adequately address this drastic change because their energies have been devoted to understanding and commenting on the Comprehensive Plan.

An immediate concern for me would be that this policy could contradict my efforts to have the fire code recognized as a limiting factor for up-zoning on my dead end street with no fire apparatus turnaround. My amendment to the amendment #B110 would address these public safety concerns, but #P45 could wipe that all away, since my dead end block of SE Henry Street is within the area marked on the map on page 25 of the PowerPoint presentation at <https://www.portlandoregon.gov/bps/article/571931>. If this policy would give "by right" the ability to develop this block for middle housing (when we are already overwhelmed by middle housing on this block in the form of duplex/apartments) then none of the public safety issues on this dead end street would be addressed when permits are issued.

Until you can refine the policy in #P45 to take into consideration public safety and infrastructure issues such as on this block of SE Henry Street, or exempt areas like my block from the policy, I urge you to hold back until the policy can be studied further. Don't rush in and create bad policy that will contradict amendments that you support. It looks unprofessional and can create much confusion and conflict among residents, many of whom have tried their best to participate in this challenging process.

Arlene Williams

5401 SE Henry Street, Portland, OR 97206

**Arevalo, Nora**

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**From:** dhare <dhare@reed.edu>  
**Sent:** Tuesday, April 26, 2016 6:52 AM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Stockton, Marty; molinaroarchitect@gmail.com  
**Subject:** testimony on amendment P45  
**Attachments:** Hare.Apr252016.P45letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Attached please find my letter of testimony on City Council Comprehensive Plan Amendment P45 Middle Housing.

Denise Hare  
2536 SE 33rd Place  
Portland OR 97202

2536 SE 33<sup>rd</sup> Place  
Portland, OR 97202

April 25, 2016

Mayor Hales and Commissioners:

I would like to share some thoughts with you regarding City Council Comprehensive Plan Amendment P45 Middle Housing. I understand the attraction of finding ways to blend more housing density into single-family zoned areas of the city. I can appreciate why Eli Spevak's ideas have generated such a rush of interest and support. However it seems premature to try to tack missing middle options onto the Comprehensive Plan without more inspection, and without allowing the Residential Infill Project to complete its work.

I would further argue that rather than trying to target density towards certain corridors, efforts should be made to facilitate more construction throughout the city, but in a responsible and sensitive manner. This means that residential infill standards should be the same for all single dwelling zones—and not applied differently to different neighborhoods. Some neighborhoods are better able to mobilize their residents and use resources to their advantage. It is unfair to downzone some residential regions and then to concentrate density in others. This only serves to fuel the land and housing price crisis even further, because “development-friendly” zones experience speculative price increases in anticipation of further developer interest. Moreover, new residents deserve access to parks, schools, and other amenities besides just transit. The transit system can adapt to, and even benefit, from a more uniform distribution of riders that supports a more complete system grid.

To achieve more affordable housing that does not threaten to undermine the strong sense of community that characterizes our neighborhoods, we need a more uniform citywide approach. The missing middle option may well be the right way to get this, but Amendment P45 is not the solution. Please reconsider and take the time needed to get it right.

Sincerely,



Denise Hare  
2536 SE 33<sup>rd</sup> Place  
Portland, OR 97202

**Arevalo, Nora**

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**From:** Mike Westling <mwestling@gmail.com>  
**Sent:** Monday, April 25, 2016 8:08 PM  
**To:** BPS Comprehensive Plan Testimony; Shriver, Katie; Valderrama, Andrea; Bhatt, Pooja; Grumm, Matt; Jamie Dunphy; Elmore-Trummer, Camille; Hales, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman  
**Subject:** Comprehensive Plan Testimony - Middle Housing  
**Attachments:** City Council Testimony - 04.27.2016.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear City Commissioners and Staff,

Attached is written testimony in support of the middle housing amendment (P45) as part of the the comprehensive plan update. I am submitting this testimony as a representative of the City Club of Portland, which recently approved an affordable housing report that includes a recommendation for updating the city's zoning code to allow and encourage a variety of housing options in the city's residential neighborhoods.

Kind Regards,

Mike Westling  
503.498.8161  
[mwestling@gmail.com](mailto:mwestling@gmail.com)

6226 NE 28th Ave.  
Portland, Oregon 97211

**Comprehensive Plan Testimony  
April 27, 2016**

**Mike Westling  
6226 NE 28th Ave.  
Portland, Oregon 97211**

I'm speaking today as a homeowner in the Concordia neighborhood and as a member of the Portland City Club's Affordable Housing Research Committee. The City Club is currently considering a set of affordable housing recommendations that includes revising Portland's zoning code and zoning map to allow for more "missing middle" housing types in the city's residential neighborhoods.

In many ways, proximity has become the equivalent of opportunity in our city. The closer you are to good schools, active parks, and well-paying jobs, the greater your chances for success. As such, the discussion about housing affordability can't **just** be about **how much** housing we have, but also **where** that housing is located.

Recent research shows that kids from poor families who live in mixed-income neighborhoods do better in school and earn more money over their lifetimes than kids who live in neighborhoods of concentrated poverty. At the same time, kids from more affluent families acquire social and emotional skills like curiosity, collaboration, and empathy that help them succeed later in life.

The benefits extend to the entire region—allowing a diversity of housing types in our neighborhoods will promote affordability, make our community more walkable, and reduce carbon emissions.

And by reducing the need for people to commute long distances from places where housing costs less, mixed-income neighborhoods can reduce traffic congestion and improve movement of freight through the region.

And the best part about revising the zoning code is that, unlike the vast majority of other affordable housing solutions, it doesn't cost a dime.

I am encouraged by the proposed amendment (P45) specifically calling for enabling and encouraging the development of middle housing. It's a good start, specifying areas within a quarter mile of designated centers and within the Inner Ring around the Central City. But if these areas are the limit of where we are encouraging more diverse housing options, then we are falling short of our responsibility to make Portland accessible for people of all incomes. Middle housing - in its many different shapes and forms - has an important role in making all of our neighborhoods more accessible and helping to build vibrant centers and corridors for the future.

Thankfully, there are ongoing parallel efforts to examine adjusting the zoning code to allow for additional flavors of middle housing, including a BPS study to adjust zoning near parks, the work of the residential infill project, and overlay zones that would allow for a greater variety of housing types in R5 zones. All of these efforts have merit and deserve full consideration. I also recommend you take a look at a proposal from the Concordia Neighborhood Association to create a new overlay zone that would allow for any R5 residential property to have multiple units as long as it otherwise conforms to the building envelope and setback provisions of its zoning designation.

If we are serious about addressing the affordability crisis, we can't restrict more affordable housing types from broad swaths of the city. Our amazing neighborhoods are what make Portland such a livable place. If we want to keep those neighborhoods affordable for the future, we'll need to take action today. Thank you.

###

## Arevalo, Nora

---

**From:** Wintergreen, Lore  
**Sent:** Monday, April 25, 2016 7:45 PM  
**To:** Nick Sauvie; BPS Comprehensive Plan Testimony  
**Cc:** Scarzello, Christina; Frieda Christopher  
**Subject:** RE: Rossi Property

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

FYI: Doug Cook (Argay Neighborhood Association Chair) is an active EPAP member on the Housing Subcommittee and at the general EPAP. I phoned him and he is not ready to take a position on this at this time, but said he would step aside.

lore wintergreen  
East Portland Action Plan Advocate  
Office of Neighborhood Involvement  
East Portland Neighborhood Office  
1017 NE 117th Ave.  
(117th between Halsey + Glisan at the foot of the water tower)  
Portland, OR 97220  
503.823.4035  
[lore.wintergreen@portlandoregon.gov](mailto:lore.wintergreen@portlandoregon.gov)  
[www.eastportlandactionplan.org](http://www.eastportlandactionplan.org)

To help ensure equal access to City Programs, services and activities, the City of Portland will reasonably modify policies/procedures and provide auxiliary aids/services/alternative formats to persons with disabilities and provide language interpretation and translation to individuals with limited or no English language proficiency. Call 503.823.4035 or the City's TDD at 503-823-6868, or the Oregon Relay Service at 1-800-735-2900 with such requests no less than five (5) business days prior to the event or visit:

[www.portlandoregon.gov/OMF/CivilRights](http://www.portlandoregon.gov/OMF/CivilRights)  
[www.portlandoregon.gov/OMF/ADA](http://www.portlandoregon.gov/OMF/ADA)

**From:** Nick Sauvie [mailto:nick@ROSECDC.org]  
**Sent:** Monday, April 25, 2016 5:29 PM  
**To:** BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>  
**Cc:** Scarzello, Christina <Christina.Scarzello@portlandoregon.gov>; Wintergreen, Lore <Lore.Wintergreen@portlandoregon.gov>; Frieda Christopher <friedajc@comcast.net>  
**Subject:** Rossi Property

This is in regards to the Rossi/Giusto farm land on the west side of NE 147<sup>th</sup>/148<sup>th</sup>, tax account R318536 and R318771. I understand that the Comprehensive Plan proposes to downzone this property from R-3 to R-5, despite the wishes of the property owners. It is unbelievable to me that the City of Portland would take this action in the middle of a housing state



of emergency. The Rossi property is one of the largest undeveloped residential properties in the city. If the current zoning is maintained, the property could become an attractive community of attached houses, courtyard apartments and other "missing middle" homes.

These are some of the things I've learned as co-chair of the East Portland Action Plan's Housing Subcommittee.

- East Portland and Parkrose/Argay in particular, experienced some of the highest rent increases in the city. See linked Willamette Week article, "Portland's Rents Spike Spreads East, Pressuring Low-Income Residents" <http://www.wweek.com/news/2015/09/30/portlands-rent-spike-spreads-east-pressuring-low-income-residents/>
- The Parkrose School District has lost hundreds of students due to gentrification pressures
- The East Portland Action Plan responded to this gentrification pressure by spending two years developing a set of involuntary displacement prevention recommendations

Economics 101 tells us that restricting the supply of multi-family land is going to further accelerate the price of housing. The Bureau of Planning and Sustainability projects that the vast majority of new housing built in the city over the next 20 years will be multi-family. Today, 80% of the residential zoning in the city is for single-family housing. Why would the Comprehensive Plan call for further reduction in the supply of multi-family zoned land?

Nick Sauvie  
Executive Director  
503-788-8052 x16



ROSE connects our community to build good homes, healthy families and neighborhood opportunities.  
Like us on [Facebook](#) | Follow us on [Twitter](#)

**Arevalo, Nora**

---

**From:** Nick Sauvie <nick@ROSECDC.org>  
**Sent:** Monday, April 25, 2016 5:29 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Scarzello, Christina; Wintergreen, Lore; Frieda Christopher  
**Subject:** Rossi Property

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

This is in regards to the Rossi/Giusto farm land on the west side of NE 147<sup>th</sup>/148<sup>th</sup>, tax account R318536 and R318771. I understand that the Comprehensive Plan proposes to downzone this property from R-3 to R-5, despite the wishes of the property owners. It is unbelievable to me that the City of Portland would take this action in the middle of a housing state of emergency. The Rossi property is one of the largest undeveloped residential properties in the city. If the current zoning is maintained, the property could become an attractive community of attached houses, courtyard apartments and other "missing middle" homes.

These are some of the things I've learned as co-chair of the East Portland Action Plan's Housing Subcommittee.

- East Portland and Parkrose/Argay in particular, experienced some of the highest rent increases in the city. See linked Willamette Week article, "Portland's Rents Spike Spreads East, Pressuring Low-Income Residents" <http://www.wweek.com/news/2015/09/30/portlands-rent-spike-spreads-east-pressuring-low-income-residents/>
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Nick Sauvie  
Executive Director  
503-788-8052 x16



ROSE connects our community to build good homes, healthy families and neighborhood opportunities.



Hannifin Global Partner

808 sw third avenue, suite 300 • portland, oregon 97204  
503.287-6825 • fax 503.415-2304  
www.otak.com

April 22, 2016

Marty Stockton  
City Planner - Southeast District Liaison  
City of Portland, Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201-5380

RE: Brummell Enterprises – Sellwood Properties

Dear Marty,

I am writing to express our support for the current City of Portland recommended land use designation map, based on Mayor Hales' amendment list. We continue to work with Brummell Enterprises on their holdings in Sellwood and remain mindful of the Comprehensive Plan update process.

Our main goal for the Brummell Comprehensive Plan testimony is to promote planning that would allow for vibrant nodes and corridors for the Sellwood neighborhood in the future. It is important to us that the properties included in the testimony can one day serve as meaningful places for Sellwood, yet are respectful of the surrounding context and neighborhood. We believe that the City's current recommended land use designation map is honorable and achieves a nice balance for the vitality of the nodes, included in our testimony, and the surrounding neighborhood. With ownership at all four corners and close proximity to transit, the intersection of SE 17<sup>th</sup> Ave and SE Sherrett St is a rare place-making opportunity and an ideal location for Sellwood to absorb growth. The extension of the Mixed Use – Neighborhood Corridor designation as requested by our testimony is key to creating a vibrant and successful node. This additional depth allows for additional flexibility and the space needed to create amenities (retail, public plazas) and also for it to work functionally (parking).

I have personally attended several SMILE Land Use Committee meetings in the past several months and am tuned-in to the current neighborhood concerns. As a whole, the concerns seem to stem from the very common human fears of growth and change. We are all aware that Portland is growing rapidly and we believe that our testimony supports responsible growth – in corridors and nodes. We are also in support of the City's efforts to increase compatibility between mixed used zones and residential zones through the Mixed Use Zones Project.

Please include this in the record and forward on to the Council.

Respectfully,

Don Hanson

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

cc. Bhree Roumagoux, Robert Hensch

## Arevalo, Nora

---

**From:** jon.newman@agilityrecovery.com  
**Sent:** Monday, April 25, 2016 4:37 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** 7th st greenway

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Myself, wife (Gina) my 2 young children and our dog Ali fully support a greenway on NE 7th Ave.

Thank you for the support

Jon Newman-Senior Sales  
Agility Recovery  
www.agilityrecovery.com  
503 490 8608

## Arevalo, Nora

---

**From:** Adam Herstein <aherstein@gmail.com>  
**Sent:** Monday, April 25, 2016 3:35 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan Testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Commissioner Fish Amendment on SE Caruthers from 35<sup>th</sup> Place to 38<sup>th</sup>, dated April 12

I oppose this amendment regarding properties on the South side of Caruthers between 35<sup>th</sup> Place and 38<sup>th</sup>.

These lots are on the south side of Caruthers, and are directly north of commercial properties on Division St. They have had a Comprehensive Plan designation of Commercial (UC(b)), for over 30 years. Planners in 1981 were looking forward when they designated these lots commercial. They were also influenced by the three lots on Caruthers at 37<sup>th</sup> that were in Commercial uses already at that time.

The Division Design Initiative talks about clustering development at “nodes”. It seems that these lots will allow larger development and reinforce the intersection of Cesar Chavez and Division with more intense development. This will accommodate more growth at a intersection with excellent transit service, in an area where a 20-minute Neighborhood is rapidly evolving.

Please do not approve this amendment, and keep the “Comp. Plan designation” on the properties on the South side of Caruthers to the MU-UC recommended in the Recommended Draft of the Comprehensive Plan.

Thank you.

Adam Herstein  
3115 SE 52nd Av  
Portland OR 97206

**Arevalo, Nora**

---

**From:** Marie Biondolillo <marieb@pcmtv.org>  
**Sent:** Monday, April 25, 2016 2:49 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Proposed Downzoning in Eastmoreland

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please note: I'm against the proposed downzoning in Eastmoreland. I don't think density should be kept low there.

My name is Marie Biondolillo and I live in Westmoreland, at 5928 SE 17th Ave, Portland OR 97202.

Thanks,

Marie

--

Marie Biondolillo  
Communications Coordinator  
Portland Community Media  
[marieb@pcmtv.org](mailto:marieb@pcmtv.org)  
(503) 288-1515, ext. 141  
<http://www.pcmtv.org/>

Portland City Council  
 1221 S.W. Fourth Avenue  
 Portland Oregon

Re: Written Comprehensive Plan and Proposed Zone Testimony

Dear Members of the Portland City Council,

This testimony applies to the property at 4915 N.E. Fremont Street in Portland Oregon with Property ID R111567 Map 1N 2E 19CD 2600. The owner of the property for many, many years is the Gladys and George LLC and their business Stanich's Restaurant continues by the family at this location to this day.

Currently, the property carries a Neighborhood Commercial 2 (CN2) commercial zone.

The new proposed Comprehensive Plan designation is Mixed Use-Neighborhood. This designation is acceptable to the property owner with the assumption that the new Zone for the property becomes Commercial Mixed Use 2 (CM2)

The reasons for these plan and zone requests are as follows:

1. This property has 100 feet of Street frontage on N.E. Fremont Street. N.E. Fremont Street is a well established commercial corridor in northeast Portland. This particular area of Fremont Street has numerous long standing residential and commercial development.
2. Lately, there has been a recent residential development nearby on Fremont Street of a four (4) story building in an existing CS zone. The CS zone allows for a 45ft height limitation, which is similar to the new Zone CM2.
3. The specific property lends itself to the density and height criteria of the CM2 zone. The property is bordered southerly by Fremont Street, on the north by the open space of a cemetery, on the west by N.E. 49<sup>th</sup> Avenue, and on the east by Settlemier Jackets. Settlemier Jackets are also requesting a CM2 zone. There is very limited impact on any adjacent properties.
4. N.E. Fremont Street provides City transit (bus line).
5. The new Comprehensive Plan and Zones will be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Property values, project loan criteria and the market will be important to determine the development for new projects. **PRECEDENCE ALREADY ESTABLISHED: The City approved and construction recently completed five (5) blocks away at 4429 NE Fremont Street the four (4) story Beaumont Village mixed use development.** The Gladys and George LLC believes, given the increased demand for these infill sites, the ability for greater density with the bonuses and incentives of the CM2 zone will be crucial to the property ultimate development and pricing of the final product.

In conclusion, the Gladys and George LLC feels the resource of a 10,000 sqft property at this location is best suited to the Mixed Use-Neighborhood Comprehensive Plan designation with a CM2 Zone.

Thank you very much for your consideration of this matter.

The Gladys and George LLC 4915 N.E. Fremont Street Portland Oregon 97213



Portland City Council  
 1221 S.W. Fourth Avenue  
 Portland, Oregon

Re: Written Comprehensive Plan and Conceptual Zone Testimony

Dear Members of the Portland City Council,

This testimony applies to the following properties which are ALL owned by L&N Third, LLC :

Map 1S 1E 01AA Tax Lot 09000 Parcel # R112202 House on 5,000 sf lot (residential use on Morrison St)

Map 1S 1E 01AA Tax Lot 08900 Parcel # R112203 House on 5,000 sf lot (residential use on Morrison St)

Map 1S 1E 01AA Tax Lot 08800 Parcel # R112205 House on 3333 sf lot (commercial use on Morrison St)

Map 1S1E 01AA Tax Lot 08700 Parcel # R112204 Parking Lot on 3330 sf (commercial use on corner Morrison St./Cesar Chavez Ave)

Map 1S1E 01AA Tax Lot 08500 Parcel # R112210 2 Houses on 6667 sf lot (commercial use on Belmont St)

Map 1S1E 01AA Tax Lot 08400 Parcel # R112209 House on 3333 sf lot (residential use on Belmont St)

The existing Commercial zone for those properties fronting Belmont St is CN-2. Two of the properties, Tax Lots, 8700 and 8800, have split zoning with the south half of each CN-2 and the north half of each R-1. The other properties which front Morrison St are residential R-1.

Tax Lots 8500, 8700, and 8800 are currently commercially used for the long time neighborhood Belmont Academy school, and the other Tax Lots are currently improved with the school use AND duplex and triplex rentals.

L&N Third, LLC believes the proposed new Comprehensive Plan designation for the properties on Belmont St of Mixed Use-Urban Center is acceptable, but only with a new Conceptual Zone of CM2.

L&N Third LLC also believes the properties on Cesar Chavez Ave and Morrison St. should have a similar Comprehensive Plan designation of Mixed Use-Urban Center and a new Conceptual Zone of CM2.

The reasons for these requests are as follows:

1. All the properties are under the same ownership and are contiguous Tax Lots comprising 26,663 sf of property fronting on Morrison St on the North; Cesar Chavez Ave on the East; and Belmont St on the South.
2. The properties as they exist now have a split zones CN-2 and R-1. The R-1 properties consisting of the north half of Tax Lots 8700, 8800 and all of Tax Lots 8900, and 9000 (total of 13,331.50 sf) have Cesar Chavez Ave and Morrison St frontage. The CN-2 properties facing Belmont St are Tax Lots 8400 and 8500 and the CN-2 properties facing Cesar Chavez Avenue are the south half of

Tax Accounts 8700 and 8800 (total of 13,331.50sf). Since this property is in one ownership, and has potential as one large development with three (3) street frontages, one new commercial comprehensive plan of Mixed Use-Urban Center and one new commercial conceptual zone of CM2 provides for a better property use and eliminates the split zone problem.

3. There is a significant likelihood that the 6,000 sf property in another ownership at the Northwest corner of Belmont St and Cesar Chavez Ave (which abuts Tax Lots 8500, 8700, and 8800) will be incorporated into a development of the L&N Third, LLC property. Cesar Chavez Ave is a Civic Corridor and Belmont St a Neighborhood Corridor with both streets served by City transit at this "important" intersection.
4. Pedestrian traffic will benefit by the L&N Third, LLC property being developed as a whole.
5. The new Comprehensive Plan and Zones will likely be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Property values, project loan criteria and the market will be important to determine the development for new projects. L&N Third, LLC believes, given the increased demand for these infill sites, the ability for the greater density with bonuses and incentives of the CM2 zone will be crucial to the properties ultimate development and pricing of the final product.

The Sunnyside Neighborhood Association has been contacted and those at the meeting appeared to support the CM2 zone.

In conclusion, although L&N Third, LLC would like all the property it owns at this location to have the same Zone of CM2.

**NOTE: THE NOTICE OF PROPOSED ZONE CHANGE TO CM-2 WAS RECEIVED FOR 5 OF THE 6 PARCELS OWNED BY L&N THIRD, LLC. HOWEVER, THE 6<sup>TH</sup> PARCEL---R112202 AT 3834 SE MORRISON ST. WAS NOT RECEIVED. OUR REQUEST IS THAT ALL THE PARCELS BE ZONED CM-2.**

Thank You,

L&N Third, LLC

Larry and Nina Lindstrom 11550 S.W. Riverwood Portland, Oregon 97219---owners of L&N Third, LLC

Portland City Council  
1221 S.W. Fourth Avenue  
Portland Oregon

Re: Written Comprehensive Plan and Proposed Zone Testimony

Dear Members of the Portland City Council,

This testimony applies to the property at 4929 N.E. Fremont Street in Portland Oregon with Property ID R111568 Map 1N 2E 19CD 2500. The owner of the property for many, many years is Settlemier Award Jackets, Inc. and their business continues at this location to this day.

Currently, the property carries a Neighborhood Commercial 2 (CN2) commercial zone.

The new proposed Comprehensive Plan designation is Mixed Use-Neighborhood. This designation is acceptable to the property owner with the assumption that the new Zone for the property becomes Commercial Mixed Use 2 (CM2)

The reasons for these plan and zone requests are as follows:

1. This property has 100 feet of Street frontage on N.E. Fremont Street. N.E. Fremont Street is a well established commercial corridor in northeast Portland. This particular area of Fremont Street has numerous long standing residential and commercial development.
2. Lately, there has been a recent residential development nearby on Fremont Street of a four (4) story building in an existing CS zone. The CS zone allows for a 45ft height limitation, which is similar to the new Zone CM2.
3. The specific property lends itself to the density and height criteria of the CM2 zone. The property is bordered southerly by Fremont Street, on the north by the open space of a cemetery, on the west by property owned by the Gladys and George, LLC, and on the east by a newer three (3) story building with main floor commercial uses and residential uses on the upper floors. The Gladys and George, LLC owners are also requesting a CM2 zone also. There is very limited impact on any adjacent properties.
4. N.E. Fremont Street provides City transit (bus line).
5. The new Comprehensive Plan and Zones will be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Property values, project loan criteria and the market will be important to determine the development for new projects. **PRECEDENCE ALREADY ESTABLISHED:** The City approved and construction recently completed five (5) blocks away at 4429 NE Fremont Street the four (4) story Beaumont Village mixed use development. Settlemier Award Jackets, Inc. believes, given the increased demand for these infill sites, the ability for greater density with the bonuses and incentives of the CM2 zone will be crucial to the property ultimate development and pricing of the final product.

In conclusion, the Settlemier Award Jackets, Inc. feels the resource of a 10,000 sqft property at this location is best suited to the Mixed Use-Neighborhood Comprehensive Plan designation with a CM2 Zone.

Thank you very much for your consideration of this matter.

Settlemier Award Jackets, Inc 4929 N.E. Fremont Street Portland Oregon 97213

Portland City Council  
 1221 S.W. Fourth Avenue  
 Portland Oregon

April 22,2016

Re: Written Zoning Testimony

Dear members of the Portland City Council,

This written testimony applies to the two (2) properties in the City of Portland in Multnomah County that constitute the existing Maplewood Retail Center located at the Southeast corner of S.W. Multnomah Boulevard and S.W. 45<sup>th</sup> Avenue. These two (2) properties are identified by State tax ID 1S1E20CB2000 and 1S1E20CB 2100. The properties are owned by L&N Fourth, LLC---Larry and Nina Lindstrom.

Currently the properties are zoned CN2 and are proposed for new zone CM1. The property owners are not in agreement with the proposed zone of CM1 and request that the City Council zone the properties **COMMERCIAL EMPLOYMENT (CE)** for the following reasons:

-----The CE zone is described as a medium-scale commercial zone and is intended for commercial sites OUTSIDE designated centers, especially along major streets and traffic routes. This describes the location of the properties well. The east-west Multnomah Boulevard is a major traffic carrier to southwest Portland neighborhood and even has it's identified I-5 exit to these communities. The intersection at 45<sup>th</sup> and Multnomah is really a 5-street "signalized" intersection with 45<sup>th</sup> Avenue providing access north and south to many long established residential and commercial locations. These streets are certainly major streets and traffic carriers.

-----The existing 9670 sq.ft. retail structure, even though not located in what could be called a "commercial center" has a proven value to the nearby residents of the area as a vital source for their commercial needs. Most all the existing tenants of the building have been there as tenants for over 15 years.

-----The property has adjacent residential zones. The property south is a relatively new residential structure and was constructed in an R-2 multi-family zone. The properties east are zoned single family with access to their existing structures from a southerly street and are separated from the subject property by a major forested/creek area with environmental protection. There is little impact to adjacent and close-by properties by the change of development parameters from the proposed CM1 to the requested CE zone.

-----The development parameters for the requested CE zone verses the proposed CM1 zone are quite minimal. There appears to be only a minor FAR upgrade and 10 foot more height allowance. Given the future housing projections for the City of Portland, if these properties were to be re-developed these

minimal upgrades could be the difference in providing a much better mixed use building than the older existing single story building much sooner.

In conclusion, the property owners L&N Fourth LLC feel that the resource of this large site at this major intersection would best be served by the development parameters found in the **COMMERCIAL EMPLOYMENT (CE)** zone. However, if the City Council feels that the property does not "fit" the CE zone, then the owners believe the **CM2—Commercial Mixed Use 2** zone (for the same reasons as the change to CE) is a better use for the properties.

Thank you very much for your consideration regarding this matter,

L&N Fourth LLC and it's owners Larry and Nina Lindstrom 11550 SW Riverwood Portland Oregon  
Telephone 503-997-9520

**Arevalo, Nora**

---

**From:** Marshall Johnson <marshall.d.johnson@gmail.com>  
**Sent:** Monday, April 25, 2016 1:35 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Fwd: Comprehensive Plan Testimony -- Fish Amendment dated April 12th

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

NOTE: address added to closing below.

----- Forwarded message -----

**From:** Marshall Johnson <marshall.d.johnson@gmail.com>

**Date:** Mon, Apr 25, 2016 at 1:30 PM

**Subject:** Comprehensive Plan Testimony -- Fish Amendment dated April 12th

**To:** [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov), [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov), [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov), [steve.novick@portlandoregon.gov](mailto:steve.novick@portlandoregon.gov), [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov), [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)

Dear Mayor Hales and Council Members,

I am writing to present my opposition to Commissioner Fish's Amendment, dated April 12, regarding properties on the south side of Caruthers between 35<sup>a</sup> Place and 38<sup>a</sup>. As a Richmond resident interested in the Comprehensive Plan, I see this node as important area/opportunity for future density and redevelopment.

These lots are on the south side of Caruthers and directly north of commercial properties on Division St. They have had a Comprehensive Plan designation of Commercial (UC(b)), for over 30 years. These lots were designated as commercial in 1981. They were also influenced by the three lots on Caruthers at 37<sup>a</sup> that were in Commercial uses already at that time.

The Division Design Initiative talks about clustering development at "nodes". It seems that these lots will allow larger development and reinforce the intersection of Cesar Chavez and Division with more intense development. This will accommodate more growth at a intersection with excellent transit service, in an area where a 20-minute Neighborhood is rapidly evolving.

Please do not approve this amendment, and keep the "Comp. Plan designation" on the properties on the South side of Caruthers to the MU-UC recommended in the Recommended Draft of the Comprehensive Plan.

Thank you,

Marshall Johnson  
Richmond Neighborhood  
2133 SE 47th Avenue

## Arevalo, Nora

---

**From:** mail@changemail.org  
**Sent:** Monday, April 25, 2016 1:08 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** 10 more people signed "Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon"

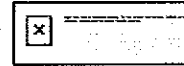
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

 New signatures

city of portland – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Portland OR: Support a NE 9th Ave Greenway in  
Portland, Oregon


Petition by NE 9th Ave Greenway, PDX · 10 supporters




**10 more people signed  
in the last 2 hours**

[View petition activity](#)

### RECENT SUPPORTERS

 **Rhonda Hughes**  
Portland, OR · Apr 25, 2016

I support the original plan to create a greenway along NE 9th Avenue. I oppose changing the alignment to NE 7th Avenue, and believe that this change would be ill-advised and dangerous.

 **Tom Byrnes**  
Portland, OR · Apr 25, 2016



Greenway on 7th makes no sense due to traffic volume and flow



**Eric Evans**

Portland, OR · Apr 25, 2016

While I recognize the need to improve the situation on 7th, I believe the proposal is well meaning but will create more problems. There is already significant cut-through traffic on at least NE 8th through NE 10th, with sometimes frightening speeds. Turning NE 7th into a dedicated bikeway will only worsen conditions on these neighborhood streets. The drivers on 7th (and succeeding streets) have already decided not to use MLK and are unlikely to be diverted back to it. They will instead favor less congested streets even deeper in the neighborhood.



**Estee Segal**

Portland, OR, OR · Apr 25, 2016

Closing NE 7th to traffic using diverters is irresponsible in this growing neighborhood! It will undoubtedly affect neighboring streets with increased traffic - streets that kids and families cross to get to Irvington School on a daily basis, multiple times. Please move forward with a greenway/bikeway on 9th Ave! Improvements of a bike path through Irving Park and a crossing at 9th & Fremont will be great!



**Hillary Barsky**


Portland, OR · Apr 25, 2016

I think the 7th Avenue choice would impact people who live between 7th and MLK in a very negative way, restricting access to both neighbors and services

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**Change.org** · 548 Market St #29993, San Francisco, CA 94104-5401, USA

**Arevalo, Nora**

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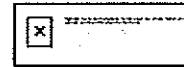
**From:** mail@changemail.org  
**Sent:** Monday, April 25, 2016 11:14 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** 5 more people signed "Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon"

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

 New signatures

city of portland – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.


Portland OR: Support a NE 9th Ave Greenway in  
Portland, Oregon  
Petition by NE 9th Ave Greenway, PDX · 5 supporters



**5 more people signed  
in the last 3 hours**

[View petition activity](#)

RECENT SUPPORTERS

 **Edward Picciotto**  
Portland, OR · Apr 25, 2016

I don't feel there are enough details in place to make sure the traffic doesn't move to neighboring sidestreets. Some possible options are diverters as well on eight and ninth blocking off access to Knott Street to stop people from cutting through.

 **Julie Dieringer**

Portland, OR · Apr 25, 2016

7th Ave is an already busy thoroughfare. Diverting to 8th puts my young children at risk and I strongly oppose this.



**Aaron Haselby**

Portland, OR · Apr 25, 2016

As someone who lives directly across from Albina Head Start. This facility needs more than a single direction in and out. Removing parent's access from 7th will be a traffic nightmare.



**Lisa Hamilton**

Portland, OR · Apr 25, 2016

I have lived on my street, NE Ivy at NE 7th for 21 years. NE 7th has always been a connection for those of us who live in Eliot neighborhood in the strip between NE 7th and MLK Blvd and bordered by NE Broadway and NE Fremont to the surrounding commercial areas. Many of the neighbors on this strip need to commute to work daily by auto (Biking or public transportation to work just isn't possible for some folks) and putting in traffic diverters on NE 7th Ave to lessen our access to NE 7th would be a hardship. The Albina Head Start program is across the street from my home at NE Ivy (and NE 7th Ave) and almost all of the parents travel by car to drop off and pick up the children attending the program. Most of the AHS employees drive to work as well. Traffic diverters on NE 7th would possibly be a hardship for parent and employees of Albina Head Start. My other concern with traffic diverters being placed on NE 7th would be with emergency service first responders such as ambulance and fire department vehicles access. How are they supposed to access homes in our strip of Eliot neighborhood between NE 7th and MLK Blvd? With rush hour traffic backed up on MLK, we need unencumbered alternative access on NE 7th without first responders having to navigate around diverters. Seconds count, as we all know when an ambulance was not able to navigate the NE Rodney Greenway traffic diverters, and a woman died.



**Steven Cornils**

Portland, OR · Apr 25, 2016

[View all 5 supporters](#)

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**Change.org** · 548 Market St #29993, San Francisco, CA 94104-5401, USA

**Arevalo, Nora**

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**From:** Josie Booth <josiebooth@fastsurf.us>  
**Sent:** Monday, April 25, 2016 11:44 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan Testimony

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Name: JOSEPHINE B. BOOTH

Address: 415 N.E. 28TH AVE.

Phone: 503-232-1427

Email: [josiebooth@fastsurf.us](mailto:josiebooth@fastsurf.us)

Property Structure: OLD PORTLAND STYLE (FOURSQUARE) Use: RESIDENCE

Hello,

I am requesting to be **removed** from the Designation: Urban Commercial which is proposed to become Mixed Use/Urban Center.

I am also requesting to return to the houses original **Zoning: R1 (Residential 1000)**.

Therefore, I am requesting to return to the original **Designation: High Density Single Dwelling**.

My **backyard** butts up to **2715 N.E. Flanders** backyard which is a house that is zoned **R1-Residential 1000**.

My house was built in 1899 and I wish to help preserve the historical nature and character in my Kerns area neighborhood.

That is what many Portland residents love about their city is the charm and history of older homes in the neighborhoods.

Thank You,

Josie Booth

**Arevalo, Nora**

---

**From:** Joe Recker <joe.recker@gmail.com>  
**Sent:** Monday, April 25, 2016 11:35 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Fwd: Support for Amendment #P55 of Comprehensive Plan Update

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Same email with full mailing address:

Joe Recker  
615 NE 64th Ave.  
Portland, OR 97213

----- Forwarded message -----

**From:** Joe Recker <joe.recker@gmail.com>  
**Date:** Mon, Apr 25, 2016 at 11:07 AM  
**Subject:** Support for Amendment #P55 of Comprehensive Plan Update  
**To:** [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)

Hi,

I strongly support the amendment to allow creation of "middle housing" developments in a significant portion of the City where more affordable housing can be produced in close proximity to transit, biking, and existing neighborhood amenities such as grocery stores and other services. I suggest that there be no allowable increase in overall building size so that the additional units are individually smaller and thus more affordable to small families struggling to own a home in the City. Two- and three-story middle-housing developments will do much to address a desired form of housing for families that has historic precedent in the City and will minimize disruption on existing communities. Similar to skinny homes on narrow lots, no parking should be required on these properties to ensure more of the site is devoted to landscaping, and outdoor space to be consistent with single-family zones. Also, a greater rear yard setback should be considered to also ensure consistency.

Thank you for the opportunity to comment on this amendment.

Sincerely,

Joe Recker  
615 NE 64th Ave

## Arevalo, Nora

---

**From:** Broughal, Justine  
**Sent:** Monday, April 25, 2016 10:52 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Testimony - Broadmoor

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Janine Hideman, a constituent, called on 4.22.16 and left a voicemail voicing her opposition to the Broadmoor amendment. She said that it needs to remain open space and not be converted to industrial use.

She did not leave any contact information other than her name.

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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## Arevalo, Nora

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**From:** Adrienne Leverette <adyleverette@gmail.com>  
**Sent:** Monday, April 25, 2016 10:42 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Re: strong support for zoning reform

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

My full name and mailing address:

Adrienne Leverette  
130 SE 53rd Ave  
Portland, OR 97215

On Mon, Apr 25, 2016 at 10:40 AM, Adrienne Leverette <adyleverette@gmail.com> wrote:  
To Whom It May Concern:

I am writing to voice my strong support for amending the Comprehensive Plan to allow for residential zones that will accommodate the "missing middle" of housing types. Portland's neighborhoods are made more vibrant by these housing types that were built when it was legal to do so. It is a great, and obviously necessary, idea to allow them to be built again in residential areas. NIMBYs may cry foul, but in times of change, someone is always going to complain. I urge you to take the long view for a livable, affordable Portland and vote for the "missing middle."

Sincerely,  
Adrienne Leverette  
SE Portland

RE: Comprehensive Plan testimony

4/20/16

Hello

This letter is in regards to the property located at 5250 NE Halsey. Myself and business partner are co-owners of the property as well as the business located at this location. We were pleased to learn that the Comprehensive zoning plan had identified this parcel as non-conforming and will rectify the current zone with a commercial zone designation.

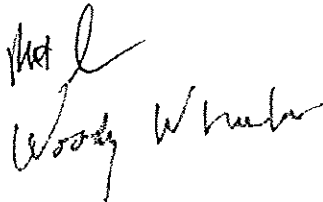
This building has been a business since it was originally built in 1929. Our location is on a transit street at the edge of a residential neighborhood.

Because of the busy nature of the corner it is not a good location for a single family resident; rather it's a natural location for a commercial use that supports the surrounding neighborhood.

We appreciate the effort of the city in regards to identifying properties such as ours and ensuring that they are in fact recognized correctly in their zoning designation.

Sincerely

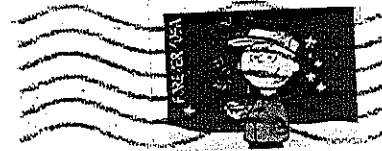
Prescott Allen  
Woody Wheeler



Co-property owners and business owners of New Deal Café  
5250 NE Halsey St  
Portland, Or 97213

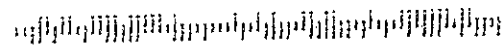
PAWW INC  
dba New Deal Cafe  
5250 NE Halsey Street  
Portland, OR 97213

FORTLAND OR 970  
21 APR 2016 PM 4 L



City of Portland  
1221 SW 4th Avenue Room 130  
Portland OR 97204

97204190021



**Arevalo, Nora**

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**From:** wheekatielee@gmail.com on behalf of Katie Todd <Katie@KatieToddArt.com>  
**Sent:** Monday, April 25, 2016 9:44 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** People's rezoning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor Hales, Council Members, and Director Anderson,

I am writing to ask that you do not move forward with proposals to change the Comprehensive Plan and rezone People's Co-op (3029 SE 21st Ave) from its current designation as non-conforming residential to commercial. I understand the intent of the rezoning/Comp Plan change is to preserve sites such as this as a sort of neighborhood-oriented commercial into the future, but I think the proposed change will have the opposite effect, potentially hastening the conversion of sites such as this into non-commercial use.

When we purchased our home 16 years ago, we deliberately chose the location, just one block from People's Food Coop because of the distinct neighborhood feel and easy access to this vibrant community resource. With all of the frustrating growth challenges happening in Portland, particularly in Clinton/Division, (traffic- side street cut throughs, congestion, honking-, the influx of Everett Homes, Air Quality issues) we still hold our "People's pocket" neighborhood, near and dear.

We are afraid that the current proposal has a high potential for unintended consequences. That People's might sell to a developer and what makes our neighborhood valuable to us, will be lost. I ask that you put the proposed changes for the People's site on hold; that you allow time for a more comprehensive discussion of how to best achieve the outcome we all want (i.e. preservation of small commercial sites in residential neighborhoods); and that you return and reconsider a more fully formed solution at a later date.

Thank you,

Katie Todd  
3126 SE 22nd Ave  
Portland, OR 97202

--  
Katie Todd

GALACTIVATIONS

PAINTINGS

ENERGY WORK

## Arevalo, Nora

---

**From:** Michael Kinne <michael.jay.kinne@gmail.com>  
**Sent:** Monday, April 25, 2016 9:43 AM  
**To:** Hales, Mayor; Commissioner Fritz; Commissioner Fish; Commissioner Novick; Commissioner Saltzman; BPS Comprehensive Plan Testimony  
**Cc:** City Auditor Griffin-Valade; Anderson, Susan; jim.rue@state.or.us; mnalandusecommittee@gmail.com  
**Subject:** RE: PROTECT SINGLE-FAMILY HOMES IN MULTNOMAH NEIGHBORHOOD

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

We oppose City Council Amendment #P45, New Policy 5.5, Middle Housing to the 2035 Comprehensive Plan (see amendment text following this email). If passed, this spurious proposed amendment will allow the single-family zoned property in Multnomah Village to be changed to multifamily zoning without the legal and adequate opportunity for the required timely public review and comment in due process. This proposed amendment is a radical, last-minute change to the 2035 Comprehensive Plan that is too far reaching to be incorporated into the plan with a very short time of approximately one month for citizen evaluation to provide reasoned public comment. This is an insufficient amount of time for our neighbors to become even adequately familiar with the desired and evaluated consequences of what is of late being proposed and to voice either approval or reasoned and considered opposition to the proposed amendment. The new Policy 5.5 has dubious legal standing, all elements considered.

In addition to objecting to the manner in which this amendment was introduced, I object to its substance. When the Discussion Map in the Draft SW Community Plan proposed that essentially all of Multnomah Village be rezoned R 2.5 to allow for attached row housing, hundreds of owners and residents in our neighborhood objected to the wholesale elimination of most single-family residential zoning at that time. I believe that the majority of the residents and taxpayers in my neighborhood still oppose it, but they are mostly unaware that this recent amendment is even being proposed or considered. The introduction of this recent amendment fails the needed legal test of due process and is specifically inconsistent with Oregon State mandated State Goal 1, wherein active citizen involvement in land use planning is required.

Hundreds of Multnomah Village residents and taxpayers, the Multnomah Neighborhood Association and the Southwest Neighborhoods, Incorporated have all considered and specifically requested that the Portland City Council change the proposed designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

If Multnomah Village is approved to be a designated Neighborhood Center within a ½ mile radius of the center of Multnomah Village, its legal boundaries will overlap with the legal and specified boundaries of the two adjacent Town Centers (specifically, Hillsdale and West Portland) as well as the legal boundary of the Barbur Boulevard Civic Corridor. The drafted higher-density development contemplated within a quarter mile of these legally designated centers will then overlap with Multnomah village's legal designation and will leave marginal room for the existing single family homes as proposed redevelopment continues to occur in the future. The Neighborhood Corridor designation better fits with the extant design and character of Multnomah Village and is more in keeping with the prevalent semi-rural character of the neighborhood that we currently live in and enjoy.

The introduction of the Draft 2035 Comprehensive Plan stated that there is more than enough existing capacity to meet the projected growth without changing any zoning. That being evident and said, during dozens of discussions with BPS staff, as we as a group advocated for the Neighborhood Corridor designation and in opposition to the Neighborhood Center designation, we were consistently and adequately assured that Multnomah Village's extant single-family zoning will remain unchanged with the proposed Neighborhood Center designation. Were we being misled by our city Mayor and our Portland City Commissioners and staff? The recently proposed Amendment #P45 directly contradicts those explicit assurances. It undermines our trust in the workings of reasoned city government and the application of legal standing in due process. I urge you to adequately consider the spurious proposed #P45 amendment and to vote against it.

Thank you.

Michael and Deborah Kinne

8121 SW 33rd Avenue

Portland, Oregon 97219

503-351-2000

cc: City Auditor, La Vonne Griffin-Valade, [lavonne@portlandoregon.gov](mailto:lavonne@portlandoregon.gov)

Susan Anderson, [susan.anderson@portlandoregon.gov](mailto:susan.anderson@portlandoregon.gov)

Director DLCDC Jim Rue, [jim.rue@state.or.us](mailto:jim.rue@state.or.us)

MNA Land Use Committee, [mnalandusecommittee@gmail.com](mailto:mnalandusecommittee@gmail.com)

### **Amendment P#45, New Policy after 5.5, Middle Housing**

**Proposed March 18, 2016**

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

**Arevalo, Nora**

---

**From:** Jody <bleyle@gmail.com>  
**Sent:** Monday, April 25, 2016 9:35 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** No People's Rezoning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mayor Hales, Council Members, and Director Anderson,

I am writing to ask that you do not move forward with proposals to change the Comprehensive Plan and rezone People's Co-op (3029 SE 21st Ave) from its current designation as non-conforming residential to commercial.

Thank you,  
Jody Bleyle

## Arevalo, Nora

---

**From:** felcher@comcast.net  
**Sent:** Monday, April 25, 2016 8:23 AM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** McCullough, Robert  
**Subject:** Amendment M74 to the Portland Comprehensive Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello City Hall --

I am emailing about the Amendment M74 to the Portland Comprehensive Plan in relation to the Eastmoreland neighborhood. My understanding is that the amendment proposes to change half of Eastmoreland from R5 to R7 zoning -- specifically the area of Eastmoreland west of 36th Ave. I am asking that you please add the other half of our neighborhood -- the area between SE 36th Ave and SE Cesar Chavez Blvd -- to the amendment.

We live in the area not currently included in the amendment. Over the last two years, we have had five tear downs within one block of us, all replaced by large new homes: (1) all these structures loom large over the other houses on our street and make it feel like we live in downtown Portland, not Eastmoreland; (2) one of the tear downs, on a lot-and-a-half property, even had two large houses placed on it in place of the single home on the property; (3) several large old trees were removed to make way for the new homes and yet tree-lined streets are one of the defining character of our neighborhood.

The lot splitting, large home building and removal of trees are changing our neighborhood. If this continues, we will no longer be one of the many unique and beloved neighborhoods that make Portland the city it is. Instead, we will be a neighborhood just like any in any new city in our country. Portland is a leader in city planning. Please keep all of Eastmoreland from changing. I urge you to add the other half of the neighborhood -- the area between SE 36th Ave and SE Cesar Chavez Blvd -- to the amendment. Thank you.

Sincerely,  
Andrew Felcher  
3660 SE Ogden St



**Arevalo, Nora**

---

**From:** mail@changemail.org  
**Sent:** Monday, April 25, 2016 8:11 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** 5 more people signed "Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon"

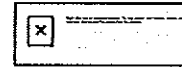
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

 New signatures

city of portland – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon


Petition by NE 9th Ave Greenway, PDX · 5 supporters




**5 more people signed  
in the last 2 hours**

[View petition activity](#)

RECENT SUPPORTERS

 **James Mischler**  
Portland, OR · Apr 25, 2016

I'm in favor of retaining the original plan for a 9th Avenue Greenway because changing it to 7th Avenue will divert too many more cars to my street (15th Avenue), a street that is already beyond capacity.

 **Janet Hamilton**  
Portland, OR · Apr 25, 2016

I live in NE and am a bike commuter to SW everyday.



**Paul Steiner**

Portland, OR · Apr 25, 2016

Traffic density is increasing, and will continue to do so because the increasing popularity of bicycle commuting is unlikely to outpace the growth of population density. The neighborhood needs a comprehensive approach to traffic calming. Turning 7th Ave into a greenway with automobile diverters is a bandaid that will adversely effect all the surrounding streets.



**Jenny Osborne**

Portland, OR · Apr 25, 2016



**Jay Hoover**

Portland, OR · Apr 25, 2016

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**Arevalo, Nora**

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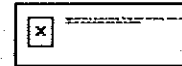
**From:** mail@changemail.org  
**Sent:** Monday, April 25, 2016 6:56 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** 5 more people signed "Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon"

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

 New signatures

city of portland – This petition addressed to you on Change.org has new activity. See progress and respond to the campaign's supporters.

Portland OR: Support a NE 9th Ave Greenway in  
Portland, Oregon





Petition by NE 9th Ave Greenway, PDX · 5 supporters


**5 more people signed  
in the last 6 hours**

[View petition activity](#)

RECENT SUPPORTERS

 **sarah nelson**  
Portland, OR · Apr 25, 2016

 **Nancy Whitaker-Emrich**  
Portland, OR · Apr 25, 2016

 **Lee Montgomery**  
Portland, OR · Apr 25, 2016



**Ryan Coons**

Madison, AL · Apr 25, 2016



**Joanne Hossack**

Portland, OR · Apr 25, 2016

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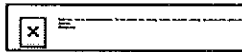
**Change.org** · 548 Market St #29993, San Francisco, CA 94104-5401, USA

## Arevalo, Nora

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**From:** NE 9th Ave Greenway, PDX <mail@changemail.org>  
**Sent:** Monday, April 25, 2016 12:32 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** New petition to you: Support a NE 9th Ave Greenway in Portland, Oregon

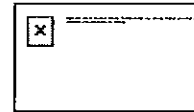
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged



New petition

city of portland – NE 9th Ave Greenway, PDX started a petition on Change.org and listed you as a decision maker. Learn more about NE 9th Ave Greenway, PDX's petition and how you can respond.

### Portland OR: Support a NE 9th Ave Greenway in Portland, Oregon



Petition by NE 9th Ave Greenway, PDX · Started Apr 25, 2016

We support the original plan to create a greenway along NE 9th Avenue. We oppose changing the alignment to NE 7th Avenue, and believe that this change would... [Read more](#)

[View the petition](#)

#### WHAT YOU CAN DO

##### 1. View the petition

Learn about the petition and its supporters. You will receive updates as new supporters sign the petition so you can see who is signing and why.

##### 2. Respond to the petition

Post a response to let the petition supporters know you're listening, say whether you agree with their call to action, or ask them for more information.

##### 3. Continue the dialogue

Read the comments posted by petition supporters and continue the dialogue so that others can see you're an engaged leader who is willing to participate in open discussion.

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**Change.org** · 548 Market St #29993, San Francisco, CA 94104-5401, USA

**Arevalo, Nora**

---

**From:** Mary Skarie <meskarie@gmail.com>  
**Sent:** Sunday, April 24, 2016 5:38 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Eastmoreland upzoning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I oppose Eastmoreland upzoning. We all need to share in increased density housing.

Mary E. Skarie

**Arevalo, Nora**

---

**From:** debra unverdruss <dunverdruss@gmail.com>  
**Sent:** Sunday, April 24, 2016 4:27 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Eastmoreland downzoning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I oppose the downzoning of the Eastmoreland area of Portland since all neighborhoods should be included in high density solutions for our population. No neighborhood should be exempt from housing development to alleviate the housing shortage now in Portland.

Debra Unverdruss  
5716 N. Bowdoin St.  
Portland OR 97203



**Arevalo, Nora**

---

**From:** Dan Laffitte <piratedel@msn.com>  
**Sent:** Sunday, April 24, 2016 3:14 PM  
**To:** Hales, Mayor; Commissioner Novick; Commissioner Fritz; Commissioner Saltzman  
**Cc:** BPS Comprehensive Plan Testimony; robert@mresearch.comq  
**Subject:** Eastmoreland Rezoning

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

My name is Dan Laffitte and I live in Eastmoreland on Carlton Street between 36<sup>th</sup> and Cesar Chavez. My address is 3804 SE Carlton. I support Amendment M74 to rezone Eastmoreland to R7. Additionally, I ask that the areas between 36<sup>th</sup> and Cesar Chavez be included in the area to be rezoned.

Thanks,

D. Laffitte  
3804 SE Carlton Street  
503-232-8984

**Arevalo, Nora**

---

**From:** Michael Metz <mmetz@pps.net>  
**Sent:** Sunday, April 24, 2016 12:58 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan Testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I oppose high density in N. Westmoreland...

Thank you,

Michael Metz  
6205 SE 22<sup>nd</sup> Ave  
Portland, OR 97202

## Arevalo, Nora

---

**From:** Catink Pdx <catink.pdx@gmail.com>  
**Sent:** Sunday, April 24, 2016 12:10 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comp Plan Saltzman S-9 Admendment K-Mart Property

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### For legal record:

#### Comment on S-9 Dan Saltzman admendment for K-Mart property off of NE 122nd and Sandy Blvd

I believe the 13.5 acre K-Mart property on the western boundary of the one-square mile Argay neighborhood should be seen as one book-end of the neighborhood with the other book-end being the 22 acre farm-site at the eastern edge of the neighborhood going south from NE 145-147th and Sandy Blvd. The proposal for the farm site currently R-3 is to become mixed-employment (change 290) and zone R-5 (change 688) misses an opportunity to make this parcel a walkable community.....it is on a corner but has no commercial services. The K-Mart property with S-9 could become monoculture with mixed use being only apartments. Thus, my recommendation is to have the K-Mart property absorb some of the mixed employment land on NE 147th and the 147th property along Sandy gets some of the K-Mart mixed-use zone.

Both should have some middle density housing for condos, townhouses and duplexes, R-3 added. The R-5 on the farm land should be eliminated because it duplicates the concentration of single-family homes already in Argay and does not add needed density or affordability.

**From:** Virginia Giusto  
2936 NE 162nd (97230)  
503 320 0038

The Giusto and Rossi families have owned the property on the SW corner of NE 147th since the mid 1949s.

**Arevalo, Nora**

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**From:** Michael Lindenberg <mjlindenberg@gmail.com>  
**Sent:** Sunday, April 24, 2016 10:58 AM  
**To:** BPS Residential Zoning  
**Subject:** Question regarding a form I received from you

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

I own the house at 3032 SE Caruthers St. I received a "Novice of Proposed Zoning Map Changes that May affect The Permissible Uses of Your Property and Other Properties." The state ID is 1S1E01CD 11800.

I see that my current "base zone" may change from its current R5 to R2.5. Question: What would this change mean in practical terms in my neighborhood? Does this mean that the new zoning would allow for more commercial or residential properties in the neighborhood? Or something else?

Thanks so much for any guidance you can provide!

Michael  
415-531-1449

Michael Lindenberg  
[mjlindenberg@gmail.com](mailto:mjlindenberg@gmail.com)

**Arevalo, Nora**

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**From:** Jim Barta <jbarta20@yahoo.com>  
**Sent:** Sunday, April 24, 2016 10:55 AM  
**To:** Hales, Mayor  
**Cc:** Elmore-Trummer, Camille; Commissioner Fritz; Commissioner Saltzman; Commissioner Fish; Commissioner Novick; BPS Comprehensive Plan Testimony; Council Clerk – Testimony  
**Subject:** Comprehensive Plan Amendments\_Middle Housing Overlay

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mayor and City Commissioners-

I send these comments as a resident of the Irvington Neighborhood. I am also on the Irvington Community Association (ICA) board and a member of the ICA land use committee.

The Northeast Coalition of Neighbors provided me with a copy of a pdf presentation of the proposed Middle Housing Amendment via email last week. After reviewing the proposed amendments in the presentation today, it appears this is a significant land use policy change for residential zones across much of the city.

I have not seen any mention of the proposed Middle Housing amendments until it was sent via email last week. Details of this proposal have not been provided to the Irvington neighborhood. The proposed amendments will have significant impact on housing in the Irvington and other Portland neighborhoods.

I respectfully request delay of any vote on the proposed Middle Housing amendments until all neighborhoods impacted by the proposal have a chance to review details of the proposal.

Jim Barta  
2317 NE 12th Avenue  
503-327-6448

**Arevalo, Nora**

---

**From:** Evy Bishop <evybishop@ipns.com>  
**Sent:** Sunday, April 24, 2016 9:54 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan Testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I ask that the Commissioners and Mayor Hales vote to reject Amendment F72.

Please seriously consider the implications of this amendment to the Argay Terrace Neighborhood. Keep Mixed Employment to the west half of the Rossi and Giusto farm properties fronting NE 122<sup>nd</sup> Avenue. In addition, re-designate the eastern half of the Rossi and Giusto farm properties and all existing farm property (including the Garre properties) from R-3 to R-5 single family so that we can preserve the livability of our neighborhood.

East County always gets the short end of the stick and potentially adding over a thousand new apartments to this area is another slap in the face. I would like to see the Eastmoreland neighborhood area, Mayor Hales, proposed to be zoned for multi units and see how fast that would be shot down!

Evy Bishop  
13932 N.E. Beech Street  
Portland, OR 97230

**Arevalo, Nora**

---

**From:** Donna <donna.kalbrener@frontier.com>  
**Sent:** Saturday, April 23, 2016 6:53 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Commissioner Fish amendment of April 12th, regarding SE Caruthers 35th to 38th

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

April 24, 2016

Dear Mayor Hales and Commisioners

Re: 3616 SE Caruthers St., Portland OR

I own, along with my sister, the house at 3616 SE Caruthers St.. The property has a Comprehensive Plan Map Designation of UC(b), which is proposed to be changed to the similar MU-UC (Mixed Use-Urban Center). I agree with this change. The zoning is currently R-5.

We wish to keep the Mixed Use Designation, so that I will have the opportunity in the future to sell my property for commercial uses. The lot is surrounded on two sides by a commercially-zoned parking lot, and would be logical to be part of a development there.

I oppose the proposed amendment described in the memo of April 12 from Commissioner Fish labeled "Potential Additional Comp. Plan Amendment" regarding properties on SE Caruthers between 35<sup>th</sup> Pl. and 38<sup>th</sup> Ave.. This amendment would remove the Mixed Use designation, and my property would revert to Single-family residential use only being allowed.

I urge you to reject this amendment, and keep my property Designated MU-UC

Thank you.

Donna Kalbrener,....

## Arevalo, Nora

---

**From:** walknbike@gmail.com on behalf of Robert Ping <robert@walklive.org>  
**Sent:** Saturday, April 23, 2016 4:01 PM  
**To:** BPS Comprehensive Plan Testimony  
**Cc:** Atkins, Ruth  
**Subject:** Housing affordability and inventory solutions

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Portland City Council and comprehensive plan update staff and consultants,

There are a number of techniques that are working in cities all over the U.S. and the world that help to increase the amount of affordable housing units. Portland needs to adopt and implement these (among others) as well in its comprehensive plan update:

**Missing Middle Housing** - Despite the inevitable pushback from some existing homeowners, please have the courage to pass policies allowing for ADU's, duplexes, triplexes, cottage housing and all of the other "missing middle" housing options.

**Inclusionary Zoning** - In a competitive market, there must be policies that protect lower income residents. Inclusionary Zoning is a growing policy that can be highly effective, yet still provide enough profitability for developers. Look to New York City and Policylink for policy language.

**Form-Based Code** - Euclidean zoning is a technique that worked 100 years ago, but is not effective today, especially in the suburban and light industrial areas of Portland (and the region). Form-Based Code allows for more mixed-use development and the types of land uses that increase livability.

**20-Minute neighborhoods and 'village centers'** - Continue to implement this strong approach to infill development and livability, creating neighborhood centers within a 20 minute walk that include nearby schools, retail, employers, transit hubs, bike facilities, parks and other critical urban amenities. Installation of missing middle housing near these neighborhood centers should be a priority focus.

Best,

**Robert Ping**  
Executive Director  
Walkable and Livable Communities Institute

Phone: (503) 289-0441  
Email: [robert@walklive.org](mailto:robert@walklive.org)  
Twitter: [@walkliveinst](https://twitter.com/walkliveinst)  
Portland, Oregon: Pacific time zone  
[www.walklive.org](http://www.walklive.org)

The WALC Institute inspires, teaches, connects, and supports communities in their efforts to improve health and well-being through better built environments.



**Arevalo, Nora**

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**From:** Doug X <dougurb@gmail.com>  
**Sent:** Saturday, April 23, 2016 3:52 PM  
**To:** BPS Comprehensive Plan Testimony; Hales, Charlie; Commissioner Fish; Novick, Steve; Commissioner Fritz; Commissioner Saltzman  
**Subject:** Comprehensive Plan Testimony on Fish April 12 Amendment  
**Attachments:** Klotz Comp Plan testimony re Fish Apr 12 amendment.doc; Caruthers-Division-Chavez node.jpg

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Attached is testimony on the Comprehensive Plan Update, Commissioner Fish's Amendment of April 12 (actual date April 20th) regarding Caruthers at 35th to 38th. Included also is an illustrative map of the area being discussed.

Thank you.

Doug Klotz  
1908 SE 35th Place  
Portland, OR 97214

Doug Klotz  
1908 SE 35<sup>th</sup> Place  
Portland, OR 97214  
April 24, 2016

**Comprehensive Plan Update Testimony**

**Re: Commissioner Fish Amendment of April 12 re: SE Caruthers 35<sup>th</sup> Pl to 38<sup>th</sup>.**  
**To: Mayor Hales and Commissioners:**

I am a Richmond resident and member of the Richmond Neighborhood Association Board, although I am speaking only for myself. I oppose the proposed amendment described in the memo of April 12 from Commissioner Fish labeled "Potential Additional Comp. Plan Amendment" regarding properties on SE Caruthers between 35<sup>th</sup> Pl. and 38<sup>th</sup> Ave.

The 10 lots in question are Designated UC(b), and proposed to change to a similar new Designation, MU-UC. For the time being, the zoning on these properties is R-5.

These properties are on the south side of Caruthers. They back onto properties on Division. They have been Comp.Plan Map Designated as UC(b) since 1981. With three lots zoned and used for commercial uses already on Caruthers (at 37<sup>th</sup>), and being near the Chavez intersection, this area is ideal to be a future commercial "node". The Division Design Initiative promotes focusing density in such "nodes" along Division. This existing designation allows for future full 200' deep development and will encourage flexibility in building design, and lower the cost of rentals.

The housing on the north side of Caruthers will have some protection from impacts when development occurs, as the provisions proposed in the Mixed Use project will ensure a 10' setback and 5' landscaped buffer along Caruthers, similar to the (b) overlay requirements today.

The Richmond Neighborhood Association testified in 2014 on the earlier, Proposed Draft. A few lots at the west end of Caruthers were changed in that process, but the Designations on the rest remained the same. The RNA has not commented at all on issues on Caruthers in this current, "Recommended Draft" that is now before the Council.

I urge you to reject this amendment, thereby keeping these lots with a MU-UC Designation. This will help allow growth within this two block range along Division at the important intersection with Cesar Chavez, where Frequent Transit Service is provided on both streets, and where growth along Division is possible and likely, to create a well-served, walkable neighborhood.

Thank you



Doug Klotz

Attached is a map showing the Caruthers/Division/Chavez node, with Comp.Plan as well as Zoning details for the area.

SE GRANT CT SE GRANT CT

SE GRANT CT

# Mixed Use Comp Plan and Residential Zoning

SE CHAVEZ BLVD

SE 37TH AVE

SE SHERMAN ST

SHERMAN ST

SE 35TH PL

SE 37TH AVE

SE 38TH AVE

SE 40TH AVE

SE CARUTHERS

LUTHERS ST

SE DIVISION ST

SE DIVISION ST

# Mixed Use Comp Plan & Mixed Use Zoning

SE CHAVEZ BLVD

SE 36TH AVE

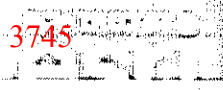
SE IVON ST

SE CHAVEZ BLVD

SE 35TH PL

SE 37TH AVE

SE 38TH AVE



**Arevalo, Nora**

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**From:** Jacob Mathai <jakemathai@gmail.com>  
**Sent:** Saturday, April 23, 2016 11:45 AM  
**To:** Hales, Mayor; Commissioner Novick; Commissioner Fritz; Commissioner Saltzman; Commissioner Fish  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** Comments : Amendment M74 to the Portland Comprehensive Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

I am resident of Eastmoreland living on 36th street in Eastmoreland. I've lived here with my family for the past 10 years. It's a historic neighborhood and a great place to raise a family, go for a walk, and live. Over the past 5 years many of the older homes in our neighborhood have been destroyed and the many lots have been split. I am an advocate for urban renewal, but I also think we need to consider the rich history of Eastmoreland and Portland. It's difficult to find parking on streets east between 37 and SE Cesar Chavez and it correlates with the increased density of the neighborhood (due to the current zoning loopholes) I

I care about Portland and want to preserve the rich history of the Eastmoreland neighborhood. I want to keep it a livable place with a balanced quality of life. That's why I strongly urge you to zone the entire Eastmoreland neighborhood (27th avenue to Caesar Chavez) as R7.

Best regards,  
Jacob Mathai  
7714 SE 36th Ave  
Portland, Oregon 97202

--  
"Be the change you want to see in the world"

## Arevalo, Nora

---

**From:** Lynn <lynn@hevanet.com>  
**Sent:** Saturday, April 23, 2016 8:57 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** No "Middle Housing"!

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

The middle housing amendment is HUGE and needs adequate time for consideration! It would be a disaster for our city to adapt it with so little thought!

As a graduate of Grant High School in 1972 and a resident of Portland these many years, I have watched and supported many changes to Portland. I understand that greater density preserves our open spaces and helps with transportation and livability issues. One thing greater density does NOT seem to do is make housing more affordable. Is there a single high density city in the world where housing is affordable? Certainly not San Francisco or Seattle or Boston or New York... If we want affordable housing, we need to have regulations that will create that...for instance, put a moratorium on all housing development *except* affordable housing.

In the meantime, I'm not convinced that the Comprehensive Plan has taken into account the limited resources of our city, heat island effects as our climate changes (Portland has one of the worst heat island effects of any city in the US!), runoff water issues, etc. People and neighborhoods need a say in what they want our city to look like and how they want to live!

Please do not allow this hasty, poorly thought through amendment to be added to our comprehensive plan.

Thank you,  
Lynn Merrick  
2116 SE 58th Ave  
Portland, OR 97215

**Arevalo, Nora**

---

**From:** Donna <oregoniandonna@comcast.net>  
**Sent:** Friday, April 22, 2016 5:08 PM  
**To:** BPS Comprehensive Plan Testimony; Hales, Mayor; Commissioner Saltzman; Commissioner Fritz; Commissioner Fish; Commissioner Novick  
**Subject:** Amendment F72 - Argay Terrace

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To All:

I ask that the Commissioners and the Mayor vote to **reject Amendment 59** and keep the Kmart site at 122nd and Sandy Boulevard Mixed Employment in the final 2035 Comprehensive Plan as recommended by the Portland Bureau of Planning and Sustainability.

I also ask that the Commissioners and the Mayor vote to **reject Amendment F72**. Keep Mixed Employment to the west half of the Rossi and Giusto farm properties fronting on NE 122nd Avenue. In addition, re-designate the eastern half of the Rossi and Giusto farm properties and all existing farm property (including the Garre properties) from R-3 to R-5 Single Family.

I moved here 10 years ago from Minnesota after my husband died and one of the reasons I chose this neighborhood was because of the location and the design of the development called Argay Terrace. I have felt very safe here due to the fact that there are no thorough fare streets and lower population density. With the changes reflected in these Amendments, I feel the neighborhood will gradually change to a higher crime area as it would bring in more and more temporary residents to the rental properties. Our neighborhood is unique for north Portland and many people have sought out this development because of its character which would all lower the value with these zoning and building changes.

Please take the residents opinions into consideration as I know none of you have any stake in the neighborhood by living here but passing these Amendments would make a drastic change in how this area will further develop in the future.

Thank you for your time!

Sincerely,

Donna Stacy

Argay Terrace Resident

503-946-8025

## Arevalo, Nora

---

**From:** Moore-Love, Karla  
**Sent:** Friday, April 22, 2016 4:46 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: MAS opposition to PPS plans to increase zoning on private and public high school campuses 10+ acres, to mirror the Comp Plan 2035 PSC suggested in Proposed Campus Institutional Zones

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Karla Moore-Love |Council Clerk  
Office of the City Auditor |City Hall Rm 130  
503.823.4086

**From:** Schwab Mary Ann [mailto:e33maschwab@gmail.com]  
**Sent:** Friday, April 22, 2016 12:40 PM  
**To:** Moore-Love, Karla <Karla.Moore-Love@portlandoregon.gov>; Hales, Charlie <Charlie.Hales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Novick, Steve <Steve.Novick@portlandoregon.gov>  
**Cc:** Smith Chris <chris@chrissmith.us>; Stockton, Marty <Marty.Stockton@portlandoregon.gov>; Cole, John <John.Cole@portlandoregon.gov>; Cole Jeff <tjeffcole@gmail.com>; McCullough, Robert <Robert@mresearch.com>; Stein, Deborah <Deborah.Stein@portlandoregon.gov>; Engstrom, Eric <Eric.Engstrom@portlandoregon.gov>; Anne Dufay <anne@seuplift.org>; Alarcon Morris, Amalia <Amalia.AlarconMorris@portlandoregon.gov>  
**Subject:** MAS opposition to PPS plans to increase zoning on private and public high school campuses 10+ acres, to mirror the Comp Plan 2035 PSC suggested in Proposed Campus Institutional Zones

Mayor and City Commissioners:

My fear, the camels nose is already under the tent in that PPS Director of Planning and Asset Management has already met with PSC and City Planners in work-sessions.

MAS is in opposition to PPS Director of Planning and Asset Management plans to increase zoning on private and public high school campuses 10+ acres, to mirror the Comp Plan 2035 PSC suggested in Proposed Campus Institutional Zones. To my knowledge has not vetted this plan with privately owned high schools.

My fear once you approve new zoning on the PSC proposed Campus Institutional Zones, it will be rubber-stamped when PPS attempts to do the same. Regrettably, I lack time to vet President Fish closing remarks siting the turn-of-the-century visions when The Olmsted Brothers visions mapping portland parks and school from horse drawn carriages.

Now for MAS vision, all private and public high school 10+ acres campus shall remain open and zone will not be increased to mirror the proposed Institutional Zones for 15 colleges and hospitals.

I've read the 148 pages, and question what will "by right" allowed in the Comp Plan 2035 should be rubber-tamped within neighborhoods.

I no longer trust PPS knowing that on Friday, March 13, 2015, PPS letter increasing the 1.31 acres field facing SE Morrison Street increased from RHI zone to CM3 was not vetted with BCA or SE Uplift District. PPS

Board could vote close an elementary school, move in high school students, the increase the RHI zoning to and rubber stamp the proposed Institutional Zones for 15 colleges and hospitals.  
Since when is PPS in the business of real estate?

President Fish thank you for keeping citizen's written testimony open until 5:00 p.m. on Friday, April 22nd.  
Best regards.

Mary Ann Schwab, Community Advocate  
605 SE 38th Avenue  
Portland, OR 97214-3203

PS also note text in red related to Goal 1

On Jan 12, 2016, at 10:18 AM, Schwab Mary Ann wrote:

Greetings Everyone,

Good news is that this is no change from the existing zoning codes -- RHI open space.

What I do find troublesome, this topic was not posted on the PSC agenda on Tuesday, January 12th? -- perhaps scheduled on Tuesday, January 26th?

I stepped away from attending today's League of Women Voter's media luncheon to attend the PSC meeting to address the camel's nose slipping under the tent.

My fear once approved -- Developers are approved to do whatever "by-right" -- whereas immediate property owners hopefully with support and assistance from their ONI Neighborhood Association(s).

must hire highly skilled Land Use Attorney to file an LUBA appeal. I hope to we all work to address transparency and equity based on social economics in work sessions prior to the PSC Advisory Committee's recommendations to City Council.

Also of concern to me are proposed changes to trees.

**2:15 p.m. Tree Preservation in Development Situations (two proposals, one from BDS and one from PP&R will be presented) (hearing / recommendation)**

..just off the telephone with Chris Smith, this topic will be address in a work session, Tuesday, January 26th.

Meanwhile, I will be asking John Cole to please alert the Neighborhood Association Land Use and Transportation Committees where these 10+ acre private and public high school campuses are located.

with copies to ONI's seven (7) Coalition Executive Directors alert their Movers and Shakers to "save the date"... .

Thanks,  
mas

Begin forwarded message:



**From:** "Cole, John" <[John.Cole@portlandoregon.gov](mailto:John.Cole@portlandoregon.gov)>  
**Date:** December 11, 2015 10:29:47 AM PST  
**To:** 'Schwab Mary Ann' <[e33maschwab@gmail.com](mailto:e33maschwab@gmail.com)>  
**Subject:** High Schools' Status under Proposed Campus Institutional Zones

Hi Mary Ann,

As a follow-up to our conversation yesterday please use the following link:

[Proposed Draft of Campus Institutional Zoning Project](#)

See boxed discussion of high schools on pg 6.

- Public and Private High schools over 10 acres in size are designated on the recommended Comprehensive Plan as Institutional Campus (IC)

See Table [150-1 Campus Institutional Zone Primary Uses](#) on pg. 35

- Note that schools are "prohibited" uses in both the newly proposed CN1 and CN2 zones.
- They remain a "conditional use" in the existing Institutional Residential zone. [This is no change from the existing zoning code.](#)

I hope this helps. Let me know if you have additional questions or comments.

Happy Holidays and Regards,

John

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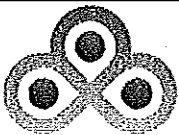
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- Jan 12 – Planning and Sustainability Commission Meeting
- Jan 26 – Planning and Sustainability Commission Meeting
- Feb 9 – Planning and Sustainability Commission Meeting
- Feb 23 – Planning and Sustainability Commission Meeting
- Mar 8 – Planning and Sustainability Commission Meeting
- Mar 22 – Planning and Sustainability Commission Meeting
- Apr 12 – Planning and Sustainability Commission Meeting
- Apr 26 – Planning and Sustainability Commission Meeting
- May 10 – Planning and Sustainability Commission Meeting
- May 24 – Planning and Sustainability Commission Meeting
- Jun 14 – Planning and Sustainability Commission Meeting
- Jun 28 – Planning and Sustainability Commission Meeting
- Jul 12 – Planning and Sustainability Commission Meeting
- Jul 26 – Planning and Sustainability Commission Meeting
- Aug 9 – Planning and Sustainability Commission Meeting
- Aug 23 – Planning and Sustainability Commission Meeting
- Sep 13 – Planning and Sustainability Commission Meeting
- Sep 27 – Planning and Sustainability Commission Meeting
- Oct 11 – Planning and Sustainability Commission Meeting
- Oct 25 – Planning and Sustainability Commission Meeting

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# Planning and Sustainability Commission Meeting

1900 SW 4th Ave, Suite 2500A

Tuesday, January 12 2016, 12:30 PM to 3:30 PM

### Length

3 hours

### Summary

R/W #7900, NE Alderwood Dr (consent); PSC Officer Vote (decision); Powell-Division Local Action Plan (hearing/recommendation); Tree Preservation in Development Situations (hearing/recommendation)

### Category

Event Types > Meetings > Board/Commission

### Description

#### Agenda

##### 12:30 PM Call to Order

- Items of Interest from Commissioners
- Director's Report

##### 12:35 PM Consent Agenda

- Consideration of Minutes from December 8 and 15, 2015 PSC meetings
- R/W #7900, NE Alderwood Dr

**12:36 PM PSC Officer Vote (decision)**

**12:45 PM Powell-Division Local Action Plan (hearing / recommendation)**

**2:15 p.m. Tree Preservation in Development Situations (two proposals, one from BDS and one from PP&R will be presented) (hearing / recommendation)**

**3:45 PM Adjourn**

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## Arevalo, Nora

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**From:** lilyn <lilyn1964@comcast.net>  
**Sent:** Friday, April 22, 2016 4:46 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Comprehensive Plan testimony

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**From:** Lily Nguyen, Nam Bui & Lien Chung  
1775 Sunburst Terrace NW  
Salem, OR. 97304

**To:** City of Portland, Oregon  
Bureau of Planning and Sustainability  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201-5380

**RE:** PSC Comprehensive Plan Testimony  
6735 SE 82nd Avenue, Portland, OR 97266  
Request to be include in Comprehensive Zone Change designation from R1a to Commercial/Mixed Use Zone

Dear Planning and Sustainability Commission:

Thank you for the opportunity to present written testimony regarding the 2035 City's Comprehensive Plan Update.

We write to express our strong support of the proposed comprehensive plan designation change along 82nd Avenue and request to be included in this change for our property located at 6735 82nd Avenue, Portland 97266. We would like to change it from "R1a - Medium Density Multi-Dwelling" to "Commercial / Mixed Use". We are the owners of 6735 82nd Avenue, Portland 97266. We have been renting this property out as an office space for over a decade. It was formerly a law office, chiropractic clinic and now an auto sales office.

The proposed change would be good for our property because then the use will finally be in conformity with what the property has already been used as for a decade or more. The R1a designation is outdated. The better zone is for Commercial/Mixed Use. We would like to have our property finally zoned correctly and not continue to seek a variance on its commercial/office use because it has been grandfathered in.

We believe this change would amount to a simple ratification of how the area is currently and successfully being used. I say successfully because I believe the mixed use designation is beneficial to all who live and work in the proposed area. Tenants in the office space provide a range of services to the residents of the neighborhood including psychiatry, psychology, general counseling, massage therapy, accounting, financial planning, event planning, legal and real estate work (and much more). This changing will not bring additional traffic to the neighborhood and the impact is minimal or close to none because the area is already being currently used for commercial purposes for over 10 years.

Additionally, the office tenants provide a certain level of security to the neighborhood by occupying buildings in the neighborhood during hours that residents are away at work. Similarly, the residents provide the same oversight to the office spaces in the evening hours. We think the combination of services and security illustrates a symbiotic relationship between the occupants of the proposed mixed use space that is exactly what building a community is about.

For these reasons and more we request the proposed change.

Thank you for the opportunity to submit this written testimony on this important issue. We hope you will seriously consider our request to be included in this change and change 6735 SE 82nd avenue site from Medium Density Multi-

Dwelling with an Alternative Design Density Overlay (R1a) to Mixed Use/Commercial as part of the 2035 Comprehensive Plan updates.

Again, Thank you for taking the time to consider this request, and please do not hesitate to reach out if you have any questions.

Sincerely,

Lily Nguyen, Nam Bui & Lien Chung  
Address: 1775 Sunburst Terrace NW  
Salem, OR. 97304  
Phone: (503) 302-2486  
Email: [lilyn1964@comcast.net](mailto:lilyn1964@comcast.net)

**Arevalo, Nora**

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**From:** Moore-Love, Karla  
**Sent:** Friday, April 22, 2016 4:41 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: whoops, MAS nearly forgot to sign off... below citizens learned the record would be held open for written testimony until 5:00 p.m. on Friday, April 22nd.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Karla Moore-Love | Council Clerk  
Office of the City Auditor | City Hall Rm 130  
503.823.4086

**From:** Schwab Mary Ann [mailto:e33maschwab@gmail.com]  
**Sent:** Friday, April 22, 2016 7:25 AM  
**To:** Moore-Love, Karla <Karla.Moore-Love@portlandoregon.gov>; Coleman-Evans Claire <eclair27@comcast.net>; Hales, Charlie <Charlie.Hales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Novick, Steve <Steve.Novick@portlandoregon.gov>  
**Cc:** Engstrom, Eric <Eric.Engstrom@portlandoregon.gov>; Cole Jeff <tjeffcole@gmail.com>; Whitmore Michael <whitmore@europa.com>; Manning, Barry <Barry.Manning@portlandoregon.gov>; Molinaro, Michael <molinaroarchitect@gmail.com>; McCullough, Robert <Robert@mresearch.com>; Anne Dufay <anne@seuplift.org>; Katy Asher <katy@seuplift.org>; Anderson, Susan <Susan.Anderson@portlandoregon.gov>; Zehnder, Joe <Joe.Zehnder@portlandoregon.gov>; Stockton, Marty <Marty.Stockton@portlandoregon.gov>  
**Subject:** whoops, MAS nearly forgot to sign off... below citizens learned the record would be held open for written testimony until 5:00 p.m. on Friday, April 22nd.

Good Morning Karla and Claire and Eric:

I watched parts of the reply [ <https://www.portlandoregon.gov/video/player/?tab=live> ]. Long about 5:30 p.m., when President Fish called up Eric Engstrom, citizens learned the record would be held open for written testimony until 5:00 p.m. on Friday, April 22nd. Those individuals unable to testify on Wednesday, April 20th, are invited back to testify next week.

Eric, help me out here. Please confirm the *City of Portland Public Involvement Principles have been included within Comp Plan 2035: Goal 1 public involvement process*. Granted, though well written, it lacks enforcement when compromised by the Mayor and City Commissioners who fail to include ONI neighborhood association representatives to serve on "work-sessions" i.e., **Inclusionary Housing Program Development - Panel of Housing Experts**. Yes, the Housing Bureau is committed to administering a program development process that is transparent and data-driven, with opportunities for input from stakeholders and interested parties. If you would like to **stay informed** of future meetings and opportunities to engage in the program development process, please **sign up** for our email list [by clicking here](#). As for citizens without access to the internet, how will they be kept informed?

Yet, what troubles me, "in-fill-middle" was endorsed this week by the City Club. Thanks to ORS SB 1533, bonus and 80% MFI adds serious complications to those of us who worked months reviewing the Comp

Plan serving on the Sunnyside Land Use and Transportation Committee. We volunteers do not have the resources to hire land use attorneys to take appeals to LUBA. Again, who really benefits, when PDC and City Planners rubber-stamp demolitions and blueprints, yet at the same time City Council forgets to plan for elementary, middle and high schools in URA PDC areas, i.e., Centennial Mills, South Water Front? I'd be remise failing to reference when the 1991 PEARL lacked foresight; so recently Portland Public School District #1 j was forced to split neighborhood feeder schools to accommodate PEARL's teenagers entering Lincoln or Wilson. So much for climate change, with children taking schools buses... . Whoops, I digress.

Here are two examples for the Panel of Housing Experts "in-fill-middle" review:

[This panel will hold monthly public meetings beginning on April 26, 2016 from 8:00am to 10:00am in the Portland Building Auditorium at 1120 SW 5th Ave.]

1. 522 SE Peacock Lane, property owners fear another three-story skinny shoe box structure, not exactly what they call a ADU.
2. 3334-3336 SE Belmont, demolition will destroying the charm and character of a turn-of-the-century transportation facility neighborhood served by the Trolley. Did I fail to mention this new entertainment area lacks parking to serve 17 OLCC outlets on Belmont between SE 33rd and SE 35th Avenues? Or the proposed condo's 72.4% tenants also needing parking on neighborhood streets?

That block of historic Belmont is one of the few remaining contiguous street-car era main streets in Portland and it was the east side's first residential main-street marketplace. Every building on that side of the block is in the Historic Resource Inventory. The building on the corner of 33rd and Belmont is also in the National Historic Register. As some of you may already be aware, there is \*supposed\* to be a 120-day demolition delay for buildings in the HRI, but there is also a loophole which allows the property owners to de-list and get a demo permit the same day. Because this building is also zoned commercial, this could mean a demolition with NO DELAY if the owner exploits this (illegal) loophole.



Again, Eric, please help me out here:

So where these topics starting with compromises in Goal 1, loopholes in buildings zoned commercial at risk of Demolition even when listed on the Historic Resources Inventory, and that last second proposed "in-the-middle" fits in with the Comp Plan 2035 -- I'm clueless. Needless to say, I am frustrated by how fast City Club endorsed "in-the-middle" when ONI Coalition Districts were not apprised to alert their neighborhood representatives. In fast, in Sunnyside, we were paying close attention the mixed-use overlay along corridors. My fear, now thanks to ORS SB 1533 developers' inclusionary bonus blanketing the entire state, we wasted our time. Again, who benefits?

Best regards,  
Mary Ann Schwab, Community Advocate  
605 SE 38th Avenue  
Portland, OR 97214-3203



## Arevalo, Nora

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**From:** Bob Marshall <Bxm@deainc.com>  
**Sent:** Friday, April 22, 2016 3:47 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Downzoning Eastmoreland

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### Greetings

I was at the Wednesday Comp Plan meeting, Number 73 in the queue and again behind the dozen who got bumped from the previous public airing. I live in Eastmoreland east of 36<sup>th</sup> and own an 80 year old brick home.

I have two points:

- 1) Homeowners who maintain older homes are practicing sustainability. Demolishing serviceable homes to build gigantic houses or thin houses uses a huge amount of resources to destroy the house, to haul away the materials, to dispose of the materials and then to reshape the land to accommodate new houses, to manufacture new materials and to move these new materials onto the site for construction. There is a lot of waste during construction and this needs to be hauled away and disposed of. Add to that the inevitable removal of carbon sequestering trees and the carbon footprint and resource use of this demolish and build model is wasteful. Maintaining and upgrading well-built homes is has a small environmental footprint and it is a right and proper thing to do. When homeowners keep and maintain their homes they build investment in the community, relationships with their neighbors and a sense of pride and ownership that is contagious throughout a neighborhood.
- 2) Downzoning Eastmoreland to facilitate the construction of existing homes is exactly the type wasteful of demolish and build model mentioned above. Downzoning would revalue our homes, making the property more valuable than the homes. Were this downzoning come to pass, homeowners who love their houses and strongly resent the idea of destroying their homes would be compelled to act against their own values and against the best interests of their neighbors and sell-out. Builders with formulaic architectural plans would replace iconic, historic homes as they have already shown they are eager to do. In doing this there would be an accelerated unraveling of the neighborhood fabric.

Downzoning Eastmoreland is an unimaginative and wrong thinking idea. A creative solution might be to partner with metro and adjacent communities and repurpose the Brooklyn Yards in the heart of inner SE. Freight and rail activity are a bane in SE Portland. The trucks are dangerous on residential surface streets and everything about the facility operates at cross purposes to the surrounding communities. The rail yards are worth a fortune if developed into housing. Imagine a new urban node could be built there with profits for everyone involved. That money could easily purchase land, say near Canby for a freight transfer facility where an economic dynamic would be appreciated. I implore Portland to think outside the box and develop creative solutions to our common issues. To solve these problems destroying things that are good and successful is not the answer.

My name is Bob Marshall  
3628 SE Martins St.  
Portland, OR 97202

**Bob Marshall** | PLA, Associate

David Evans and Associates, Inc.

2100 SW River Parkway | Portland, OR 97201 | [www.deainc.com](http://www.deainc.com)

d: (503) 499-0232 | f: (503) 223-2701 | cisco ext:10232 | [bxm@deainc.com](mailto:bxm@deainc.com)

**Arevalo, Nora**

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

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

Alice Blatt  
15231 NE Holladay  
Portland, OR 97230

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

**Arevalo, Nora**

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**From:** Broughal, Justine  
**Sent:** Friday, April 22, 2016 2:53 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Broadmoor

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Janet (503-255-9340) left a voicemail opposing the Broadmoor amendment on 4/15

I called her back on 4/15 and left a voicemail requesting her last name and address. I have not received a response.

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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**Arevalo, Nora**

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**From:** Broughal, Justine  
**Sent:** Friday, April 22, 2016 2:40 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Broadmoor

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mejida Nelson left a voicemail today with no phone number. She is opposed to the Broadmoor amendment. She said that the Columbia Slough is super important for wildlife and human habitat and health. She's very unhappy that this proposal is happening at the last minute.

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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## **Arevalo, Nora**

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**From:** Broughal, Justine  
**Sent:** Friday, April 22, 2016 2:36 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** Broadmoor

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi there,

A constituent called (Jill Nelson Deboard) left a voicemail. She did not leave her phone number or address.

She is opposed to Broadmoor amendment. She says it should remain wildlife habitat, not industrial space. We need to preserve the bird species and western painted turtles.

She is a Mt. Tabor Resident.

Justine Broughal  
Constituent Services Assistant  
Office of Commissioner Amanda Fritz  
[Justine.Broughal@portlandoregon.gov](mailto:Justine.Broughal@portlandoregon.gov)  
(503) 823-3008

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## Arevalo, Nora

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**From:** Broughal, Justine  
**Sent:** Friday, April 22, 2016 2:31 PM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: Broadmoor Golf Course

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Please see the constituent testimony below

**From:** M [<mailto:marywahl1980@gmail.com>]  
**Sent:** Wednesday, April 13, 2016 10:42 AM  
**To:** Commissioner Fritz <[amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)>; Adamsick, Claire <[Claire.Adamsick@portlandoregon.gov](mailto:Claire.Adamsick@portlandoregon.gov)>  
**Cc:** mary wahl <[marywahl1980@gmail.com](mailto:marywahl1980@gmail.com)>  
**Subject:** Broadmoor Golf Course

Commissioner Fritz:

I am writing to thank you for not supporting the proposal to convert Broadmoor Golf Course to industrial use. It's an important natural resource area, and those are increasingly rare. With climate change impacts, the ecological functions of sites like the Broadmoor Golf Course are even more valuable. Further, any short-term economic gain from converting an asset like the Broadmoor Golf Course to industrial use is outweighed by the economic gain from conserving the natural resource values. It's not just the economic gains to real estate near natural resource areas that are important, but also the value to the broader area for still having intact natural resources. In the "old days" in Oregon, we figured out that it wasn't a matter of "jobs vs fish," when we considered our forests and other high value natural resource areas, but a matter of the economic value of the jobs in a state that conserved its natural resources vs the kinds of jobs in a state that gave up its natural resources. Portland will lose an important asset if it gives up the Broadmoor Gold Course, and the value of this increasingly rare kind of resource is far greater -- both in natural resource and economic terms -- than we will ever realize from converting this site to industrial use. I appreciate your support for conserving the Broadmoor Golf Course site as a natural resource asset.

Thank you.  
Mary Wahl  
1800 NE 17th Ave #1  
Portland, OR 97212

April 22, 2016

VIA EMAIL  
[eputestimony@portlandoregon.gov](mailto:eputestimony@portlandoregon.gov)

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

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

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

Dear Mayor Hales and Council Members:

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

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

Respectfully submitted,



Mark D. Whitlow

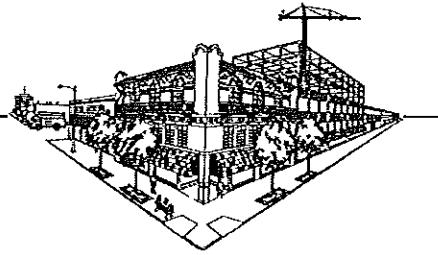
MDW:sv

Enclosures

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

# E. D. Hovee & Company, LLC

Economic and Development Services



## MEMORANDUM

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

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

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

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

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

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

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

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

---

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



# 1) AMENDING THE EOA

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

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

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

## 2) RETAIL LEAKAGE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The BPS analysis appears to overlook three critical items:

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

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

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

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

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

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

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

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

## CONCLUSION

The following observations are offered by way of summary:

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

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

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

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

c: Mark Whitlow, Perkins Coie LLP

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

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

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

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

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

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

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

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

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

## END NOTES

<sup>1</sup> By email dated February 29, 2016, Mark Whitlow transmitted the 1-page of *Retail-Related Revisions to Portland EOA* (draft of 2-24-16) to Steve Kountz and Tom Armstrong with the request that "we would like to continue (our) conversation about the need to amend the EOA in a very minor way as proposed by Eric Hovee in the attachment. Please consider it, as we think it is an important factual base that should be in the EOA."

<sup>2</sup> As provided via email dated, April 6, 2016 from Mark Whitlow, Perkins Coie, LLP, to Tom Armstrong, BP: "... the City is required to include findings explaining how new proposed site development restrictions will not adversely impact its Goal 9 inventory. Such inventory must be preserved or expanded based on an Economic Opportunities Analysis (EOA) that identifies the characteristics and types of "other employment uses" (OAR 660-009-0015), which are defined to include "all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities." OAR 660-009-005(6). In addition, the EOA must identify sites that are expected to accommodate employment growth based on the site characteristics typical of expected uses. OAR 660-009-0015(2). The resulting plan must base its inventory of employment lands, in part, on the site characteristics of the various employment uses expected to generate employment growth. OAR 660-009-0025. Stated plainly, the EOA must analyze the need for, and inventory of, "other employment" uses based on their particular site characteristics, and must provide for such sites in the resulting plan.

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

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

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

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



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NORTHWEST, L.L.C.

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

April 22, 2016

VIA EMAIL

**Re: 2035 Comprehensive Plan Testimony**

Dear Mayor Hales and Council Members:

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

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

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

Sincerely,

Robert L. LeFeber, Principal Broker

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

## Arevalo, Nora

---

**From:** lbauerpvna@aol.com  
**Sent:** Friday, April 22, 2016 10:57 AM  
**To:** Bauer, Linda; BPS Comprehensive Plan Testimony; Hales, Mayor; Commissioner Fritz; Commissioner Saltzman; Commissioner Novick; Commissioner Fish  
**Subject:** Re: Middles Housing

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Linda Bauer  
6232 SE 158th  
Portland, Oregon 97236

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

In a message dated 4/22/2016 10:53:32 A.M. Pacific Daylight Time, lbauerpvna@aol.com writes:

### **Please do not expand P-45 outside of Corridors !**

**Let's build within our currently zoned but no built areas such as Pleasant Valley. This area is zoned for 5,000 homes and 5,000 jobs. Building in Pleasant Valley will not cause displacement because most of the properties are owner-occupied . If you up-zone inner Portland and do not outlaw demolishes, People will be displaced.**

**Another positive for not up-zoning Inner Portland are the costs involved. " The Bureau (BES) anticipates nearly \$2 billion in capital investment in these programs over the next twenty years. " " The Bureau of Environmental Services plans for its facilities based on build-out densities allowed within the comprehensive plan land use densities." If you go to the Map App You will see that the bulk of these capital investments are in Inner Portland and they are just to bring the facilities up of current build-out densities.**

**"Approximately one-third of the bureau's annual budget is allocated to debt payments. Portland's rates are high by regional and national standards ." As the City Council knows the "BIG PIPE " was built to 93% of anticipated density. Increasing that density could trigger a new Big Pipe, even before we pay off the first Big Pipe . Talk about making Portland too expensive for anyone to live in . As part of an inter-governmental agreement with Gresham, all of the sewage from Pleasant Valley ( 5,000 homes and 5,000 businesses) will go to Gresham and not trigger a "BIG PIPE" project in Portland . . Continued public acceptance of rate increases is essential to meeting level of service standards and will require open and clear dialog with the public and decision makers.**

**Excerpts below in red are from the proposed "Citywide Systems Plan" .**

## Accommodating Growth

The Bureau of Environmental Services plans for its facilities based on build-out densities allowed within the comprehensive plan land use densities. The Bureau expects to be able to maintain and improve the sewer systems to accommodate growth as long as sewer and stormwater rates are sufficient to meet capital investment needs.

The geographic distribution of new growth is potentially a concern for all BES services – sanitary sewer, stormwater management, and protection and improvement of watershed health. In parts of the city, it is difficult to provide traditional constructed sanitary and/or stormwater systems, both from a cost and engineering perspective. Coordinating growth and density in centers and corridors in areas with good infiltration or where constructed stormwater management is technically and economically feasible will help address these concerns. “

### Recommended Plan Citywide Systems Plan

#### Chapter 6. Bureau of Environmental Services 68

“Approximately one-third of the bureau's annual budget is allocated to debt payments. Portland's rates are high by regional and national standards; however, this is expected to change as other cities begin to undertake combined sewer overflow control capital projects. Planned operations and maintenance of, and capital improvements to, the sewer and stormwater systems will depend on continued predictable increases in sewer and stormwater rates. Continued public acceptance of rate increases is essential to meeting level of service standards and will require open and clear dialog with the public and decision makers.

Changes to the zoning might alter the future base assumptions changing the number of properties predicted to be at risk of basement sewer backups.

**Capacity Upgrades:** Based on the Systems Plan, these programs add capacity by upsizing pipes and/or adding surface infiltration facilities. Projects are prioritized based on risk and benefit/cost. Work also includes cost-effective pipe rehabilitation, if located within the project area. Capacity upgrade projects are anticipated in the following basins: Holladay/Stark/ Sullivan, Beech/Essex, Oak, Taggart/Insley, Wheeler, Alder, NE 13th Ave, Northwest Neighborhoods, and North Portland.

As development occurs, impervious surfaces reduce the ability of stormwater to soak into the ground and increase the amount of stormwater runoff, disrupting the natural water cycle. Without appropriate stormwater management, these conditions erode stream channels, increase the risk of landslides, contribute to street and stream flooding, and prevent groundwater recharge. Parking lots, roadways, rooftops, and other impervious surfaces increase the pollution levels and temperature in streams, rivers, and groundwater resources.

The Bureau focuses efforts on comprehensive, multi-purpose solutions in the highest priority areas for work in all four program areas of the CIP, guided by both regulatory requirements and the Bureau's mission and Strategic Plan. The Bureau anticipates nearly \$2 billion in capital investment in these programs over the next twenty years. Capital projects and programs are drawn from the recommended system improvements discussed in earlier sections. It is important to note that the proposed Investment Strategy represents a conservative financial approach to addressing system needs. The Bureau's 20-year Investment Strategy (included in Appendix A) is summarized in Table 6.4

Construction of the recently completed \$1.4 billion combined sewer overflow control (CSO) facilities has increased sewer and stormwater rates significantly over the past two decade.

Approximately one-third of the bureau's annual budget is allocated to debt payments. Portland's rates are high by regional and national standards; however, this is expected to change as other cities begin to undertake combined sewer overflow control capital projects. Planned operations and maintenance of, and capital improvements to, the sewer and stormwater systems will depend on continued predictable increases in sewer and stormwater rates. Continued public acceptance of rate increases is essential to meeting level of service standards and will require open and clear dialog with the public and decision makers.

-  
Linda Bauer

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**Arevalo, Nora**

---

**From:** Moore-Love, Karla  
**Sent:** Friday, April 22, 2016 10:05 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: Written Testimony for 4/20/16 Items 394 & 395  
**Attachments:** NTNA Comp Plan Letter.pdf

Karla Moore-Love |Council Clerk  
Office of the City Auditor |City Hall Rm 130  
503.823.4086

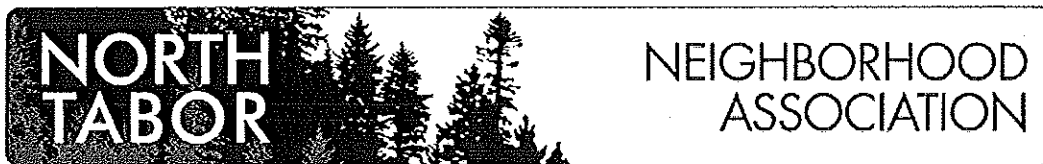
**From:** Keith Mosman [mailto:mosmank@gmail.com]  
**Sent:** Wednesday, April 20, 2016 12:30 AM  
**To:** Moore-Love, Karla <Karla.Moore-Love@portlandoregon.gov>  
**Subject:** Written Testimony for 4/20/16 Items 394 & 395

Hello:

Attached is a letter submitted by the North Tabor Neighborhood Association regarding council agenda items 394 & 395 on the April 20, 2016 schedule.

Please let me know if you need any additional information.

Best,  
Keith Mosman  
Chair, North Tabor Neighborhood Association



April 20, 2016

The North Tabor neighborhood is in the midst of a rapid and unwelcome change in character caused by the development policy of the City of Portland.

Every neighborhood in Portland is experiencing the same change.

This change is that **housing is getting rapidly more expensive**. This burdens every resident of Portland who does not own property -- especially the poorest of us -- while also burdening local businesses who must recruit workers and hindering the government's ability to invest in our many pressing needs.

The rise of Portland housing prices has multiple causes, and addressing it will require many different solutions. But the single biggest cause is that since 2006, **Multnomah County's population has grown 79 percent faster than its housing supply**. Year after year after year, our rental vacancy rates have remained among the very lowest in the country. All of us know people who have already been priced out of town by the the double-digit annual increases in rent that have followed these low vacancy rates. Some of us know people who have been priced out of housing entirely. Many of us fear that we, too, will soon have to leave our community because of this problem.

Preserving the character of the Portland we love requires making it possible for people to live in Portland without being wealthy.

Yet the city continues to block the construction of additional homes in many neighborhoods -- even, bizarrely, within a short walk of three rail stations where you can catch trains to downtown and Gateway every two minutes during rush hour, and every five minutes almost all day.

One of those rail stations, at NE 60th Avenue, is in our neighborhood. An earlier draft of the city's comprehensive plan proposed upzoning the block face immediately east of NE 60th Avenue and north of Glisan, a row of single-family homes from which someone can literally hear a MAX train whistling to a stop every two minutes each morning.

The mayor's office has observed that the RH zone is unlikely to enable development if it only applies to the west side of these blocks. That's a fair point. But it proposes limiting the full blocks to R1 rather than upzoning the entire blocks.

This makes no sense to us. If any blocks in the city should allow dense housing, it is these. **We do not support the recommended amendment and strongly suggest designating these full blocks for RH or some other appropriate intensity.**

Allowing denser housing on these blocks is also consistent with other goals of the North Tabor Neighborhood, such as developing a stronger commercial district at 60th and Glisan; focusing taller buildings on the nodes of main streets rather than along local streets; further improving walking, biking and transit in the area; and converting two blocks of Oregon Street into a vibrant linear pocket park. But these considerations -- along with any others that might relate to the physical appearance of buildings in our neighborhood -- pale in comparison to the importance of increasing the supply of homes in Portland as soon as possible. This is an essential step to preserving the character of our neighborhood and our city.

We also note that many other areas in the central city also have proposed down-zoning. While we have limited our specific comments to our neighborhood, preserving unsustainably low densities in more affluent neighborhoods increases the development pressures on our own. The North Tabor Neighborhood Association has long supported smart growth for our neighborhood, but that goal cannot be achieved in isolation. We need our neighbors and our city to work together to ensure that everyone in Portland can afford housing.

Thank you for time and consideration.

Sincerely,  
The North Tabor Neighborhood Association



**Arevalo, Nora**

---

**From:** Washington, Mustafa  
**Sent:** Friday, April 22, 2016 9:56 AM  
**To:** Sarah Prowell  
**Cc:** BPS Comprehensive Plan Testimony  
**Subject:** RE: Please Vote No on the Proposal to Industrialize the Broadmoor Golf Course

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sarah,

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

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

Thanks again,

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

**From:** Sarah Prowell [mailto:[sprowell@ix.netcom.com](mailto:sprowell@ix.netcom.com)]  
**Sent:** Wednesday, April 20, 2016 7:00 PM  
**To:** Hales, Mayor <[mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)>  
**Subject:** Please Vote No on the Proposal to Industrialize the Broadmoor Golf Course

Dear Mayor Hales,

I am very concerned by the proposal to allow industrial development of the Broadmoor Golf Course and I urge you to please reconsider and join Commissioners Fish, Fritz, and Novick in Voting NO.

As the density of Portland increases over the coming decades, it becomes increasingly important for the City to protect special existing wildlife and open spaces like the Broadmoor. It's size and "connector" location between riparian zones, the Columbia Slough, and its open space with large mature trees make it a very special place for wildlife and for

people. Industrial development of this treasure would undermine some of the very things we love about Portland....including easy access to mature natural settings and their associated wildlife, plants and waters.

I hope you will reconsider and support the wishes of the populace over the financial benefits desired by a single property owner.


Please vote NO on this ill-conceived proposal to destroy and industrialize the Broadmoor Golf Course natural open space.

Sincerely,

Sarah Prowell  
2216 SW Sunset Blvd.  
Portland, OR 97239

**Arevalo, Nora**


---

 **From:** Hales, Mayor  
**Sent:** Friday, April 22, 2016 9:54 AM  
**To:** BPS Comprehensive Plan Testimony  
**Subject:** FW: REJECT

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**From:** ruthlong5345@comcast.net [mailto:ruthlong5345@comcast.net]  
**Sent:** Wednesday, April 20, 2016 4:52 PM  
**To:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>  
**Subject:** REJECT

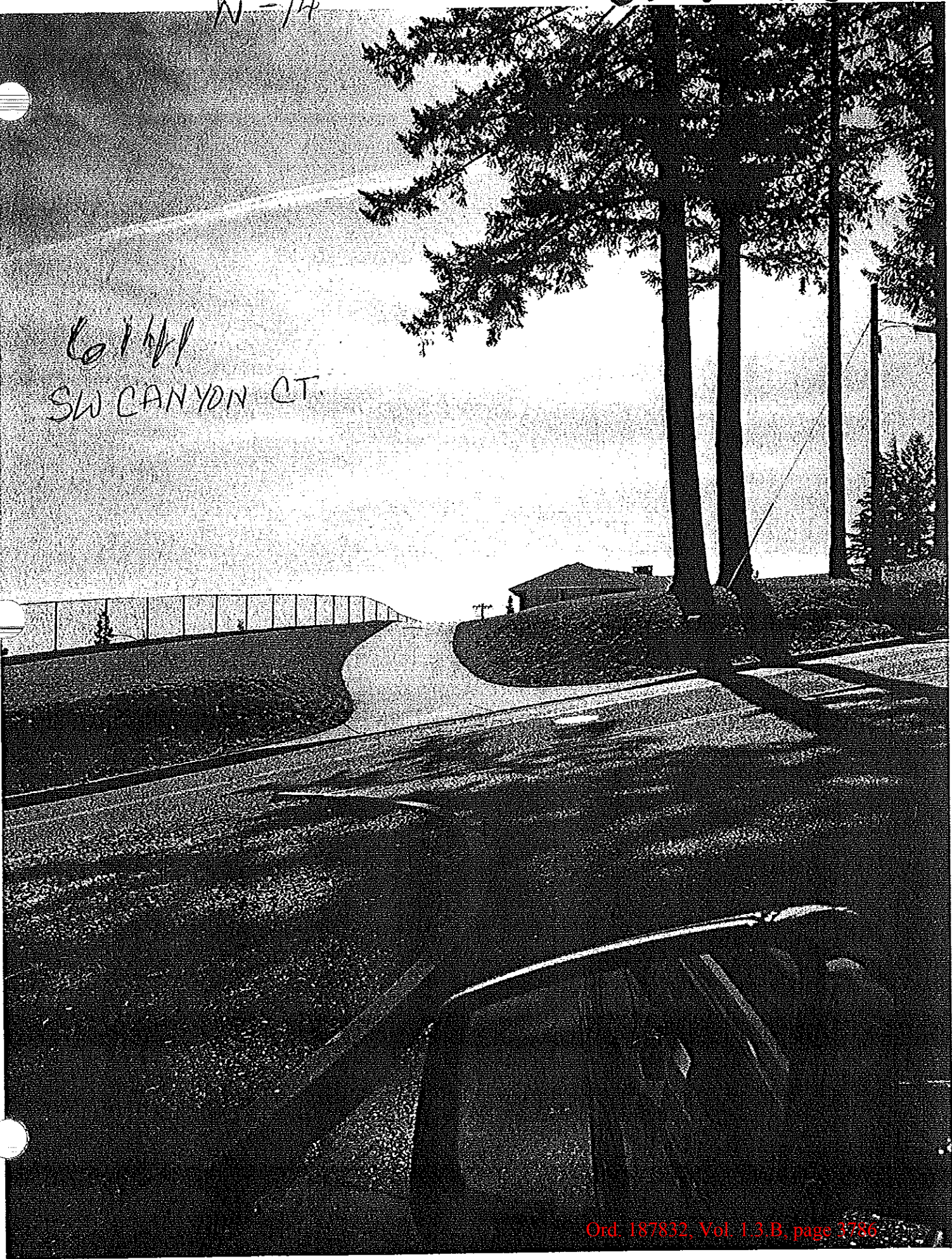
REJECT : the comprehensive plan AMENDMENT S9:Keep Kmart site MIXED Employment as it was planned.  
AMENDMENT F72: 122nd and Shaver Keep Mixed Employment to west half and re-designate the eastern half of Rossi and Gusto farm properties FROM R-3 to R-5 To SINGLE family

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N-14

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SW CANYON CT.



April 20<sup>th</sup>, 2016

My name is Molly Anderson and I reside at 1655 SE Spokane St in Sellwood. Thank you, Mayor Hales and commissioners for hearing my testimony today. I am here because I oppose amendment M35 in the 2035 Comprehensive Plan. This is the amendment proposed by an Alaskan land management and development company, Brummel Enterprises, to up zone several properties in Sellwood with disregard to the current residents and infrastructure of the neighborhood.

The property I am most concerned with located directly next door to my home at 1665 SE Spokane St with a request to change zoning from R2.5 to CM2 mixed use commercial. This beautiful, 100 year old home is currently a rental property housing upwards of 11 people belonging to a neighborhood church organization. It plays a roll in affordably housing residents that contribute to the economic diversity in our neighborhood. We are just up the street from Bertie Lou's Café on busy 17<sup>th</sup> Ave. Like all of the main thoroughfares in Sellwood, once you turn off of 17<sup>th</sup> the busyness drops away and you are on a residential street of single family homes. Young children run back and forth between the houses and neighbors talk to one another. It is a large part of why I chose to make my family's home here. The threat of a four story apartment building and retail space looming over my single story house causes me great anxiety. Not only does it raise safety concerns for my children and threaten to break down community on our street, it would block light to my back yard where I grow a large portion of our family's food. Street parking is also currently at capacity. I enjoy being able to walk to the many business and restaurants along 13<sup>th</sup> and 17<sup>th</sup> Ave, but would never have bought house next to a commercially zoned property.

Additionally the property located behind 1665 SE Spokane St, a 100 year old duplex at 1668 SE Nehalem St is on the amendment without request of the property owner, Eric Franklin. When I spoke with him he told me that he and his wife had submitted his written testimony stating they didn't feel that up zoning to mixed use commercial was appropriate for our neighborhood.

Brummel Enterprises claim that they want the neighborhood to be involved in this process. They did not make their request known to me and I own the house next door. I found out about this amendment via social media. A homeowner on SE Sherrett St received noticed that Brummell had requested that her home be up zoned. When I went door to door in my neighborhood to raise awareness, no one else knew this was happening either. I did not find a single person in a 2 block radius that was in favor of the up zoning. After attending a SMILE Land Use Committee meeting and hearing of their opposition to amendment M35 and their lack of faith in Brummell Enterprises I know this company is not to be trusted with the future of my community.

There are several apartment buildings going up at breakneck speed in Sellwood. I urge you to allow for the area to be fully developed as zoned to protect the integrity of the neighborhood. Thank you for your consideration.

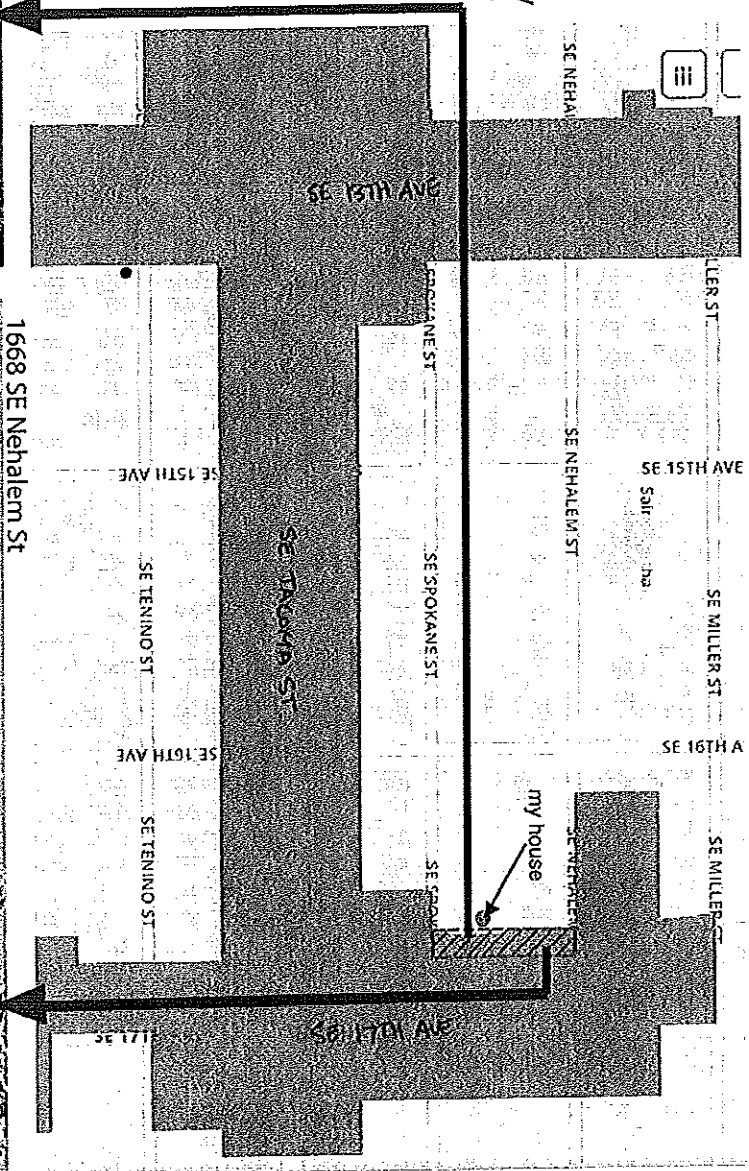
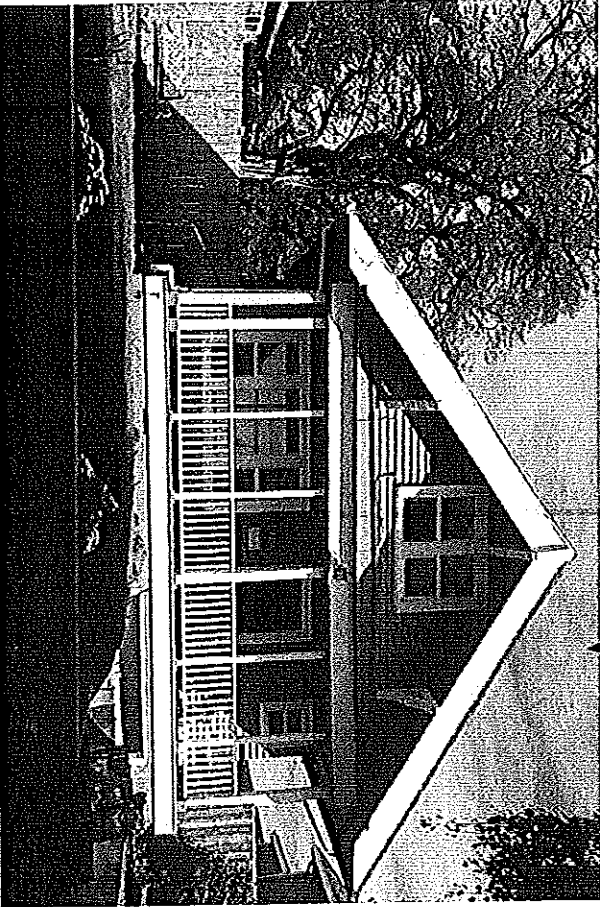
Molly Anderson  
1655 SE Spokane St, Portland, OR 97202

**Amendment M35 of the 2035 Comprehensive Plan**

- These are just 2 of the properties up for rezoning under Amendment M35
- 1665 SE Spokane St - A rental property owned by Brummel Enterprises currently housing 11 people
- 1668 SE Nehalem St - A beautiful duplex that is up for zone change against the wishes of the home owner, Eric Franklin
- Please help maintain the current zoning on these 100 year old neighborhood homes.

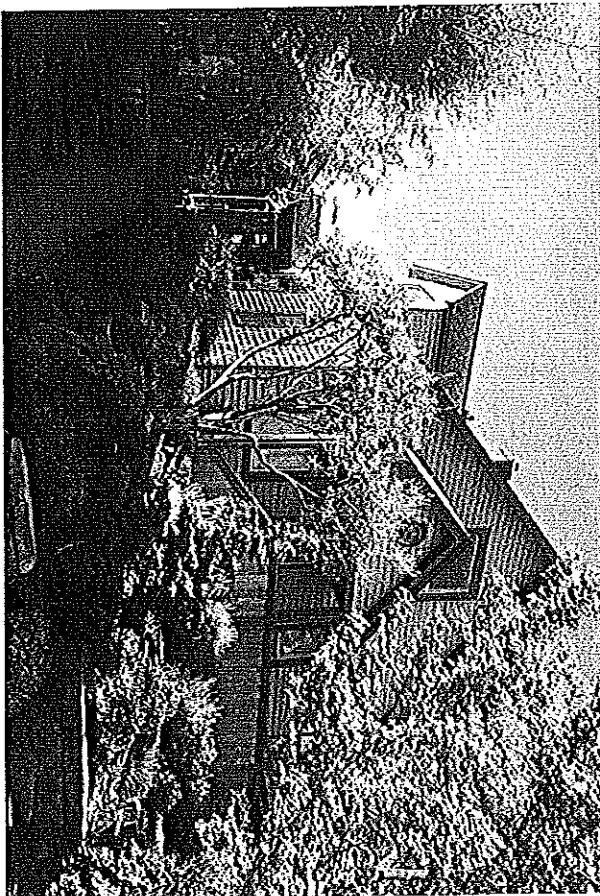
-Molly Anderson  
1655 SE Spokane St  
Portland, OR 97202

1665 SE Spokane St



screenshot of Map App

1668 SE Nehalem St



Comprehensive Plan Testimony  
% Clerk Office  
1221 SW 4th Ave, Room 130  
Portland, OR

KNOCK  
Knock Software, Inc  
April 19th, 2016

Honorable Mayor and City Commissioners,

You've already heard testimony about how important Open Data is to citizens. Data collected or purchased by the city is a public good, and that means it should be open. I want to give you a different perspective on why Open Data is important to businesses, especially those dealing with transportation.

I have heard some confusion about why Open Data is relevant to the Comprehensive Plan, which is focused on land use and transportation. Today we think about transportation in terms of concrete and painted lines, but make no mistake: in the future, transportation will be about data.

Portland's Transportation System Plan is planning for the expansion and mass adoption of transit, car and bike sharing, and self-driven or app-hailed vehicles. All of these technologies are powered by data. What else is Uber but a bunch of drivers and riders — and a powerful database connecting them? Waze is changing the way people drive — and whether it is for better or worse it is all about data.

The license and format of that data matters. Increasingly, companies innovating with our shared road and transit systems are producing proprietary, locked-up data. Do we want this to be our future? Or do we want data that is Open to community use and cross-platform innovation?

If you have trouble imagining this future, look to our past. Portland became a leader in promoting Open Data for transportation when Trimet became the first city to adopt the GTFS Open standard. Thanks to that work in 2005, we now have accurate transit schedule and route information available to every app. This openness has helped countless companies (including Portland's own Globe Sherpa) innovate and has led to a transit system that is smarter and more efficient.

Had it not been for the advocacy of a few individuals, Trimet's transit data system likely would have gone a very different way. Imagine if Google, who first partnered with Trimet, had wanted exclusive rights to the data or a proprietary data format. Today we'd have fewer companies and civic hackers innovating with transit data and multi-modal trip planning apps.



As the CEO of a company that specializes in transportation data, I understand how lucky it is that things went that way. My company, Knock Software, makes tools for city planning that leverage dozens of Open Data sources. We believe the data our company collects should be Open as well — even if that means our competitors can use it. But businesses like mine face a prisoner's dilemma: what if our competitors use our Open Data but they lock up their own data? We believe it is in everyone's long term interest to publish Open Data, but it comes at an increased shorter-term risk and cost to us.

This is why it is so important for cities, especially those investing in smarter transportation, to adopt Open Data policies. When cities prioritize Open Data, they level the playing field for businesses and technologies that are Open. This in turn leads to more innovation, better options for citizens, and more efficient transportation systems.

The proposed amendment P11 makes Portland's Open Data policy effectively moot. Portland needs a strong Open Data policy, and the time and place to do it is now in the Comprehensive Plan. I hope that I have shown how important this is to the businesses contributing to our transportation future. I would be happy to provide further input on how we can word our policy to encourage Openness without placing an undue burden on city bureaus and staff.



William Henderson  
Chief Executive Officer, Knock Software  
Board Member, Portland Independent Chamber of Commerce

Testimony for Portland City Council  
Portland Comprehensive Plan  
April 20<sup>th</sup>, 2016

Mayor Hales and Council Members:

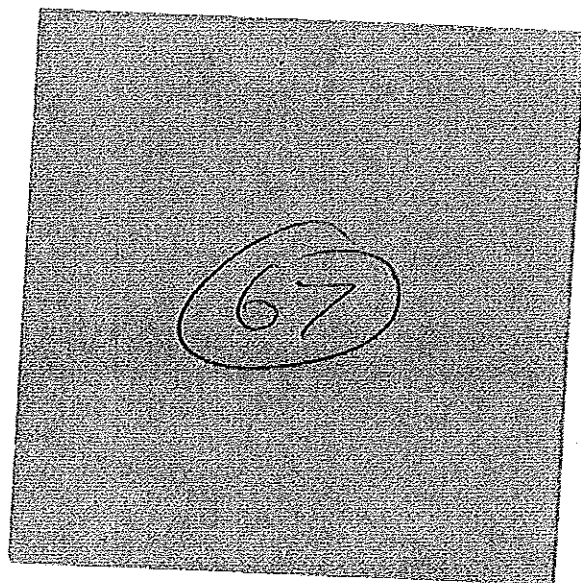
First, I want to thank the Mayor and Commissioner Novick for sponsoring amendment #M65 to give my property at NE Ivy and Williams the more appropriate designation of CM3. This will allow the build out of the main street area now growing around New Seasons and other local businesses. If there are any questions from other Council Members I will be happy to answer them.

However, I also want to take this opportunity to speak to the issue of middle scale housing, especially as it relates to the R2.5 thru R1 zones. I am a strong supporter of neighborhood scaled in-fill housing, and have built a number of projects myself. One of the reasons that in the 1990's I supported eliminating the off street parking requirements for smaller projects and supported the changes to the land division to allow courtyards was to encourage these projects.

However, we left one important regulatory change for the future which I guess is now. That change is to regulate construction in these zones by FAR, rather than number of units. Under the present system the developers of smaller units are at a distinct disadvantage – six units at 800 square feet simply provide less building area for sale and therefore less profit than six units of 2000 square feet each. By switching to an appropriate FAR, the playing field would be leveled so that a developer could choose to build six 2000 sq foot units, twelve 1,000 square foot units, or fifteen 800 square feet on the same site with the same lot coverage and building area. This would help us get many additional housing units without changing the size of buildings being built in our neighborhoods.

Thank you for your time,

Rick Michaelson  
503-274-1035  
rick@icppdx.com



My name is Nancy Matela and I own the property at 1535 SE Alder in Buckman Neighborhood. It is two 5000 sq ft lots straddled by a 7000 sq ft house. Each lot is zoned R5 one of which is a corner lot. It was built in 1898 as a single family dwelling, and is considered architecturally significant. It was converted to a triplex in the 70s and later grandfathered in because it's non-conforming in the R5 zone.

Five years ago, I added a rental unit in the 2000 sq ft basement but was told by the City I had to take it out because the 10000 sq ft property could not have four units. As an aside, two years later, a 30 unit building was put in one block from me on a smaller lot. Yes, it is zoned for commercial.

After I was forced to take out the offending unit, I filed an official request to change my property's zoning from R5 to R2.5. I was told it would be taken up with the comprehensive plan process and so I resubmitted my request to the City Council last fall. I researched my immediate neighborhood, and I realized that my property wasn't the only non-conforming building. 40% of the R5 properties in the neighborhood actually are used as R2.5s and R1s. I then realized that my testimony shouldn't focus on just my property, but should request the conversion of the whole neighborhood to R2.5 allowing for the density that is needed so close to the downtown core.

When the comprehensive plan was finally published, it showed most of the R5s in Buckman switched to R2.5s. Needless to say, I was pleased. My three and half years of waiting paid off and those that were non-conforming would also be brought into compliance. However, the rest of the neighbors who testified were not pleased. They are worried about wholesale demolitions, an epidemic of skinnies and an onslaught of Renaissance McMansions. The neighbors want to preserve the historical integrity of the neighborhood. And they want to preserve the modest income housing that Buckman offers. I realized that I agree with them. I contacted them and we met in person to understand each other's side and brainstorm solutions. And I think we came up with something that can work.

Leave the R5s alone. But allow every R5 lot to be converted to a duplex if desired. And allow every duplex to have at least one ADU. This would address the density goal that the City has, and it would allow property owners like me to be able to fund improvements and ever growing property taxes with the additional rents. This would also provide modest housing stock addressing low- and moderate-income needs. The biggest fear that many of us have is demolitions. It is suggested that regulations be drawn up that promote remodels rather than new construction. While this is complicated, it is doable. The overall goal would be to maintain the integrity of the historic neighborhood while promoting density and affordable housing.

**If these changes aren't made, then I stick to my original request to change R5s to R2.5s.**

Nancy Matela  
1535 SE Alder St  
Portland, OR 97214  
503-267-1401

Raz Properties, LLC  
4445 SW Washouga Ave.  
Portland, OR 97239-1377  
April 20, 2016

Submitted by  
a gentleman  
who doesn't  
intend to speak  
today. -Deborah

To: Charlie Hales, Mayor, Portland Police Bureau  
Dan Saltzman, Commissioner, Bureau of Development Services  
Nick Fish, Commissioner, Bureau of Environmental Services  
Amanda Fritz, Commissioner, Bureau of Parks & Recreation  
Steve Novick, Commissioner, Bureau of Transportation  
Mary Hull Caballero, City Auditor

Subject: "Comprehensive Plan Testimony"

Dear Council Members:

I am writing **in support** of the new Comprehensive Plan re-zoning for a particular group of properties from R-7 to a higher density R-1. I am the owner of three properties located at or adjacent to 1660 SW Bertha Boulevard, at the intersection with SW Capitol Hill Road in Portland. The properties are identified as R330121, R330226 and R330093. They have been in my family since before the City of Portland annexed the Hillsdale area, and have served for many years as a bus depot (under non-conforming use) as well as a residence for two homes. Currently, these lots are zoned R7 with c and p overlays. I understand that the overlay districts will remain unchanged by the new Comprehensive Plan Updates. In addition, these properties are within the Hillsdale Plan District.

The change of zone to R-1 will permit re-development to a higher and better use of the property. I have lived in Hillsdale essentially all my life and have seen many changes. When I was born my parents lived in a house on Capitol Highway which was designated Oregon 99W at that time and was the main road to Portland. Within blocks of the house, to the east, south, and west were pastures and dairy farms. Just before my time, the subject properties of this letter all bordered on the Southern Pacific Red Electric Line (in service from 1914 to 1929) connecting Hillsdale to Portland and as far as Corvallis through Forest Grove.

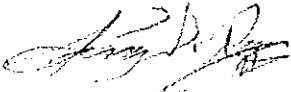
Times change and so has Hillsdale. The pastures have become lots for homes and commerce. Barbur Boulevard has been constructed as the new Oregon 99W, and I-5 is the new main road from the Canadian border, through Portland to the Mexican border. There is a need for more high density housing in Portland in the next 20-30 years. There are a number of existing R-1 properties in the immediate vicinity and within the Hillsdale Plan area. Zoning to R-1 not only provides badly needed housing for the City, but will ultimately mean higher land values and property tax revenues than if the sites remained as R-7. The site is very well served by public transit, located near commercial hubs like Burlingame Fred Meyer and the Barbur Boulevard corridor as well as the Hillsdale Town Center. The site is also ideally located near OHSU, Lewis and Clark College, PCC Sylvania, as well as being a quick commute to Portland State University and downtown Portland.

Raz Properties, LLC  
April 20, 2016  
Page 2

Environmentally, the Plan's upgrade to R-1 zoning will better serve the conservation and protection overlays for Stephens Creek as it flows through these properties. There are a few recent housing developments in the area, such as the Headwaters on SW 30<sup>th</sup>, that have successfully mitigated and enhanced sensitive wetland, habitat and vegetated areas. That is an aspiration and condition I personally have for the future development of this property. To that end, I have proposed and advocated for a site design that would daylight and restore much of the currently undergrounded Stephens Creek.

Finally, I support the Hillsdale Plan and its efforts to maintain vitality, health, and neighborhood character in Southwest Portland. I appreciate the planning and passion that has been demonstrated for increasing the density while maintaining the livability in Southwest Portland neighborhoods. I therefore support the re-zoning of my properties - or any property - in a manner that ultimately preserves the character, vitality, and long-term livability of this neighborhood.

Thank You,



Henry "Buz" Raz, Member  
Raz Properties, LLC



# Oregon Tradeswomen, Inc.

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04.20.2016

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

Dear Mayor Hales and Commissioners:

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

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

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

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

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

Best regards,

Abby Bandurraga  
Pathways Program Manager  
Oregon Tradeswomen, Inc.



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

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

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

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

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

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

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

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

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

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

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

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

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



Batch #7

TO: PORTLAND CITY COUNCIL

Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov  
Commissioner Amanda Fritz, amanda@portlandoregon.gov  
Commissioner Nick Fish, nick@portlandoregon.gov  
Commissioner Steve Novick, novick@portlandoregon.gov  
Commissioner Dan Saltzman, dan@portlandoregon.gov  
Council Clerk, cputestimony@portlandoregon.gov

1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

RE: PROTECT SINGLE-FAMILY HOMES IN MULTNOMAH NEIGHBORHOOD

I oppose City Council Amendment #P45, New Policy 5.5, Middle Housing to the 2035 Comprehensive Plan (see amendment text below). If passed, this amendment will allow the single-family zoned property in Multnomah to be changed to multifamily zoning without adequate opportunity for public review and comment. This amendment is a radical, last-minute change to the 2035 Comprehensive Plan that is too far reaching to be incorporated into the plan with approximately a month for public comment. This is insufficient time for our neighborhood to become aware of the consequences of what is being proposed and to voice opposition to it.

In addition to objecting to the manner in which this amendment was introduced, I object to its substance. When the Discussion Map in the Draft SW Community Plan proposed that essentially all of Multnomah be rezoned R2.5 to allow attached row housing, hundreds of people in our neighborhood objected to the wholesale elimination of most single-family residential zoning at that time. I believe that the majority of the people in my neighborhood still oppose it, but that they are unaware that this amendment is even being considered. This is totally inconsistent with State Goal 1 that requires citizen involvement in land use planning.

Hundreds of Multnomah residents, the Multnomah Neighborhood Association, and Southwest Neighborhoods Inc. have all requested that the City Council change the proposed designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

If the Village is designated a Neighborhood Center with a ½-mile radius, it will overlap with the boundaries of the two adjacent Town Centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development within a quarter mile of these designated centers will overlap with Multnomah and leave little room for the existing single family homes as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village and is more in keeping with the semi-rural character of the neighborhood.

The introduction of the Draft 2035 Comprehensive Plan stated that there was more than enough existing capacity to meet the projected growth without changing any zoning. During dozens of discussions with BPS staff, as we advocated for the Neighborhood Corridor and in opposition to the Neighborhood Center designation, we were assured that Multnomah's single-family zoning would remain unchanged with the proposed Neighborhood Center Designation. Amendment #P45 directly contradicts those assurances. It undermines our trust in city government and in due process. I urge you to reconsider amendment #P45 and to vote against it.

Please add this to the record.

Thank you,

*Jamison W. Markham*  
11025 SW 34th Ave  
Portland OR 97219

cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
Director DLCD Jim Rue, jim.rue@state.or.us  
MNA Land Use Committee, mnalandusecommittee@gmail.com

7 # 11 + 18

**Amendment P#45, New Policy after 5.5, Middle Housing**  
Proposed March 18, 2016

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

**TO: PORTLAND CITY COUNCIL**

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Please add this to the record.

Thank you,

*Jeanne Shugart*

*Jeanne Shugart*

*Jeanne Shugart*

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In addition to objecting to the manner in which this amendment was introduced, I object to its substance. When the Discussion Map in the Draft SW Community Plan proposed that essentially all of Multnomah be rezoned R2.5 to allow attached row housing, hundreds of people in our neighborhood objected to the wholesale elimination of most single-family residential zoning at that time. I believe that the majority of the people in my neighborhood still oppose it, but that they are unaware that this amendment is even being considered. This is totally inconsistent with State Goal 1 that requires citizen involvement in land use planning.

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Please add this to the record.

Thank you;

Name

Address

*Susan M. Hall* 4.13.16  
1037 SW 33rd Place, 97219.  
cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
Director DLCD Jim Rue, jim.rue@state.or.us  
MNA Land Use Committee, mnalandusecommittee@gmail.com

**Amendment P#45, New Policy after 5.5, Middle Housing**  
Proposed March 18, 2016

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**TO: PORTLAND CITY COUNCIL**

Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov  
Commissioner Amanda Fritz, amanda@portlandoregon.gov  
Commissioner Nick Fish, nick@portlandoregon.gov  
Commissioner Steve Novick, novick@portlandoregon.gov  
Commissioner Dan Saltzman, dan@portlandoregon.gov  
Council Clerk, cputestimony@portlandoregon.gov

1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

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Please add this to the record.

Thank you,

*Susan B. Girouard* & *Michael Yarruda*  
16915 SW 33rd Place Portland, OR 97219

cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
Director DLCD Jim Rue, jlm.rue@state.or.us  
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Please add this to the record.

Thank you,

(Name) *[Signature]*

(Address) *7111 SW 33rd Pl  
Portland, OR 97219*

cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
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Thank you,

(Name)

JOAN ANDERTON

(Address)

PM Anderton 4/13/2016

3409 SW Nevada St  
PTLD 97219

cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
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Mary Ellen Seger  
7015 SW 33rd Pl  
Portland, OR 97219

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Hathaway Koback  
Connors LLP

520 SW Yamhill St.  
Suite 235  
Portland, OR 97204

E. Michael Connors  
503-205-8400 main  
503-205-8401 direct

[mikeconnors@hkcllp.com](mailto:mikeconnors@hkcllp.com)

April 20, 2016

**VIA HAND DELIVERY**

City Council  
City of Portland  
c/o Bureau of Planning & Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Re: Draft 2035 Comprehensive Plan  
Hayden Island Manufactured Home Community  
Policy Amendment # P48

Dear Mayor and Commissioners:

As you know, this firm represents Hayden Island Enterprises, the owners and operators of Hayden Island Manufactured Home Community ("HIMHC"). HIMHC consists of 440 manufactured home sites, 169 RV sites and 1,500 residents located on Hayden Island. The City has consistently recognized HIMHC as a vital affordable housing resource for the City.

At the November 19, 2015 hearing for the 2035 Comprehensive Plan update, HIMHC submitted oral and written comments requesting policy language recognizing the unique nonconforming use protections that the City has previously acknowledged apply to this manufactured home park and the necessity for these nonconforming use protections to ensure the long-term preservation of this vital affordable housing resource. HIMHC very much appreciates Commissioner Fritz's support for our request, which led to the proposed amendment to Comprehensive Plan Policy 5.36 as set forth in Policy Amendment # P48. Although we believe the amendment to Comprehensive Plan Policy 5.36 is helpful, it is very general and does not address the specific issues raised by HIMHC. The proposed amendment merely requires the City to "Facilitate replacement and alteration of manufactured homes within an existing mobile home park."

HIMHC is submitting these written comments to request that the City Council adopt more specific language for Comprehensive Plan Policy 5.36 or as part of the official legislative comments. HIMHC is requesting that the following language (or similar language) be included as part of the 2035 Comprehensive Plan update and related code amendments:

"Hayden Island Manufactured Home Community is a recognized nonconforming use that provides an important housing resource. The nonconforming use status applies to the manufactured home park as a whole, including the site layout, improvements and common area

Page 2  
April 20, 2016

structures and amenities. Notwithstanding anything in Chapter 33.258 to the contrary, the installation of a manufactured home in the Hayden Island Manufactured Home Community shall not constitute new development, redevelopment or an alteration requiring that any nonconforming use aspect of the manufactured home park be brought into compliance with the existing development regulations. Notwithstanding anything in Chapter 33.470 to the contrary, new or altered manufactured homes installed in the Hayden Island Manufactured Home Community shall not be required to comply with the noise insulation requirements set forth in Section 33.470.040.”

Although the City has previously acknowledged the typical nonconforming use approach does not apply to a manufactured home park, as evidenced in the 1992 and 1999 letters from the City to HIMHC we submitted with our November 19, 2015 comments, such letters do not carry the same weight as official language in the Comprehensive Plan and/or City code. The uncertainty regarding the application of typical nonconforming use standards to the manufactured home park continues to be an issue for HIMHC, especially with respect to financing for the park. To resolve this uncertainty and ensure that the City’s previous determinations are officially recognized, HIMHC is requesting that the specific language (or similar language) noted above be included in Comprehensive Plan Policy 5.36.

Given the City Council’s strong advocacy for protecting and maintaining affordable housing resources and the importance of HIMHC as an affordable housing resource, we hope the City Council will support this requested amendment. We appreciate your consideration of our comments. We look forward to working with the City further on this matter.

Very truly yours,

HATHAWAY KOBACK CONNORS LLP



E. Michael Connors

EMC/pl

cc: Hayden Island Enterprises



Erwin Bergman, member of Columbia Slough Watershed Council  
5330 NE Holman  
Portland, OR 97218

Mayor Hales, City Commissioners. I am here to share with you my concern and strong opposition to Amendment M33, the proposed upzoning of 57 Acres of the Broadmoor Golf Course to an Industrial designation. It would be a very unfortunate if not tragic event for all the People of Portland to lose one of its vestiges of nature and its past. Withdraw Amendment No33 I ask.

The proposed Broadmoor M33 Amendment calls for rezoning a 57 Acre segment to an Industrial Zone. The majority of the site is within a designated environmental overlay; an area the city recognizes has "highly significant resources and functional values". The entire site also ranks as "high value" on the regional natural resources inventory. The site is bordered on three sides by waterways and wetlands including the Columbia Slough, the Catkin Marsh Wetlands, and the Port mitigation and enhancement parcels. The site contains more than an entire mile of riparian habitat. Eliminating this site will not only eliminate important habitat, it will leave the surrounding habitat fragmented, isolated and eviscerated. Rated one of the most important wildlife complexes on the Slough. The state listed sensitive Western Painted Turtles have been identified here, together with 11 at risk bird species including songbirds. The site also has a most impressive stand of massive trees including large giant sequoias just like ones the SE Portland community fought to save. How about Portland, the City of Trees? To cut or to treasure them?

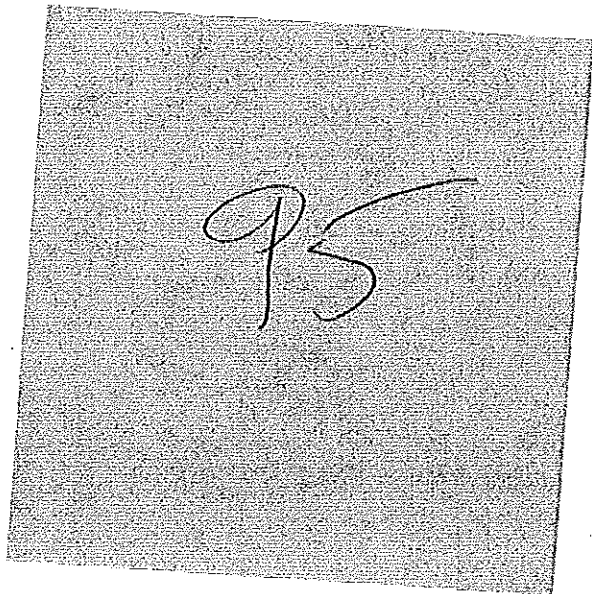
John Charles Olmsted in 1900 looked at the land that included Broadmoor with foresight. He proposed acquiring a large acreage in the Columbia Slough region for future parkland to provide "...great stretches of meadowland bordered and diversified by groves of trees. No other form of park has ever proved so attractive and so useful to the masses of people as the meadow park, particularly when there can be associated with it long reaches of still water as a landscape attraction".

Analysis by the Industrial Health and Watershed Health Work Group and at the Planning and Sustainability Commission indicates that

designating this Broadmoor parcel is better suited as open space and habitat than industrial land. It doesn't offer significant enough job potential to justify the investment in infrastructure needed to develop it. Terrain features together with its very extensive E and C zones will make necessary infrastructure placement extremely challenging and expensive.

While the underlying rationale for the Broadmoor rezoning appears to be a desire to create additional midlevel employment opportunities locally one can only wonder what widgets not already supplied by China could be created here, widgets that we think are vital for our well being, bought today and discarded tomorrow with our domestic garbage. Loosing Broadmoor is to high a price to pay for this. Would it not be better if we would practice a more efficient industrial land use management together with some City incentives options? This could significantly reduce or eliminate any perceived industrial land shortfall. In driving through Portland's industrial areas one would be rather amazed seeing all those empty or totally underused commercial lots and warehouse type structures sitting empty and wasted. Should we not look at all these locations to satisfy our industrial land inventory? Yes, we know it is so much easier and even more "respectable" to level and pave over farmland or resource rich open space. The Broadmoor Amendment is unnecessary. It would be a bad decision for all the people of Portland. Please withdraw this amendment.

*Erin Puzan*



even 11 more additional cars sliding down the steep driveway onto the steep approach to nearby SW Canyon Ct. will create a serious traffic hazard to SW 6st Drive and SW Canyon Court.

Also, as pointed out by several other letters to the Planning Commission, adding another 27 or even 11 plus cars to the steep uphill portion of SW 61<sup>st</sup> Drive to access the only nearby grocery shopping at SW Barnes Rd. (Thriftway) and the nearby Sylvan School will increase substantially the traffic in this quiet suburban neighborhood, increase the already long delays to access NW Burnside from SW Barnes Rd. or from SW. Skyline Rd.

I have lived next door to the subject property for 50 years. Each of my three sons were hit on their bikes by automobiles upon entering from my driveway to SW 61<sup>st</sup> Drive because of the steep street of SW 61<sup>st</sup> Drive just a few feet uphill from the driveway from the subject property which is steeper section of SW 61<sup>st</sup> Drive and has to descend via a far, far steeper driveway.. Fortunately, my three children were not seriously hurt and the destroyed bikes were replaceable. Adding another 27 or even 11 multifamily homes on the subject property will create a very serious safety and traffic hazard on SW 61<sup>st</sup> Drive and . Mr. Nadir Rasoulli, the applicant, may have lived there for a few days or weeks but during the several years, that he has owned the property, he has rented out his house. There is a current proposal to change from the office campus (which is a few blocks West of the subject property) to a block or two West of the subject property. That will add substantially to the traffic on SW Canyon Ct. which intersects with SW 61<sup>st</sup> Drive at the corner of the subject property, increasing the hazard at that intersection.

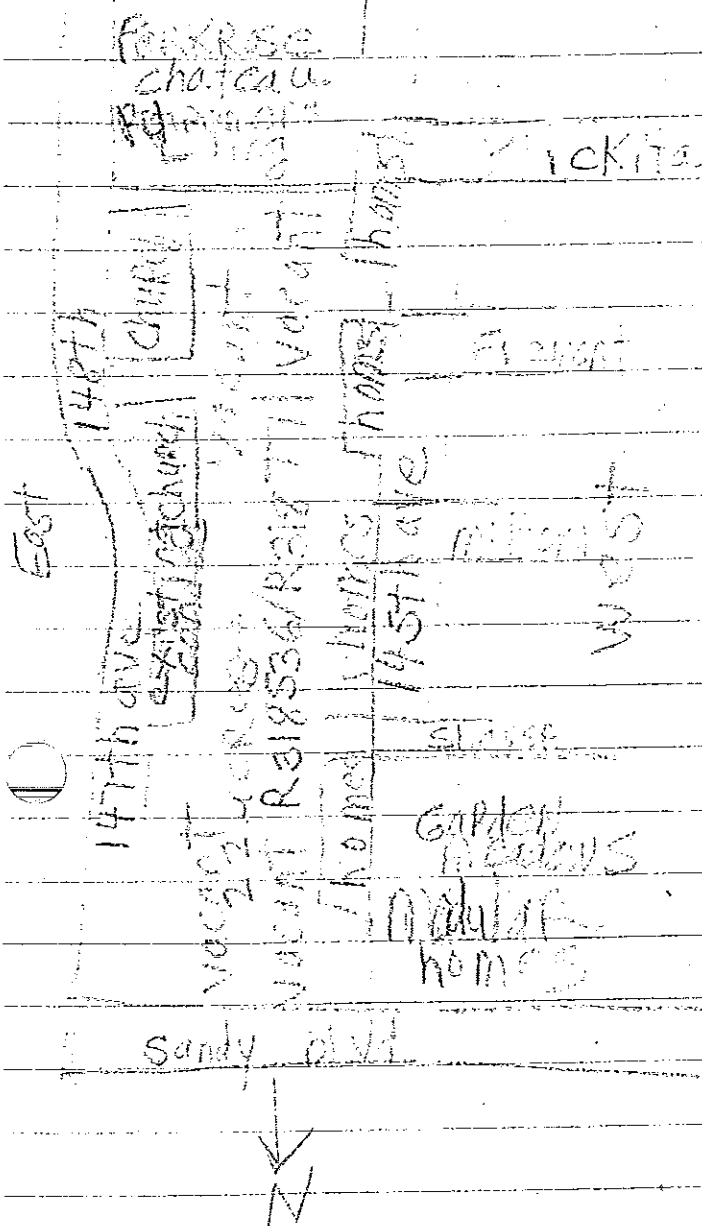
I join the many neighbors in the Sylvan and the Highlands area who strongly oppose changing the Comprehensive Plan and this late date and via an unusual procedure ignoring the normal procedural procedures to create a substantial traffic hazard, ruin the established neighborhood and values and will make a detrimental change to the single family neighborhood in Sylvan and Highlands area.

Sincerely,

Milton C. Lankton

Helena B. Lankton

FROM: Paulette Rossi  
 3710 NE 147 (97230)  
 catink.prix@gmail.com



opposed to:  
 proposed changes  
 • 290 mixed employment  
 • 688 R-5 single home

Keep CURRENT ZONE  
 R-3  
 middle housing option

See color map page N

property between  
 NE 145th and 147th  
 and sandy blvd  
 extending 22 acres  
 south

The current R-3 zone meets middle-income-condo townhouse, duplex affordability goals and density criteria. The vacant 22 acres are the east edge of the Argay neighborhood which has R-7, R-10 single family homes and 2 multi-story apartments. Argay is an R-5 zone option for baby boomers down sizing and for children buying their first single home.



April 20, 2016

Jenny Boyce  
6215 NE Wasco St.  
Portland, OR 97213  
[art.heart.earth@gmail.com](mailto:art.heart.earth@gmail.com)  
503-984-7343

Portland Sustainability Commission  
Residential Zones Testimony  
1900 SW 4th Ave., Suite 7100  
Portland, OR 97201

Dear Portland Sustainability Commission,

I am writing in regards to the notice I received about my area of Portland (M45) being re-zoned for high density residential and mixed use buildings as part of the Portland Comprehensive Plan.

I bought my house in 2011 at the end of the crash. At the time I was a child and family therapist at the local community mental health agency Morrison. I made 30,000 a year and got very lucky to buy after the crash - there was really no other way I could have done it. My house then sold for 123, 000. Currently it is worth about 200,000. But if I sold it there is very little chance I would be able to buy another home in Portland central.

I have come to love my little neighborhood between NE Halsey, highway 84, 57th and 63rd. It is made up of many working class families - blacks, whites, latinos, asians, gay, straight, young, and old. In my view, our little pocket is a hold out of the Portland that we are loosing so quickly to a more homogenous culture of middle class, hipster, white folks, which I identify as and there is nothing wrong with us, but I love diversity too.

I understand that density is important - I really believe in high density as a design for a more ecological, healthy city. But I also see diversity of class, race, age, etc. as necessary for a healthy thriving city.

After receiving the notice a month or so ago about these possible changes, I wrote up a flyer for the neighborhood to let people know about the possible changes. I also drafted a letter they could send in to say they weren't for the changes.

As I walked through the neighborhood leaving the flyer on people's doorstep, I fell more in love with my little pocket of Portland, meeting sweet, very diverse, working class people.

I met an older couple on 60th who no longer have a mortgage and would not like moving. I got a call from an older woman who said that she wouldn't be able to attend any meetings and the news was disturbing to her as she has lived and rented in the same 4 flex for 40 years along with other family members and would have no where to go.

I met a man with a family who has already begun protesting these changes for the same reason I am, they wouldn't be able to buy in Portland if they sold their home.

I want to have more of a voice in this process, and I want to give people in my part of the Rose City Park neighborhood more of a voice. Often lower income people, for various reasons, are left out of that process.

I think there are ways to gain density and keep diversity. More people do not have to be displaced. This is a creative town - we can figure this out!!

Thank you for your time,

Jenny Boyce

Integra Realty Resources  
Portland

1220 SW Morrison Street  
Suite 800  
Portland, OR 97205

T 503.478.1000  
F 503.274.8630  
www.irr.com/portland



April 20, 2016

Portland City Council  
City Hall  
Portland, OR

RE: Proposed changes to Comprehensive Plan

I reside at 6329 SE 36<sup>th</sup> Avenue here in Portland. I am a Councilor of Real Estate (CRE) and hold the MAI designation as a commercial real estate appraiser by the Appraisal Institute and have been both State and National President of that organization. I am also past chair of The Americas (North, Central & South) of the Royal Institution of Chartered Surveyors, an international valuation organization. I served two terms on the International Valuation Standards Council setting international valuation standards. Finally, I have been valuing commercial property in the City of Portland for 40 years.

I came to the Council chambers today to testify, but found more than one hundred people scheduled to speak before me, so I have taken Councilor Fish's suggestion to file my testimony in written form.

I believe that the proposed changes to the comprehensive plan have unintended consequences.

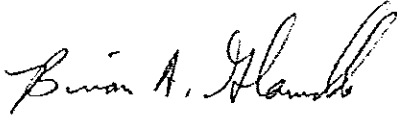
It is my understanding that staff proposes to ban future drive thru lanes at fast food restaurants, pharmacy's, grocery stores, etc. I also understand that the parking requirements for retail buildings and the siting of grocery stores and other retail buildings will change. I further understand that staff has proposed that those existing uses be designated as pre-existing, non-conforming uses. This leaves uncertainty whether a structure can be rebuilt in case of fire, earthquake, etc. and whether or not an existing building can be expanded or the configuration



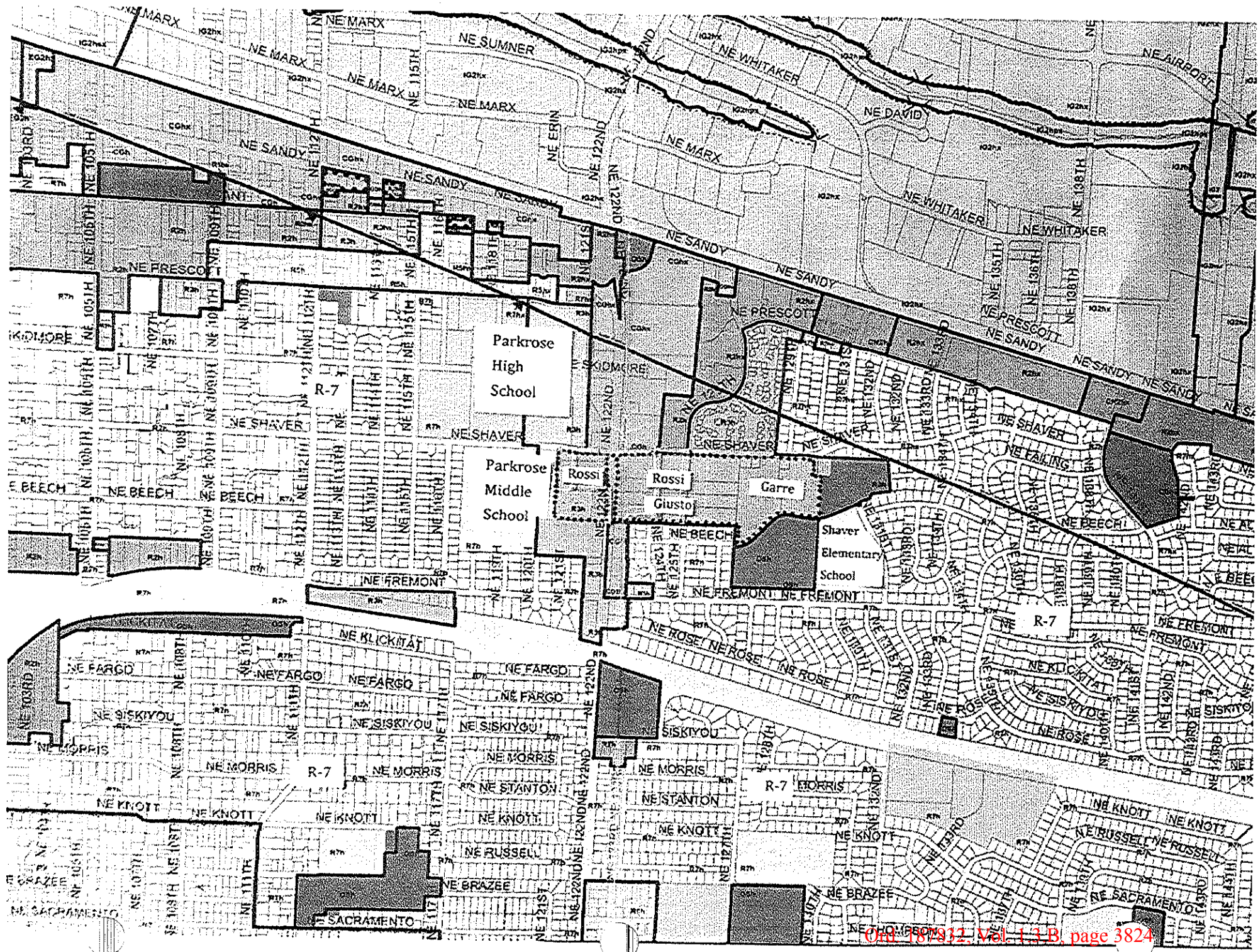
changed without invoking the new, underlying requirements. I understand that a remodel exceeding \$130,000 would also possibly require conforming to the underlying zone. In a 50,000 square foot grocery store, \$130,000 which could be exceeded by painting and adding new flooring.

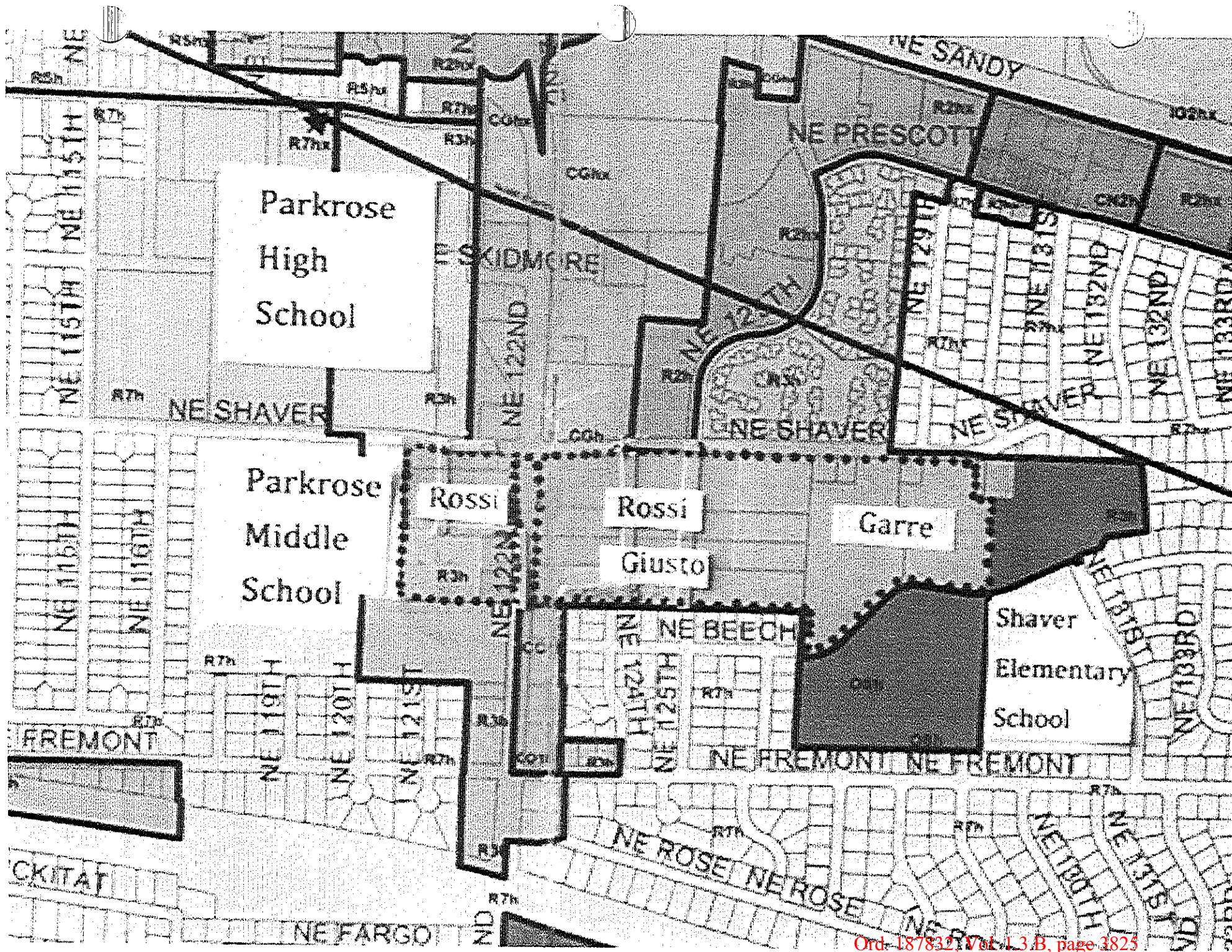
This creates uncertainty for buyers and for lenders. From a valuation perspective, uncertainty equals risk and appraisers will be adding the risk component which will lower the value of the real estate in question. I have discussed this with lenders and other appraisers and have had no disagreement with the statement. Whether property owners will challenge the City regarding the diminution of their property values is beyond my expertise. I urge the Council to have staff take a second look at these unintended consequences before adopting this new plan.

Respectfully submitted:



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





Amendment #F72, Rossi Farms

Dear Mayor Hales, Portland City Council Members and Staff

The Garre, Giusto and Rossi Family members very happy with the changes staff made on the east side of 122nd Ave and Shaver. Your staff has been awesome and helpful during this whole process, thank you. On the west side I still do still have a lingering concern that I think was perhaps missed and that is the R3. Here are our concerns.

**Traffic:** After some study with our planning consultant (Rudy Kadlub), the anchor grocery for the neighborhood will be placed on the west side of 122nd and Shaver. This is because afternoon rush hour traffic runs south on 122nd from the Airport Way Corridor and Sandy Blvd. Having R3 laid out on the west side of 122nd Ave. as proposed, (see Chris's map for reference) would greatly lessen the chances of anchor grocery being on that side of 122nd.

**Flexibility:** The R3 area is quite large and its borders are not flexible for an integrated business/housing mix.

**Housing:** We are hoping to plan a mixed-use project on the west side of 122nd geared to our citizens that either don't have cars at all or can't drive due to age and/or medical conditions. Also, being immediately next to grocery and 122nd Ave with many alternate transportation options, R3 is much to low of a density.

**Our Solution/Request:** We would like to have the R3 on the west side of 122nd changed to all Mixed Use - Civic Corridor to solve this future potential problem and maintain master planning flexibility.

Mixed Use - Civic Corridor (instead of R3 on the west side of 122nd Ave.) will allow a better integration of grocery, neighborhood businesses and housing at the more appropriate higher density.

The goal of the family is to create a master plan that will create the most complete community possible for our residents. This would be a great help to that goal.

Once again, we are very happy with the proposal for the east side of 122nd. The present proposal allows room to infill the neighborhood support businesses required to have a complete and walk able community with the appropriate housing density and diversity mix.

Again, thank you for your helpful staff. If any of this sounds confusing don't hesitate to ask me a question. If anyone would like to talk or have me come down in person just let me know.

Thank You

Joe Rossi 503-753-9671

Submitted  
by  
Martie  
Succc  
4/20/16

TO: PORTLAND CITY COUNCIL

Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov  
Commissioner Amanda Fritz, amanda@portlandoregon.gov  
Commissioner Nick Fish, nick@portlandoregon.gov  
Commissioner Steve Novick, novick@portlandoregon.gov  
Commissioner Dan Saltzman, dan@portlandoregon.gov  
Council Clerk, cputestimony@portlandoregon.gov

1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

RE: PROTECT SINGLE-FAMILY HOMES IN MULTNOMAH NEIGHBORHOOD

I oppose City Council Amendment #P45, New Policy 5.5, Middle Housing to the 2035 Comprehensive Plan (see amendment text below). If passed, this amendment will allow the single-family zoned property in Multnomah to be changed to multifamily zoning without adequate opportunity for public review and comment. This amendment is a radical, last-minute change to the 2035 Comprehensive Plan that is too far reaching to be incorporated into the plan with approximately a month for public comment. This is insufficient time for our neighborhood to become aware of the consequences of what is being proposed and to voice opposition to it.

In addition to objecting to the manner in which this amendment was introduced, I object to its substance. When the Discussion Map in the Draft SW Community Plan proposed that essentially all of Multnomah be rezoned R2.5 to allow attached row housing, hundreds of people in our neighborhood objected to the wholesale elimination of most single-family residential zoning at that time. I believe that the majority of the people in my neighborhood still oppose it, but that they are unaware that this amendment is even being considered. This is totally inconsistent with State Goal 1 that requires citizen involvement in land use planning.

Hundreds of Multnomah residents, the Multnomah Neighborhood Association, and Southwest Neighborhoods Inc. have all requested that the City Council change the proposed designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

If the Village is designated a Neighborhood Center with a ½-mile radius, it will overlap with the boundaries of the two adjacent Town Centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development within a quarter mile of these designated centers will overlap with Multnomah and leave little room for the existing single family homes as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village and is more in keeping with the semi-rural character of the neighborhood.

The introduction of the Draft 2035 Comprehensive Plan stated that there was more than enough existing capacity to meet the projected growth without changing any zoning. During dozens of discussions with BPS staff, as we advocated for the Neighborhood Corridor and in opposition to the Neighborhood Center designation, we were assured that Multnomah's single-family zoning would remain unchanged with the proposed Neighborhood Center Designation. Amendment #P45 directly contradicts those assurances. It undermines our trust in city government and in due process. I urge you to reconsider amendment #P45 and to vote against it.

Please add this to the record.

Thank you,

*Gayle Haezenberger*  
(Address) 6929 SW 34th - Portland OR 97219

cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
Director DLCD Jim Rue, jim.rue@state.or.us  
MNA Land Use Committee, mnalandusecommittee@gmail.com

4/13/16

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Proposed March 18, 2016

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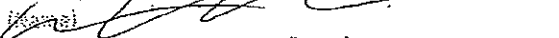
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The introduction of the Draft 2035 Comprehensive Plan stated that there was more than enough existing capacity to meet the projected growth without changing any zoning. During dozens of discussions with BPS staff, as we advocated for the Neighborhood Corridor and in opposition to the Neighborhood Center designation, we were assured that Multnomah's single-family zoning would remain unchanged with the proposed Neighborhood Center Designation. Amendment #P45 directly contradicts those assurances. It undermines our trust in city government and in due process. I urge you to reconsider amendment #P45 and to vote against it.

Please add this to the record.

Thank you,



2005 SW 34th Ave  
Portland OR 97219

cc: City Auditor, LaVonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
Director DLCD Jim Rue, jim.rue@state.or.us  
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If the Village is designated a Neighborhood Center with a 1/2-mile radius, it will overlap with the boundaries of the two adjacent Town Centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development within a quarter mile of these designated centers will overlap with Multnomah and leave little room for the existing single family homes as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village and is more in keeping with the semi-rural character of the neighborhood.

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Please add this to the record.

Thank you,

(Name)

(Address)

*Alta Claudine Stock 4/13/16*  
*Alta* 4/13/16  
7035 SW 34th Ave  
cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
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Please add this to the record.

Thank you,

(Name)

(Address)

*Betsy Langford, Gia Accardi*  
*6905 SW 33rd Pl. Portland, OR 97219*

cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
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Please add this to the record.

Thank you,

*Wade Jones*

*Wade Jones*

*Wade Jones*

*705 SW 34th Ave 97219*  
cc: City Auditor, La Vonne Griffin-Valade, lavonne@portlandoregon.gov  
Susan Anderson, susan.anderson@portlandoregon.gov  
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Zoning Testimony in support of Amendment F72

Re: Argay Neighborhood farmland near 122<sup>nd</sup> Avenue and NE Shaver Street

Good afternoon, I am Albert G A R R E, my wife and I have lived in the Argay Terrace neighborhood for 32 years.

I am here to speak about the zoning designation for property in the Argay Neighborhood, which is immediately west of 122<sup>nd</sup> Avenue and south of NE Shaver Street, that is currently "open land", and is being farmed by its respective landowners. For full disclosure, my wife and I are one of those landowners, and our 10 acre portion of this land, is currently zoned residential R-3.

I am here to speak in favor of Amendment F72.

It was about 31 year ago, during annexation, when the city went through an almost identical zoning process for this property. The result of that process was a decision to designate most of the open farm land as an R-3 medium density residential zone, and some of it abutting 122nd Avenue, as a commercial zone. Amendment F72 continues the philosophy of that original zoning decision. It was correct 31 years ago and is even more correct today.

Regarding the residential zoning of this land, the R-3 designation for this property makes especially good sense because of its proximity to, the soon to be opened, Loowit View Park. Those who choose to live in a medium density housing arrangement are more likely, to need, and use a park. Having an active park is vital to keeping it a safe and neighborhood friendly area, which makes the entire neighborhood better place to live.

A future residential R-3 development on this property, which is located near a city park, a collector street, an arterial street, and a commercially zoned area, makes good planning sense. It will contribute to a more complete community, and will make the Argay Neighborhood a more desirable and livable area.

April 20, 2016

TO: Portland City Council  
FROM: Anti-Displacement PDX coalition  
RE: Comprehensive Plan Map Amendments

Dear Mayor and City Commissioners:

Anti-Displacement PDX applauds the inclusion of over two dozen anti-displacement and affordable housing policies in the 2035 Comprehensive Plan. Thank you for your partnership and work to strengthen Portland's commitment to equitable development.

ADPDX is concerned that several of the proposed amendments to the Comprehensive Plan map undermine the City's ability to achieve the Plan's anti-displacement goals. Amendments that decrease allowed density in high-opportunity neighborhoods are contrary to the intent of the anti-displacement policies that you have included in the Plan, and render these anti-displacement tools less effective.

Decreasing the allowable density in close-in neighborhoods, those rich in amenities and services, and those with good access to high-frequency transit serves to create exclusionary neighborhoods, rather than expanding housing opportunity for low-income Portlanders, people of color and renters.

Examples of proposed amendments that limit housing opportunity and exacerbate exclusionary housing conditions:

- Amendments M45 and M71 would decrease allowable density around the 60<sup>th</sup> Avenue light rail station;
- Amendments S20, S21 and S22 would take away allowable density in the close-in Buckman neighborhood;
- Amendments M74, M75 and B88 would prevent greater housing opportunity in the exclusive Eastmoreland neighborhood. Rather than decreasing density in such neighborhoods, Portland should create *more* opportunity for housing choice in these areas.

In contrast to the above-mentioned proposals, there are other map amendments that would *increase* allowed housing density, and therefore support the Comprehensive Plan's goals of preventing displacement and expanding housing choice and access. We support amendments S12, N24, B72, B78, B86, M25 and M32, among others.

We look forward to working with City Council to immediately begin implementing the Comprehensive Plan's anti-displacement and affordable housing policies. Allowing for more housing in our City's high-opportunity neighborhoods must be the first step.

Sincerely,

Anti-Displacement PDX coalition

Contact: Cameron Herrington, Living Cully, 503-489-8334, [cameronherrington@livingcully.org](mailto:cameronherrington@livingcully.org)



# Anti-Displacement PDX

Fighting for an equitable Portland with housing for all

## What do we want?

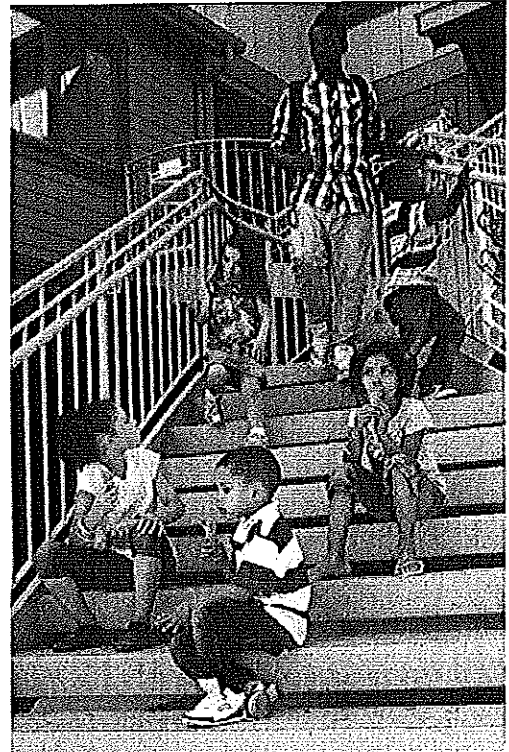
ADPDX has secured Comprehensive Plan policies that will protect people of color and low-income people from housing insecurity as a result of gentrification and displacement. We prioritize people not profit. Affordable housing choices must be available throughout Portland, especially in high-opportunity, transit connected areas.

## Why is this important?

Many families are just one paycheck and no-cause eviction away from homelessness. An eviction can cripple a person's work prospects, disrupt a child's education, and disconnect a person from their family and social ties. Enough is enough. The mass displacement of people of color, those of low-incomes, and renters must end now. An equitable Portland means responding to the waves of gentrification and displacement that have dismantled entire communities. It forces people to the far ends of the region, with fewer infrastructure and transit investments, and economic opportunities.

## What have we won?

We want to thank City of Portland staff and the Planning and Sustainability Commission for adopting our anti-displacement recommendations in the Comprehensive Plan. These additions will bolster access to housing, education, economic opportunity, and transit for all community members. Our policies focus on achieving equitable outcomes for communities of color, low-income people, renters, people with disabilities, and older adults - ultimately making more a more inclusive and prosperous Portland.



## What are the next steps?

As City Council reviews a draft Comprehensive Plan and considers their own amendments, they can be a part of building an equitable Portland, making possible the development of "middle housing" options. However, this effort is at odds with downzoning of close-in, high-opportunity neighborhoods such as Eastmoreland. We are disappointed with this exclusionary act that mimics the racist redlining of our past, and creates further economic segregation. Downzoning here contradicts the anti-displacement policies that were hard fought and won. We urge the City Council to vote NO on the downzone amendments for neighborhoods of high opportunity.









**NO NEW REDLINING!**  
**Another 30 years of exclusion is not what Portland should aspire to.**

# Anti-Displacement PDX

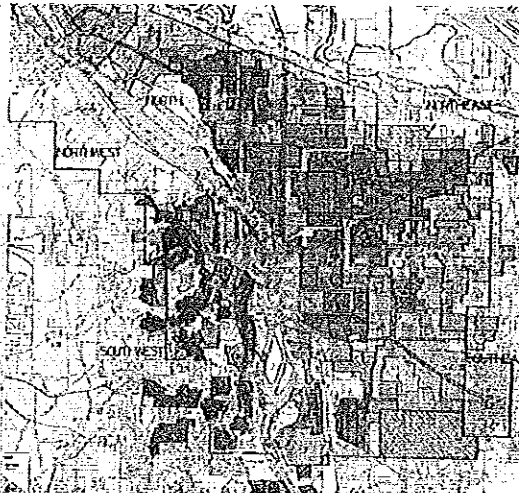
Fighting for an equitable Portland with housing for all

## RESIDENTIAL SECURITY MAP 1936 HOLC Redline map and key

— L E G E N D —

-  A FIRST GRADE
-  B SECOND GRADE
-  C THIRD GRADE
-  D FOURTH GRADE
-  SPARSELY BUILT UP  
(COLOR INDICATES GRADE)
-  INDUSTRIAL
-  COMMERCIAL (IMPORTANT RETAIL AND WHOLESALE AREAS)
-  UNDEVELOPED OR FARMLAND  
(NO PROBABLE CHANGE WITHIN 5 YEARS)

PREPARED BY  
DIVISION OF RESEARCH AND STATISTICS  
WITH THE CO-OPERATION OF THE  
APPRAISAL DEPARTMENT  
HOME OWNERS' LOAN CORPORATION  
MAY 1, 1936



This map indicates how banks and realtors steered people based on race, carving Red Grade D areas for Blacks and other people of color, while green Grade A were reserved for white people. Homeownership supports long term financial stability, allowing a person to pass on their wealth to the next generation. We see the echoes of these practices today, often driving patterns of gentrification.

From the Portland's Historic Redline District sign on opposite page:

"In Portland's past, "redlining" practices created exclusionary zones for "Negroes and Orientals" by real estate, banking, and insurance companies. Agents could lose their licenses for crossing this color barrier. Now urban gentrification displaces low-income families, as the remaining affordable housing stock in this area disappears."

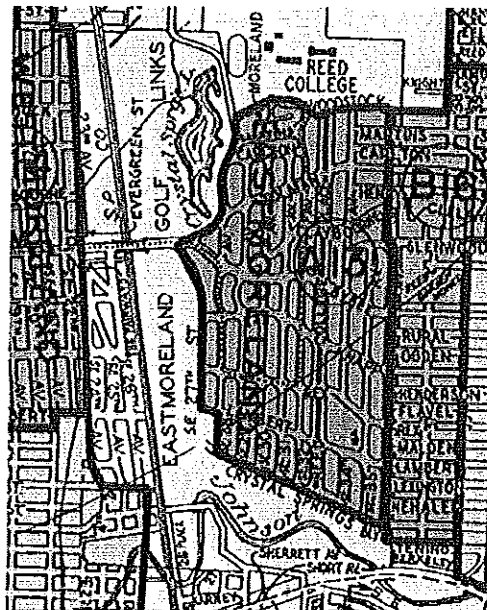
Learn more and get involved!

Check out Anti-displacement PDX on Facebook.

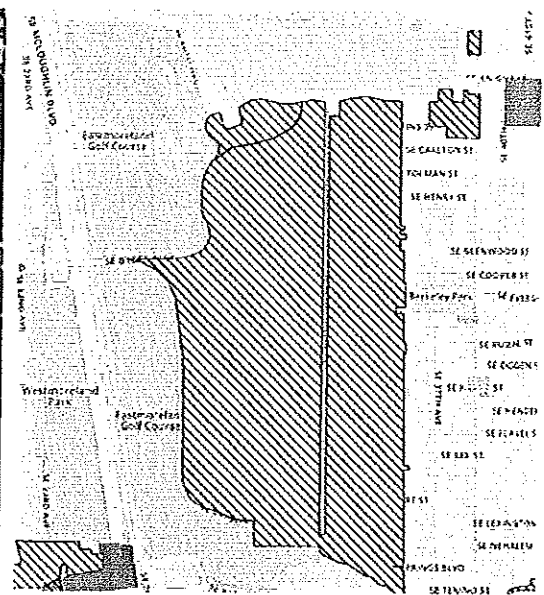
[www.facebook.com/anti-displacementpdx/](http://www.facebook.com/anti-displacementpdx/)

Learn more about income segregation and the financial ills of exclusionary zoning here:

[www.friends.org/latest/land-use-regulations-and-income-segregation](http://www.friends.org/latest/land-use-regulations-and-income-segregation)



Eastmoreland was A graded for home loans in 1936.



In an amendment to the Comp Plan (2016) Eastmoreland is proposed to be downzoned in the same area as the redline map of the 1930's. Other downzones we oppose include Buckman and the 60th Ave MAX station areas.

Photo Credits: Orange Splot, LLC, Woolsey Corner, Portland; Portland Occupier, Redline District Sign.

Doug Klotz  
1908 SE 35<sup>th</sup> Place  
Portland, OR 97214  
April 20, 2016

## Testimony on Comprehensive Plan Updated Council Amendments

Mayor Hales and Commissioners:

I am here to speak in support of the Missing Middle, both in Amendment P45, and in the proposed zone changes in Inner Southeast.

I have read the testimony of United Neighborhoods for Reform, and agree that the proposal to rezone these areas to allow a transition zone of multi-unit, smaller, more affordable housing has merit. I also understand their concerns about the impacts on neighborhoods.

However, I believe that adopting Amendment P45 now is a solid first step toward providing more affordable, sustainable housing, adopting into Policy the city's support for Middle Housing. The future process to implement the Policy is where the details can be worked out, impacts quantified, and regulations written that will address neighborhood concerns.

I would modify the area of application mentioned in the amendment, to cover not only "areas within a quarter mile of designated centers... and within the Inner Ring" but also within a quarter mile of Frequent Service Transit corridors, and for at least a quarter mile around Light Rail and BRT stations.

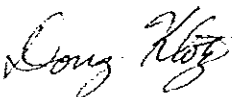
I also support the zone changes carefully crafted by BPS planners, and supported by PSC, for two areas in Inner Southeast:

The proposed zone change from R-5 to R2.5 between Stark and Alder and 15<sup>th</sup> and 20<sup>th</sup> is a conservative approach that will allow additional density through internal conversions, and legalize existing situations. I oppose Amendments S-21 and S-22 which would roll back these mild upzones. I also think that the Mayor's April 11 proposal, though carefully crafted, is unnecessarily complex and confusing compared to a simple zone change.

The area east of Lone Fir, between Belmont and Stark and 26<sup>th</sup> and 30<sup>th</sup>, is already higher density than to the west, higher than R-1 in places. Staff went through lot by lot, and carefully crafted zoning that matches the density and pattern on the ground, with R-2 and R-1 proposed. I support the staff proposal, and oppose Commissioner Novick's #2 proposal, which again is unneeded complexity.

These two areas can maintain their many historic houses (and apartment buildings) while providing needed growth in accessible Inner Southeast.

Thank you



Doug Klotz

2035 Comprehensive Plan Amendment Testimony  
April 20, 2016

I am testifying in support of Commissioner Novick's Amendment #2 in his memorandum dated April 12, 2016, which would leave the zoning unchanged between SE 26<sup>th</sup> Ave. and SE 30<sup>th</sup> Ave. and between SE Stark St. and SE Belmont St., excluding the area north of Belmont proposed for Mixed Use.

The area in question is currently zoned Single Family 2500 and 5000, and was proposed to be changed to Multifamily 1000 and 2000.

The comments I heard from the planning staff in support of the proposed zoning change, is that the area has an existing mix of housing types, and that there is a potential for affordable housing in the area.

I think the residents of the area are being treated unfairly by the way these justifications are currently proposed to be implemented.

The issues of a mix of housing types, and a need for affordable housing, are equally true for many parts of Buckman, Sunnyside, and Kerns

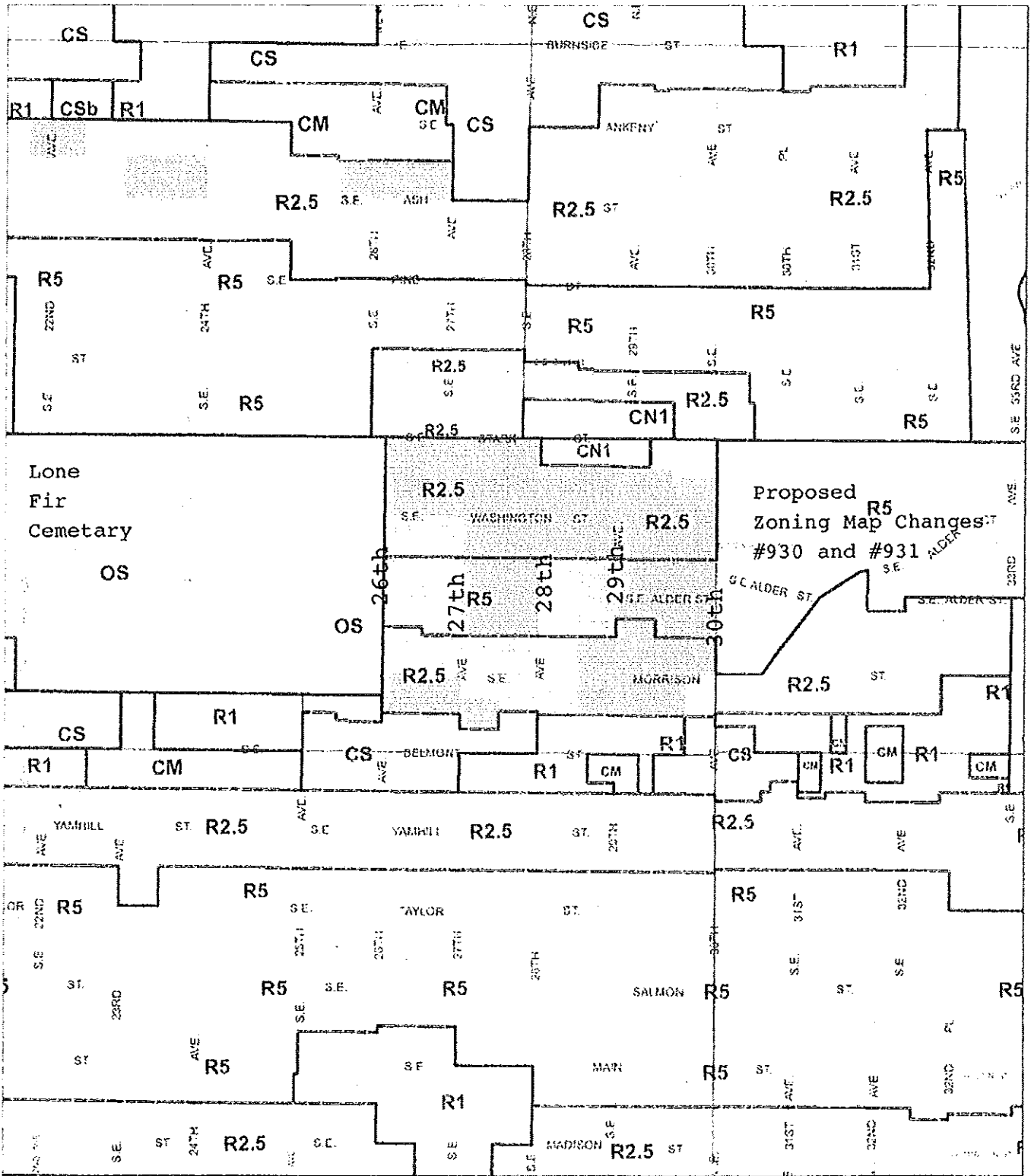
If the principals upon which this proposed zoning change are valid, they should be discussed and implemented in a neighborhood, or city wide change in zoning standards, not by picking on a few households.

Changing our zoning now would be unfair. Our neighborhood should be able to participate fully in the concepts developed by the residential infill project, and particularly in the discussion of "middle housing". We currently have a vibrant mix of single family, duplexes, triplexes, and some larger multifamily residences. What makes the mix work is the scale of the buildings, few of which are over 2 stories, and most of which meet single family setbacks. The proposed changes would allow currently conforming single family homes to have four story apartment buildings constructed immediately adjacent. The scale of the buildings that would be allowed outright in the proposed zoning do not belong in an area with historic single family residences. This change is too extreme for an area already providing a variety of housing of the types the city is hoping to encourage.

Please adopt Commissioner Novick's Amendment to leave our zoning unchanged.


Thank you for your consideration.

Laurie Kovack  
736 SE 28th Avenue  
Portland OR 97214



**Map C  
Proposed Changes**

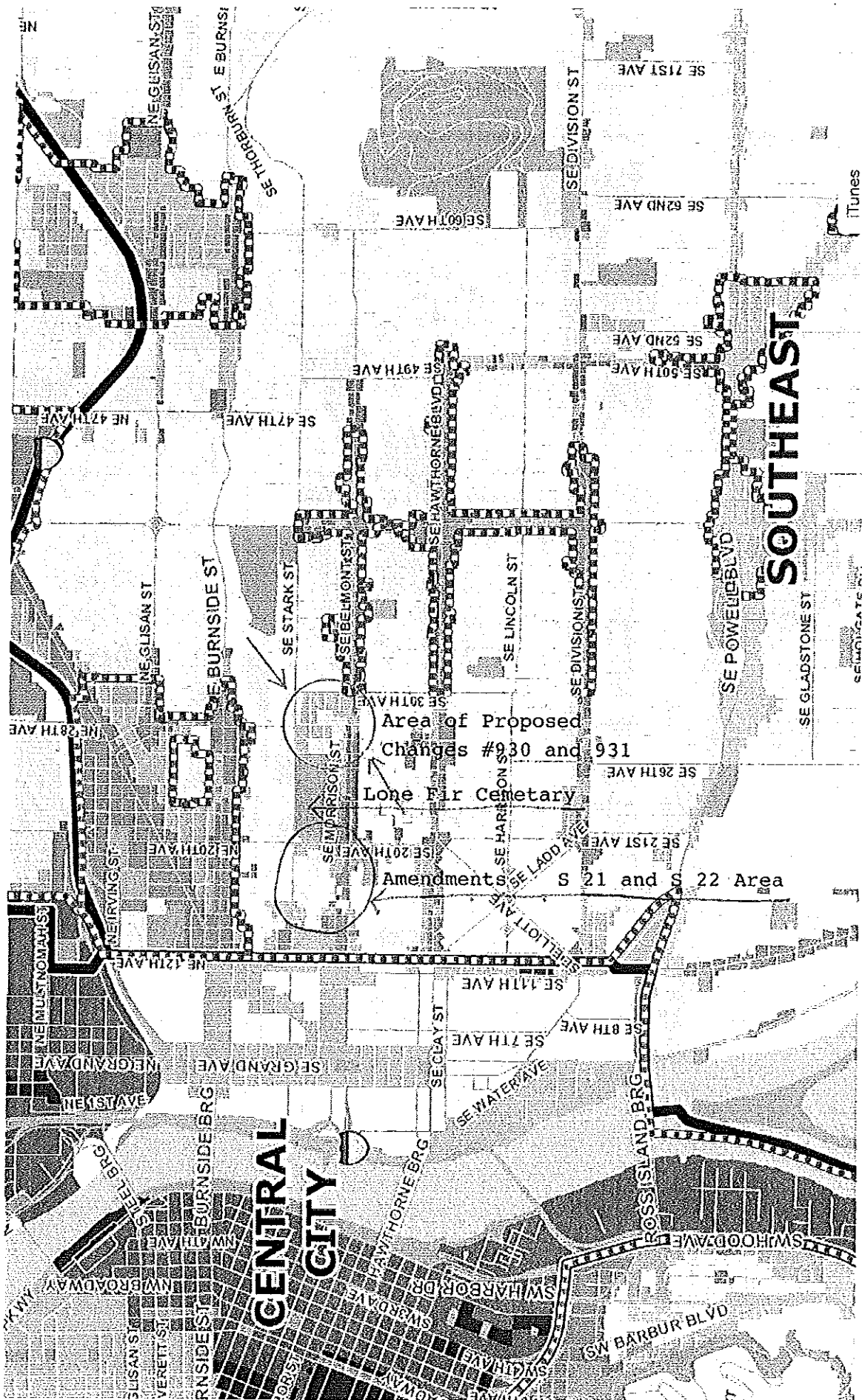
Proposed Multi-Dwelling 2,000  Existing Zone Designations

Proposed Multi-Dwelling 1,000 

April 6, 2015

**Note: Existing Zones R2.5 and R5 are single family zones  
Proposed Zones R1 and R2 are multifamily zones**





April 12, 2016

Memorandum

TO: Mayor Hales and City Commissioners  
FROM: Commissioner Novick  
CC: Joe Zehnder, Chief Planner; Eric Engstrom, Principal Planner; Susan Anderson,  
Director  
RE: Potential additional Comprehensive Plan Amendment

Two potential additional amendments to the Comprehensive Plan have come to my attention since publication of the Comprehensive Plan Amendment Report on March 18. I would like these further amendments to be considered.

1. This map amendment would re-designate properties located in NW Portland in the area bounded by:
  - NW 29<sup>th</sup> Ave. on the east
  - NW Nicolai St. on the north
  - The half block south of NW Roosevelt St. on the south
  - The half block to the west of NW 31<sup>st</sup> Ave on the west

The parcels are currently designated Mixed Employment. This amendment proposes re-designating the parcels Central Employment / EX. The properties included in this area are R307721, R307722, R307724, R307726, R307727, R307729, R307730, R307739, R307740, R307741, R307744, and part of R307719. These parcels are adjacent to and nearby the parcels addressed by Amendment #M47.

In addition, this amendment proposes refining Amendment #M47. Amendment #M47 changes the designation on R307720 and part of R30719 from Mixed Employment to Multi-Dwelling 2,000. This amendment would change the designation to Multi-Dwelling 1,000 instead of Multi-Dwelling 2,000.

*Cosponsor:*

2. This map amendment proposes applying the changes proposed by the Mayor in the first amendment discussed in his April 11, 2016, memo to the area between SE 26<sup>th</sup> Ave. and SE 30<sup>th</sup> Ave. and between SE Stark St. and SE Belmont St., excluding the area north of Belmont proposed for Mixed Use. Currently, much of this area is proposed for a designation that will allow a mix of R1 and R2 zoning.

*Cosponsor:*

2035 Comprehensive Plan – Council Amendments

	Change: Reconsider down-designations in the vicinity of SE 17th and Insley. Restore High Density Multi-Dwelling.	BPS Recommendation: No Change. Support PSC recommendation because intended LRT stop was never built. LRT stop is about ½ mile away.
Amendment #S21  ★	Location: Buckman Change #348 (R5 area between 14 <sup>th</sup> , Morrison, 20 <sup>th</sup> , Stark)  Multiple Taxlots (See Map)	Related testimony (for or against): Buckman NA, various individuals
	Requested by: Saltzman, Fritz	Service Considerations: None
	Change: Remove recommended Single-Dwelling 2,500 and restore Single-Dwelling 5,000.	BPS Recommendation: No change. The existing development in the area is predominantly built to the R2.5 density.
Amendment #S22  ★	Location: 1910 SE Stark and Vicinity - Buckman Change #928  R167885, R167886, R167887	Related testimony (for or against): Buckman NA, various individuals
	Requested by: Saltzman, Fritz	Service Considerations: None
	Change: Remove recommended Multi-Dwelling 2,000 and restore Single-Dwelling 5,000.	BPS Recommendation: No change. The existing development is multi-dwelling. Opportunity for affordable housing.
Amendment #N24	Location: South end of Westmoreland Park near SE Nehalem and 23rd	Related testimony (for or against): Property owner
	Requested by: Novick	Service Considerations: McLoughlin and Tacoma are both expected to be over capacity in this area in 2035 during PM peak. Substandard streets and stormwater constraints in the area. Mitigating factor is close proximity to Milwaukie LRT – Tacoma Station, and access to Springwater Corridor trail.
	Change: From Single-Dwelling 5,000 to Multi-Dwelling 2,000	BPS Recommendation: Support
Amendment #B42	Location: 715 SE 62nd Ave  R114528	Related testimony (for or against): Property owner



TERRY PARKER  
P.O. BOX 13503  
PORTLAND, OREGON 97213-0503

**Subject: Testimony to the Portland City Council opposing the middle housing amendment (P45) to the comp plan, April 20, 2016.**

By calling for the addition of middle housing in single family home neighborhoods, it appears the density extremists and affordable housing crusaders have teamed up to destroy the village - in their eyes to save it. This paradigm would be equivalent to constructing 80 story buildings in downtown Portland and the Pearl District.

The whole idea of middle housing throws out traditional zoning that has been designed to protect the sanctity of Portland's diverse single family home neighborhoods, and tears at the heart strings of very neighborhoods that people buy into for their livability. Street trees alone can not replace green yards that provide outdoor living space for families and supply habitat for urban wildlife. The fence that extends across my modest backyard often doubles as a freeway for the many gray squirrels that make my neighborhood their home.

As opposed to preservation, the middle housing concept opens the door as an incentive to demolish more and more affordable and quality single family homes. Land prices increase significantly when more density can be added. Will new housing options be as affordable as existing starter homes? While internal conversions of existing large houses should be considered as a way to add density, cottage clusters do not belong in R5 zoned and smaller lot sized neighborhoods.

Any new construction in single family zoned neighborhoods needs to fit the scale and setbacks of the existing homes nearby, and must require one off-street parking place for each housing unit. Charging households in single family home neighborhoods a fee to park on residential streets in front of their own homes is contrary to affordability. Likewise, affordability is not continually increasing sewer, water and garbage service rates, and jacking up property taxes.

Weakening zoning regulations must not be determined by profit-centered development interests. If the middle housing concept is to be considered, an extensive amount of community outreach and public response must take place - decoupled from and not to be confused with the comp plan process - before and if any implementation could take place.

Respectively submitted,

Terry Parker  
Northeast Portland

Testimony to City Council in support of 7<sup>th</sup> Avenue Greenway by Susan Stringer

RE: Amendment TSP40116

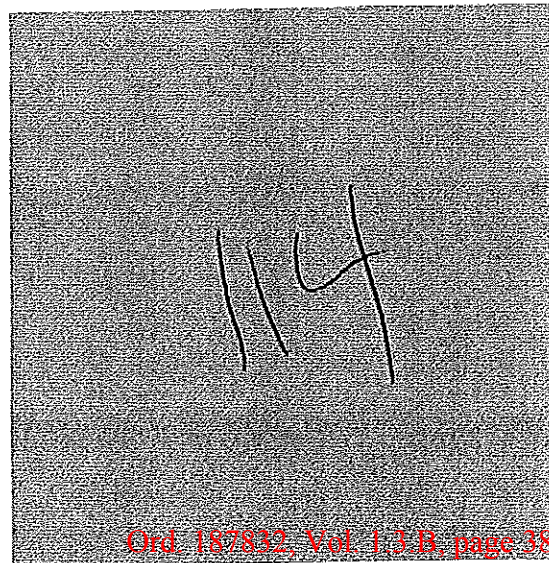
Hello, my name is Susan Stringer, and I am a resident of the Eliot neighborhood.

Commissioners, thank you for the opportunity to testify in support of the proposed greenway on NE 7<sup>th</sup> Avenue. For many years neighbors on 7<sup>th</sup> Avenue have seen a lot of unsafe traffic behaviors mainly from frustrated commuters avoiding MLK. They are cutting through the neighborhood using 7<sup>th</sup> Avenue as their route driving faster than posted speed limits, refusing to stop for pedestrians and rarely yielding to cyclists. Currently, 7<sup>th</sup> Avenue is a de-facto bike route. In addition, hundreds of pedestrians use this street including children that attend Albina Head Start, King and Irvington Schools as well as residents walking to take public transportation. Keeping all people safe that are using 7<sup>th</sup> should be a priority. A group of neighbors got together and realized that the BTA, Bike Loud PDX, Go Lloyd, NE Broadway/Weidler Alliance and King, Eliot, and Irvington neighborhood associations were among the organizations that had the same vision as residents who also support the greenway. It is exciting to see so many organizations and residents from very different back grounds share this progressive vision of the future of 7<sup>th</sup> Avenue as they join together to help plan the future of our city bikeways.

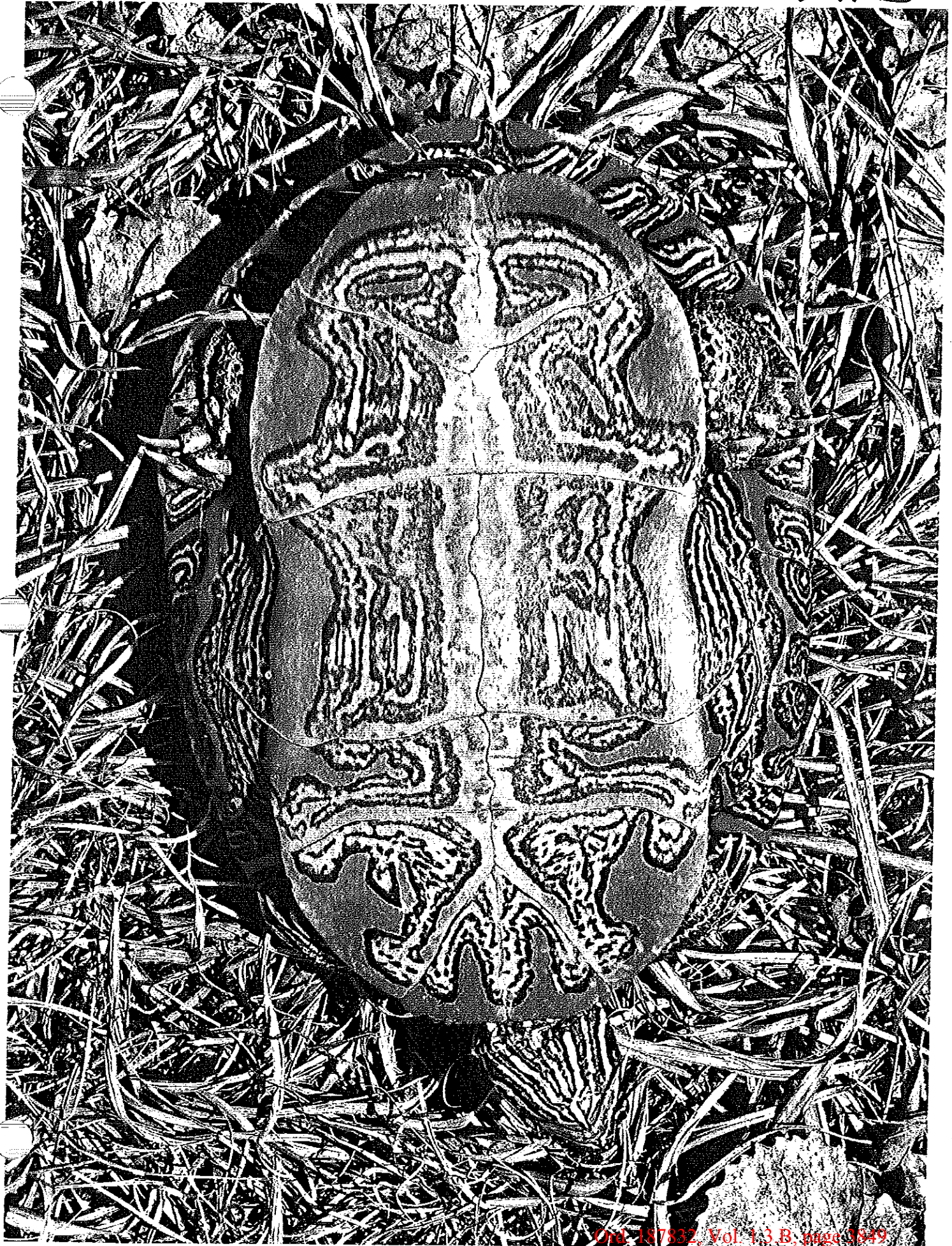
As a resident I am grateful to be part of this process. Because we want to make sure this is a process where everyone is involved, our group held 3 different community events. Some of our neighbors are excited for the positive change and some of our neighbors are concerned about the greenway design. Therefore, we are talking to pedestrians, cyclists, neighbors and other city residents to make sure everyone has a voice. We will continue to advocate for everyone's involvement, because, a greenway on 7<sup>th</sup> is EVERYBODY'S greenway, not just for those who live on 7<sup>th</sup>.

Included in our written testimony is supportive documentation including letters from neighborhood associations, signatures in support from residents, survey results, and a list of reasons why 7<sup>th</sup> Avenue is a superior choice over 9<sup>th</sup> Avenue in addition to being half the cost, saving one million dollars of tax payers money.

Thank you for your time and attention.



Batch #3



E-# 111 118

April 20, 2016

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

26

#### Portland Comprehensive Plan Amendment M34

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

We have provided material and testimony in the past that:

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

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

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

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

Riverside

GOLF AND COUNTRY CLUB

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

Ord. 187832, Vol. 1.3.B, page 3850

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

Riverside M34 Area: 881 potentially lost trees

Broadmoor M33 Area: 97 potentially lost trees

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

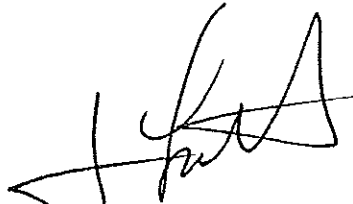
Given Riverside's repeated objection to the industrial designation and our stated plans to not convert our property to industrial use, we believe that the City is not in compliance with Goal 9; and that a decision relying upon Riverside as industrial land would not be supported by substantial evidence.

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

Sincerely,



Lucas Miller, General Manager



Jim Laubenthal, Member



*Riverside*

GOLF AND COUNTRY CLUB

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

Ord. 187832, Vol. 1.3.B, page 3851

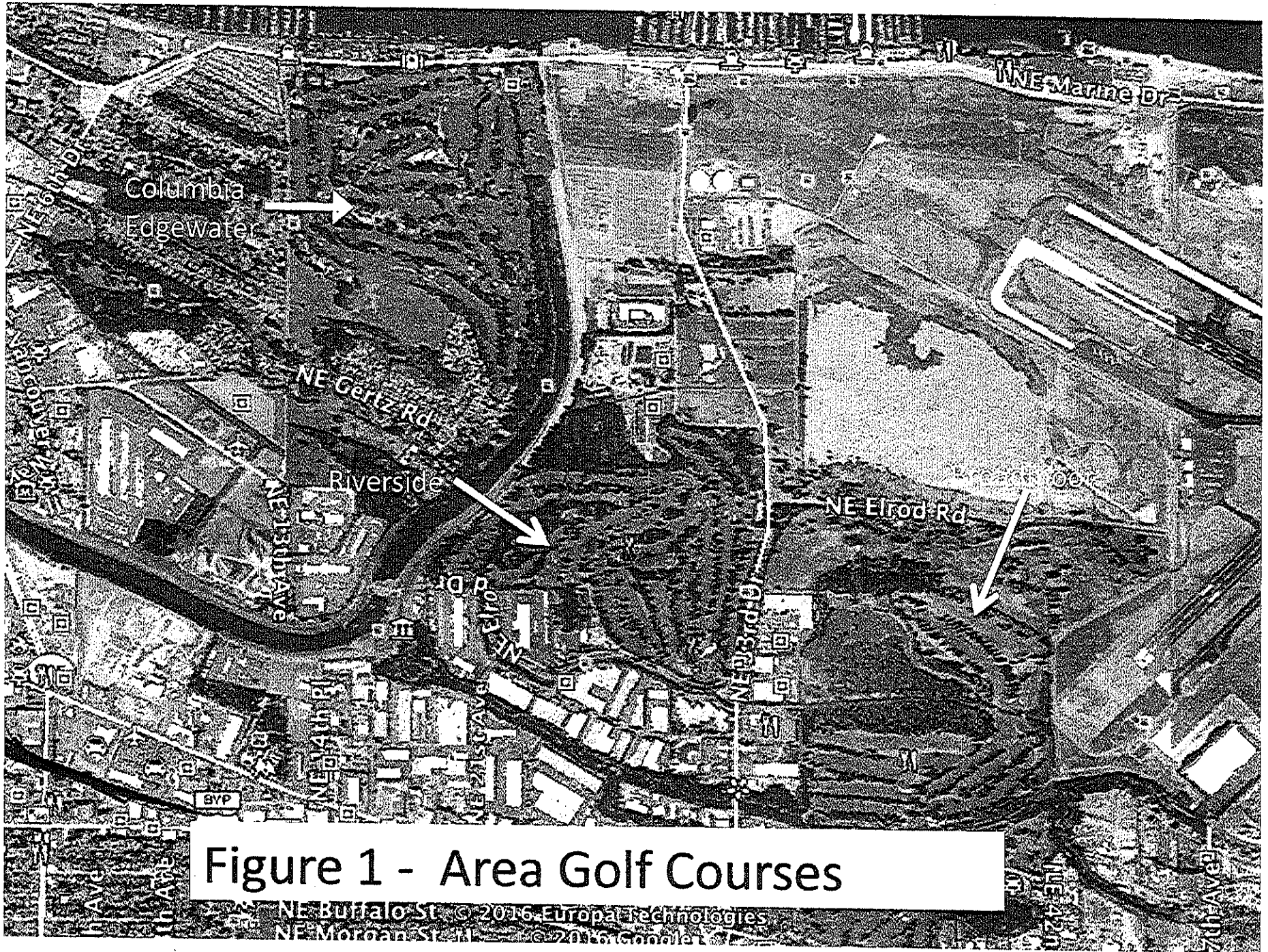


Figure 1 - Area Golf Courses

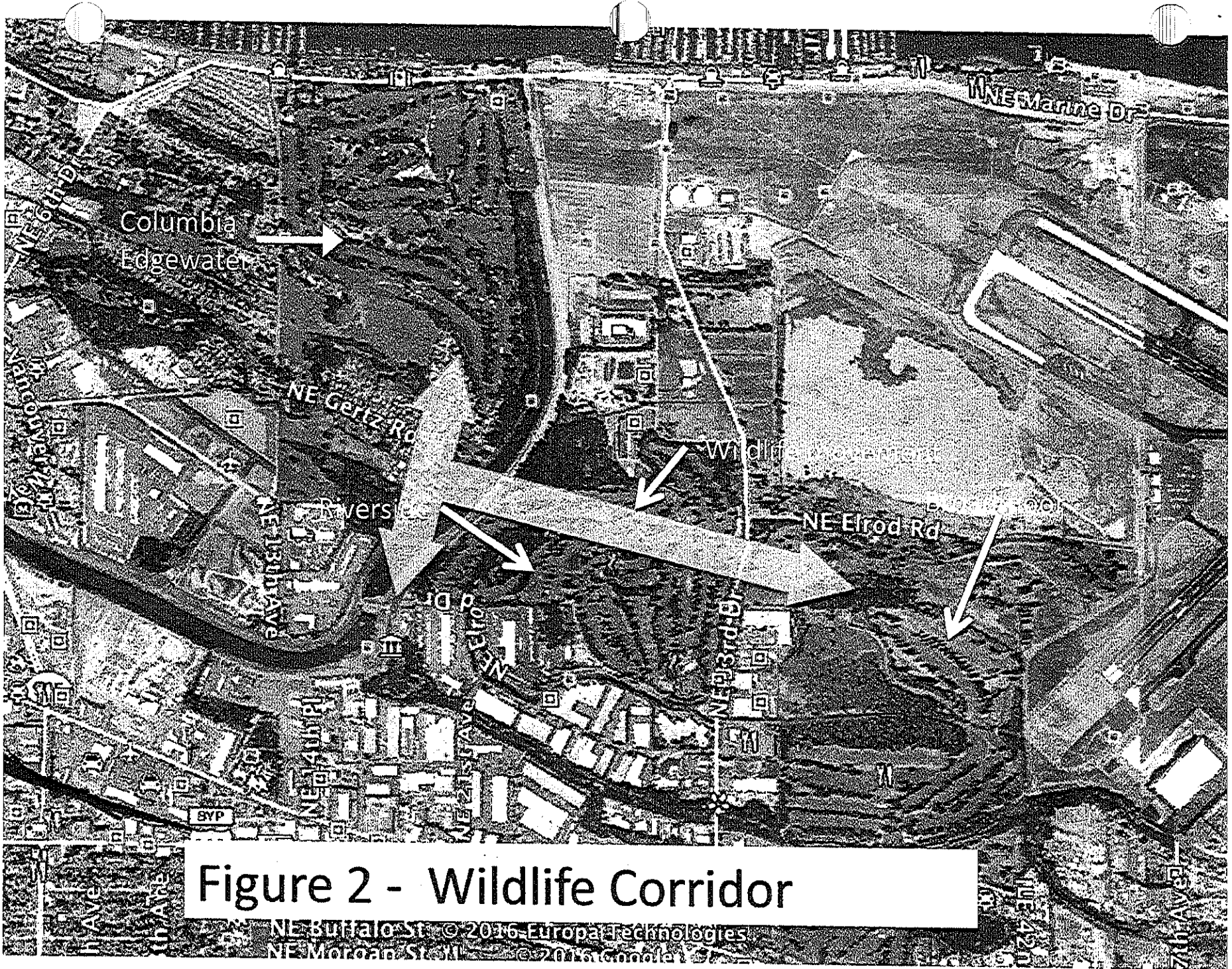


Figure 2 - Wildlife Corridor

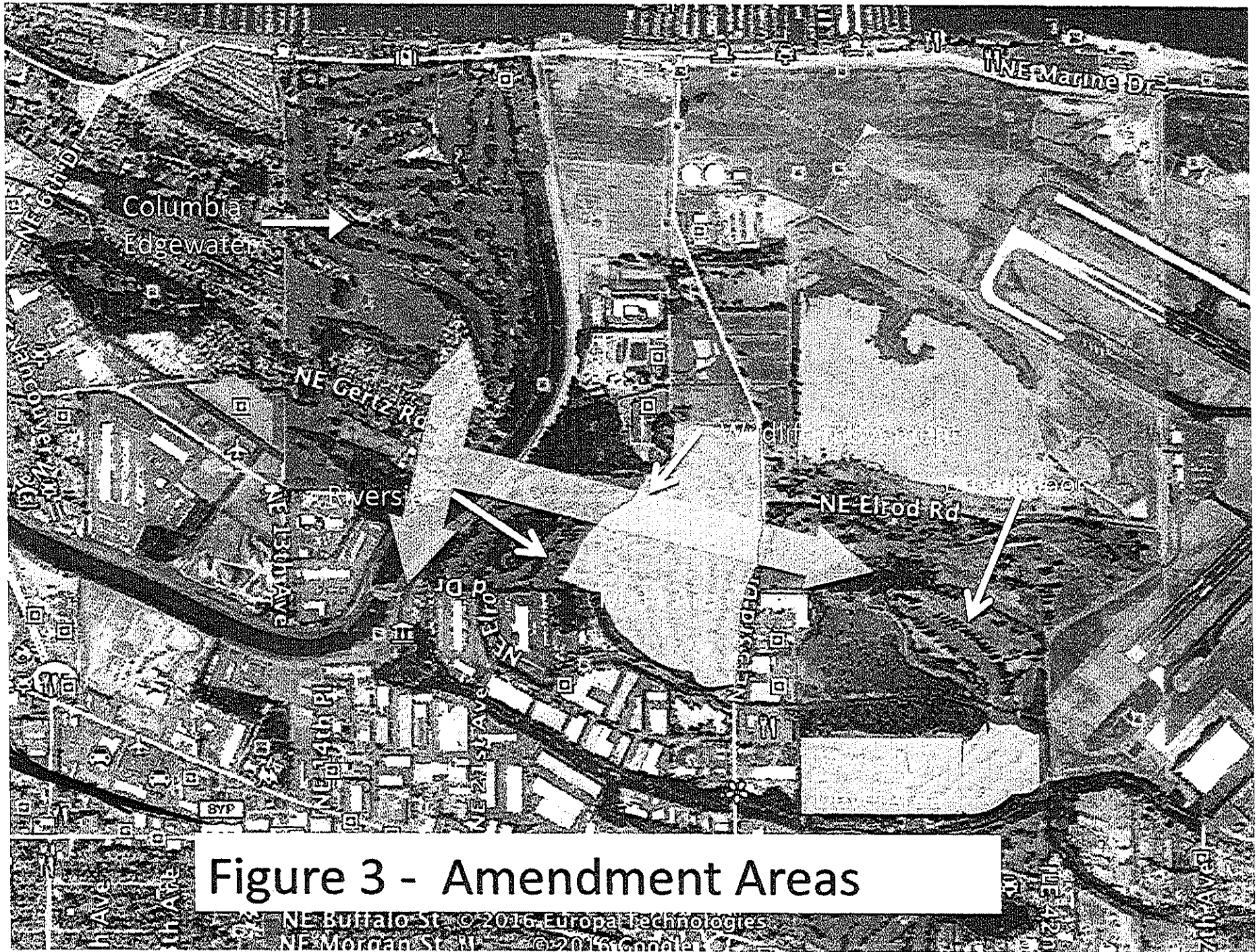


Figure 3 - Amendment Areas



TESTIMONY TO PORTLAND CITY COUNCIL

COMPREHENSIVE PLAN AMENDMENT P45, MIDDLE HOUSING

April 20, 2016

To: Mayor Hales  
Commissioner Fritz  
Commissioner Novick  
Commissioner Fish  
Commissioner Saltzman

From: James Gorter  
8041 SW 8<sup>th</sup> Avenue  
Portland, Oregon 9721503-246-5097  
[jcgort@msn.com](mailto:jcgort@msn.com)

I am speaking today in opposition to Comp Plan Amendment P45, Middle Housing.

While there definitely is a need for smaller and more affordable housing in Portland, this is not the way to achieve it these goals.

Mayor Hales, you said in your 2015 State of the City address, "I'm passionate about keeping great neighborhoods great, and extending the benefits of livable urbanism to more of our city neighborhoods. And here's what we must do to get there: preserve neighborhood character, work to preserve affordability, tighten the rules on demolition, and have strong infill standards and design guidelines." The middle housing amendment as written would not do these things. It decimates neighborhood character, is untried on affordability and incentivizes demolitions.

This measure is huge, engulfing large swaths of the city, including all of Moreland-Sellwood and most of the inner east side from Holgate to Broadway. It makes the Portland zoning map look like a plate of donuts. Most of the west side where I live is protected because of the lack of storm water drainage capacity.

The comp plan has been in the works for several years. To impose a change this big at the last minute is inappropriate and wrong. This change is fully as big as multiuse and institutional zones, both of which involved months if not years of study and analysis. Middle housing needs the same attention before being written into code.

To create these huge tracts of middle housing under the guise of a single-dwelling zone overlay is disingenuous. If middle housing zones are established, they need their own zoning designation. Don't hide them as single dwelling zones.

The quarter mile circle is arbitrary and is too large for all areas. Some neighborhood centers are large and complete, others cannot support a quarter mile of middle housing. The

boundaries need to be drawn with the same care used to establish the neighborhood centers themselves. Neighborhoods must be involved in their establishment.

Middle housing zones would incentivize the demolition of many viable, more affordable houses. Backhoe sales would boom. A viable existing house is less expensive than a new one. I own a small multi-family building inside one of the middle housing zones. If it were to be demolished, replacement housing may be nicer and newer, but it would be far out of their reach. They would be displaced to Troutdale or Cornelius.

Let the Residential Infill Project finish its work. Conduct a multifamily housing study.

Please pull this off the table for now. Thoroughly study the implications. Involve the residents and neighborhoods that would be impacted. Develop a plan to guarantee affordability. If you still feel this is a worthwhile proposal, bring it back with openness and for a full vetting before the residents of Portland.

My name is Lorraine Thornton. I live at 735 N Fremont St. and my testimony is for the Amendment M42.

I been living in the Boise-Eliot neighborhood for almost 10 yrs. and I have seen streets redesigned, which I feel made it worse, traffic lights, which seems to be on every corner, causing more dense traffic, high rise buildings replacing the trees, allowing the fresh air to be stagnant. More traffic, noise from the construction workers and car alarms, combustion, and pollution. There are restless nights and days because the area doesn't shut down.

There are places, like a church, an elementary school, that makes a neighborhood, these places are my neighborhood, my community. There are children that attend the Boise-Eliot Elementary and how can we protect them from this influx of traffic? Crosswalks and school signs are seen when the school is in session, but what about when it's after school and summer time, when the children are playing on the streets or in their yards, how do we protect these innocent lives then?

The neighborhood is looking more and more like an industrial area than a peaceful family neighborhood it once was. Adding more buildings in an already crowded area will just add on more issues of safety and parking.

Who will benefit? Surely not the poor individuals. I do not see this as an equal balance when the poor is subjected to a high priced grocery store and a vast amount of condos/apts erected around us. With this expansion, allows gentrification, which in turn, allows the possibility of displacement of human beings and animals (if any). And for those reasons, I oppose the Amendment. I ask that my plea to save my neighborhood, my community from more gentrification will not be unheeded.

Lorraine Thornton

April 19,

To The Portland City Council and Mayor

Testimony in Support of Novick and Saltzman Proposed  
Amendments to the Comp Plan.

By Richard Potestio

I am here to support Commissioners Novick's and Saltzman's  
Proposed Amendment to the Comp Plan supporting Middle  
Scale Housing.

Portland is experiencing a housing crisis, aspects of which  
include Affordability, Equity, Gentrification and Demolition.  
This crisis is in part a result of our zoning, which mandates  
single dwellings on about 70 percent of our land area. This is a  
de-facto Urban Anti-Growth Boundary. Restricting the  
opportunity to add new housing in this huge area creates an  
ongoing shortage of housing where people want to live—in our  
cherished vintage neighborhoods.

**MIDDLE SCALE HOUSING PROVIDES A SOLUTION TO THIS  
CRISIS, AS IT IS AFFORDABLE HOUSING FOR A DIVERSE  
POPULATION THAT CAN BE BUILT ON ANY BLOCK IN ANY  
NEIGHBORHOOD.**

Because Middle scale housing is modest in size, it will be  
affordable for small, local developers and may not require  
public subsidy or large-scale investment. Because it increases  
density, it will be affordable for buyers as land costs are  
distributed to more units. And rents may be more affordable  
because the landlords are likely to be members of our  
community and sensitive to our means.

## MIDDLE SCALE HOUSING FITS NEIGHBORHOODS WHERE PEOPLE WANT TO LIVE

Portland's neighborhoods are filled with well-integrated examples of Middle Scale housing adjacent to both lower and higher density housing types. New Middle Scale housing integrated in the same manner, will give residents the opportunity to raise families and retire in their same neighborhood.

## MIDDLE SCALE HOUSING WILL ADDRESS SEGREGATION BUILD COMMUNITY

As Portland refined its zoning map over the decades, it segregated the city into areas of distinct housing types. This in turn has segregated our population into areas defined by socio-economic means. Portland has been discovered, and the resulting rise in prices has caused gentrification and relocation of individuals and communities.

Middle Scale Housing integrates a mix of housing types and thereby ensures that people of all ages, incomes, relationships and backgrounds can coexist in neighborhoods. Thus Middle Scale housing may be the basis for truly diverse and healthy communities.

Therefore, you, our leaders, cannot undermine the benefits of Middle Scale Housing by directing our planners to grab a new color to fill in the zoning map where political opposition is weak. Middle Scale housing cannot be isolated on the periphery of neighborhoods or sequestered in high density Corridors and Centers.

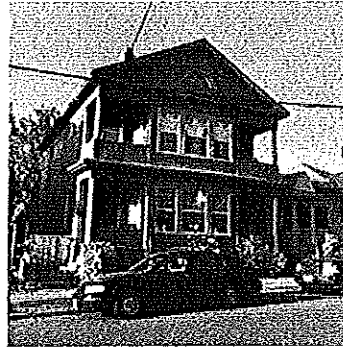
Page 3/3

Imagine, if over the course of 20 years, 25% of our single dwelling housing stock were replaced with Middle Scale Housing at a rate of four to one, the city could grow by 75% and absorb the full number of anticipated newcomers to our region.

Imagine Portland with 1.2 million persons living across the city in neighborhoods that are modeled on Historic Buckman, Kerns, Goose Hollow or Sullivan's Gulch.  
This is the promise of Middle Scale Housing.



# Examples of Middle Scale Housing



Duplexes



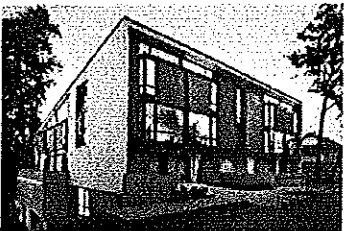
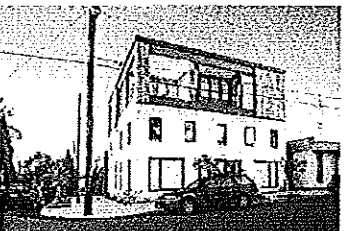
Twin houses



Courtyard-Garden Complexes with Town Homes and Apartments



Fourplexes



Contemporary Middle Housing- Richard Potestio Architect



SUSTASIS FOUNDATION  
AN OREGON 501(C)(3) PUBLIC BENEFIT CORPORATION  
REG. NO. 462867-95

April 20, 2016

Mayor Charlie Hales  
City of Portland  
1221 SW 4th Ave, #110  
Portland, OR 97204

Dear Mayor Hales and Commissioners,

RE: Testimony on Central City 2035 Plan

I am writing as executive director of Sustasis Foundation, 742 SW Vista Avenue, Portland. I'm also a member of the board of the Goose Hollow neighborhood association, known as the Goose Hollow Foothills League.

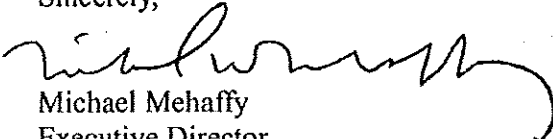
On behalf of our president Tracy Prince, who is also on the board of the Architectural Heritage Center, I'd like to express our great appreciation to Mayor Hales for his amendment #58, which removes the up-zoning of the King's Hill Historic District. This important amendment will prevent demolition of many priceless architectural assets, while retaining the already high residential density of Goose Hollow – one of the highest in Oregon, in fact.

I'd also like to join the Architectural Heritage Center and express our appreciation to the Council for the other amendments to protect the vital heritage on which our city's livability and prosperity ultimately depend, specifically Amendments 4 and 12. For the record I'd like to briefly mention the proposed amendments to policies 3.42, 3.43, 4.27, 4.45 and 4.52.

In closing, may I observe that the protection of Portland's heritage is in no way at odds with its sustainable development, growth and affordability; on the contrary, let me assert, that heritage is essential to it. We are at a crucial moment as a city, where so many of the internationally celebrated accomplishments of the last four decades are increasingly in peril. Once again, as in the 1960s, the siren songs of an "architectural-industrial complex" if you will, could tempt us to allow irreversible damage to our urban legacy.

It is the neighborhoods and their activism – sometimes rowdy activism that has made people uncomfortable – that have safeguarded our livability and our urban quality up to now. This activism has promoted the proven vitality and diversity of Jane Jacobs' urban vision, and rebutted the trickle-down, hypertrophic formulas of, say, an Edward Glaeser. In that light I urge the City to re-invigorate, and not degrade, the neighborhood involvement system.

Sincerely,



Michael Mehaffy  
Executive Director  
Sustasis Foundation





# MACKENZIE.

DESIGN DRIVEN | CLIENT FOCUSED

April 20, 2016

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

Re: **2035 Comprehensive Plan – Mixed Use Zones**  
*Drive-Through Safety Assessment*  
Project Number 2160034.01

Dear Mayor Charlie Hales and Council Members:

Mackenzie has prepared this response on behalf of the Retail Task Force (RTF) and the International Council of Shopping Centers (ICSC) to address claims by City staff that drive-through lanes impact the safety of pedestrian, bicyclists, seniors, and people with disabilities. Staff has further claimed that frequent curb cuts and large parking lots increase the number of conflicts between cars and pedestrians, inferring that drive-through lanes contribute to this concern.

In our experience, the presence of a drive-through lane does not necessarily require additional driveway locations, although it may depend on the specifics of a site. Most new projects with drive-through lanes do not require driveways that only serve the drive-through lane, but rather share driveways with the site's parking lot. City development standards regulate the number and location of driveways, and Section 33.224 of the City Code lists guidelines for "Drive-Through Facilities" which require increased driveway spacing from intersections.

As for the safety of pedestrians and bicyclists related to drive-through lanes, we were not able to find any studies showing a correlation. A search of the Institute of Transportation Engineers (ITE) online library was conducted, but only found research and recommendations which provides guidance for proper site design, as well as proper driveway design, in order to ensure on-site pedestrian and bicycle safety.

Currently, the City of Portland has design standards for both appropriate site circulation and driveway design to ensure safety for all modes of transportation. Specifically, Section 33.224 of the City Code lists guidelines for "Drive-Through Facilities" including setbacks, landscaping requirements, and stacking lane standards. Driveway and stacking lane entrances for drive-through facilities must be located 50 feet from adjacent intersections. Stacking lanes must be a minimum of 150 feet long, or 80 feet per lane if multiple stacking lanes are provided.

Landscaping requirements for drive-through facilities are dependent on the abutting zoning, but at a minimum, drive-through facilities must provide landscape screening (described in Code Section 33.248.020(B)) with the use of trees and shrubs to soften the impacts of the development. Drive-through facilities must also be set back 5 feet from all street and lot lines abutting zones R, C, E, or I. Additionally, all drive-through facilities must meet the off-site impact standards of Code Section 33.262 for "Off-Site Impacts." These requirements help reduce noise from idling cars, lighting impacts, and reduces the interference of queued traffic with on-site and off-site traffic and pedestrian flow.



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The City's *Pedestrian Design Guide* also provides guidelines for designing safe pathways and stairs for areas outside of the public right-of-way, including private property. Proper path placement, landscaping, and lighting are listed as attributes that can make safe pedestrian paths. As a requirement, the City requires that pedestrian accesses protected from auto traffic be provided, and that the environment of the site be inviting to pedestrians and transit users, as specified in Code Section 33.266.130.

Due to the nature of drive-through facilities, vehicles do not travel at high speeds through the parking lots and in the queue lane. Where pedestrian facilities are required to cross a drive-through lane, the chance for conflicts resulting in injury are very low.

In summary, current City of Portland code sections and design standards adequately address safety of pedestrians, bicycles, elderly and disabled persons through required building orientations, separate and delineated paths for pedestrians between the building entrance and sidewalk as well as through some parking lots. In addition, the driveway spacing, queuing requirements, and landscape ensure drive-through lanes have little impact on the adjacent streets and neighboring uses. To claim that drive-through lanes require further regulation to benefit safety of other modes ignores the significant requirements for site design that already improve safety. Finally, there is no correlation that we could find between drive-through lanes and pedestrian safety.

Sincerely,

Brent Ahrend, PE  
Traffic Engineer | Senior Associate



M



Submitted by  
Cameron Herrington

Oak Leaf Mobile Home Park residents  
c/o Cameron Herrington, Living Cully  
cameronherrington@livingcully.org, 503-489-8334

April 18, 2016

Dear Portland City Council,

As residents of the Oak Leaf Mobile Home Park (4556 NE Killingsworth St.), we are glad to have the opportunity to share our story with you, and to let you know about the threat we are facing right now. The owner of the Oak Leaf is selling our homes out from under us, and we face displacement and homelessness. If we lose our homes, we cannot afford to live in Portland.

#### **PROBLEMS**

- 1) We are in danger of becoming homeless.
  - a. The owner is trying to sell the Oak Leaf, and the new owner plans to shut it down.
  - b. We will be kicked out onto the streets, and we cannot afford housing anywhere else in Portland.
  - c. We are all low-income. Many of us have been homeless in the past. Several are veterans. We have families with children, older adults, and people with disabilities.
  
- 2) There are many problems at this park that the owner has not addressed:
  - a. Health issues: rats; sewage backing up in people's homes and on the ground outside; mold; overflowing garbage
  - b. Safety issues: electric system is not up to code, creating a fire hazard; drug usage and other criminal activity
  - c. Mismanagement of the park: illegal rent increases, failure to cooperate with Portland Police to address crime and safety issues, renters forced to pay for repairs out of their own pockets, basic livability issues in park-owned homes (including no heat or hot water)

#### **SOLUTION**

The solution to both of these problems is for us to own and manage the park ourselves. This will prevent us from becoming homeless, and empower us to manage the park and fix the problems that we deal with every day. It will also preserve the Oak Leaf as a place for 34 low-income households to find affordable, safe, stable housing.

Even though the Oak Leaf has problems, it is our home. It is a place we can afford, and where we have stability and a sense of community. We are fighting together to save the Oak Leaf, and to save our homes!

When we own the Oak Leaf ourselves, we can fix it up, clean it up, and make it a great place to live.

#### **WHAT WE NEED FROM THE CITY**

- 1) City Commissioners make public statements in support of our effort to buy the park, and expressing concern that we will become homeless if it is shut down.
- 2) Carry out inspections of the Oak Leaf, and issue citations and fines to the owner. However, do NOT shut down the park or condemn our housing.
- 3) Create a zoning designation for manufactured housing parks, so that they cannot be converted to other uses.
- 4) Allocate funds to support our offer to purchase the park. With the support of CASA of Oregon, we are working to pool our resources, take on a loan, and make a counter-offer to buy the Oak Leaf. We have a funding gap of \$1.5 million, and we need help from the City of Portland. This investment will prevent homelessness and create 35 units of permanently affordable housing for low-income people.

We look forward to your support and action to help us preserve our homes. Thank you for your time and attention to this urgent matter.

Sincerely,

Oak Leaf Mobile Home Park residents and allies



**GUARANTEED TO SATISFY**

April 20, 2016

VIA Hand-Delivery

Portland City Council  
c/o Council Clerk  
1221 SW Avenue, Room 130  
Portland OR 972014

RE: 2035 Comprehensive Plan Testimony – Opposition to Drive-Through Ban in Mixed Use Commercial Zones . P32

Dear Portland City Council Members:

This letter is written on behalf of Dutch Bros. Coffee in regards to the proposal to prohibit drive-through development in most of the new commercial mixed use zones proposed by the City of Portland 2035 Comprehensive Plan. Dutch Bros. Coffee opposes this restriction and asks the City Council to consider removing it from the 2035 Comprehensive Plan because this ban would unfairly limit Dutch Bros.'s ability to grow and improve its business and is unsupported by any evidence of a need for the ban.

Dutch Bros. Coffee was founded in 1992, in Grants Pass, Oregon. Over the past 24 years, it has grown into the nation's largest privately-held, drive-through coffee company. Our growth is accomplished exclusively with local owner-operators who have worked their way up in the company. These operators have built our company by maintaining a passion for connecting with, and giving back to, their local communities—something we like to call "Dutch Love."

Dutch Bros. Coffee operators engage with local partners, including charities, schools, and community service organizations, through give-backs and donations. Indeed, each of our local owner-operators is expected to invest at least 1% of gross revenues into their local community. Most give more. In 2015, Portland-area Dutch Bros. owner-operators gave back over \$75,000 to Portland-area partners. Dutch Bros. also joined in the effort to raise \$500,000 for the Knight Cancer Institute for the Knight Challenge, and we partnered with the Trailblazers in the Rip-City 3-on-3 Tournament to raise funds for the Special Olympics. As some of you may have heard, Dutch Bros. Coffee also recently became the official coffee sponsor of the Portland Timbers and the Portland Thorns.

These community connections begin with engaging our customers at the drive-through window, making the drive-through an essential part of our business model. Thus the proposed ban would severely limit our growth and our ability to spread Dutch Love. Also, existing nonconforming outlets would be unable to upgrade and improve their sites for fear of losing the drive-through and thus closing the location. The inability to grow and improve our outlets will negatively affect both us and the local communities we serve.

Dutch Bros., LLC • P.O. Box 1929 • Grants Pass, OR 97528 • Phone: 541-955-4700

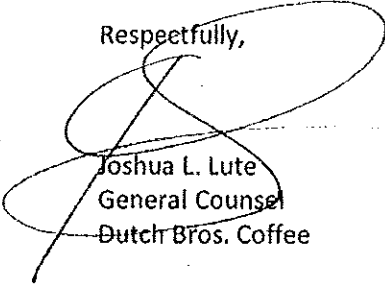
Ord. 187832, Vol. 1.3.B, page 3867

So far, we have heard no evidence to justify a drive-through ban. Some have cited safety concerns caused by interactions between pedestrians and drivers. But in my four years as Dutch Bros.'s General Counsel, in addition to the four years I served as a Dutch Bros. barista, I have not heard of a single accident involving a driver and pedestrian in any of our drive-through lanes. Vehicle and pedestrian interaction issues are easily resolved in the normal course of site design and the existing permit process.

Another supposed justification is that eliminating drive-throughs will help limit the use of personal vehicles. But is more likely that the opposite is true: drive-throughs are established only where there is already vehicle traffic. Dutch Bros. Outlets, like other drive-through establishments, are a matter of convenience for customers on trips that they have already planned. Eliminating them won't take cars off the road, but could contribute to the need for larger parking lots and will also cause more trips outside of the city by the customers who need them, such as disabled persons, senior citizens, and busy parents.

Dutch Bros. urges the Portland City Council to reject the proposed drive-through ban in mixed use commercial zones.

Respectfully,



Joshua L. Lute  
General Counsel  
Dutch Bros. Coffee

RE: AMENDMENT # S16

Greetings. I am testifying to protest last minute changes to the proposed update to the 2035 Comprehensive Plan, specifically the Map amendment regarding Lewis & Clark College's properties located at SW Terwilliger and Lower Boone's Ferry. These properties sit at the intersection of SW Maplecrest Dr. and the aforementioned streets. My wife and I own a home located at 645 SW Maplecrest Dr., about a block away.

These properties are not located within Lewis & Clark's master plan, and as such should not be included within the boundaries of the campus institutional zone.

The college was denied a request to include these properties in a land-use case in 2009 (#08-180498). Lewis & Clark did not raise this request during work on the Comp plan, or upon review by the Planning and Sustainability Commission, and doing so now indicates a clear desire to circumvent the public process for land use decisions.

In other words, this amendment was inserted at the last minute, and therefore has bypassed public processes of Comp Plan examination, review, discussion, and approval. This bypass severely reduces faith in the public review process, as well as Portland's commitment to transparent governance.

The primary problems of this rezoning arise from the serious transportation and environmental impact that the development of this property would have on the Collins View Neighborhood. For these reasons, the Collins View Neighborhood Association unanimously opposes this amendment.

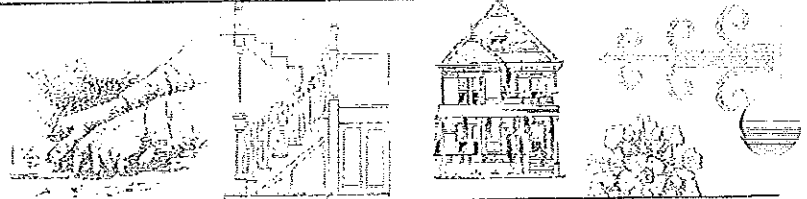
The reasons for not including these properties in the campus institutional zone are many, and were discussed with the hearings officer in the original 2009 land use case. The primary reason is that with the use of SW Terwilliger, and especially, Lower Boones Ferry Rd. as arterial thoroughfares for residents in Lake Oswego to I-5, the volume of traffic that passes through this intersection is so heavy as to make it dangerous for Collins View residents that must exit SW Maplecrest Dr. onto SW Terwilliger. These streets and this intersection were not designed to accommodate the volume of traffic they now receive, and allowing the College the opportunity to develop these properties (as they have indicated a desire to do) will only make a bad situation much worse. In the mornings, traffic on SW Terwilliger (a two lane neighborhood street) regularly backs up from I-5 all the way to this intersection, a distance of over a mile. Turning left onto SW Terwilliger from SW Maplecrest (the direction of I-5) can take as long as ten minutes because traffic is so heavy. Moreover, cars coming from Lake Oswego regularly speed through this intersection, making it dangerous to merge onto SW Terwilliger. Without a major redesign of the streets and this intersection, additional development at the intersection would be untenable.

I appreciate the City's commitment to economic development. However, allowing Lewis & Clark to include these properties in its campus institutional zone would irreparably disrupt neighborhood life in this quiet, residential area, and will create tremendous safety hazard for residents on SW Maplecrest Dr. and SW Maplecrest Ct. This proposed change to the Comp plan update would literally put lives at risk.

Joshua Eastin, Ph.D.  
Asst. Professor of Political Science  
Mark O. Hatfield School of Government  
Portland State University



Architectural Heritage Center  
701 SE Grand Avenue  
Portland, OR 97214  
503 231-7264  
503 231-7311 fax  
www.visitahe.org



April 20, 2016

Submitted  
by  
Deborah  
O'Neill  
4/20/16

Dear Mayor Hales and Commissioners,

The Bosco-Milligan Foundation/Architectural Heritage Center thanks individual council members for advancing amendments to the Comprehensive Plan that increase the protection of historic buildings and neighborhoods. We urge the Council as a whole to include these amendments Chapters 3 and 4 of the final adopted version of the plan.

These amendments, if adopted, will give historic resources a more important place in the Comprehensive Plan and thus offer the possibility of creating centers and neighborhoods that maintain and increase Portland's desirable character. We recognize that the policies set the right direction and that programs by governments, non-profit organizations like ours, and private investors and individuals will be necessary to actually implement these goals and policies. We look forward to working with the city on implementation.

Attached is a list of the amendments to the Comp Plan goals and policies that the BMF supports. We want to call your attention to a few critical amendments:

- 3.42 Distinct Identities: The new language recognizes the importance of creating additional districts and creating new tools to allow for preservation.
- -3.43 Diverse Residential Areas: The new language expands and clarifies the need to consider the existing character of historic district neighborhoods and properties in the inner ring neighborhoods. Further, the language calls on the city to make appropriate revisions to the base zones and design guidelines to support that character. We recognize that these areas will be subject to growth but we believe that the growth can be accommodated in much more compatible ways.
- -The suggested new policy (currently placed after 4.46) on Resolution of Conflicts in Historic Districts, which applies the above principles on an equitable, citywide basis, is critical if Portland is to have a citywide historic resources program. The BMF strongly supports this policy addition.
- -4.27 Historic Buildings in Centers and Corridors: The new language recognizes the importance of these areas in establishing the city's character. We believe that this



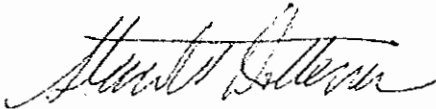
language fits well with some of the proposals for historic main street areas included in the Mixed Use Zones Project.

- We support the amendments in the Historic and Cultural Resources section of Chapter 4. Overall, the amendments represent a much clearer statement of the City's intent to manage our history. In policies 4.45 and 4.49, we support the direct recognition of the state "owner consent" provisions in limiting local government's options for protection of resources. We believe the language in 4.45 is clearer and should be used in both policies.

Finally, beyond the policies, the BMF supports the proposed zone changes in Eastmoreland and the King's Hill Historic District. In both cases, the changes seek to preserve the basic strong historic character without materially impacting our ability to handle growth or an increasingly diverse population.

Thank you for considering these amendments.

Sincerely,



Steve Dotterrer, Chair  
Advocacy Committee

**Ty Wyman**

**Documents Regarding  
Commissioner Proposed Amendment N14  
for  
6141 SW Canyon Court  
Portland, OR 97221**

Batch #2



April 19, 2016

Dunn Carney Allen Higgins & Tongue LLP  
Attention: Ty K. Wyman  
851 SW 6<sup>th</sup> Avenue, Suite 1500  
Portland, Oregon 97204

Re: 6141 SW Canyon Court Zone Change – Portland, Oregon  
Technical Letter #2 Supplemental Transportation Analysis

Project Number 20151006.00

Dear Mr. Wyman:

This technical letter supports the proposed property rezone at 6141 SW Canyon Court, Portland, Oregon. The following materials address roadway improvements required as part of a development approval and specifically, the requirement (or ability) to construct a sidewalk along SW 61<sup>st</sup> Drive.

Notwithstanding public testimony regarding the inability to construct sidewalks along SW 61<sup>st</sup> Drive, if the subject property is rezoned and redevelopment proposed, at a minimum, the applicant will be required to construct a 1/2 street improvement along the property frontage consistent with the City of Portland local street standard. This includes any necessary roadway widening, curb and gutter, sidewalk and any necessary right-of way dedication.

Overall, as properties develop/redevelop along SW 61<sup>st</sup> Drive regardless of zoning, it is anticipated the City will require construction of roadway improvements, including sidewalk, with the intent of ultimately providing a continuous sidewalk along SW 61<sup>st</sup> Drive connecting to SW Canyon Court. This will result in continuous sidewalks between SW 61<sup>st</sup> Drive and the commercial area to the east facilitating pedestrian travel.

Sincerely,

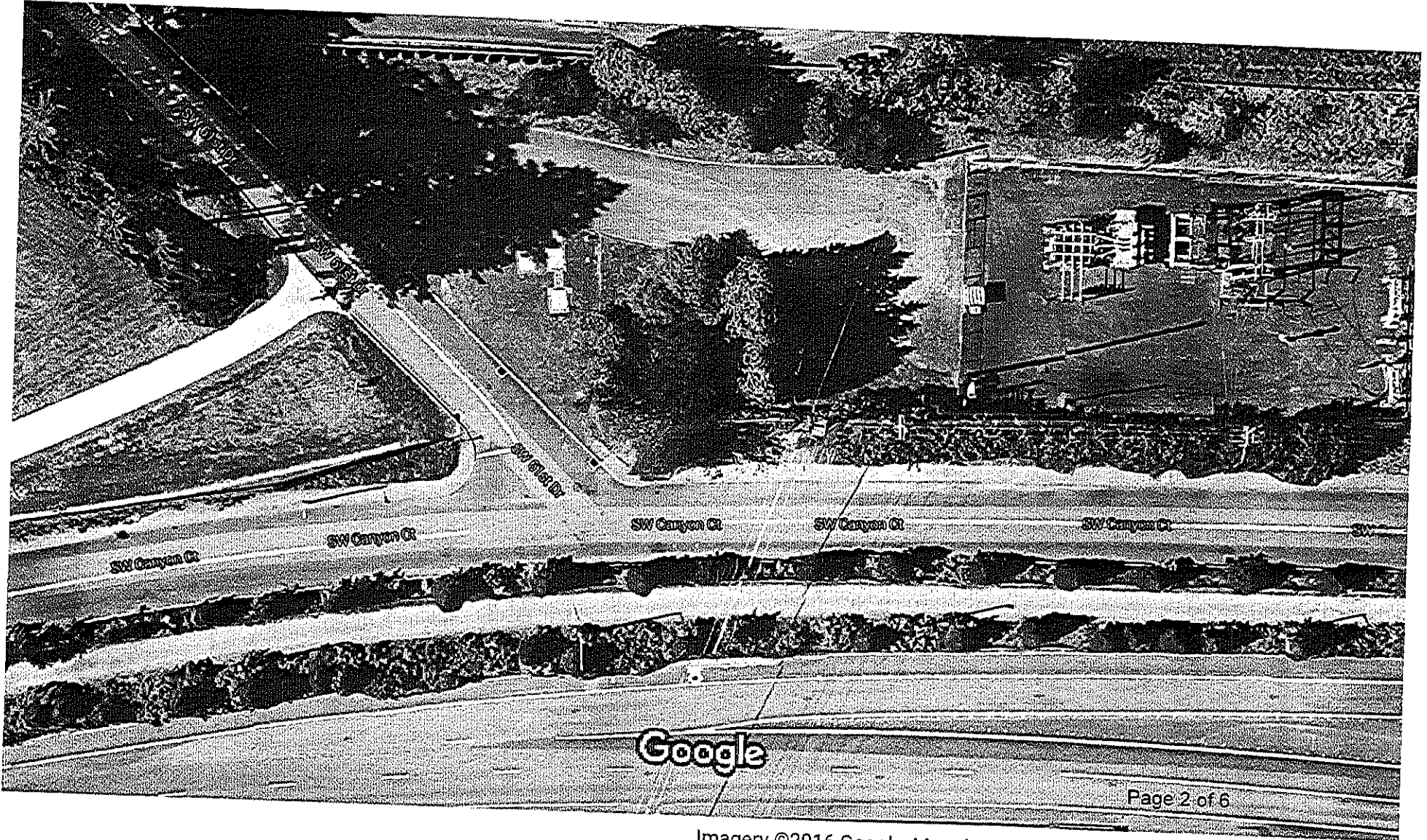
Christopher M. Clemow, PE, PTOE  
Transportation Engineer



RENEWS 31 DEC 2017

# Google Maps 6141 SW Canyon Ct

SW 61st and Canyon Sidewalk Views



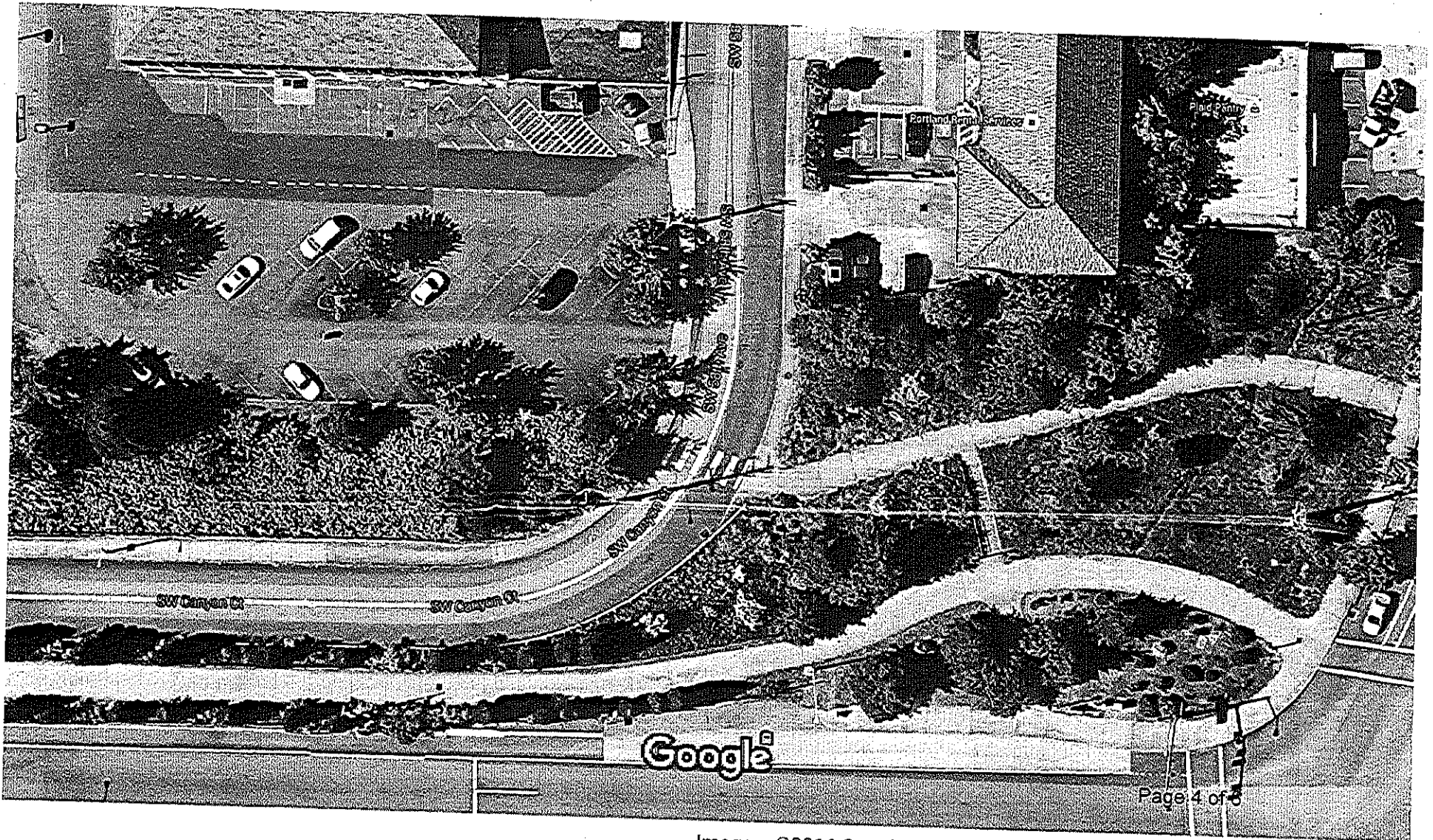
Google Maps 6141 SW Canyon Ct



Imagery ©2016 Google, Map data ©2016 Google 50 ft

# Google Maps 6141 SW Canyon Ct

SW Canyon & 58th Ave Sidewalk Crosswalk and Trail views

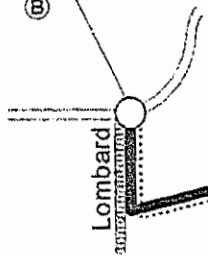


# 58-Canyon Rd

For snow/ice detours  
visit [trimet.org](http://trimet.org) or call  
503-238-RIDE (7433).

Beaverton  
Transit Center  
20 52 53 54 57  
61 76 78 88  
MAX WES SMART

ⓑ



BEAVERTON

Canyon Road

87th

WEST  
SLOPE

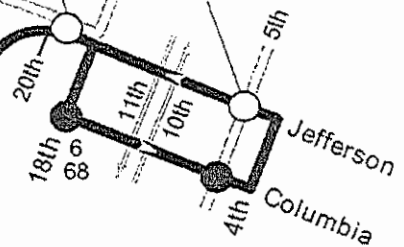
Sylvan  
Skyline

Sunset Hwy

Goose Hollow/  
SW Jefferson St

PORTLAND  
CITY CENTER

City Hall/  
SW 5th & Jefferson



Bus and MAX transfers  
on 5th and 6th avenues.

- Schedule Stop
- Secure Bike Parking
- WES Line and Station
- Snow Route
- MAX Line and Station
- Transfer Nearby
- Portland Streetcar



5-17-16

Testimony Re: City Council Comprehensive Plan Amendment P45 Middle Housing April 20, 2016

My name is Barbara Strunk. I am the United Neighborhoods for Reform representative to the Residential Infill Project.

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

A central goal of United Neighborhoods for Reform (UNR) is to prevent the demolition of viable, relatively affordable houses in our neighborhoods. 43 neighborhood associations throughout Portland support our resolution that includes this goal.

The proposal to rezone residential areas around mixed-use Centers of the City to allow a transition zone of multi-unit, smaller, more affordable housing has merit. There is a need for smaller, more affordable housing. There is no question that the large, expensive houses currently being built in our neighborhoods benefit very few Portlanders. However, UNR urges caution in proceeding with the Middle Housing Zones as written and proposes the following change to the amendment:

**Limit the re-zoned transition areas around Centers to 200-300 feet, or two blocks, of Centers with complete services, including frequent public transit.**

Our reasons are as follows:

- 1) This amendment regarding middle housing is a huge change that potentially affects most of the city. To bring it into the Comp Plan at this late date is irresponsible. Middle housing deserves the same consideration as mixed-use, residential infill and institutional zoning.
- 2) Opening this change to wide areas of the city will make thousands of smaller, viable, older, relatively affordable homes vulnerable to demolition. We question whether even smaller new houses will be as affordable, or as well built, as many currently existing houses.
- 3) A quarter mile around each neighborhood center is far too large. As drawn, middle housing zones would encompass all of Sellwood-Moreland, and almost all of the eastside from SE Holgate to NE Broadway. Opening up such wide swathes of the city is



an invitation to bring in the backhoes and decimate the traditional neighborhood character, historic housing and urban green spaces that the Comp Plan and the Residential Infill Project are charged with protecting.

4) A thoughtful process is needed to judge the impacts of such a zone change on neighborhoods. Each center should be considered on a case-by-case basis. Modeling and analysis must occur, including infrastructure, parking, transit, and impact on adjacent single dwelling areas before making a zone change to such large areas of the city. (A related example: the City Council has decided to move very slowly to introduce required deconstruction of demolished homes. The same caution must be applied to this idea, even though, in this case, caution does not benefit developers.)

5) The City has apparently little interest or influence over the development of effective public transportation. Without better transportation infrastructure it is unwise to encourage such widespread increases of density.

6) The Residential Infill Project has not completed its work regarding the scale and mass of single-family houses. Code must be clear and transparent that much smaller houses are the sustainable way of the future. Any proposed multi-family buildings in single-family residential zones must be the same size overall as a single-family house in that zone. Code for middle housing areas must include tight controls on scale and mass of buildings to ensure that new construction is truly affordable for the majority of Portlanders.

7) Before such a large area of the city is re-zoned, "middle housing" and the goals around middle housing must be clearly and carefully defined. What is an "appropriate" designated center? What size and price is "middle housing"?

This amendment moves too fast: let the Residential Infill Project complete its work. Do some thoughtful modeling. Do not let the profit-centered interests of the developers to build new structures drive the decisions of the City Council.

Thank you for your careful consideration of our comments.

Respectfully submitted,

United Neighborhoods for Reform

Submitted by  
Bruce Campbell  
4/20/16

April 19, 2016

**Re: Opposition to Amendment M33 and TSP Project 473**

Dear Mayor Hales and Commissioners Novick, Saltzman, Fritz and Fish:

I am a resident of the Sunderland neighborhood. I love my home and I want to stay here. But I am beginning to believe the City wants me to leave. Your 2035 Comprehensive Plan places an "industrial overlay" over my residential property and that of my neighbors. In addition, the plan rezones the 15 acres of Broadmoor Golf Course that directly abut my home from open space to industrial. And now at the eleventh hour—the coup de grace—Mayor Hales and Commissioners Saltzman and Novick propose to rezone to industrial an additional 57 acres of the golf course that lie smack in the center of fragile wetlands and an environmental protection zone, with no road access.

Amendment M33 is a bad deal, and not just for me and my neighbors. I walk this area frequently and I know its landscape intimately (see photos). I also know that the City understands this is a special area. You deemed it high value for natural resources, and you've directed millions of taxpayer dollars toward helping this Middle Slough region recover from a half century of industrial dumping, groundwater contamination and other polluting practices. You have extensively studied the Slough, and you've produced lengthy reports on the critical importance of its wetland habitats. To quote from your 2012 press release:

*More than 170 species of birds including kingfishers, owls and great blue herons use the area, in addition to deer, bats and amphibians.*

So why the sudden amnesia? Is this simply a response, as KGW posits, to the request of one private interest owner? What about the public and the environmental good?

Together Amendment M33 and the related TSP Project 473 would:

- Build a new road for industry access, at an estimated cost to the taxpayers of 5.9 million dollars, ripping through woods and an area bounded by the Slough and two other recovering wetlands.
- Industrialize a full mile of riparian habitat, containing dozens of old growth sequoias, smack in the middle of a wildlife migratory corridor.
- Completely undermine public trust and the city's public process. This open space to industrial conversion was NEVER proposed during the multi-year comprehensive plan public process. I have followed this process closely, and this area was proposed to be permanently protected as open space.

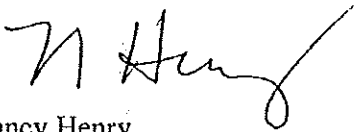
I live on the Buffalo Slough, a short walk from this 57 acre parcel. This area is a recovering treasure within the City. I have watched river otters teach their pups to crack mussels at the water's edge. I've seen cormorants dive repeatedly for fish and bald eagles swoop in to snag ducklings. I have documented dozens of species of migratory and native birds in this area that are unseen in the rest of Portland.

Industrializing this parcel gives lie to the City's promise made in 2012, when you partnered with Metro to purchase the Catkins wetlands next door to the Broadmoor parcel:

*"Now we can protect even more valuable wetlands -- preserving them for wildlife, and providing another place for people to appreciate nature in Portland. Being good stewards of this region for the next generation is at the core of who we are as Portland Parks & Recreation." Mike Abbate, Portland Parks & Recreation Director.*

Before you say yes to destroying this habitat for narrow and shortsighted financial interests, I implore you to visit these 57 acres and walk them with me. Call me, and I will make myself available at your convenience.

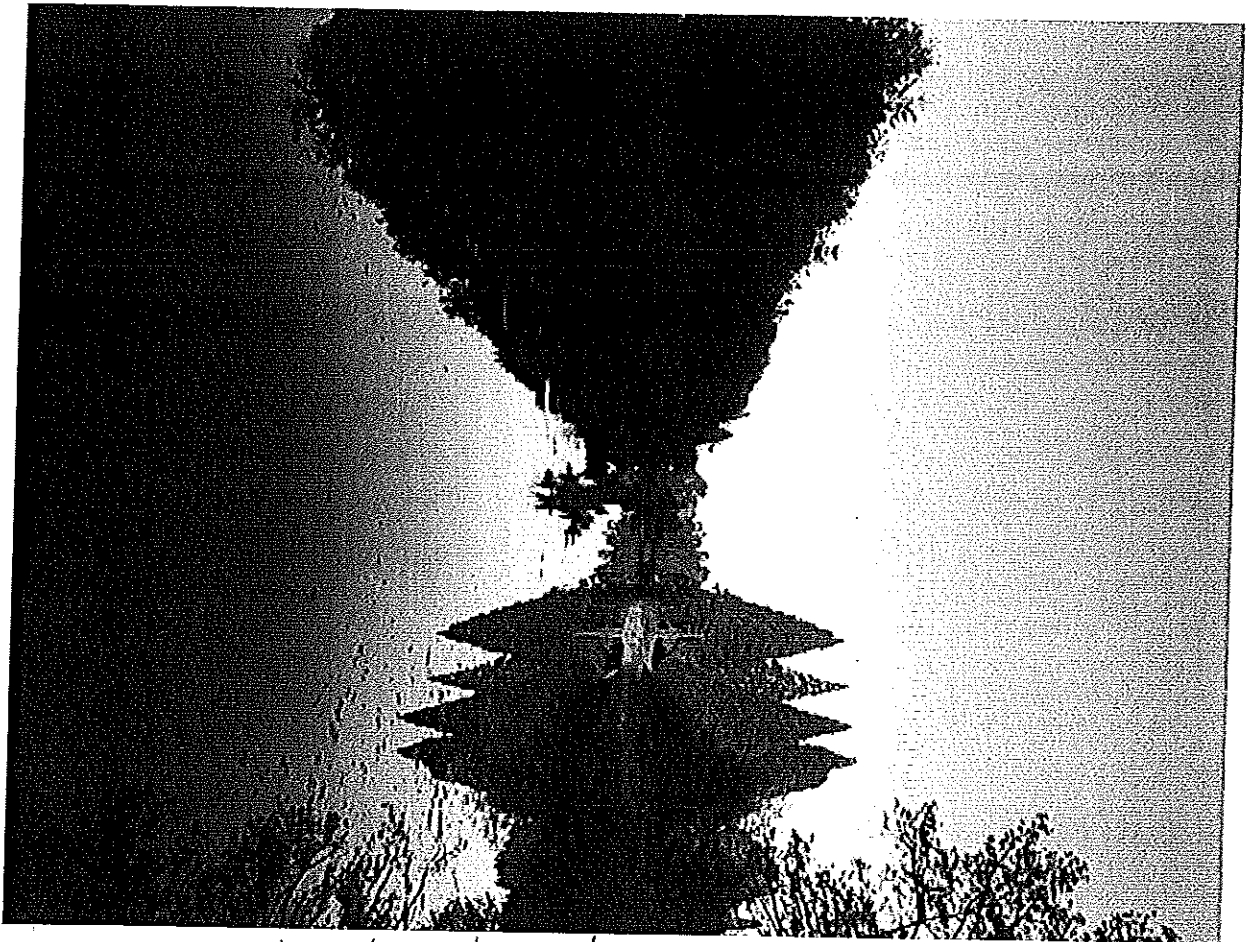
With passion and urgency,



Nancy Henry

3261 NE Holland Court

503-709-0818



Broadmoor's endangered Waterways





Broadmoor's waterways and sequoias



*Mayor Charlie Hales*

Amendment M-33 Recommend to remain Open Space

I couldn't sleep last night. I'm in shock. I live in the blast zone of Bullseye Glass if it were a smart bomb. A daycare center, a Fred Meyer corporate parking lot and a small city park where local kids play form the opposite rim of the blast zone. I went to a talk hosted by the Eastside Portland Air Coalition to get more information. Erin Brockovich was there. It was worse than I thought. Every neighborhood in the city has blast zones. ESCO, Precision Cast Parts, Intel, to name a few. Ms. Brockovich wasn't in town chasing ambulances. She comes to Portland anyway to visit her son and grandchildren, now the visits are a tax deduction.

A few weeks later close friends called to let me know the city council was going to re-zone the golf course next to them from Open Space ( OS ) to industrial. It was going to be paved over, jobs would come. I thought about the Fred Meyer parking lot and the park next to it and wondered: what was the temperature difference between the empty asphalt lot and my small kid filled park. Do you know?


I asked Google and printed out some of the answers. Google is like an old professor that rattles on, it easy to drown in the information. I took just the first few entries. One is from a National Geographic article, another near as I can tell, bullet points from a company selling sod, and the third research done in Arizona on open space in urban environments. I read those articles and realized my friends don't live next to a golf course, it's open space with benefits.

Open space with trees is 30 to 40 degrees cooler than concrete or asphalt. ( Sit in the shade of any tree in any park in the city to know this is true. )

1 tree removes 26 pounds of carbon dioxide. ( that equals 11,000 miles of auto emissions )

One acre of trees eliminates 13 tons of particles and gases annually.

A big tree removes 60 to 70 times the pollution a small tree does. ( This is one of the rare times I think size and age matter. )



The EPA and DEQ aren't going to save us. They aren't coming. The US Forest Service discovered the toxic levels of heavy metals in my park next to the Fred Meyer parking lot. It's up to you and me. We are the ones who will save us.

Every tree and open space makes a difference whether it's one tree on a lot with a one bedroom house or a grove between the airport and a busy highway and railroad tracks.

While it's cold comfort the owner of Bullseye lives in his own blast zone, I don't blame the developers or business owners - scorpion and the frog - it's an old fable, it's in their nature. But it's not in ours. There will be no apps making a cloud drop rain. We're not going to put our lips around our smart phone and inhale fresh air. Only open space and old trees make fresh cool air. And every last one matters.

Thank you for your time and consideration,



Hillin Jones

## Urban Downtime

The City of Light is also a city of green, with a panoply of parks and gardens where Parisians rest and rejuvenate.

By Jennifer Ackerman

That we should find nature rejuvenating is hardly surprising. After all, our tribe arose not in cinderbelt but in wild forests and grasslands. Our ears are made not for the stinging scream of sirens but for the sly scratch of a predator's paws and the whistle of wind that warns of impending weather. Our eyes evolved to tease apart not the monotonous grays of cityscapes but the subtle gold, olive, and burgundy hues that signaled ripe fruit and tender leaves, and our brains to reward our sensory efforts with feelings of deep pleasure.

Could this be why the citizens of Paris work so hard to reinvent dead urban space and neglected squares of hardscape as places of vibrancy and green? Consider Parc des Buttes-Chaumont in the city's crowded 19th arrondissement. Once this patch of land held an old gallows, then a gypsum quarry, then the city dump. Now the big bucolic park of grassy slopes and grottoes is alive with bloom and birdsong and a healthy jumble of people who spill onto its hilly lawns: kickboxers, musicians, university students perusing their notes or memorizing lines for a play, lovers rolling over one another like tumblers, and old men who have settled themselves on the grass to rest.

Parisians in fact will seize just about any spot in their city for park or garden: tiny balcony, abandoned auto plant, bankrupt parking garage, derelict railway, even the giant curved facade of a new museum. They will sacrifice broad boulevards for the sake of bike paths with leafy canopies. They will argue for community gardens over apartments or media centers. They will relinquish a busy city expressway along the Seine for a temporary beach park, and will see in every shabby lot a prospective cathedral of green.

Why are citizens of the City of Light so intent on finding space for parks and gardens, for street trees and nature strips? For that matter, why would any city go to the bother and expense of growing green space in the stone and steel of an urban environment? At a time when half the world's population lives in cities (a proportion expected to grow to 60 percent by 2030) and funds may be scarce for urban housing, schools, social services, fire and police protection, this is no trivial question.

It's true that in Paris, as in many other cities, parks and gardens are a luxury. "But they are also essential," says Martine Petelot, a member of the Jardin Nomade, a small community garden on a vacant lot in the congested 11th arrondissement. "Our garden allows us to work the earth, to watch things grow. People need to scratch about in the soil, breathe in the scent of plants and flowers, let off steam, and meet other people. For many, it's almost like therapy."

If the recent renaissance in urban parks and public spaces is any indication, many city residents and planners share Petelot's perspective. The past five to ten years have seen an explosion of tree planting in cities and the creation of new parks and public gathering spots—a revolution inspired in part by new science. A growing body of research suggests that spaces filled with leafy vegetation filter pollution and trap tiny particles of dirt and soot: Street trees can reduce airborne particulates from car and bus exhaust. Large groves of trees may have an even more profound green-lung effect for cities, cleansing the air of dangerous chemicals. In Chicago, scientists found that each year trees removed some 234 tons (212 metric tons) of particulates, 98 tons (89 metric tons) of nitrogen dioxide, 93 tons (84 metric tons) of sulfur dioxide, and 17 tons (15 metric tons) of carbon monoxide.

Tree leaves block sunlight as well, cooling islands of heat generated by hard city surfaces. The temperature of asphalt or concrete under a shade tree can be as much as 36°F (20°C) cooler than a patch of pavement in full summer sun; the air up under the canopy of mature trees may be five to ten degrees cooler.

Parks and gardens are also essential to human social and psychological well-being. Without access to grass and trees, says Frances Kuo, we humans are very different creatures. For the past decade, Kuo and her colleagues at the Landscape and Human Health Laboratory of the University of Illinois have researched the effects of green space on city dwellers. The team carries out many of its studies in Chicago's public housing neighborhoods, where barren expanses of hardscape reflect the old view that vegetation is an extravagance the city can't afford.



One sequence of studies focused on residents of the Robert Taylor Homes, a cluster of 28 identical high-rise buildings, now mostly torn down, that formed the nation's largest public housing development. Some of the buildings were surrounded by grass and trees, others by concrete and asphalt. Kuo and her team discovered that people living in buildings near green areas had a stronger sense of community and coped better with everyday stress and hardship. They were less aggressive and less violent, they performed better on tests of concentration, they managed their problems more effectively.

They also felt safer—and with good reason. In one of its more startling findings, the team upended the common belief that barren spaces are safer than green ones. A study of violent crime in a housing project of 98 apartment buildings showed that in and around buildings near vegetation that didn't hamper visibility there were only half as many crimes as in areas near no vegetation. The greener the surroundings, says Kuo, the lower the crime rate against people and property. The team also found less litter and graffiti in natural landscapes.

In their most recent research, a national study of 450 children ages five to eighteen, the scientists discovered that children with attention deficit disorders showed reduced symptoms when they were exposed to natural environments. After play in verdant settings, parents reported that the children's ability to concentrate, complete tasks, and follow directions improved dramatically—in all age groups, in all parts of the country.

Why would vegetation influence our mental well-being? For one thing, grass and trees provide a welcoming place for people to gather. In the hectic and crowded cores of cities, people need the little grove of chestnut trees outside their apartments where they can mingle in the shade and hear the hiss of wind in high trees. They need big public lawns where they can play together. They need the tiny sprouting plots of neighborhood gardens, where they can put aside the city's stress on time and the temporary in favor of growth and permanence.

Scientists suspect that green space also has a restorative effect on our voluntary attention, the kind of intense focus required to work or study, to ignore distractions and concentrate on the task at hand. Voluntary attention is like a mental muscle; we exercise it in nearly every aspect of our lives. It dictates how well we think and how we handle ourselves in difficult situations—whether we roll with the punches or fly off the handle. Living in a city with its relentless crush of noise and traffic, conflicts and demands, makes us "crabby and impulsive," Kuo says. Being in nature refreshes us by letting us give voluntary attention a rest and allowing us to surrender to involuntary attention: the effortless and often enjoyable noticing of sensory stimuli in our environment.

Kuo speculates that over the course of human evolution, there was selection for this response to the natural world. Our ancestors who found nature effortlessly engaging had an advantage. "They were the ones more likely to know where the berries could be found and where the critters hung out," she says. "When push came to shove in difficult environmental conditions, they were better able to survive."

In our modern era, with all its pressures, contact with nature in urban settings may be more crucial than ever. A park-rich metropolis helps us stay physically healthy and battle overweight and diabetes. Two big recent studies of people in populated urban centers in the Netherlands and Japan showed that those living in areas with easy access to green spaces where they could walk had significantly better health and lower mortality rates than those without. Health studies suggest that even relatively passive contact with nature lowers blood pressure and anxiety levels.

Politicians and planners may be getting the message. In 2003, the U.S. Conference of Mayors passed an urban forestry resolution to promote the preservation and new growth of trees and forests in city environments. Two years later, 50 city leaders from around the globe signed a Green Cities Declaration at the United Nations World Environment Day in San Francisco. Mayors from Delhi to Dakar, Moscow to Manila, resolved to chart a bold new course for the urban environment, launching efforts to reduce waste and pollution, ease traffic congestion, and—by the year 2015—to ensure an accessible public park or recreational open space within a third of a mile of every city resident.

"Reclaiming space so that a city can 'breathe' is an integral part of the challenges confronting urban civilization today," says Bertrand Delanoë, the popular mayor of Paris. "A modern city needs areas free from density, noise, and the frenzied urban pace. We must re-create the kinds of spaces that lend themselves to talking, walking, discovering, relaxing."

When Delanoë ran for office six years ago, a centerpiece of his campaign was a pledge to find, within city limits, 75 acres (30 hectares) for new parks and public spaces. In a metropolis as densely settled as Paris, this is no easy task. But Mayor Delanoë and his staff are recycling land with characteristic Parisian creativity and verve, rescuing bits and pieces of the city to create new parks.

Among them is *Un Tracé de Verdure sur les Maréchaux*, a linear greenway to be planted along a tram route in the south of Paris, and the *Jardins d'Eole*, a soon-to-open informal ten-acre people's park where residents of the working-class neighborhoods of the northern 18th arrondissement can picnic and play on fields that were once train yards. With these and other small parks and public spaces, including some of the 40 or so vibrant community gardens that have cropped up on vacant lots all over the city, Delanoë's promise will likely be fulfilled.

Champions of urban parks hail recent progress in the greening of cities but warn that much remains to be done. Some leaders consider their cities all built up, with no room for more parkland, says Peter Harnik, director of the Center for City Park Excellence at the Trust for Public Land in Washington, D.C. But if a city has space for one more building, Harnik posits, it has room for one more park.

As for footing the bill: Cities have traditionally reserved funds for such requisites as police, sewers, and fire trucks, and considered parks and green space as pleasant amenities—investments for leftover money. But researchers such as Frances Kuo argue that parks in cities represent a minor public investment with a huge payoff. "Parks help people take care of themselves so cities don't have to spend as much on social, medical, and safety services trying to fix their problems," she says.

What then should be the goal of city planners? A park near every doorstep where people can gather and gain a healthy dose of that remedy Henry David Thoreau said we can never have enough of: nature.

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## Environmental Benefits of Green Space

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### Download Environmental Benefits Fact Sheet

Green spaces are a great benefit to our environment. They filter pollutants and dust from the air, they provide shade and lower temperatures in urban areas, and they even reduce erosion of soil into our waterways. These are just a few of the environmental benefits that green spaces provide.

**Urban advantages.** More green space within a city's boundaries can improve the urban environment. Among the green space advantages listed in EcoPlanIT Madison: Green Space Goal (UW-Madison Department of Urban and Regional Planning) are: helping regulate air quality and climate...reducing energy consumption by countering the warming effects of paved surfaces....recharging groundwater supplies and protecting lakes and streams from polluted runoff.<sup>1</sup>

**Water quality protection.** Proper landscaping reduces nitrate leaching from the soil into the water supply and reduces surface water runoff, keeping phosphorus and other pollutants out of our waterways and preventing septic system overload.<sup>2</sup>

**Reduced heat buildup.** Trees in a parking lot can reduce on-site heat buildup, decrease runoff and enhance night time cool downs. Tests in a mall parking lot in Huntsville, Ala. showed a 31 degree difference between shaded and

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unshaded areas.<sup>3</sup>

> Sustainability

**Reduced soil erosion.** A dense cover of plants and mulch holds soil in place, keeping sediment out of lakes, streams, storm drains and roads; and reducing flooding, mudslides and dust storms.<sup>4</sup>

**Improved air quality.** Trees, shrubs and turf remove smoke, dust and other pollutants from the air. One tree can remove 26 pounds of carbon dioxide from the atmosphere annually, equaling 11,000 miles of car emissions. One study showed that one acre of trees has the ability to remove 13 tons of particles and gases annually.<sup>5</sup> • 2,500 square feet of turf absorbs carbon dioxide from the atmosphere and releases enough oxygen for a family of four to breathe.<sup>6</sup>

**Lower attic temperatures.** Trees shading homes can reduce attic temperatures as much as 40 degrees. According to the EPA, urban forests reduce urban air temperatures significantly by shading heat sinks such as buildings and concrete and returning humidity to the air through evaporative cooling.<sup>7</sup>

**Natural resource conservation.** By using trees to modify temperatures, the amount of fossil fuels used for cooling and heating is reduced. Properly placed deciduous trees reduce house temperatures in the summer, allowing air conditioning units to run 2 to 4 percent more efficiently. The trees also allow the sun to warm the house in the winter.<sup>8</sup>

**Green roofs cool urban hot spots.** Led by cities such as Chicago and Toronto, as well as a number of universities, evidence is mounting that green roofs (i.e. roofs totally or partially covered with vegetation) can play an important role in saving energy, reducing the urban heat island effect and adding more green space to a built environment.<sup>9</sup>

**Cooler summer days.** Lawns will be 30 degrees cooler than asphalt and 14 degrees cooler than bare soil in the heat of summer.<sup>10</sup>

**Natural resource conservation.** Homeowners can “grasscycle” by leaving grass clippings on the lawn when mowing. The clippings quickly decompose and release valuable nutrients back into the soil to feed the grass, reducing the need for nitrogen by 25 to 50 percent. Modern mulching lawn mowers make “grasscycling” even easier, and homeowners can reduce their mowing time by 30 to 40 percent by not having to bag clippings.<sup>11</sup>

**\*\*Reduced pollution.\*\*** Trees naturally remove pollutants from the air, so every tree that’s subtracted from a city’s ecosystem means some particulate pollution remains that should have been filtered out. In Washington, that amounts to 540 extra tons each year.<sup>12</sup>

**Rainfall retention.** A healthy, sodded lawn absorbs rainfall 6 times more effectively than a wheat field and 4 times better than a hay field.<sup>13</sup>

**\*\*Natural storm water management.** \*\*A big tree removes 60 to 70 times the pollution than a small tree.<sup>14</sup>

**Reduced temperatures.** In Atlanta, temperatures have climbed 5 to 8 degrees higher than surrounding countryside where developers bulldozed 380,000 acres between 1973 and 1999, according to NASA. Scientists fear the heavily developed corridor between Boston and Washington could be the next big hot zone.<sup>15</sup>

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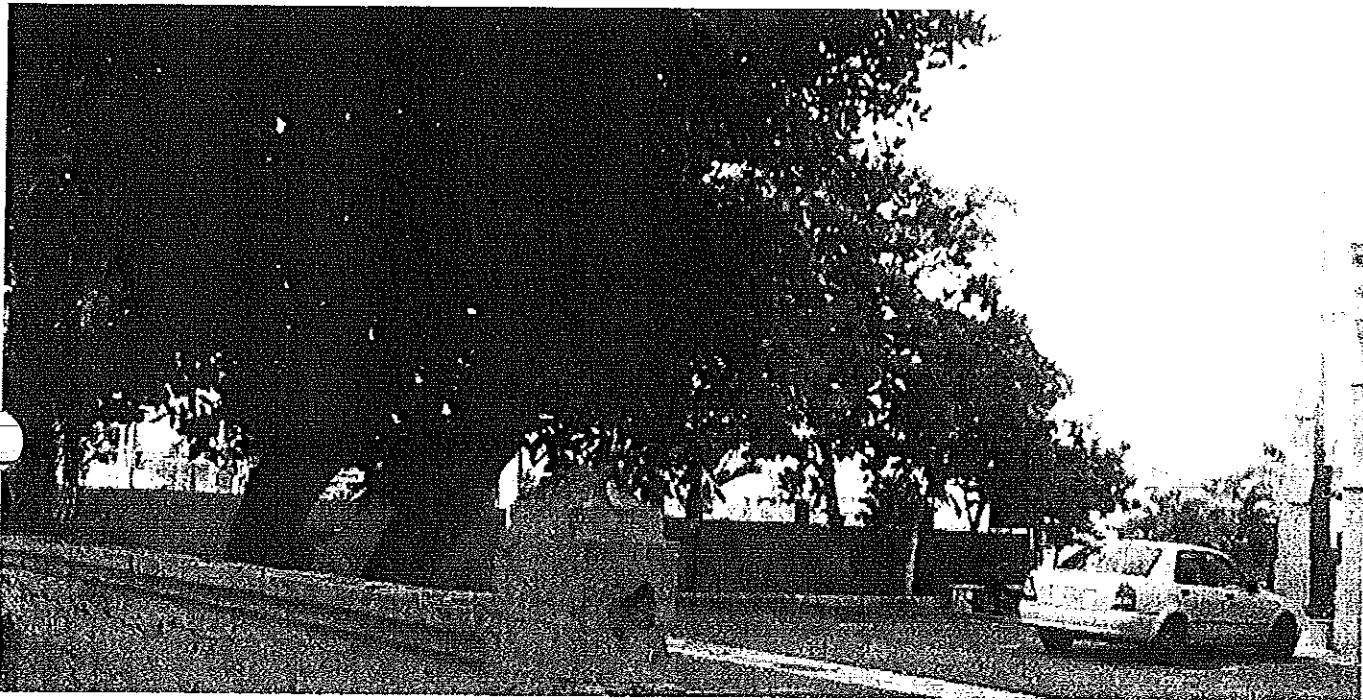
We invite you to provide feedback on the National eXtension Conference which took place March 22-25 in San Antonio  
<https://extension.org/feedback/>)



# Trees and Local Temperature

Climate, Forests and Woodlands , Trees for Energy Conservation - September 16, 2015 (20150916)

Print (http://www.printfriendly.com)



Trees shade an urban parking lot.

## *Written by Melanie Lenart*

Urban forests can help keep cities within a healthy temperature range, although the exact temperature reduction from urban forests is difficult to measure. The extent of the effect varies in space and in time, which complicates the issue, but large parks or tracts of urban trees can cool daytime summer air temperatures by about 10°F (McPherson and Simpson 1995).

Increasing the green cover of cities by 10% or more could help temper the local temperature rise projected for coming decades as climate change manifests (Gill et al. 2007). Plants cool the surface of the planet in two ways. They cool the air by evaporating water through their leaves. They also moderate the temperature of the ground surface by shading it from direct sunlight. Both of these processes have the greatest impact on sunny summer afternoons.



Trees transpire water through their leaves, increasing the surface area contributing to evaporation. When a molecule of water evaporates, it takes with it some heat that could otherwise be used to warm the nearby environment. Trees provide an evaporative cooling effect that can decrease local air temperatures by several degrees Fahrenheit. This effect typically reaches its peak when evaporation levels are highest, usually at midday.

Even more dramatically, the temperature difference between shaded and non-shaded ground can be as much as 36°F, based on some studies described below. While the studies measured temperature of the ground surface, heating differences also occur at the surface of an animal's fur or a person's skin.

It is difficult to estimate the influence of urban trees at the scale of a city, perhaps in part because the differences tend to register at the local scale of neighborhoods (/pages/58141/urban-forests-and-heat-waves) (Harlan et al. 2006). The climatic effect of vegetation also varies throughout the day, with the cooling effect typically peaking at midday.

In a study in Valencia, Spain, researchers found that a temperature monitor exposed to direct sunlight warmed to about 104°F in midday sun, while a shaded monitor at the same site registered below 80°F (Gomez et al. 2004). In a study in Phoenix, Arizona, the surface temperature of asphalt measured 140°F on a hot summer day, while a nearby patch of shaded grass measured 104°F (Mueller and Day 2005). In both cases, the biggest differences occurred on the hottest afternoons.

Peak temperatures of soil exposed to direct sunlight reached about 18°F warmer than soils under shade on a typical July afternoon, based on a year-long study of temperatures below piñon-juniper canopy in New Mexico (Breshears et al. 1998). Temperature monitors were placed roughly 1 inch (2 cm) below the surface to measure near-ground fluctuations. While daytime summer soil temperatures ran lower under the tree canopy, January soil temperature consistently ran slightly higher under the sheltering canopy than it did in the exposed areas. The difference of several degrees Fahrenheit was most pronounced at night during the cool season, with little or no extra heat detected during the warmer nights in May and July.

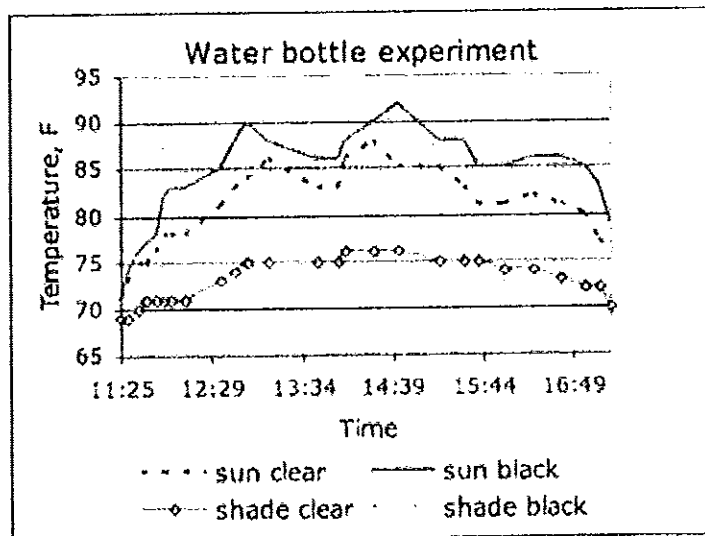
These studies and others indicate that trees moderate heating at the ground surface, providing a cooling effect that is most pronounced on summer days, while a slight warming effect occurs during winter nights. The effect this will have on heating and cooling costs in urban areas relates largely to location and size of trees.

A Tucson study assessing cooling value found little temperature difference when relatively small trees were planted randomly around homes, with canopy comprising about 30% of the area (Kliman and Comrie 2004). In contrast, a Phoenix study that projected daily energy savings of about 13% or more assumed large trees comprised about 60% of the area with most plantings on the west and south of the residence (McPherson and Simpson 1995). The Tucson study found plantings on the west and south sides of homes tended to provide the most cooling in summer, while plantings on the north side actually increased the heat load, perhaps by blocking winds.

The consistent finding that the cooling effect from shade and transpiration is most pronounced on summer afternoons indicates that trees near buildings could help reduce energy demands, especially during times of peak demand (McPherson and Simpson 2003). This can be especially important during hot months or during heat waves, as these are the times when electrical power production is most susceptible to large-scale blackouts.

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Four half-pint water bottles were set on a table: two clear and two painted black. One of each color was set in the shade and the other in the sun. The temperatures were measured from 11:25 am to 5:15 pm. Source: Diana Rashash, NC Cooperative Extension.

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#### Related to Trees and Local Temperature:

- [Urban Forests and Climate Change \(/pages/33748/urban-forests-and-climate-change\)](/pages/33748/urban-forests-and-climate-change)
- [Urban Forests and Heat Waves \(/pages/58141/urban-forests-and-heat-waves\)](/pages/58141/urban-forests-and-heat-waves)
- [Climate Mitigation by Urban Forests \(/pages/58125/climate-mitigation-by-urban-forests\)](/pages/58125/climate-mitigation-by-urban-forests)
- [Cost-Benefit Approach to Urban Forests \(/pages/58138/cost-benefit-approach-to-urban-forests\)](/pages/58138/cost-benefit-approach-to-urban-forests)
- [Designing Urban Forests \(/pages/58137/designing-urban-forests\)](/pages/58137/designing-urban-forests)
- [Urban Forest Project Protocol](#)
- [Calculating Carbon Drawdown by Trees \(/pages/33382/calculating-carbon-drawdown-by-trees\)](/pages/33382/calculating-carbon-drawdown-by-trees)
- [Urban Forestry and Carbon Storage](#)

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**Summary of Mt. Tabor Neighborhood Association positions**  
(4-20-2016)  
on  
**2035 Comprehensive Plan Draft, City Council Amendments**  
(for draft dated 3-18-2016)

MTNA Opposes:

**#S8 – Portland Nursery, 5050 SE Stark.** See MTNA testimony delivered orally at hearing on December 10, 2015 (attached).

**#M28 – SE 60<sup>th</sup>/Belmont.** See MTNA testimony delivered via email on April 11, 2016 (attached).

MTNA Supports with a friendly amendment:

**#F61 – SE 51<sup>st</sup> and Hawthorne**

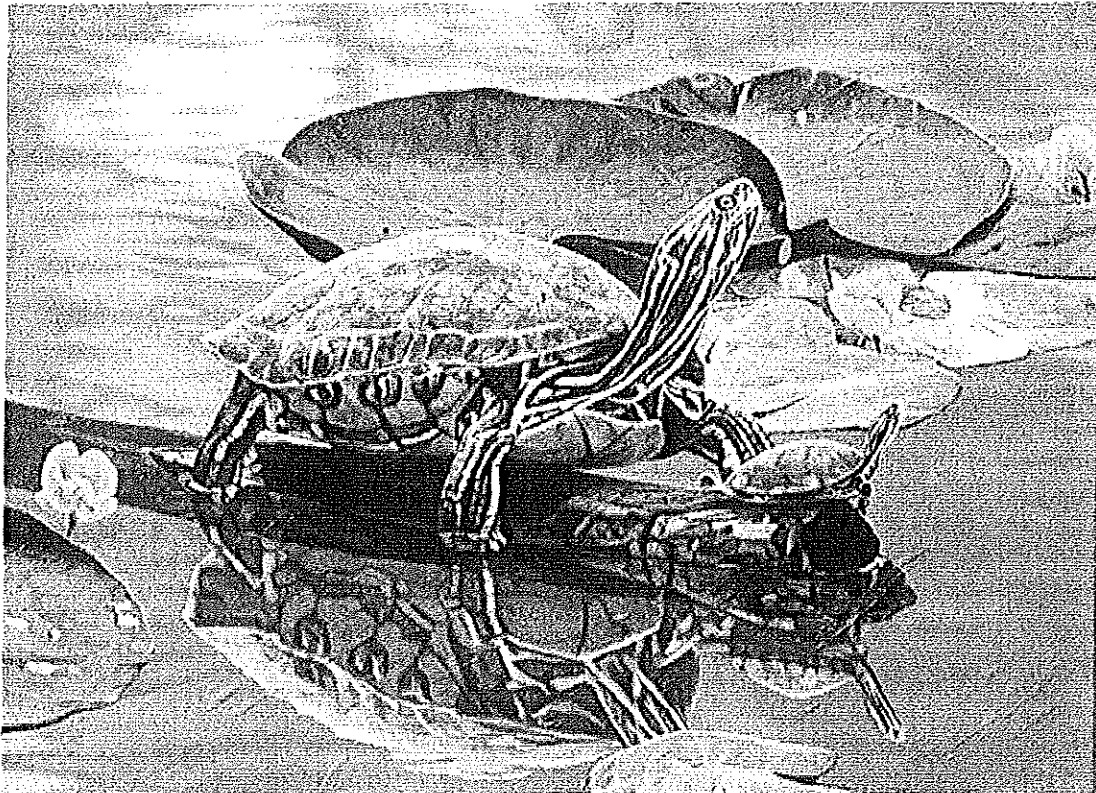
We are grateful Commissioners heard our testimony on December 10, and Commissioner Fritz drafted this amendment. We support this amendment, and request a friendly amendment that refines which lots are included.

As we spoke of in our December 10<sup>th</sup> testimony, there is a natural and significant transition in transportation classification and built environment at SE Hawthorne and SE 50<sup>th</sup> Ave. Our intent was to have all lots lining Hawthorne east of SE 50<sup>th</sup>, until SE 51<sup>st</sup>, (this is a one block section) included in an amendment that designates these lots as "Mixed Use – Neighborhood" in the Comp Plan Map and CM1 in the zoning map. This amendment, however, leaves the SE and NE corners of this intersection outside the amendment. **We feel the lot on the NE corner in particular should be added to those taxlots covered by the amendment for these reasons:**

- This property on the NE corner of this jogged intersection (5011 SE Hawthorne) is well behind the transition point and visually more a part of the lower intensity neighborhood environment than the other lots at this intersection. See attached map.
- A transition in building height must occur somewhere, and we feel it is preferable to have the street itself serve as a buffer between the buildings of differing heights.
- 5011 is a large lot with an odd shape that would allow building height to impose on a higher number of (5) residential lots.
- 5011 has good redevelopment potential even within the lower intensity designation this amendment will place on lots. It has a large parking lot that can be developed to greater potential and profit by the owner, even with the amendment.

For documentation of the original testimony that prompted #F61, see MTNA testimony delivered orally at hearing on December 10, 2015 (attached).

Submitted by  
Bob Bernstein  
4/20/16





Submitted  
by  
Martha  
Stiven  
4/20/16

April 20, 2016

Mayor Hales and Members of the City Council  
City of Portland  
1221 SW 4<sup>th</sup> Avenue  
Portland, OR 97201

Dear Mayor Hales and City Commissioners,

My name is Richard Piacentini and I am submitting this written testimony regarding the Proposed 2035 Comprehensive Plan and corresponding map designations. Our company, Belmar Properties, manages properties controlled by members of the John Piacentini family, including those in the following ownerships:

- Rosehill Investment, LLC
- Siena Capital, LLC
- John B. Piacentini Trust
- Louise Piacentini
- J&F Investments, LTD

Collectively, the companies and individuals own thirty (30) properties impacted by the Proposed 2035 Comprehensive Plan. Although the vast majority of the sites are occupied by small, retail businesses (two properties are vacant), they fall into all four of the Proposed Mixed Use Plan Designations.

I appreciate that you heard our earlier testimony on January 6 and appreciate that two of our properties are on your amendment list. The first is the property at SE 60<sup>th</sup> Avenue and SE Belmont Street. The proposed Comprehensive Plan Map change is No. 1418 and the Amendment number is M28. We requested that you change the Proposed Plan Designation from Mixed Use Dispersed to Mixed Use Neighborhood. I continue to support that change. Since we testified before you, we have met with representatives of the Mt. Tabor Neighborhood Association and learned that their primary concern had to do with the existing traffic situation. Subsequent to that meeting we reviewed the Transportations System Plan and learned that improvements to 60<sup>th</sup> Avenue are proposed, including the intersections at NE Glisan, Burnside, SE Stark and SE Belmont (TSP Project 70006). In discussing this with staff, they indicated that the impact of designating these limited properties to Mixed Use Neighborhood as opposed to Mixed Use Dispersed would have a negligible impact on traffic and in fact, would not influence their traffic models. We have submitted written testimony to the Planning and Sustainability Commission in support of the 60<sup>th</sup> Avenue Corridor Project and requested its funding. I have attached a copy of the March 22 testimony. It is for this reason in addition to the surrounding land use and development patterns that the staff has recommended approval of the Plan

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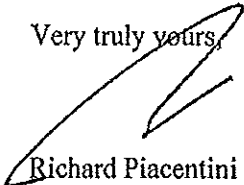
Mayor and Portland City Commissioners  
April 20, 2016  
Page Two

designation change to Mixed Use Neighborhood. We continue to request that you approve the proposed amendment.

We also appreciate and support the proposed map change from Mixed Use Dispersed to Mixed Use Neighborhood at the property and 907-916 SW Gibbs. Map Change 1499 and Amendment M20. We believe that these properties can support the increased density allowed in the Mixed Use Neighborhood Plan Designation. Staff is also in support of this change.

For these reasons, we continue to request adoption of Map Amendments M28 and M20. Thank you for your work on this important matter.

Very truly yours,



Richard Piacentini  
Belmar Properties

Cc: Michael C. Robinson, Perkins Coie  
Marty Stiven, Stiven Planning & Development Services, LLC.

Attachment

PROPERTIES  
**BELMAR** INC

March 22, 2016

Ms. Katherine Schultz, Chair  
City of Portland Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201

RE: Proposed Transportation System Plan

Dear Chair Shultz and members of the Planning and Sustainability Commission

My name is Richard Piacentini and I am submitting this written testimony regarding the Proposed 2035 Transportation System Plan ("TSP") in conjunction with the 2035 Comprehensive Plan update. Our company, Belmar Properties, manages properties controlled by members of the John Piacentini Family including those in the following ownerships:

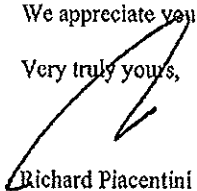
- Rosehill Investment, LLC
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- Louise Piacentini
- J&F Investments, LTD.

We own property located on the Northeast corner of the intersection of SE Belmont Street and SE 60<sup>th</sup> Avenue. We understand that the proposed TSP identifies improvements to intersections along SE 60<sup>th</sup> Avenue, including improvements at the Burnside, Stark, Belmont and Glisan intersections. This project is identified as Project 70006. We also understand that the project is identified as an unconstrained (unfunded) project. We would like to encourage that the Planning & Sustainability Commission recommend moving the project from unconstrained (unfunded) to constrained (funded) in order to improve the chances for these improvements to occur.

We are working with the City Council and staff to change the proposed Comprehensive Plan Map from Mixed Use-Dispersed to Mixed Use-Neighborhood and know that there are concerns about the capacity at some locations along SE 60<sup>th</sup> north of Belmont. TSP Project #70006 will serve to mitigate those concerns..

We appreciate your consideration of our request.

Very truly yours,

  
Richard Piacentini  
Belmar Properties

Cc: Mayor Charlie Hales  
Commissioner Steve Novick  
Michael C. Robinson, Perkins Coie  
Marty Stiven, Stiven Planning & Development Services, LLC.

2001 SIXTH AVENUE—SUITE 2300  
SEATTLE, WASHINGTON 98121  
PH 206.448.1975 | FX 206.448.1978  
richardp@belmarprop.com

Testimony to City Council regarding provision of more opportunities for development of "Middle Housing" and affordable housing in Portland.

Also, proposal to protect sunlight access for existing dwellings

This testimony references three documents that are attached.

1. The first document is the Feb 2, 2016 memo to Mayor Hales from Principal Planner Engstrom. On page 4 of this document five options are suggested to the Mayor for Council consideration. I recommend that the first 2 approaches be further pursued with adequate community input. Those are re-evaluate zoning in inner SE PDX, and evaluate R 2.5 comp Plan areas not yet zoned R2.5. In addition to the staff suggestions, I recommend that the Council have Planning staff further evaluate the potential for additional land area in the city to be designated R-1, R 2. and R-2.5. If the City Council thinks more opportunities are needed for the development of middle housing, designating more vacant and/or underdeveloped land as R-1, R-2 or R-2.5 is a more legally viable process than hastily changing the comp plan and zoning code to allow for additional density (middle housing )in fully developed single family residential neighborhoods presently zoned for that use. Housing structures built at R-1, R-2 and R 2.5 densities are qualitatively different in mass and height (development intensity) than those structures built at R-5, R-7 or R-10 densities.

The owners of homes in existing low-density residential zones bought those properties with the underlying understanding that their neighborhoods would not appreciably change. This understanding is based on city land use designations as proscribed at the time of acquisition. The provision of owner certainty for how intensely land adjacent to their property can be developed through zoning regulation is a major principle in the practice of land use planning.

2. The second document is the city planning definitions of multi-dwelling residential zones. To provide for more land area suitable to be zoned for R-1, R-2 and R-3 (R-2.5?) basic, rational land planning criteria for where those zones should be located has been highlighted. Examples of those criteria are: If near low residential zones, have multi-family zones be applied to large sites (1 acre +) or groups of

sites; Have multi-family zones be applied near major streets and supportive public and commercial services. As stated in the Engstrom staff report, high density residential zones should only be located in areas that are physically suitable and where adequate infrastructure is fully developed.

3. The third document is an e-mail I sent to the Mayor and Council in early February of this year. It basically appeals to you to not have the subject of low-income housing be addressed in the comprehensive plan process. My argument was and still is as follows. Providing opportunities for low cost housing is not a simple matter of supply-demand economics. Providing more land zoned for moderate density housing, thus more residential units built than the projected need, will not alone reduce the costs of those units. The e-mail includes an opinion paper written by Brian Cambell. He basically states that the Portland 20 year land supply proposed in the new comp plan for additional housing is adequate. The private real estate market, however, determines the mix and quality of what gets built. Without government affecting change in how this market functions, we will not be able to appreciably address the needs of those who cannot afford market-rate housing. The City Council needs to develop a 21st-century mix of economic inducements, incentives and requirements to engage the housing development industry in providing for a more broad range of affordable housing. Inclusionary zoning is one example of an incentive that can be used by the City.

Lastly, I request that the City Council develop a policy (and implementing ordinances) protecting existing home owner's right to sunlight. This policy and implementing codes should affect all forms of new housing development in all the moderate to low density residential zones, whether it be for middle housing or single family residential infill. Existing home owners in these zones have a right to the sunlight they presently access: sunlight on rooftops that presently have solar panels installed or have high potential for solar energy production; sunlight to their yards, especially rear yards; and sunlight to their dwelling windows. The burden of proof would be on all new residential developments, showing that the above sunlight policy and code regulations are met through planning and/or building code review.



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## MEMO

**DATE:** February 2, 2016

**TO:** Mayor Hales

**FROM:** Eric Engstrom, Principal Planner  
Bureau of Planning and Sustainability, Comprehensive and Strategic Planning

**CC:** Susan Anderson, Director; Joe Zehnder, Chief Planner

**SUBJECT:** Middle housing options

---

The purpose of this memorandum is to summarize a range of options to increase the amount of land available for "middle housing" with the new Comprehensive Plan. These options were prepared in response to interest from several Council offices, and recent hearing testimony.

### What is middle housing?

For purposes of this memo, "middle housing" is defined as multi-unit or clustered housing types that are compatible in scale with single-family homes. Middle housing has more and usually smaller units than typical detached single-family development. Examples include row houses, townhouses, and plexes (duplexes, triplexes, four-plexes), or small garden apartments. ADUs and clusters of small cottages also could be considered middle housing.

### Why promote middle housing?

The recommended Comprehensive Plan provides enough zoned capacity to meet expected housing needs over the next 20 years. However, Comprehensive Plan also highlights the need for more housing in the range between the single-family houses and units in larger multi-family or mixed-use buildings. There is growing demand for greater housing supply and choice in terms of price, size, location, tenure options and accessibility.



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Less expensive. Creating more middle housing opportunities with the Comprehensive Plan may help relieve some price pressure. Generally, these forms of housing can be built using wood frame construction methods. They are less expensive to build than 4-6 story mixed use buildings, and are more land-efficient than detached single family homes. Middle housing can also serve as a transition between denser mixed-use development and abutting single dwelling neighborhoods.

Home ownership. Although home ownership is generally beyond the reach of the lowest income groups, there is also a challenge in supplying enough entry-level homes to meet expected demand. Most of the City's single-family supply is single-family lots in the 5,000-7,000 square foot range, while most of the expected demand over the next 20 years is for more affordable lots in the 1,600 to 4,000 square foot range. Much of the available land for additional single-family construction is in East Portland and outer Southwest Portland, while demand is highest in the inner most neighborhoods. Construction of more attached homes could help meet this demand.

Access to complete communities. The new Comprehensive Plan promotes compact development within walking distance of neighborhood and town center locations. To achieve our "complete neighborhood" goals, we want to be able to have about 3,500 to 7,000 households within a walkable ½-mile distance of our commercial main streets. Many centers are not yet to this level of density. Zoning for more attached housing options near the edges of the identified centers could be a way to help achieve that goal.

Choice. There is demand for greater range of housing types that are adaptable to different life stages, and multigenerational living. Surveys have also suggested that many apartment dwellers would prefer to live in their own home, if they can afford it. While it is prudent to supply enough multifamily housing to meet rising demand for that housing type, it may also be desirable to provide other options.

### Definitions and zoning

Middle housing can occur in several different forms.

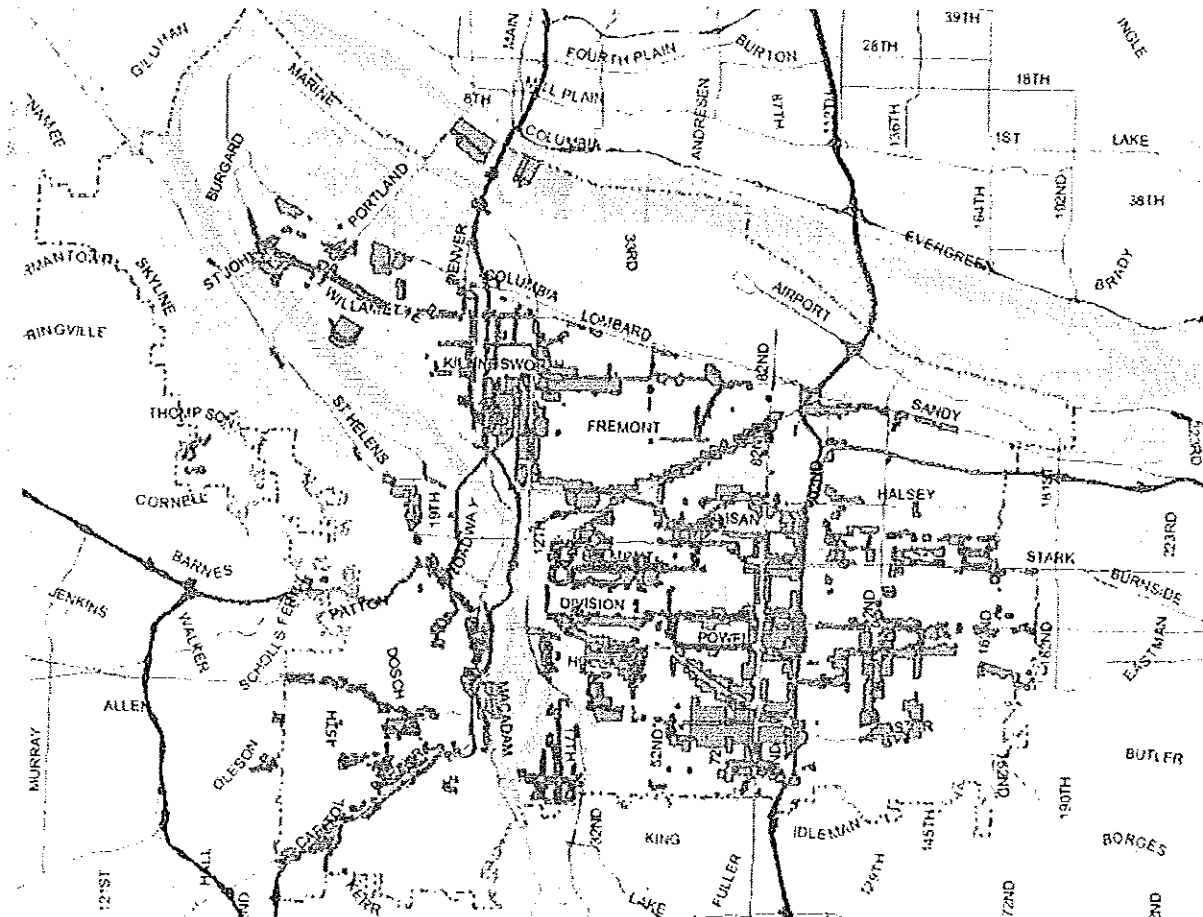
- **Row houses:** Attached houses when each home is on its own fee-simple lot.
- **Townhouses:** Attached houses when there are not platted lot lines (either rented, or sold as condominiums). Townhouses come in groups of 3 or more.
- **Duplexes:** A pair of attached units, either side-by-side (semi-detached), or one above the other (stacked).



- **Triplex, Fourplex, etc.:** A multi-dwelling structure that contains three or four primary dwelling units on one lot. Each unit must share a common wall or common floor/ceiling with at least one other unit.
- **Courtyard Housing:** Cottages, townhouses or apartments oriented around a shared courtyard or common green.
- **Accessory Dwelling Unit (ADU):** A second dwelling unit created on a lot with a house, attached house, or manufactured home. The second unit is created auxiliary to, and is always smaller than the house, attached house, or manufactured home. ADUs are limited in size to no more than 800 square feet.

Middle housing forms are generally allowed, to varying degrees, in the R1, R2 and R2.5 zones. Limited forms of middle housing are also allowed in R5 (ADUs, duplexes or attached homes on corners).

Figure 1. R1, R2, and R2.5 Zones



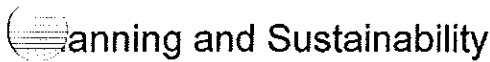
### Specific options for Council consideration

Staff have evaluated several approaches to provide more land supply for middle housing. The following table outlines five different approaches, with potential locations to provide context for each of these approaches. Although specific study areas are identified, staff recommends further vetting of these candidate areas. There has not yet been an opportunity for public discussion of many of these proposals. Council may wish to gather more community input before acting on any of these approaches. The five potential approaches are:

- Re-evaluate zoning in Inner-Southeast Portland *Yes*
- Evaluate R2.5 Comp Plan areas not yet zoned to R2.5 *Yes*
- Add more R2.5 or R2 near centers *NO*
- Parks-oriented density *NO*
- More flexibility in R5 – Residential Infill Project *NO*

The referenced study areas have been evaluated by staff to eliminate areas with significant infrastructure gaps or other significant physical or environmental constraints. They all are areas with relatively complete urban services and infrastructure, and they are all close to both frequent service transit and a Neighborhood Center or transit corridor.





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# Multi-Dwelling Residential Zones

R-2.5?

Moderate density Residential

R3 (Residential 3,000) zone (<http://www.portlandoregon.gov/bps/article/53296>)

The R3 zone is a low density multi-dwelling zone. It allows approximately 14.5 dwelling units per acre. Density may be as high as 21 units per acre if amenity bonus provisions are used. Allowed housing is characterized by one and two story buildings and a relatively low building coverage. The major type of new development will be townhouses and small multi-dwelling residences. This development is compatible with low and medium density single-dwelling development. Generally, R3 zoning will be applied on large sites or groups of sites.

R2 (Residential 2,000) zone (<http://www.portlandoregon.gov/bps/article/53296>)

The R2 zone is a low density multi-dwelling zone. It allows approximately 21.8 dwelling units per acre. Density may be as high as 32 units per acre if amenity bonus provisions are used. Allowed housing is characterized by one to three story buildings, but at a slightly larger amount of building coverage than the R3 zone. The major types of new development will be duplexes, townhouses, rowhouses and garden apartments. These housing types are intended to be compatible with adjacent houses. Generally, R2 zoning will be applied near Major City Traffic Streets, Neighborhood Collector and District Collector streets, and local streets adjacent to commercial areas and transit streets.

R1 (Residential 1,000) zone (<http://www.portlandoregon.gov/bps/article/53296>)

The R1 zone is a medium density multi-dwelling zone. It allows approximately 43 units per acre. Density may be as high as 65 units per acre if amenity bonus provisions are used. Allowed housing is characterized by one to four story buildings and a higher percentage of building coverage than in the R2 zone. The major type of new housing development will be multi-dwelling structures (condominiums and apartments), duplexes, townhouses, and rowhouses. Generally, R1 zoning will be applied near Neighborhood Collector and District Collector streets, and local streets adjacent to commercial areas and transit streets.

RH (High Density Residential) zone (<http://www.portlandoregon.gov/bps/article/53296>)

The RH zone is a high density multi-dwelling zone. Density is not regulated by a maximum number of units per acre. Rather, the maximum size of buildings and intensity of use is regulated by floor area ratio (FAR) limits and other site development standards. Generally the density will range from 80 to 125 units per acre. Allowed housing is characterized by medium to high height and a relatively high percentage of building coverage. The major types of new housing development will be low, medium, and high-rise apartments and condominiums. Generally, RH zones will be well served by transit facilities or be near areas with supportive commercial services.

RX (Central Residential) zone (<http://www.portlandoregon.gov/bps/article/53296>)

The RX zone is a high density multi-dwelling zone which allows the highest density of dwelling units of the residential zones. Density is not regulated by a maximum number of units per acre. Rather, the maximum size of buildings and intensity of use are regulated by floor area ratio (FAR) limits and other site development standards. Generally the density will be 100 or more units per acre. Allowed housing developments

Attachment 3

Gary Miniszewski <garyminiszewski@gmail.com>

Feb 8, 2016

To Mayor Charles Hale and City Councilors

Dear Mayor,

My name is Gary Miniszewski and I have been a land use planner in this state for 35 years. This is a request and not testimony regarding the Draft Comprehensive Plan. I do not think it is advisable to address the Portland Housing Crisis through your review process of the draft comprehensive plan. I appreciate the City Council's concern regarding housing/rental costs in Portland, however, somehow trying to remedy this problem by making changes to the comprehensive plan is not appropriate and will not at all be effective. In reviewing the Draft City Comp Plan reports on housing and land use, I think that future housing has been adequately addressed in the Draft Plan. Those report determinations have been thoroughly done and adequate for how many new housing units will be needed in Portland in the next 20 years, (with a variety of housing types and their mix) and how new housing can be spatially allocated throughout the city, (as depicted on the comprehensive plan map). To better address the Portland housing crisis outside of the Comprehensive Plan arena, I ask that you consider the following letter by land planner, Brian Cambell, printed in the Oregonian Newspaper 02/02/16, especially the last four paragraphs.

Thank You.

The recent opinion piece by Rep. Knute Buehler, R-Bend, had many good points addressing economic causes and effects of the current affordable housing crisis. However, blaming Oregon's land use planning system for being part of the cause is a misdiagnosis of the problem. Planning under Oregon's system is guided by citizen-developed statewide goals that lay out how cities and counties plan for the future. In the Portland area, Metro also comes under state guidance, primarily through Goal 14, which requires urban growth boundaries. The goals lay out the planning process, the extensive citizen input involved and the subjects to be addressed. Among those is Goal 10, which addresses housing needs. It requires that all jurisdictions complete a housing needs analysis for projected population growth and provide a 20-year supply of buildable land for each type of housing needed, from government-assisted housing to single-family housing on the upper end of the market. Unfortunately, it does not say anything about "affordability," and that is a gap the planning profession and others have long recognized but which the state has not begun to address until now when we have a crisis on our hands.

It is clear that what is needed is the creation of incentives and subsidies to address the full spectrum of needed housing — not just building more market-rate housing. The necessary land is there, planned and zoned for the full range of housing types, from the most basic to the most luxurious, from single-family houses to high rises and everything in between. A 20-year land supply within our boundaries is more than enough to meet the needs of the foreseeable future. The private real estate market, however, determines the mix and quality of what gets built. Without changing how this market functions we will never be able to address the needs of those people who cannot afford market-rate housing.

Federal public-housing funds used to fill much of this need, but those have long been a diminished resource. So, what mix of measures is needed to accomplish this? We clearly need to re-evaluate and reform Goal 10 to create the rules under which more affordable housing is required in each jurisdiction. But more importantly, the state, plus the larger cities and Metro, must seriously take on the task of creating a 21st-century mix of inducements, incentives and requirements that will engage the housing development industry (private and nonprofit) in providing a broader range of affordable housing and enable cities to preserve existing housing stock for low-income residents. These are the measures that will truly address the full spectrum of need.

The bottom line is that identifying land-use regulations as the driver of our current crisis is inaccurate. The lack of a coherent strategy and funding is the problem. Until the state and its communities find the resources (i.e., programs and money) to adequately address this problem, we will be unable to meet the housing needs of all Oregonians.

Sent from my iPad

Sent from my iPad

April 22, 2016

Mark D. Whitlow  
MWhitlow@perkinscoie.com

VIA EMAIL

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

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

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

Dear Mayor Hales and Council Members:

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

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

Respectfully submitted,

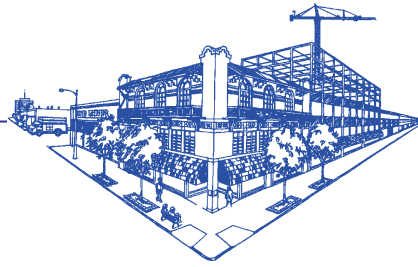


Mark D. Whitlow

MDW:sv

Enclosures

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



## **MEMORANDUM**

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

---

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

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

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

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

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

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

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



# 1) AMENDING THE EOA

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

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

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

## 2) RETAIL LEAKAGE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The BPS analysis appears to overlook three critical items:

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

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

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

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

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

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

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

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

## CONCLUSION

The following observations are offered by way of summary:

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

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

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

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

c: Mark Whitlow, Perkins Coie LLP

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

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

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

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

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

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

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

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

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

## END NOTES

<sup>1</sup> By email dated February 29, 2016, Mark Whitlow transmitted the 1-page of *Retail-Related Revisions to Portland EOA* (draft of 2-24-16) to Steve Kountz and Tom Armstrong with the request that “we would like to continue (our) conversation about the need to amend the EOA in a very minor way as proposed by Eric Hovee in the attachment. Please consider it, as we think it is an important factual base that should be in the EOA.”

<sup>2</sup> As provided via email dated, April 6, 2016 from Mark Whitlow, Perkins Coie, LLP, to Tom Armstrong, BP: “... the City is required to include findings explaining how new proposed site development restrictions will not adversely impact its Goal 9 inventory. Such inventory must be preserved or expanded based on an Economic Opportunities Analysis (EOA) that identifies the characteristics and types of “other employment uses” (OAR 660-009-0015), which are defined to include “all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities.” OAR 660-009-005(6). In addition, the EOA must identify sites that are expected to accommodate employment growth based on the site characteristics typical of expected uses. OAR 660-009-0015(2). The resulting plan must base its inventory of employment lands, in part, on the site characteristics of the various employment uses expected to generate employment growth. OAR 660-009-0025. Stated plainly, the EOA must analyze the need for, and inventory of, “other employment” uses based on their particular site characteristics, and must provide for such sites in the resulting plan.

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

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

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

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





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

April 22, 2016

VIA EMAIL

**Re: 2035 Comprehensive Plan Testimony**

Dear Mayor Hales and Council Members:

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

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

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

Sincerely,

Robert L. LeFeber, Principal Broker

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

**Arevalo, Nora**

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**From:** Victoria W <wilkinson.victoria@gmail.com>  
**Sent:** Thursday, April 21, 2016 11:35 PM  
**To:** Commissioner Fish; Commissioner Novick; Commissioner Saltzman; Commissioner Fritz;  
Council Clerk – Testimony; Hales, Mayor  
**Subject:** Wildlife Habitat at Broadmoor Golf Course - Amendment to Portland's Comprehensive  
Plan to convert 57 acres of protected wildlife habitat to industrial use

Please do not allow this valuable wildlife habitat to be destroyed for profit.

We will all regret this type of action one day after the damage is done.

Wildlife habitat has been decimated as it is. Preserve what remains for the creatures who depend upon it and for the value it and they add to our lives.

You can help do something truly important by preserving this area. It is more important than economics, profit, etc. Nature, wildlife and the environment don't have money to compete with. It is up to you to protect them.

Sincerely,

Victoria Wilkinson

Proposed Amendment to Change Zoning on Broadmoor Golf Course to "Industrial"

I would like to strongly oppose the proposed Amendment to change the zoning on 57 acres of the Broadmoor Golf Course from Natural Area to Industrial.

I'm familiar with the Golf Course from participating in Portland Audubon's Christmas Bird Counts that take place in that area. It's great natural habitat, and is appropriately zoned as open space. The City has always assured the public that the golf course would be protected.

The City has spent much treasure husbanding natural resources around Broadmoor. In 2012, the City purchased, with Metro, 54 acres adjacent to Broadmoor (east of NE 33rd Drive). The Environmental Services Director of Portland noted at the time that this is "*a rare remnant of Columbia River floodplain,*" and that "*Preserving it will protect a significant natural resource and help improve water quality in the slough.*" Indeed, the entire site ranks as "high value" on the regional natural resources inventory.

Broadmoor sits right between two wetlands and alongside the Columbia Slough, which the City has spent millions of dollars to restore. Catkin Marsh, a 54-acre wetland, located within Broadmoor, is planned to be a future trail link in the regional trail system, a future pathway to bring residents into contact with nature – hardly compatible with an industrial area.

But Mayor Charlie Hales and Commissioner Dan Saltzman recently proposed an amendment to the City's zoning plan that would allow 57 acres of the golf course to be designated for industrial use. There are plenty of other places to put heavy industry; it is NOT necessary to obliterate a full mile of riparian area (as in this proposal) to accommodate industry.

Jobs are being created in Portland – NOW – at a faster pace than almost anywhere else in the country. If Portland wants to continue being a "jobs" magnet, it would do better to maintain its livability than to destroy existing natural areas (one of Portland's main "draws").

Lastly, this proposal flaunts public process. This change was never aired during the multi-year public process developing the plan. The area was always proposed to be permanently protected as Open Space; this proposal surfaced at the very end of the process, requested by the landowner.

Please withdraw this proposed Amendment.

Deanna Mueller-Crispin  
1221 SW 10<sup>th</sup> Ave Unit 1013  
Portland, OR 97205

Portland Nursery  
testimony Dec 10

**MTNA position with regard to Portland Nursery**  
Testimony delivered at Comp Plan hearing December 10, 2105

1. The MTNA overwhelmingly supports Portland Nursery and its desire to continue to prosper as a nursery at its SE Stark Street location.
2. We sympathize with the nursery's concern over its current zoning situation, with nursery being a nonconforming use on the residentially zoned portion of its property.
3. There would, however, be great risk to the residential neighborhood in zoning the entire property as commercial, as the nursery's owners have requested. Such a large block of commercial property on this street would be completely out of character with the surrounding residential area, and zoning the entire property commercial would open the door for major commercial redevelopment along the lines of a big box store by any future owner. It could, in fact, very well have the effect of making the property more valuable for development than for continued operation as a nursery. The MTNA unequivocally opposes according the entire property commercial zoning.
4. Indeed, we believe that the Bureau of Planning and Sustainability staff has done an excellent job of finding a middle path. The Bureau's staff report – recommending that the commercial zoning at Portland Nursery be extended back an additional 123 feet, in conjunction with the recommendation that nursery use be made "conditional" rather than "nonconforming" on that portion of the property that continues to be zoned residential – is an elegant and well-thought-through proposal, and one that is good for everyone involved. The staff report will improve the zoning situation for Portland Nursery while offering continued protection for the character of the neighborhood, and we hope that the City Council will see the wisdom of this carefully crafted solution.
5. The owners' agent, Peter Fry, has proposed a possible "special" designation in the Comprehensive Plan with respect to nursery property that would allow outright use as long as the property remains a nursery, but that would revert to residential zoning at such time as the nursery use goes away. We are open to working with the BPS staff and the nursery owners to seek such a creative compromise, but, if such a special designation is not possible, we respectfully request that the City Council uphold the staff proposal.

SE 60th/Belmont  
testimony April 11

# MOUNT-TABOR

NEIGHBORHOOD ASSOCIATION

April 11, 2016

**RE: Comp Plan draft amendment to SE 60th and SE Belmont**

Dear Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman -

We are writing today because we were alarmed to find — on the list of City Council proposed Comp Plan Map amendments (item #M28) — a recommendation to up-zone the property on the northeast corner of SE 60th and SE Belmont. We have not previously seen this proposal in the Comp Plan's public documents over the last several years. It is distressing to see this potential change of zoning raised at the last minute, with such a compressed opportunity for the neighborhood to gather information and weigh in.

The intersection at SE 60th and SE Belmont is dangerous and functions poorly. This location has had more injuries in the last twelve years than all but one other location in our neighborhood (data from the PBOT Vision Zero project). This intersection's "level of service" is demonstrably inadequate and fails to meet *current* load demands. Traffic backs up so badly here in all four directions that aggressive cut-through traffic pours off these collector streets, to burden local access streets. No increase in intensity of land use can occur at this location until the transportation plan targeted at improving the infrastructure here is implemented (Project # 70006, "60th Avenue Corridor Improvements") — and as of today, that transportation plan has not been funded.

We would love to see the property on the northeast corner of SE 60th and Belmont developed into an asset for our neighborhood, but not with up-zoning that ignores — and indeed would exacerbate — the transportation issues at this failing intersection. Infrastructure improvements must precede development, or at least take place concurrently with it. Yes, the properties on two other corners of this intersection — built early in the last century — are multi-story buildings, but it is precisely because these more intense uses are already in place that this particular lot must be developed at a much lower intensity. The existing properties consume all of the intensity the infrastructure here can bear.

In the absence of sufficient infrastructure, or at least a funded plan to fix the infrastructure on a committed schedule, the Mt. Tabor Neighborhood Association supports the staff recommendation for zoning at this site; that recommendation was also supported by the Planning and Sustainability Commission through its review.

Sincerely,  
Stephanie Stewart and John Laursen  
Mt. Tabor Neighborhood Association Land Use  
1121 SE 50<sup>th</sup> Ave; Portland, OR 97215

**MTNA position Upper Hawthorne**  
Testimony delivered at Comp Plan Hearing December 10, 2015

**Topic:** UPPER HAWTHORNE, refinement of the commercial designation between SE 50<sup>th</sup> and SE 51<sup>st</sup>

- With the 1980's Comp Plan, all lots lining Hawthorne were designated commercial (and the same level of intensity of commercial) all the way up to SE 51<sup>st</sup>.
- These comments concern a one-block section of Hawthorne, between SE 50<sup>th</sup> and SE 51<sup>st</sup>.
- There is an obvious transition that happens at Hawthorne and SE 50<sup>th</sup>.
- Most significantly, the transportation classification steps down 2 levels at SE 50<sup>th</sup> and Hawthorne -- from "District Collector" along Hawthorne, down past "Neighborhood Collector", down all the way to "Local Service Traffic" -- as the flow of Hawthorne's through traffic actually turns south and begins to follow 50<sup>th</sup>.
- The natural transition at SE 50<sup>th</sup> and Hawthorne has been reinforced with other planning efforts in which the neighborhood has participated, including the multi-year *Hawthorne Transportation Plan* process which resulted in an intersection improvement and neighborhood entryway, both of which further codified the transportation classification transition that happens at SE 50<sup>th</sup>.
- The commercial lots lining Hawthorne between SE 50<sup>th</sup> and SE 51<sup>st</sup> are all currently built out at a low intensity commercial, and this steps down nicely making an amiable transition to the all residential neighborhood.
- Because these low-intensity commercial lots are non-intrusive at their current scale, they exist in a symbiosis that much of the neighborhood truly loves.

**Request:** MU-Neighborhood (Comp Plan Map) + CM1 (zoning map) + "d" overlay

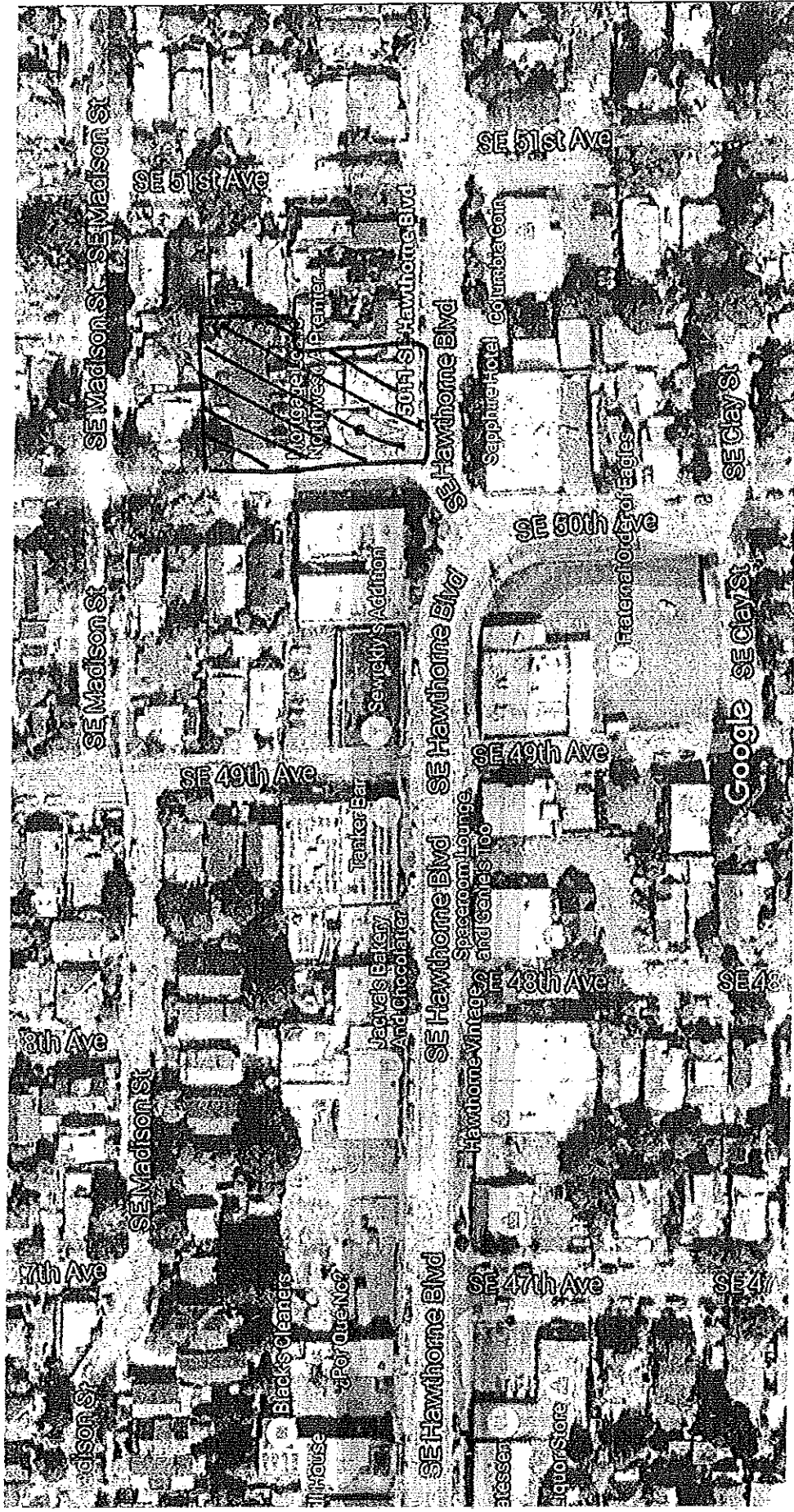
- **Community supported option** -- For Staff to designate commercial lots along SE Hawthorne between SE 50<sup>th</sup> and SE 51<sup>st</sup>, to the lowest intensity commercial designation available, "Mixed Use -- Neighborhood" on the Comp Plan Map with CM1 on the zoning map, while also adding a Design "d" overlay.
- **Explanation** - We understand Staff's first recommendation for this area was to designate it "Mixed Use -- Urban Center" specifically because MU-UC automatically carries the Design overlay to this sensitive location. MTNA is not comfortable with the building heights permitted with bonuses via the MU-UC designation. We agree the Design overlay is highly appropriate at this location because the transition between commercial and immediately adjacent residential is so sensitive, but we seek its application without having to compromise on the appropriate Comp Plan Map designation.

The "d" overlay is not currently being applied automatically to the new MU-Neighborhood properties, despite these being sensitive locations throughout the city. We are told by Planning staff that while they'd like to blanket the Design overlay on all MU-Neighborhood lots because of their sensitivity, the case load that implies was rejected by an understaffed BDS. We were told that if we'd like to definitely secure the Design overlay for these lots, we'd have to 1) accept the less appropriate MU-UC on the Comp Plan Map, or 2) make a special request for a site-specific adjustment to apply the Design overlay to these lots. Our "Community Supported Option" above asks for the MU-Neighborhood designation that is most appropriate here, with a special (yet logical) application of the Design overlay.

**Contact:** Stephanie Stewart with MTNA. 503-230-9364; [stewartstclair@gmail.com](mailto:stewartstclair@gmail.com)

Upper Hawthorne - MAP

Google Maps 5011 SE Hawthorne Blvd



Imagery ©2016 Google, Map data ©2016 Google 100 ft

- Higher intensity Commercial
- Lower intensity Commercial; amendment #F01, supported by MTNA
- 5011 SE Hawthorne; we request this lot be added to #F01 tax lots



Google Maps

Testifier	Date	District	Neighborhood	Address	Zipcode	City	Comment	State ID
Margot Black	4/22/2016	Southeast	Eastmoreland	2244 SW Vermont	97219	Portland	This proposed down-zoning is exclusionary, unjustifiable, and unconscionable. It protects vast land grab by the wealthiest Portlanders and completely denies the call for density, multifamily housing, and diverse mixed income neighborhoods. How can we possibly act as though this is reasonable? It's like keeping the estate's expansive lawn been during an historic drought.	1S1E24AC 6500
James Smith	4/22/2016	Southeast	Mt. Tabor	424 SE 50th Ave	97215	Portland	The proposed change of the Portland Nursery site to commercial would grant the property unfettered development potential within the neighborhood. Planning Staff's recommendation to allow the nursery as a conditional use is a far better solution in that it both provides a path to the land/business owner for land use approval of their use, it also ensures that the surrounding residential property owners have a voice in the approval process. While Portland Nursery is broadly supported by the neighborhood the potential legacy for future commercial uses of the property under a commercial zone are very troubling for the neighborhood. Please reject this proposal and instead follow Planning Staff's proposal to grant conditional use.	1S2E06BA 1200
Paul Jeffery	4/22/2016	Southeast	Eastmoreland	4002 SE Salmon St	97214	Portland	Why, with the greatest housing crisis in memory, does Portland want to downzone a whole section of town to benefit only one group of people: wealthy property owners? There are ZERO other people this benefits. The Mayor speaks of concern about the homeless issue, and I think he's being genuine, but surely he must realize that housing supply restrictions—even at the upper end—have a negative effect on whether people at the bottom end of the market can afford to stay in a home. Mayor Hales, show some leadership and show by example that your own neighborhood is an integral part of the overall housing supply in PDX, and if the city must address this as a whole, YOUR neighborhood cannot work against any solution. If you ask anything from us, you must also be willing to give the same from yourself.	1S1E24CA 2800
Paul Jeffery	4/22/2016	Southeast	Eastmoreland	4002 SE Salmon St	97214	Portland	Why, with the greatest housing crisis in memory, does Portland want to downzone a whole section of town to benefit only one group of people: wealthy property owners? There are ZERO other people this benefits. The Mayor speaks of concern about the homeless issue, and I think he's being genuine, but surely he must realize that housing supply restrictions—even at the upper end—have a negative effect on whether people at the bottom end of the market can afford to stay in a home. Mayor Hales, show some leadership and show by example that your own neighborhood is an integral part of the overall housing supply in PDX, and if the city must address this as a whole, YOUR neighborhood cannot work against any solution. If you ask anything from us, you must also be willing to give the same from yourself.	1S1E24CA 2800



Testifier	Date	District	Neighborhood	Address	Zipcode	City	Comment	State ID
Benjamin Kerensa	4/23/2016	Southeast	Eastmoreland	351 NE 78th Avenue	97213	Portland	I oppose the proposed amendment by Mayor Hales and Eastmoreland NA Chair which would exclude Eastmoreland from having higher density and downgrade density. This is NIMBYism and privilege of a white wealthy neighborhood exercising its political influence and the Mayor trying to prevent the density our city frankly needs.  All neighborhoods needs to share density and just because a neighborhood is affluent and the mayor lives there does not mean it should get a pass.	1S1E24AC 7100
Benjamin Kerensa	4/23/2016	East	Powellhurst-Gilbert	351 NE 78th Avenue	97213	Portland	I support a higher density designation here.	1S2E09BC 90000
Benjamin Kerensa	4/23/2016	East	Powellhurst-Gilbert	351 NE 78th Avenue	97213	Portland	I support a higher density designation here.	1S2E09BA 4500
Benjamin Kerensa	4/23/2016	East	Powellhurst-Gilbert	351 NE 78th Avenue	97213	Portland	I support a higher density designation here.	1S2E09BB 5606
Benjamin Kerensa	4/23/2016	Southeast	Mt. Tabor	351 NE 78th Avenue	97213	Portland	I support a higher density designation here.	1S2E05CD 3800
Benjamin Kerensa	4/23/2016	Southeast	North Tabor	351 NE 78th Avenue	97213	Portland	I support the current high density designation here.	1N2E31DA 18100
Benjamin Kerensa	4/23/2016	Southeast	North Tabor	351 NE 78th Avenue	97213	Portland	I support the current higher density designation here.	1N2E31DA 18100
Benjamin Kerensa	4/23/2016	Northeast	Rose City Park	351 NE 78th Avenue	97213	Portland	I support the current medium density designation.	1N2E31AA 14500
Benjamin Kerensa	4/23/2016	Northeast	Rose City Park	351 NE 78th Avenue	97213	Portland	I support the current high density designation.	1N2E31AA 16400
Benjamin Kerensa	4/23/2016	Northeast	Rose City Park	351 NE 78th Avenue	97213	Portland	I support the current high density designation	1N2E31AA 8200
Benjamin Kerensa	4/23/2016	Northeast	Madison South	351 NE 78th Avenue	97213	Portland	I support the current Urban Commercial and would encourage upgrade to allow dense housing.	1N2E29DD 10900

Testifier	Date	District	Neighborhood	Address	Zipcode	City	Comment	State ID
Benjamin Kerensa	4/23/2016	Northeast	Madison South	351 NE 78th Avenue	97213	Portland	I support the higher density designation	1N2E28CC 4700
Benjamin Kerensa	4/23/2016	Northeast	Madison South	351 NE 78th Avenue	97213	Portland	I support the proposed designation	1N2E28BC 3800
Benjamin Kerensa	4/23/2016	Southeast	Buckman	351 NE 78th Avenue	97213	Portland	I support the current higher density designation	1S1E02AB 7500
Benjamin Kerensa	4/23/2016	Southeast	Buckman	351 NE 78th Avenue	97213	Portland	I support the current higher density designation	1S1E02AB 6100
Benjamin Kerensa	4/23/2016	Southeast	Buckman	351 NE 78th Avenue	97213	Portland	I support the current higher density designation	1S1E02AB 6100
Benjamin Kerensa	4/23/2016	Southeast	Buckman	351 NE 78th Avenue	97213	Portland	I support the current designation and not the proposed change	1S1E02 102
virginia giusto	4/24/2016	East	Argay	2936 ne 162nd	97230	Portland	<p>Comment on S-9 Dan Saltzman admendment for K-Mart property off of NE 122nd and Sandy Blvd</p> <p>I believe the 13.5 acre K-Mart property on the western boundary of the one-square mile Argay neighborhood should be seen as one book-end of the neighborhood with the other book-end being the 22 acre farm-site at the eastern edge of the neighborhood going south from NE 145-147th and Sandy Blvd. The proposal for the farm site currently R-3 is to become mixed-employment (change 290) and zone R-5 (change 688) misses an opportunity to make this parcel a walkable community.....it is on a corner but has no commercial services. The K-Mart property with S-9 could become monoculture with mixed use being only apartments. Thus, my recommendation is to have the K-Mart property absorb some of the mixed employment land on NE 147th and the 147th property along Sandy gets some of the K-Mart mixed-use zone.</p> <p>Both should have some middle density housing for condos, townhouses and duplexes, R-3 added. The R-5 on the farm land should be eliminated because it duplicates the concentration of single-family homes already in Argay and does not add needed density or affordability.</p> <p>From: Virginia Giusto 2936 NE 162nd (97230) 503 320 0038</p> <p>The Giusto and Rossi families have owned the property on the SW corner of NE 147th since the mid 1949s.</p>	1N2E23BC 1100

Testifier	Date	District	Neighborhood	Address	Zipcode	City	Comment	State ID
Anne Richards	4/25/2016	Southeast	Eastmoreland	7032 N. Omaha Ave.	97217	Portland	I am very troubled by Mayor Hales' advocacy for reduced density in his own neighborhood, Eastmoreland. Here in much less wealthy Arbor Lodge in North Portland our density has increased while homeless camps are permitted to set up in our neighborhood. The mayor's decision smacks of conflict of interest and abuse of the public trust, at the minimum. It preserves the wealthy and inaccessible nature of Eastmoreland at a time the rest of the city is being asked to sacrifice.	1S1E24BD 9100
diana rempe	4/25/2016	Southeast	Eastmoreland	6356 N wilbur Ave	97217	Portland	I do not understand why Eastmoreland is slated to be downzoned, as Portland experiences out-of-control housing prices. We who live in less affluent neighborhoods are seeing our density increase and Eastmoreland should be no exception. This feels like the wealthy are receiving preferential treatment and I would love a meaningful explanation AND the cancellation of this plan. Thank you.	1S1E24BD 6500

Testifier	Date	District	Neighborhood	Address	Zipcode	City	Comment	State ID
John Rush (1/4)	4/26/2016	West	Sylvan-Highlands	6060 SW Mill Street	97221	Portland	<p>City Council Members,</p> <p>We are writing to express our continued opposition to the proposed rezoning of the property located at 6141 SW Canyon Ct and to the process by which this was proposed as an amendment to the Comprehensive Plan by Commissioner Novick. We have provided comments to the Bureau of Planning and Sustainability in March, 2015 and provided testimony (both written and in Council session) in November, 2015 as part of the planning process. Both testimony letters are attached to the submitted email for reference.</p> <p>Overall, we strongly oppose rezoning of the property at 6141 SW Canyon Ct without proper and due process for neighbors to hear, see and engage in a dialog about the merits and costs of re-zoning the property. Overall, this proposed change does not belong in the Comprehensive Planning process at all. The property has a "Combined Opportunity Map Score" of 2 on a scale of 1 to 5, it is the only residential property within the SHNA boundary to have a change suggested (and only through the action of the developer and a single City Council member) and no true analysis was completed to look at the impact the proposed change will have to the neighborhood in light of other, already approved, changes that will drastically impact the neighborhood and the safety, transportation and parking infrastructure of a single, highly bottlenecked street and dangerous intersection at East Sylvan School.</p> <p>Commissioner Novick has proposed his amendment even though the Bureau of Planning and Sustainability recommended no change to the zoning for the property (currently zoned R20) and there has been significant neighborhood opposition due to lack of a comprehensive analysis about the impact of this and other significant development on a single access, dead end street (SW Canyon Ct). Since the rezoning proposal and proposed amendment have been part of the Comprehensive Planning process, no specific notice about the potential change has been sent to affected neighbors. In fact, all matters about this proposal have been much less than transparent. Correspondence and "proposals" have been hidden in brief live testimony, carried out in meetings not noticed to the neighborhood or to the public, and testimony has been buried in thousands of pages of general Comprehensive Plan testimony.</p>	1S1E06CB 2200
John Rush (2/4)	4/26/2016	West	Sylvan-Highlands	6060 SW Mill Street	97221	Portland	<p>From our personal perspective, we believe that a zoning change for this property does not belong in the Comprehensive Plan in any fashion and the proposed zoning change should follow the standard Type III process required for requesting a zoning change. A Type III process better addresses re-zoning of a single property and that process requires notification to neighbors, pre-conference hearings and open hearings to allow proper discussion and dialog about the proposed change, rather than being added as a "rider" to the Comprehensive Plan process.</p>	

Testifier	Date	District	Neighborhood	Address	Zipcode	City	Comment	State ID
John Rush (3/4)	4/26/2016	West	Sylvan-Highlands	6060 SW Mill Street	97221	Portland	<p>The property owner made his proposal as part of the Comprehensive Planning process. The Bureau of Planning and Sustainability thoughtfully considered the proposal and concluded:</p> <p>"This site is not in a proposed center or corridor and transit options are limited. Although there are some commercial services within ¼ mile, the transportation infrastructure is congested and any changes merit consideration of a broader, more cohesive area."</p> <p>Many neighbors have voiced their concerns about the impact of increased density for this property and impact on the neighborhood infrastructure, especially in light of the approved development of 244 apartment units immediately to the west that will impact that same infrastructure (mainly SW Canyon Ct and the intersection at East Sylvan School).</p> <p>Even though the Planning process had been followed and the planning experts in the Bureau of Planning and Sustainability concluded that no zoning change is appropriate for this property without broader consideration of the impact on transportation and parking infrastructure, Commissioner Novick decided that a zoning change is appropriate in this case.</p>	
John Rush (4/4)	4/26/2016	West	Sylvan-Highlands	6060 SW Mill Street	97221	Portland	<p>This decision directly contradicts the analysis of the planning experts, the concerns of neighbors directly impacted and totally circumvents an established process for requesting a zoning change. This is the only requested change for a residential property within the entire SHNA boundary considered during the Comprehensive Planning process. The proposed change was driven only by the wishes of the property owner and not as a result of neighborhood requests or the result of planning analysis. There is nothing comprehensive about this proposed change or about Commissioner Novick's proposed amendment to the Comprehensive plan for this single property. Further, the method by which the amendment has been included in the final step of the Comprehensive Plan process reeks of developer favoritism and back-office politics over open and transparent process and neighborhood involvement. In addition, circumvention of the regular Type III review robs the City of Portland of more than \$15,000 in fees that would be required through the standard procedures; funds the City explains it dearly needs.</p> <p>In our opinion, the City Council should deny the proposed amendment and direct the property owner to pursue a zoning change request through the standard Type III process which includes notification to neighbors and transparent discussions about the merits of the proposed change. Sincerely, John Rush and Alicia Ahn</p>	

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Doug Klotz	4/26/2016	Southeast	Eastmoreland	1908 SE 35th Pl	97214	Portland	For the record, I oppose the downzoning or down-designating of the Eastmoreland neighborhood from R-5 to R-7.	1S1E24BA 2600
Brian Cefola	4/27/2016	Southeast	Eastmoreland	3244 NE Schuyler Street	97212	Portland	The city in recent years has made massive investments in nearby Westmoreland Park and the Orange Line. We should be looking for ways to expand access to those amenities by allowing more people to live near them. M74 does the opposite: it raises the minimum land purchase required for homeownership, restricting residency to a wealthier class.  Eastmoreland should be a city neighborhood, not a private country club. I urge you to reject Amendment M74.	1S1E24BD 5800
Christopher Coiner	4/27/2016	Northeast	Madison South	8510 NE Brazee st	97220	Portland	I think this zoning may be inappropriate in this area without a major commercial center. I would support residential use only if accompanied with ground floor retail of some kind. This should be zoned to reflect the need and desire for this neighborhood to have a more pedestrian focus. This being one of the last brownfields in Portland and an anchor for the area, it should be developed to reflect the surrounding values. A development of small housing isn't it.	1N2E28BC 400
Thomas Karwaki	4/27/2016	North	Hayden Island	7139 N. Macrum	97203	Portland	NPLUG and the NPNS Chairs Coalition support changing this to Commercial-Neighborhood Center.	2N1E34C 604
Thomas Karwaki	4/27/2016	North	University Park	7139 N. Macrum	97203	Portland	The UPNA Land Use Committee and Board and General Membership have voted several times to support this change from commercial property to residential. This reflects what is actually built. The change will increase bicycle and pedestrian and vehicular safety. This a blind curve onto a private bridge. There is substantial commercial near by. The neighborhood also objected to commercial at this location in the 1980 Comp Plan. Significant stormwater issues make this a difficult set of properties to be developed for commercial mixed use .	1N1E07CB 7000
Kimberly Botter	4/27/2016	Northeast	Madison South	3426 NE 88th Ave	97220	Portland	I also feel this designation is inappropriate for this location. I believe CM2 with Neighborhood Center overlay would be more appropriate. This would provide continuity with the designation and the newly added Neighborhood Center overlay on 82nd from around Beech to Siskiyou and would be in line with desires of the community to have a more pedestrian focus. I would support residential housing units above a commercial storefront with ground floor windows. This is large tract of land and needs to be thoughtfully planned to benefit the Madison South and Roseway neighborhoods with input from surrounding community. This area already had community feedback through PSU planning process called 'Imagine 82nd'. I urge city officials to reference this document which is still relevant to community desires.	1N2E28BC 400
April Epperson	4/27/2016	Northeast	Madison South	8348 ne schuyler	97220	Portland	I would love to see affordable housing in this lot. Town homes would be my preference but not opposed to apartments if they are over business space.	1N2E28BC 400