From:

Lauren Danahy <info@willamettenurseconsultantgroup.com>

Sent:

Friday, January 08, 2016 5:59 PM

To: Cc: BPS Comprehensive Plan Testimony lauren@danahy.net

Subject:

City Council meeting on 1/7

Importance:

High

To Whom It May Concern:

5112 SW News # Blud PDX 97221

I attended the City Council Meeting on 1/7 at SEI. I was unable to sign up to provide testimony due to the large number of people that were there with "End Displacement" stickers worn on their clothing. It was swarming with people and we ran out of time to sign up. There were others that also wanted to sign up and weren't able to either.

As I sat in the entire meeting, listening/observing, I realized that the "End Displacement" (E.D.) folks had organized some group to attend this hearing.

I would like to say that although there were other issues discussed at the meeting, the E.D. folks monopolized the ENTIRE meeting. I don't find this fair. I was further shocked to watch as they left "en mass" once their issues/items were well-represented, i.e. once they had all testified. At a certain point in the meeting, I realized this had occurred as the auditorium was then half full vs. the standing room only initially when it started.

I was heartbroken that they ran out of time to hear the rest of people as the issue I had attended was never even broached by anyone! I was thrilled when they announced they are having another meeting next Wed night at City Hall from 4p-7p to accommodate more testimony.

I would like to request that my name be added to the list of citizens that would like to testify. The issue that I am speaking on is the Strohecker's grocery store property.

Please let me know if I am able to be added to this list via this mechanism, or if I need to do it some other way.

Thank you for your time and assistance in this process.

Sincerely, Lauren Danahy

Lauren Danahy, RN, BS, MBA, CCM, LNCC Disability & Catastrophic Nurse Case Manager Legal Nurse Consultant Principal of Willamette Nurse Consultant Group LLC p.971.777.2687

## f.503.345.7200

URL: www.willamettenurseconsultantgroup.com

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From:

Hales, Mayor

Sent:

Friday, January 08, 2016 2:54 PM BPS Comprehensive Plan Testimony

To:

bra complehensi

Subject:

Thomas Karwaki
FW: Comprehensive Plan -- North Portland Land Use Group & Neighborhood Chairs

Request for Health Overlay addition

Attachments:

NPLUG\_HealthOverlay Final.docx

Dear Thomas,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

From: Thomas Karwaki [mailto:karwaki@yahoo.com]

Sent: Thursday, January 07, 2016 4:07 PM

To: Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>.commissioner <dan@portlandoregon.gov>.commissioner <dan@portlandoregon.gov>.commissioner <dan@portlandoregon.gov>.commissioner <dan@portlandoregon.gov>.commissioner <dan@portlandoregon.gov>.commissioner

Cc: Lum, Leslie <Leslie, Lum@portlandoregon.gov>; Kelley, Mary <mary@npnscommunity.org>

Subject: Comprehensive Plan -- North Portland Land Use Group & Neighborhood Chairs Request for Health Overlay addition

City Council Members,

The North Portland Land Use Group which includes all of the land use committee chairs of North Portland and the North Portland Neighborhood Associations Chairs request that a Health Overlay be included within the Comprehensive Plan for all of North Portland. This proposal is found below and in a Word attachment.

Thomas Karwaki

7139 N. Macrum Ae.

Portland, OR 97203

Land Use Chair, University Park Neighborhood Association

253.318.2075

Subject: Health Overlay Zone

Introduction Ordinance 187832, Vol. 1.3.J, page 6822

North Portland is a vibrant, diverse community of single and multi-family homes, commercial centers, and industrial preserves situated at the confluence of the Columbia and Willamette rivers. Our eleven neighborhoods face increasing growth and density in the coming years. The City of Portland Comprehensive Plan identifies inner neighborhood areas such as North Portland as ideal for increased density. The plan recognizes, however, that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers.

In order to meet the coming growth in our community without compromising the health and well being of our residents, North Portland's neighborhood representatives recommend a health overlay zone. This zone applies specific land use, design, and monitoring requirements on new development in North Portland to mitigate negative health and safety impacts. The health overlay zone supports a vision along with goals and strategies outlined below that together preserve and enhance our way of life while accommodating new development in our community.

Our community draws inspiration for our recommendations from two key sources. Portland's comprehensive plan update, Policy 4.28.d, encourages design and land use patterns that mitigate negative air quality and noise impacts in Portland neighborhoods, especially near high vehicle traffic areas, and other sources of air pollution. Similarly, Portland's Climate Action Plan (CAP) goals 1-4 aim to reduce the environmental impacts of new development through more sustainable land use and design principles.

#### Vision

A North Portland community that preserves and enhances the health and well being of its residents while accommodating growth and density needs.

#### Goals

To achieve our vision, North Portland's neighborhoods propose the following three goals:

- Better Air and Water Quality: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on energy demand, air conditioning use, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality.
- Reduced Noise Pollution: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- Increased Safety: Land use, design, and monitoring requirements that reduce or minimize the negative impact of
  future development on criminal activity and emergency preparedness.

### Strategies

Goals provide benchmarks by which to measure progress towards our vision. Each goal, however, is supported by specific, actionable strategies that residents, community leaders, and City of Portland staff can use to better our community. We provide an illustrative list of strategies below based on NPLUG discussions, but we expect individual neighborhood association meetings to generate and refine strategies to best fit our community vision.

### Better Air and Water Quality

- Improve storm water management design standards for new developments
- · Require air filtration in all new residential developments
- Improve ventilation requirements for new residential developments
- · Require building features that facilitate less energy use
- · Require moisture-infiltration and ventilation features that reduce mold formation
- Eliminate exposure to harmful asbestos materials 78.32.

   Install traffic-calming, pedestrali, and bicycle features formaning the use of single occupancy vehicles (SOVs)

- Install more and better transit infrastructure to encourage more energy-efficient transportation modes
- · Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments
- · Install air-monitoring stations in North Portland neighborhoods

### Reduced Noise Pollution

- Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

## Increased Safety

- Educate residents on emergency preparedness procedures
- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

### Conclusion

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.

Subject: Health Overlay Zone

#### Introduction

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#### Vision

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To achieve our vision, North Portland's neighborhoods propose the following three goals:

Better Air and Water Quality: Land use, design, and monitoring requirements that reduce or
minimize the negative impact of future development on energy demand, air conditioning use,
air pollution and greenhouse gas emissions, heat-related illness and mortality, and water
quality. Ordinance 187832, Vol. 1.3.J, page 6825

- Reduced Noise Pollution: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- Increased Safety: Land use, design, and monitoring requirements that reduce or minimize the
  negative impact of future development on criminal activity and emergency preparedness.

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- Install traffic-calming, pedestrian, and bicycle features to minimize the use of single-occupancy vehicles (SOVs)
- Install more and better transit infrastructure to encourage more energy-efficient transportation modes
- · Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments
- Install air-monitoring stations in North Portland neighborhoods<sup>1</sup>

### Reduced Noise Pollution

- · Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

# Increased Safety

· Educate residents on emergency preparedness procedures

<sup>&</sup>lt;sup>1</sup> Monitoring stations do not directly affect air quality, but do allow for on-going evaluation of air quality **Ordinance** 187832, Vol. 1.3.J, page 6826

- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- · Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

### Conclusion

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.

From:

Hales, Mayor

Sent:

Friday, January 08, 2016 2:52 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

FW: University Park Neighborhood Association Comments on Comprehensive Plan

Attachments:

UPNA comments on Comprehensive Plan 1.7.16.docx

From: Thomas Karwaki [mailto:karwaki@yahoo.com]

Sent: Thursday, January 07, 2016 5:46 PM

To: Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>;

Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Cc: Lum. Leslie <Leslie.Lum@portlandoregon.gov>

Subject: University Park Neighborhood Association Comments on Comprehensive Plan

Below and attached are the comments of the UPNA to be submitted into the record.

Tom Karwaki is authorized to represent the UPNA tonight.

UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION

TESTIMONY on COMPREHENSIVE PLAN

January 7, 2016

The Board of the University Park Neighborhood and its Land Use Committee requests that you consider the following comments and concerns about the proposed Comprehensive Plan.

1) The Water Bureau property known as the Carey Boulevard property be zoned OPEN SPACE.

The creation of the Mid Peninsula Trail has created a park like setting. The UPNA's comments to the Planning and Sustainability Commission requested that this land be OPEN SPACE. Alternatively, the UPNA requests that the current R5 zoning be maintained and that the one R2 parcel be rezoned to R5.

This request is based on two heritage trees being on the property, its historical use as a park, and the Equity Goals of the Comprehensive Plan. Two hundred years of experience show that Railroads and Residential Housing are not compatable. This is one of the few parcels in the City of Portland where no residences abut railroad lines. In addition, upzoning to allow multifamily housing would create an inequity — the poorest residents in the neighborhood would live adjacent to a rail line, in an area which already has some of the worst air quality in the US.

This set of parcels is used by over 1200 people every day in the summer to walk dogs, run, bike, play ball, or enjoy the birds and fauna (August 2015 activity census performed by UPNA). It is also used by over 20 and as many as 50 houseless individuals each day of the year.

- 2) The UPNA Board strongly urges the City Council to FIX a problem created by the current Comprehensive Plan south of Willamette Boulevard and to the east of the railroad line. Five residences are zoned Commercial. The City does not own the bridge and there is a dangerous blind curve at this location which makes vehicular and pedestrian access very difficult. We request that this be DOWNZONED to R5. The addresses of the subject properties are: 6858, 6946, 6838,6832 and 6822 N. Willamette Blvd.
- 3) The UPNA Board urges the City to rezone the property south of Oberlin and east of Minerva to R5 to be consistent with the rest of the zoning west of Macrum Ave.

- 4) The UPNA Board DOES NOT support the creation of an Institutional Campus Zone, but WEAKLY SUPPORTS the reclassification of the Baxter-McCormick property as proposed by the proposed Comprehensive Plan to a lower than Industrial employment zone. The UPNA preferred option is to Reclassify and ReZone the Baxter-McCormick property to OPEN SPACE.
- 5) The UPNA Board and Land Use and Open Space Committees supports the proposed rezoning and reclassification from Industrial to Open Space of a parcel of land south of Willamette Blvd.
- 6) The UPNA Board supports the proposed replacement of the viaduct on Willamette Blvd, the replacement of a private bridge across the railroad on Willamette Blvd. and rail line improvements. It also supports the proposed watershed infrastructure improvements.
- 7) The Map App did not work properly initially and even in its latest version is difficult to use, loses input and is user unfriendly. It isn't alway clear what map is being examined, the directions were unclear and it wasn't available in any languages other than English. This suggests that it did not adhere to the goals for inclusivity and community input found in the Comprehensive Plan.
- 8) The UPNA Board and Land Use Committee strongly supports the inclusion of a Health Overlay for North Portland as proposed by the North Portland Land Use Group and Neighborhood Association Chairs.

Submitted,
Thomas Karwaki
University Park Neighborhood Association Vice Chair & Land Use Committee Chair
7139 N. Macrum Ave
Portland OR 97203
253-318-2075 cell
karwaki@yahoo.com

UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION

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Comprehensive Plan.

8) The UPNA Board and Land Use Committee strongly supports the inclusion of a Health Overlay for North Portland as proposed by the North Portland Land Use Group and Neighborhood

Association Chairs.

Submitted.

Thomas Karwaki

University Park Neighborhood Association Vice Chair & Land Use Committee Chair

7139 N. Macrum Ave

Portland OR 97203

253-318-2075 cell

karwaki@yahoo.com

Michael S. Harrison, FAICP Harrison Consulting 837 NW 25th Ave Portland, Oregon 97210

To: His Honor Charlie Hales, Mayor and the Portland City Council Commissioner Nick Fish Commissioner Amanda Fritz Commissioner Steve Novick Commissioner Dan Saltzman

1221 SW 4th Ave, Room 340 Portland OR 97204

Re: Portland Comprehensive Plan Update's impact on the Eliot Neighborhood.

Dear Mayor and City Council,

I urge you to not to rezone the southern part of the Eliot neighborhood from R2 to R2.5, as is proposed in the current version of Comprehensive Plan update.

My Eliot, relationship extends back to 1976 when, as a Portland City Planner, I was assigned the task of preparing the Model Cities Policy Plan for City Council adoption. The plan was approved by the Planning Commission and forwarded to the City Council, but the Council declined to consider the plan because the bulk of the plan's content was focused on social service and education issues, which were considered the responsibility of the County. At the time, the separation of City and County roles in social service provision was recent.

The major issue in Eliot was an unmet commitments made by the City through the Portland Development Commission as part of the Emanuel Hospital urban Renew Plan and district. Changes to Urban Renewal funding, at the federal level, made implementation of the Renewal Plan imposable. The plan was to clear most housing in Eliot to make way for job generating hospital expansion and construction of new housing. Clearance was the only part of the plan carried out. Roughly, 350 families were displaced and their homes cleared in Eliot to make way for development of jobs and housing that never came. Many who were forced to relocate had perversely been forced to relocate to make way for 1-5 Freeway, the School Districts Blanchard Center and the Memorial Coliseum

Some years later, (1989) I was given the task of developing what became known as the Albina Community Plan. The Albina Plan included all of the Eliot Neighborhood as well as all of 15 other North and Northeast Portland neighborhoods. A condition

for participation in the Albina Plan placed on neighborhoods was to find a way increase their potential for housing development by ten percent. Some neighborhoods embraced the requirement, as Eliot did and ultimately all the Albina Neighborhoods met the ten percent increase benchmark.

When Eliot considering where to put the additional housing one area the neighborhood suggested was the southern part of Eliot where Additional housing was perceived as needed to stop or reduce development pressure for additional clearance and development for service business and warehousing. Such a shift would was seen as further threaten the Eliot's identity as a residential neighborhood.

The southern lots of Eliot are deep, 125 feet, making it difficult to develop the maximum density allowed with row-house projects. A full range of potential residential zones was considered, including R2 and R2.5. The R2.5 zone was rejected for two primary reasons; it is a zone where density is controlled by street frontage and not lot area, and it is a zone that emphasizes single-family development. Eliot residents wanted to increase diversity as well as population in and the increase in expected new housing in R2 was higher than under R2.5 because largely due to the R2 zones openness to condo and apartment markets.

The area having been red Lined retarded housing development in Eliot at the time also by lenders. When the Albina plan was adopted in 1993, the market was only starting to consider new housing in Eliot. Since then local owners have invested significantly in new housing, in same case without the ability to gain bank financing. The proposed rezoning would make recent developments in compliance with the Albina plan and Eliot neighborhood Plan nonconforming and will reduced the value of the improvements made in the last decade.

A reason sited for the downzoning was to protect historic resources in the Eliot Conservation District. Such a downzoning would break faith with property ones who worked for the creation of the Conservation district after they were assured by the Landmarks Commission that creation of the district would not result un property being downzoned.

This downzoning fails to consider the work the neighborhood and City have done in the last twenty years to repair the damage to the community done by past City actions.

Than you.

Michael S. Harrison, FAICP

# Copy to

Charlie Hales, Mayor 1221 SW 4th Ave, Room 340 Portland OR 97204 503-823-4120

Amanda Fritz, Commissioner 1221 SW 4th Avenue, Room 220 Portland OR 97204 (503) 823-3008

Nick Fish, Commissioner 1221 S.W. 4th, Room 240 Portland OR 97204 (503) 823-3589

Steve Novick, Commissioner 1221 SW 4th Ave, Room 210 Portland OR 97204 (503) 823-4682

Dan Saltzman, Commissioner 1221 SW 4th Ave, Room 230 Portland OR 97204 (503) 823-4151

From:

Hales, Mayor

Sent:

Friday, January 08, 2016 2:49 PM

To:

Tanya March

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: 2035 Comprehensive Plan Comments

Dear Tanya,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. 'The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

From: Tanya March [mailto:tlm27@caa.columbia.edu]

Sent: Thursday, January 07, 2016 5:08 PM

To: Commissioner Fish <nick@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>;

Commissioner Novick <novick@portlandoregon.gov>

Cc: Fritz, Amanda < Amanda. Fritz@portlandoregon.gov>

Subject: 2035 Comprehensive Plan Comments

Dear Commissioner Nick Fish,

cc: Amanda Fritz, Chales Hales, Steve Novick,

Nick, I wanted to thank you for coming to my children's school (MLC) today and for teaching in the middle school. I think you heard from our librarian and others in our community the pain of urban density without proper planning for public school infrastructure.

The 2035 Comprehensive does not offer balanced thoughtful planning in the Alphabet Historic District between the needs for additional housing and the needs for the children of the new residents with out yards for easy access playground, transportation flexibility, and accessible public schools.

I need to jet to a Parks Committee meeting at City Hall I hope to make it to the tail end of tonights meeting at SEI, I just wanted to get on the record in regards to the Comp Plan since this could be my last chance to testify on this issue.

yours, Tanya March 8334 N. Hartman St.

From:

Hales, Mayor

Sent:

Friday, January 08, 2016 2:35 PM

To:

Robert Bernstein

Cc:

BPS Comprehensive Plan Testimony

Subject:

RE: my input in general re: comp plan..submitted 8:16pm 1/7/16

Dear Robert,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely,

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

From: Robert Bernstein [mailto:bobbo1946@yahoo.com]

Sent: Thursday, January 07, 2016 8:19 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Novick <novick@portlandoregon.gov>

Subject: my input in general re: comp plan..submitted 8:16pm 1/7/16

It would be nice if NE, albeit as gentrified as it is and North also, could feel the benefits of mixing upper and lower income. When I worked with families it was always distressing that the kids in, Columbia Villa, let's say..had few functional good, male role models..think it benefits both groups and the City. We are turning into a rich enclave.

I would like to see the adoption of the recommendations of the Division St. Design Initiative..as to protection of privacy, sun access, views, parking, neighborhood, "fit", relating building height to street width. Encourage preservation of older homes. Do what you can re: LUBA/Metro towards having more development a bit further out..let the developers pay for new infrastructure..

Real Protection for trees and Birds, not mitigation..unless it's "real" time.

Robert B. Bernstein

7415 SE Main St.

From:

Hales, Mayor

Sent:

Friday, January 08, 2016 2:14 PM

To:

Jan Roxburgh

Cc:

BPS Comprehensive Plan Testimony

Subject:

RE: Public Testimony for PCC Comprehensive Plan Hearing January 7, 2016

Dear Jan,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

From: Jan Roxburgh [mailto:hummingbirdzoo@yahoo.com]

Sent: Friday, January 08, 2016 1:47 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner <novick@portlandoregon.gov>; Commissioner <novick@portlandoregon.gov>; Commissioner <novick@portlandoregon.gov>; Commissioner <novick@portlandoregon.gov>; Commissioner <

Subject: Public Testimony for PCC Comprehensive Plan Hearing January 7, 2016

Public Testimony for PCC Comprehensive Plan Hearing on January 7, 2016,

6-9pm

Dear Mayor Hales and Commissioners Amanda Fritz, Nick Fish, Steve Novick, and Dan Satzman, and also the PSC Commissioners,

I sincerely thank you for recognizing the importance of protecting West Hayden Island from further industrial development, for the next 20 years. It means such a lot to residents on the island like me, and to so many others who care about retaining what remains of our precious and endangered natural areas in the Portland area.

I would like to suggest that having extra protections in place would be a good idea, such as giving a qualified organization, such as Audubon of Portland, the authority and responsibility of systematically monitoring the condition of the land and wildlife at regular intervals. This organization could be required to write a report on their findings which they then submitted to the Portland City Council. I suggest this because of my concerns of how West Hayden Island is already carrying a burden of huge piles of toxic river dredgings that have been placed by the Port of Portland, and according to SB412, the Port intends Ordinance 187832, Vol. 1.3.1, page 6838

1

to continue to dump dredgings there. I am also concerned that activity by the Port of Portland and others may have disrupted the nesting of Bald Eagles so that they left last year.

Thank you for your time and consideration.

Sincerely,

Jan Roxburgh 1503 N. Hayden Island Drive, Portland, OR 97217



This email has been sent from a virus-free computer protected by Avast. www.avast.com

From:

Brandon Spencer-Hartle < Brandon@restoreoregon.org>

Sent:

Friday, January 08, 2016 11:09 AM BPS Comprehensive Plan Testimony

To: Subject:

FW: Add to Record for 1/7/2016 Item 28

From: Brandon Spencer-Hartle

Sent: Friday, January 08, 2016 11:07 AM

To: 'Karla.Moore-Love@portlandoregon.gov' <Karla.Moore-Love@portlandoregon.gov>

Subject: Add to Record for 1/7/2016 Item 28

Please add the following to the record relative to Item 28 "Adopt a new Comprehensive Plan for the City of Portland, Oregon." The text is verbatim of verbal testimony provided at the January 7, 2016, hearing:

My name is Brandon Spencer-Hartle, I am here tonight representing Restore Oregon.

I am asking the Council to add an additional policy, a new Policy 4.55, to the Historic and Cultural Resources section of the proposed Comprehensive Plan. This addition would support a recent Land Use Board of Appeals opinion related to the use of historic resources. Historic resources that lack economic viability fall into demolition-by-neglect and risk being demolished in favor of more lucrative uses.

Please consider addition the following policy:

4.55. Economic Viability. Provide options and incentives to allow for the productive, reasonable, and/or adaptive reuse of historic resources.

While similar to current Policy 4.56, specific reference to economic viability is called for to set the framework for investing in historic resources and maximizing the use of them into the future. The above policy recommendation is adapted from Clackamas County's Comprehensive Plan, where it has been valuable in facilitating the reuse of complex historic resources.

Thank you, Brandon

Brandon Spencer-Hartle Senior Field Programs Manager Restore Oregon 503.946.6379 Preservation News & Events

From:

PDX Comp Plan

Sent:

Friday, January 08, 2016 10:11 AM BPS Comprehensive Plan Testimony

To: Subject:

FW: BPS Testimony for Tonight's Hearing January 7, 2016

This appears to be testimony.

Sara Wright p: (503) 823-7728

From: BPS Mailbox

Sent: Friday, January 08, 2016 8:54 AM

To: PDX Comp Plan <pdxcompplan@portlandoregon.gov>

Subject: FW: BPS Testimony for Tonight's Hearing January 7, 2016

NaTasha Gaskin City of Portland Bureau of Planning and Sustainability Ph: 503-823-7802

Follow us on <u>Twitter</u>: @PortlandBPS Subscribe to the <u>BPS Enews</u> Like us on <u>Facebook</u>

From: Katherine Wilson [mailto:katherinewil@gmail.com]

Sent: Thursday, January 07, 2016 11:50 PM

To: BPS Mailbox <<u>BPSMBX@portlandoregon.gov</u>>; Hales, Mayor <<u>mayorcharliehales@portlandoregon.gov</u>>; Cc: Commissioner Fish <<u>nick@portlandoregon.gov</u>>; Commissioner Fritz <<u>amanda@portlandoregon.gov</u>>; Commissioner Saltzman <<u>dan@portlandoregon.gov</u>>; Frost, Liam <<u>Liam.Frost@portlandoregon.gov</u>>; Frost,

Subject: BPS Testimony for Tonight's Hearing January 7, 2016

Dear Esteemed Mayor and City Council,

My name is Katherine Wilson. I was once nicknamed "The Godmother of Film in Oregon." My Nez Perce Elders gave me my Indian name of Redhawk.

I am also a 6<sup>th</sup> generation Oregonian on my Mother's side. My husband and I have commuted to work in Portland for 40-some years. We have worked on over 45 films in Portland alone. My husband has recently been working on "Grimm" for the last 5 years.

I am a screenplay writer and Producer. I worked on all 3 of Oregon's biggest Academy Award winners and it's largest grossing films. <a href="http://imdb.me/katherinewilson">http://imdb.me/katherinewilson</a>. My husband's credits are linked to mine under 'spouse': Philip Krysl.

I took the day off of editing my current film to drive 3 hours to Portland today to first visit with the Governor's Office of Film's Project Manager, and then with the Film Commissioner; as I was coming to testify at your hearing.

An elderly friend went at 4:30 to sign up for me while I drove there. But they wouldn't allow her to put my name on the list. I didn't get to testify.

I just got back. It's 10:30 pm. Mayor Charlie said we could write to you if we couldn't testify due to time limits. I hope I can get this to you before midnight!

But my heart was filled hearing this incredible community speak their hearts while I was there.

This is what I would have said: "I have something to offer all of you!" And it will meet almost every single goal in your Plan! (See below)

What's my plan? It's a vision I have had since 1973 when I started growing this industry:

SAVE TERMINAL ONE! Put it in a land bank. Lease it to the film industry! Why? Oregon's Film Industry needs a home, a studio, a central gathering place.

- Grimm tried to rent it. It's perfect AS IS for our INDUSTRY.
  - o Perfect for the Semi's who need access to the Freeways
  - $\circ\,$  Perfect for the various 12 separate film departments with its Garage doors for loading and unloading
  - o Perfect for building sets in.
  - o Will foster low carbon footprint with its proximity to the train station and Trimet. Ordinance 187832, Vol. 1.3.J, page 6842

- o Enough space for parking for cast, crew, trucks AND Semi's!
- o Near filmmakers' favorite restaurants and shopping!
- Space for moving vintage structures onto to create a back lot!
- o A place big enough to intern young people into the business
- o An eventual Tourism destination
- o A green industry,
- o But in an industrial area where we can use special effects
- A place with open sky for shooting, especially period pictures that need no modern telephone wires and cables.
- o Great light, clear fir, and non toxic building materials for sensitive artists

## Besides all that:

- o Keep this last piece of Portland land for the next 7 generations!
- o It is just a few hundred feet from a residential area.
- It could support bringing jobs by having space for large budget features

It meets the Zoning requirements with out being a typical industrial pollutant!

Here is how it meets the outcomes of YOUR plan (in italics), and I quote:

"Vision

Portland is a prosperous, healthy, equitable and resilient city where everyone has access to opportunity and is

engaged in shaping decisions that affect their lives. Guiding principles

Not just where but HOW Portland will grow. The Comprehensive Plan includes five Guiding Principles to recognize that implementation of this Plan must be balanced, integrated and multi-disciplinary. The influence of the

Guiding Principles is seen throughout the Plan as they shape many of the individual policies and projects.

# Economic Prosperity

Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

My husband makes \$100,000 a year driving a Set Dec truck with out a diploma!

Human Health

\*Avoid or minimize negative health impacts and improve opportunities for Portlanders to lead

healthy, active lives.

#### \*Environmental Health

Weave nature into the city and foster a healthy environment that sustains people, neighborhoods,

and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of

Portland's air, water and land.

## \*DON'T LET A TOXIC INDUSTRY BE THE HIGHEST BIDDER! Keep it off the market!

Equity

Promote equity and environmental justice by reducing disparities, minimizing burdens, extending

community benefits, increasing the amount of affordable housing, affirmatively furthering fair

housing, proactively fighting displacement, and improving socio-economic opportunities for

under-served and under-represented populations. ARTISTS and people of color.

Intentionally engage under-served and underrepresented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history.

Resilience

Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and built environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts. "

The Film Industry is one of Portland's fastest growing industries! Grimm <u>alone</u> brought \$250 MILLION into the Portland Metro's economy!

But, please, don't just do it for me, even though I need it for my next feature film, but because Portland needs it for its next feature film, tv series, the Film Industry Community needs it, and our Children and Grandchildren may eventually need it for other even more important reasons!

Thank you so much for your time. Please call me if I can answer any questions.

My Very Best,

Katherine Wilson

PO Box 398

Walterville, Oregon 97489

(541) 521-3378

From:

Hales, Mayor

Sent:

Friday, January 08, 2016 9:01 AM

To:

David Kemper

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: Comp Plan Testimony Irvington Historic District

Dear David,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

----Original Message-----

From: David Kemper [mailto:djk@djk.name]

Sent: Friday, January 08, 2016 7:53 AM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; commissioner-novick@portlandoregon.gov; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com> Subject: Comp Plan Testimony Irvington Historic District

Dear Mayor and Commissioners,

While this email may be too late, I am hoping to add my voice to the discussion regarding the proposed zoning change moving the commercial node at 15th and Brazee from R5 to CM1.

In summary: I am against the change.

This commercial node is a one-off single-story building in the middle of predominantly single-family homes. In its current state the commercial node blends as best it can with the surrounding houses, and its residential zoning curbs what can be done in that space (e.g., closure by 11PM vs. 2AM).

I was concerned when Hop House received a full liquor license; beer and wine was the limit at that location in the past. With commercial zoning, what could be next? A liquor store? The three businesses at that location appear to be working well with the current zoning.

There is an abundance of commercial property within easy walking distance of the commercial strips of Broadway and Fremont Streets. Please keep 15th and Brazee residential.

Thank you for your consideration. Ordinance 187832, Vol. 1.3.J, page 6846

David Kemper 2639 NE 16th Avenue Portland, OR 97212 503-282-0630

From:

Vijay Balakrishnan <br/> <br/>bvijaykr@gmail.com>

Sent:

Friday, January 08, 2016 8:54 AM BPS Comprehensive Plan Testimony

Subject:

Re: Comprehensive Plan testimony

Summary:

1. Enact a 24 month moratorium on big box apartment buildings - to be lifted when the comprehensive plan is enacted.

- 2. Support and implement the Division Design Initiatives Policy Recommendations and implement them in the Comprehensive Plan.
- 3. Run a City Government that is for the people, by the people and not just for the developers and their lobbyists.

Data from Division St shows 80% of renters/households in that sampled area use cars-this is after 2 years of social engineering there of buildings with no or minimal parking. I want a pollution free city and bike friendly neighborhood. But, there needs to be a balance. Hey developers-make your profits but also be socially responsible/accountable to the problems you leave behind for the neighborhood to deal with for years to come. The anonymous REIT's they flip to don't give a hoot about the neighborhood as long as they can get their steady monthly income from it.

We need Solar access right for neighborhoods affected by big box developments. We need proper notification mechanisms to neighbors at the Early Assistance stage of a development.

Vijay Balakrishnan Address: 4408 SE Morrison St Portland, OR 97215

On Thu, Jan 7, 2016 at 10:30 PM, Vijay Balakrishnan < <a href="mailto:bvijaykr@gmail.com">bvijaykr@gmail.com</a>> wrote: Summary:

- 1. Enact a 24 month moratorium on big box apartment buildings to be lifted when the comprehensive plan is enacted.
- Support and implement the Division Design Initiatives Policy Recommendations and implement them in the Comprehensive Plan.
- 3. Run a City Government that is for the people, by the people and not just for the developers and their lobbyists.

Data from Division St shows 80% of renters/households in that sampled area use cars-this is after 2 years of social engineering there of buildings with no or minimal parking. I want a pollution free city and bike friendly neighborhood. But, there needs to be a balance. Hey developers-make your profits but also be socially responsible/accountable to the problems you leave behind for the neighborhood to deal with for years to come. The anonymous REIT's they flip to don't give a hoot about the neighborhood as long as they can get their steady monthly income from it.

We need Solar access right for neighborhoods affected by big box developments. We need proper notification mechanisms to neighbors at the Early Assistance stage of a development.

From: Sent: Dori Lyon <dorilyon.lpc@gmail.com> Friday, January 08, 2016 8:49 AM BPS Comprehensive Plan Testimony

To: Subject:

Fwd: Comprehensive Plan Testimony

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

From: Dori Lyon <dorilyon.lpc@gmail.com>

Date: Fri, Jan 8, 2016 at 8:47 AM Subject: Comprehensive Plan Testimony To: cputestimony@portlandoregon.gov

# Hello,

I just want to add that before developers bull doze their way into our neighborhoods they need to have etiquette training.

For example, they need to obey the speed limits and not block drive ways or sidewalks when they are working on a project. If they are going to need more space they need to have adequate signs up for detours so drivers and pedestrians are not passing by when it is dangerous. For example, it would be best to block the street and reroute drivers if they are going to block the street for any length of time.

Also, it would be helpful if the developers notified the adjacent neighbors near the project about the start and expected end date of the proposed project.

Open communication about the project with the neighbors effected by the project needs to take priority. For instance, in my neighborhood there were 3 McMansions built. For over 6 months the neighbors had to deal with construction from this. I don't think they should be allowed to take that long on a project, holding the neighbors hostage to noise and disruption for that long.

It took them way too long since they did one house at a time. Neighbors had to deal with the noise, and commercial trucks in their area for over 6 months. If they have more then one home to develop in an area they need to do it all at once, not prolong the project for 6 or more months. Also, some kind of compensation for the neighbors during the disruption would be considerate: maybe a dinner voucher or grocery voucher..neighbors deserve some kind of compensation for putting up with the development in their once quiet neighborhoods.

Thanks for listening,

Dori Lyon 7006 NE Hassalo St. Portland, OR 97213 971-344-5714



January 8, 2016

Council Clerk 1221 SW 4th Ave, Room 130 Portland, OR 97204

Re: Public Comments on the Comp Plan Regarding Kaiser Towers properties along N Williams at NE Fremont and NE Ivy Street

Dear Portland City Council Members:

The following comments and recommendations from the Northeast Coalition of Neighborhoods (NECN) are submitted as part of the current testimony period for the Comprehensive Plan. Our comments focus on the parcels commonly known in the neighborhood as the "Kaiser Towers lots." We are formally requesting that City Council make no changes to the current zoning designation in the Comp Plan and Mixed Use Zones processes for these lots. The lots are located on North Williams Avenue and are bounded on the south by NE Ivy and to the North by NE Fremont. The lot Tax ID numbers are R103346, R103347, R308624, and R308625.

The group of lots noted above are currently recommended by the Planning and Sustainability Commission to be down-zoned from the RX zone with a design overlay to a high density residential RH zone. We can find ways to be supportive of the RX zoning for these lots with the handful of location specific limits City Council has explicitly placed on the properties because we feel that it retains a smaller scale mixed use potential. However, we cannot be supportive of any additional up-zoning to these lots because of the scale and use incompatibility of our neighborhood with neighboring single and two story homes, many from the late 1800's. Prior to the Council's decision to rezone these lots two and half years ago, their designation was R1. Radically revising the zoning of these lots will lead to a more uneven pattern of development between the long-time residents and the new, denser character of the area. Specifically, we are adamantly opposed to changing these lots to CM3 Zoning noted in the Mixed Use Zones efforts that link back to the Comp Plan.

Additionally, Rick Michaelson, past Planning Commission Chair and owner of part of the acreage in question, and NECN are in agreement that that the abutting R2 lot at 32 NE Fremont is currently R2 zoning and should remain R2 in the Comp Plan. It is in common ownership with most of the other lots noted above. It is known by the Multnomah County Tax Assessor as R103345. It should not be up-zoned in any way at this late point in the process, and would only come as a last-minute surprise to nearby neighbors.

NECN serves to amplify the voices of community members from twelve inner North and Northeast Portland neighborhoods. The comments included in this testimony were referred by our Land Use and Transportation Committee and were endorsed by the NECN Executive Committee members.

The NECN Board of Directors and our Land Use and Transportation Committee members thank you for your important work for the future of our city, and we appreciate your serious consideration of our comments.

Sincerely,

Alan Silver

Chair, NECN Board of Directors

From:

kammymatt@aol.com

Sent:

Thursday, January 07, 2016 10:58 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan

I am very concerned about the lack of thoughtful parking requirements for new high density housing on NE Halsey at 52nd (and on NE Sandy and NE Fremont) and the excessive emphasis on buildings that are over-sized for our modest, yet charming and heretofore livable and personal neighborhoods. I am mostly a bicycle commuter myself and a big fan of transit, but it is not realistic that new residents will not have cars, and when they do, they will congest our narrow streets with parked cars, disrupt our quiet and privacy, and diminish our quality of life. A reasonable amount of new parking, e.g. underground of new buildings, must be required. If not, traffic will worsen on now, quiet neighborhood streets with condo residents trolling for parking and the safety of our kids and adults will be affected, as will our ability to assure friends they can visit and find a place to park.

I am also very troubled by the wave of demolitions and re-building of houses completely beyond the scale of neighbor houses, and was very disappointed to learn that the proposed \$25K tax was rejected by City Council today. It should be expensive to tear down a perfectly good house, especially to offset the cost of waste disposal, etc to the community, not to mention dispersal of dangerous lead and asbestos and chemicals found in destroyed homes and diminished quality of life for neighbors when a giant home fills the lot. The environmental costs and carbon footprint of tear-downs and new building construction are astronomical. At the very least, deconstruction should be required and new homes should be limited to being no larger than the nearest, historic large home. Perhaps remodeling fees should be minimal to incentivize that over demolition. Home demolition is completely antithetical to our City's focus on sustainability and it negatively impacts neighbor's privacy, sun and light access and aesthetic and psychic experience. Portland is starting to feel as congested, unaffordable (does to large, high end development) and boxed in as Seattle and for the first time ever, I would consider moving away.

Lastly, I am very concerned about the increasing lack of affordable housing in Portland. The City must require each new development to include a meaningul percentage, e.g. 30%, of affordable housing in order to build. There is no reason to "give away the farm" since folks are clamoring to move here.

I fear that the developers have taken over City Council and our leaders have lost sight of what make Portland's neighborhood's great. Please protect the quality of life of old Portland.

Thank you for your attention,

Kammy Kern-Korot 3334 NE 61st Avenue Portland OR 97213

From:

Julia Hall <juliahall@cuneocellars.com>

Sent:

Thursday, January 07, 2016 10:37 PM BPS Comprehensive Plan Testimony

To: Subject:

Comprehensive Plan Testimony

To Whom it May Concern,

I am very concerned about the Stroheckers's Grocery at 2855 SW Patton Rd. property may be rezoned. I strongly recommend that the city council keep the Ordinance No. 155609 be kept intact.

From a concerned neighbor,

Julia and John Hall 5021 SW Maple Lane Portland, OR 97221 City of Portland Bureau of Planning and Sustainability Attn: Mixed Use Zones Project 1900 SW 4th Avenue Suite 7100 Portland, OR 97201

Re: Comments to Mixed Use Zones Project on Behalf of Pepsi Beverages Company

### Dear Portland City Council:

I am writing on behalf of Pepsi Beverages Company ("PBC") and we wish to make a statement on the record with the City Council for it to consider a change from the proposed Commercial/mixed use zones to a General Employment zoning with respect to the area where we currently operate two locations.

PBC supports the Mixed Use Zones Project ("MUZ") to implement Portland's new Comprehensive Plan to ensure the management of growth in Portland's neighborhood and communities and to provide long-term solutions to affordable housing and economic opportunities for well-paying jobs for its residents.

Our understanding is that we are now at a stage where the City Council is considering the Planning and Sustainability Commission's (PSC) Recommended Comprehensive Plan and Map, and that the PSC's recommended Comprehensive Plan designation for our site is Mixed Use — Urban Center. The issue is that PBC requires more flexibility to continue operations in the area and park heavy trucks and equipment on-site. Our understanding is that the PSC is considering changes to allow more flexibility for Warehouse and Freight Movement uses in the commercial/mixed use zones, but none of the commercial/mixed use zones will likely allow parking of heavy trucks. It is our understanding that the General Employment zones (EG1, EG2) will allow heavy truck parking with some limitations, however, this would require a change in designation from "Mixed Use — Urban Center" to "Mixed Employment" in order to allow the EG1 or EG2 zone to be implemented. PBC is formally requesting that the City Council consider implementing such a change.

Andrew Paget, Market Director, Oregon Market, Elizabeth Drown, Regional Product Availability Manager and Greg Haskin, PepsiCo Government Affairs Senior Director and I attended the Information Session on the Mixed Use Zones Project Discussion Draft of zoning code and map amendments on October 7<sup>th</sup>. Obviously these proposed changes are a concern for our current operations, future plans and their impact on our direct business footprint including the impact of nearby parking and transportation routes. We presently operate two locations, 2505 NE Pacific and 2627 NE Sandy Blvd in Portland, OR that are potentially impacted.

These locations are critical to our operations and PBC has been a viable business in Portland and in the State of Oregon for well over 50 years. We currently employ 232 full time employees. We are an integral part of the community in not only our day to day business operations but with our goodwill

City of Portland Bureau of Planning and Sustainability January 7, 2016 Page 2 of 3

towards the community. We have provided product donations to support the following in and around the Portland market:

- Centennial high school booster club
- Birch community services
- Friends of the Library
- Bureau of the Police/ Portland
- Colton FFA
- National Brain Tumor Society
- American Cancer Society/Oregon
- Washington County Justice
- Crimes Against Victims
- Sprague High school Booster Club
- Special Olympics
- Doernbechers Children's Hospital
- Portland Rose Festival
- Hydrocephalus Association
- Serendipity Center
- Serres Green House
- Clark County Veterans Association Center
- Chris Dudley Foundation for Diabetes
- Clackamas Emergency Services
- Adventist Medical Center
- St. Mary's home for boys

Our employees support and participate in the following:

- Leukemia & Lymphoma Society: 25+ employees signed up to take part in the Light the Night
   Walk on October 24th. Our location raised \$2,900 for the Leukemia & Lymphoma Society.
- Delete Blood Cancer: 55 employees registered as bone marrow donors.
- School Supply Drive: \$500+ donated in school supplies. The supplies will be allocated to high school teachers in the area.
- PepsiCo Feeds America: 20+ Employees attended the event to package food for the Oregon Food Bank, resulting in thousands of pounds of food for our fellow Portlanders!
- Ally Day: Recognition and celebration of the LGBT Community; showing support of equality and sensitivity in the workplace.

City of Portland Bureau of Planning and Sustainability January 7, 2016 Page 3 of 3

While considering these major zoning changes we believe it is also important to consider how businesses are currently operating in the community and how these changes have the potential to impact them. We think it is important to highlight all these activities to make sure that the City of Portland knows that we are not only a thriving distribution company that has been a staple in Portland for many years, but we are also making a difference in Portland for both our employees and the communities in which they live and work.

Can you please provide us with some written assurance that the City Council will consider our request to examine the proposed zoning change, or that the zoning changes recommended by the PSC will not impact our current operations.

Respectfully submitted,

Kevin FitzPatrick Supply Chain Operations Manager - GTM Pepsi Beverages Company

From:

Amy Brewer <amybrewer@clncsunnyside.net>

Sent:

Thursday, January 07, 2016 10:14 PM

Subject:

BPS Comprehensive Plan Testimony Fwd: Comprehensive Plan Testimony

Including address in signature.

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

From: Amy Brewer <amybrewer@clncsunnyside.net>

Date: Thu, Jan 7, 2016 at 10:12 PM Subject: Comprehensive Plan Testimony To: cputestimony@portlandoregon.gov

Amy Brewer, #25, further testimony - Enter in to testimony article "Sunnyside's Getting Darker" and my Letter to the Editor, both in the January, 2016 edition of The Southeast Examiner.

Extracting light equity from adjacent homes and creating premium investment products to be divested to undisclosed investors devalues the livability and value of Portland's family homes to the benefit of the international real estate investment market. This is not serving the citizens of Portland and is a business model that negatively impacts citizens today AND in the future for generations.

To address Mr. Novick's introduction in the meeting tonight, yes, development will happen. We want to share light and welcoming spaces with our new neighbors and continue to enhance our communities instead of darkening and devaluing them in the name of what's best for developer profits. Development has many shades of success, and they should be determined by the benefits received by the dwellers, neighbors and neighborhood. The answer to Portland density is design that creates heritage class buildings and is congruent and of benefit to the surrounding structures and neighborhood. Big box apartment buildings are punitive on the existing and future neighbors, and are designed specifically and exclusively in the interest of the selling to undisclosed investors on the international real estate investment market (Enter in to testimony article outlining Green Light Development business model - Burnside 26 apartments, whose 'Luke and Jess' video sparked backlash, sell for \$41.5 million, Oregonian, Luke Hamill, August 19, 2015).

 Enact a 24 month moratorium on big box apartment buildings - to be lifted when the comprehensive plan is enacted.

2. Support and implement the Division Design Initiatives Policy Recommendations and implement them in the Comprehensive Plan.

The current and future citizens of Portland will all benefit with light access and breathing room for existing and future neighbors. Save and protect the livability of our existing neighborhoods before it's too late.

Thank you.

Amy Brewer amybrewer@clncsunnyside.net Clear Light Neighborhood Coalition - Sunnyside

www.clncsunnyside.net

503.478.1997

CLNC works for transparency in the real estate development process, by supporting and implementing clear communication channels for neighbors who want to work with developers and governing agencies.

.

Amy Brewer

4408 SE Morrison Street

Portland OR 97215

amybrewer@clncsunnyside.net

Clear Light Neighborhood Coalition - Sunnyside

www.clncsunnyside.net

503.478.1997

CLNC works for transparency in the real estate development process, by supporting and implementing clear communication channels for neighbors who want to work with developers and governing agencies,

From: Heather FlintChatto <heather@newbuildings.org>

Sent: Thursday, January 07, 2016 9:44 PM
To: BPS Comprehensive Plan Testimony

Cc: Cunningham, Bill; Nettekoven, Linda; Manning, Barry; Adamsick, Claire; Mason, Vinh;

Stockton, Marty; Hales, Mayor

Subject: Solar Equity & Innovation Comp Plan Testimony

Attachments: Solar Policy - Comp Plan Comment Letter 1.7.2016.pdf

On behalf of myself, I am writing to submit the attached DRAFT "Equity & Innovation Solar Policy" Recommendations as testimony on the Comprehensive Plan.

Thank you for your consideration, Heather Flint Chatto, Urban Planner & Designer, LEED AP 2121 SE 32<sup>nd</sup> Avenue Portland OR 97214

P.S. I would have submitted it in person but they were turning people away at the hearing.

January 7, 2016

RE: Portland Solar Equity & Innovation Policy

Portland City Council members:

As an urban designer, former comprehensive planner, and sustainability and environmental policy professional for over 17 years, I would like to advocate for your attention to a critical environmental and urban planning issue that needs attention now as part of your policy adoption efforts being considered while undertaking the Comprehensive Plan update: Solar equity, energy efficiency, climate protection, and community resiliency.

As our populations grow, and our urban sphere expands upwards to maintain our urban growth boundary, we are in need of more policy tools in our toolbox to ensure we are supporting our goals for <u>both</u> livability and density. From the hundreds of survey responses received from the Division Perceptions Survey about the negative impacts of recent development, there is a deep and widely held concern that we are moving backwards on livability, something we are so famous for that is indeed part of our brand and identity here in this great City.

The attached draft "Solar Equity and Innovation Policy" recommendations (while still in progress) should be considered for inclusion in the Comprehensive Plan Update and the Mixed Use Zoning proposals. As supporting background, I have also including some the preliminary solar analysis which demonstrates that:

- Buildings built too tall on narrow east-west streets create a significant solar impact.
- A significant amount of radial benefit is lost when blocking 20-35 degree sun angles on narrow E-W streets with 60' ROW.

A solar policy like the attached draft recommendations could help achieve more context-sensitive development and will go a long way towards <u>engendering more broad support of mixed use density by existing communities</u> as well as supporting more energy savings and resilience within our residential neighborhoods as well. Given Comprehensive Planning goals for increased density, as well as resiliency and livability, and existing precedents in other Oregon communities, it is recommended that there be further consideration of a solar equity and innovation policy for Portland.

The attached Climate Action Plan letter from NBI also documents the OR state statute that allows for solar access policies to be enacted by cities and counties and lists some recommendations for next steps.

Thank you for your attention to these draft policy recommendations. I encourage you to continue to be bold in your approach to livability and to further advance our national legacy of leadership in Portland.

Thank you so much for your community dedication and long-term vision,

Heather Flint Chatto, LEED AP, Urban Planner & Designer 2121 SE 32<sup>nd</sup> Avenue Portland, OR 97214

# Portland Solar Equity & Innovation Policy for Consideration in the Comprehensive Plan Update PRELIMINARY DRAFT 1.7.16

#### GOALS

- 1. Maintain Quality Access to Air & Light (Equity)
- 2. Encourage Climate and Community Resiliency through Innovative Energy Efficient Building Design (Environment)
  - a. Provide incentives and bonuses for net zero energy and other ultra-low energy, verified, high performance buildings
- 3. Retain Value for Commercial & Residential (Economy)
  - a. Properties
  - b. Energy Generation/Solar (Hot water & PV)
  - c. Energy Efficient Passive Strategies (e.g. daylighting, thermal heating, and natural ventilation)
  - d. Urban Agriculture Production

#### POLICY RECOMMENDATIONS

1. Equity: Maintain Access to Air & Light

#### Recommendation:

- Maintain fair and reasonable access to sun, air and light for buildings, residents and the pedestrian right way.
- b. Provide windows on all sides of upper stories of residential buildings,
- c. Provide light wells where a building is planned to abut another future building façade

#### Why to support this policy:

- Support passive heating, and cooling and fosters more natural ventilation
- Minimizes large blank walls.
- Helps reduce overly concentrating windows on rear of buildings which can result in privacy impacts and "overlighting" at night of adjacent properties. Especially key where new development abuts residential zoning and existing residential uses.
- 2. Environment: Foster Innovative Building Design & Climate Resiliency
  - a. Provide incentives to encourage compact, energy-efficient infill housing types. Buildings with x% solar
    or verified/certified ultra-low energy buildings (including net zero energy verified, or LEED,
    PassiveHaus, Earth Advantage certified mixed use buildings).
- 3. Economy: Retain Value for Commercial & Residential Properties:

Buildings built too tall on narrow east-west streets create a significant solar impact. This includes loss of access to the sun in the months Portlanders need it most for thermal comfort, heating, and daylighting, and also significantly impacts economic value for energy generation, and long term resiliency goals.

Policy Recommendation: Require a solar shading analysis as part of permit submittal requirements to identify and minimize/mitigate impacts where feasible through design strategies any significant overshading of an adjacent building or property. Measure solar shading onto adjacent properties on December 21st.

Why to support this policy:

- Saves energy and supports climate resiliency from passive heating and cooling, and natural daylighting.
- Excessive solar shading impacts thermal comfort. Access to natural daylight has commonly recognized and documented psycho-social impacts to health and well-being. Studies show connection between greater productivity and natural daylighting as well.
- · Retain economic value of property owners on (or adjacent to buildings abutting) E-W corridors.

# PROPOSED EQUITY & INNOVATION SOLAR POLICY Comprehensive Plan Policy Implications & Recommendations

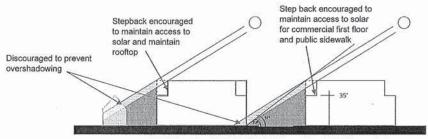
#### Comprehensive Plan

- 1. Maintain fair and reasonable access to sun, air and light for buildings, residents and the pedestrian right way.
- Scale Building Heights to Street Widths -> Build taller buildings on wider streets.
- Growth Strategy: Focus taller buildings on North-South Streets where shading impact is the least impactful to adjacent existing residential neighborhoods

#### Mixed Use Zoning Recommendations:

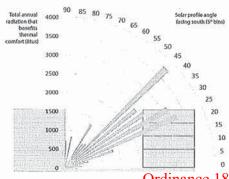
- 1. 8'-12' step back of main street building façade beginning at 4th floor of street frontage
  - a. Specifically on narrow/60' E-W main street corridors. (e.g. Division, Sellwood)
  - b. Areas with a Neighborhood Center designation if desired (Woodstock)
  - c. Areas with smaller scale historic main street character (e.g Hawthorne, Mississippi, Belmont)
- 2. Provide windows on all sides of upper stories of residential buildings
- 3. Provide light wells where a building is planned to abut another future building facade

# Encouraged and Discouraged Building Form & Shading Conditions on East-West Streets



E-W Streets with 60' ROW (Building edge to building edge)

# PRELIMINARY SOLAR ANALYSIS FOR 60' RIGHT OF WAY (ROW)



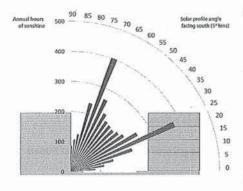
#### The Radial charts:

 The number of hours per year that the sun is at a certain elevation, define by bins of 5 degree increments (and where each number represents 5 degrees less and up to that number), as measured off the horizon facing due south.

The sum of radiation is the number of useful BTUs (to bring effective temperature for a person outside up to 75F comfort), with the same southern angle binning.

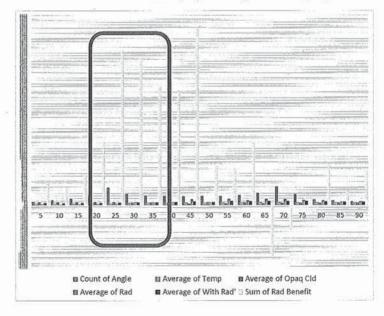
Ordinance 187832, Vol. 1.3.J, page 6862

# Solar Shading Impact Analysis 60' Wide Right of Way Street



 This second radial chart shows the number of hours that the sun is at certain angle. This diagram shows the beneficial radiation (which counts radiation when temp is < 75F), which shows the preponderance of these hours at low angle winter times.

The chart below shows the average temp (F), average radiation (Btu) and average cloud cover (0-10).



# Conclusions:

- A significant amount of radial benefit is lost when blocking 20-35 degree sun angles on E-W streets.
- Buildings built too tall on narrow east-west streets create a significant solar impact.

(Excerpt from the Climate Action Plan comment letter submitted by New Buildings Institute to the City of Portland in April 2015. NBI is a national nonprofit think tank for high performance green buildings, providing policy, technical research and design guidance for new and existing buildings.)

Portland has experienced a significant amount of new development recently, with wide community concerns expressed about loss of solar access to adjacent properties. To accomplish the objectives in 3B Installed Solar and as it relates to desired urban form in item 4Q Better Multifamily Buildings, it is necessary to address solar access protection. With the knowledge that increased density allows protection of the urban growth boundary and provides great efficiencies in land use, transportation and overall sustainability, we support infill development, adaptive reuse of existing buildings and higher density development goals. Increases in development can help meet these goals, but they may also result in greater impacts to existing neighborhoods and adjacent properties that are not fully documented or analyzed. These impacts may include loss of solar access, which reduces the capability of adjacent properties to independently generate energy through onsite renewables. Other cities in Oregon such as Clackamas and Ashland have adopted policies for solar access protection. Ashland's policy ensures that a shadow on the north property line shall not exceed a minimum level as measured on December 21st.

Oregon state law states the following:

#### 227.190 Solar access ordinances; purpose; standards

- (1) City councils may adopt and implement solar access ordinances. The ordinances shall provide and protect to the extent feasible solar access to the south face of buildings during solar heating hours, taking into account latitude, topography, microclimate, existing development, existing vegetation and planned uses and densities. The city council shall consider for inclusion in any solar access ordinance, but not be limited to, standards for:
  - (a) The orientation of new streets, lots and parcels;
  - (b) The placement, height, bulk and orientation of new buildings;
  - (c) The type and placement of new trees on public street rights of way and other public property; and
  - (d) Planned uses and densities to conserve energy, facilitate the use of solar energy, or both.

Given Comprehensive Planning goals for increased density, as well as resiliency and livability, and existing precedents in other Oregon communities, it is recommended that there be further consideration of solar access protection policies. We would encourage the Climate Action Plan to include the following direction that will help support more zero energy and low-energy buildings, protect solar access and help mitigate any significant impacts.

#### Specific recommendations:

- Work with the City of Portland to adopt a solar access protection ordinance consistent with state policy 227.190 above and other leading cities and counties in Oregon (e.g. Ashland)
- 2) Coordinate with the BPS and BDS to addresses the topics in state statute 227.190 (a)-(d) above by incorporating, zoning code provisions, building design standards, and solar setbacks that help mitigate impacts to adjacent development, support livable and resilient communities, as well as energy self-sufficiency.
- Integrate these policies with current Mixed Use Zoning project efforts to help ensure new zoning codes and policies for the placement, and allowed height and bulk of new buildings do not

- significantly reduce the potential solar access of adjacent development and protects access to sunlight for both electricity generation systems and passive solar heating.
- Require solar shading analysis as part of permit submittal requirements to assess impacts of new development to existing adjacent development.
- 5) Require mitigation for any significant impacts to loss of solar access. Below is the suggested language NBI provided in our comments on the Comprehensive plan:

Mitigate impacts from new development that substantively reduces solar access on adjacent properties and public rights-of-way. To balance goals for increased density in the Comprehensive Plan with the potential impacts from loss of solar access, all new development projects over 10,000 s.f. or over 35' in height should include a solar shading and impact analysis as well as a recommendation for mitigation of any substantive impacts on solar access.

Mitigation measures should include at least one of the following:

- a. Transfer of solar development credits
- b. Compensation to impacted individuals
- Development of (or contribution towards) shared community solar or other renewable projects.
  - \*If solar access impacts are de minimis, then no mitigation would be required

From:

Carol Adams <carolcadams@gmail.com>

Sent:

Thursday, January 07, 2016 9:14 PM

To:

BPS Comprehensive Plan Testimony

Cc:

Portland Adams

Subject: Attachments: Comprehensive plan testimony Stroheckers-sale.pdf; ATT00001.htm

Sent from my iPad

Begin forwarded message:

Date: January 7, 2016 at 8:55:31 PM PST To:<cputestimony@portlandoregon.gov> Subject: Comprehensive Plan Testamony

I support the Southwest Hills position on the issues surrounding the redevelopment of the Strohecker's property located at <u>2855 SW Patton Road</u>, <u>Portland</u>, <u>Oregon</u> and want my name added to their petition.

Please uphold the intent of the 1984 Ordiance No. 155609. Carol C Adams

3011 SW Nottingham Drive Portland, Oregon 97201

From: Ray Culi <ray@rnbdesign.org>
Sent: Thursday, January 07, 2016 9:04 PM
To: BPS Comprehensive Plan Testimony

Subject: Fwd: Tomorrow Night's Hearing on the Comp Plan / Background/ KEY Talking points

# Dear Mayor & City Councillors

I am testifying on behalf of my family who lives on the same block as the cluster of properties at the southeast corner of NE Fremont and N Williams.

My wife and I and our three children live in a modest one-story house among Victorian cottages built in the 1800's. These are one to 1-1/2 story homes in the conservation distric t of Eliot neighborhood.

Everyone in this area has already been feeling the effects of the development explosion along Williams, and the effects

, in our opinion,

have been more negative than positive:

gentrification, housing affordability issues, congestion, livability, air quality.

Traffic lineups along Fremont are worse than ever, and our kids are breathing the emissions

of cars that idle for hours morning and evening right in front of our houses

I bike along Rodney everyday and it is increasingly dangerous with cars trying to avoid Williams Ave, taking short cuts and speeding over the newly installed speed bumps.

As I've stated before in previous hearings is that the infrastructure cannot support such aggressive growth, not to mention the impact it is already having

on the neighboring single family homes. Upzoning the lots

to CM3 from what Planning has recommended would be a crime in my opinion , especially after the aggressive upzoning already received by the developers of the lots in this area.

Respectfully yours, Ray Culi 70 NE Fremont St. Portland Oregon

From:

Peter Adams <pfadams@fgrc.net>

Sent:

Thursday, January 07, 2016 8:56 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testamony

Attachments:

Stroheckers-sale.pdf; ATT00001.txt

I support the Southwest Hills position on the issues surrounding the redevelopment of the Strohecker's property located at 2855 SW Patton Road, Portland, Oregon and want my name added to their petition.

Please uphold the intent of the 1984 Ordiance No. 155609.

Peter F Adams

Peter F. Adams 3011 SW Nottingham Drive Portland, Oregon 97201 Mayor Charlie Hales Commissioner Nick Fish Commissioner Amanda Fritz Commissioner Steve Novick Commissioner Dan Saltzman 1221 SW 4<sup>th</sup> Avenue, Room 110 Portland, OR 97204

# Portland 2035 Comprehensive Plan

Re: Riverside Golf And Country Club

I am writing regarding Riverside Golf & Country Club's designation as future Industrial Sanctuary. I have been a member for 20 years. Riverside is important to me and my family and is certainly a historical landmark for the City of Portland. Riverside was even part of the Vanport Flood!!

- (1). Riverside has developed thousands of wonderful citizens for the City of Portland.
- (2). Riverside has employed thousands of employees helping to drive the Portland economy.
- (3). Riverside has put millions of dollars back into the Portland economy.
- (4). Riverside has attracted many regional events drawing people in from all over the NW.
- (5). Riverside is more than an industrial sanctuary but more a home for residents of North Portland.

It would be a blight on the history of Portland to turn Riverside into an industrial sanctuary rather than keep it as historical environmental preserve. The city of Portland needs to retain Riverside in its current form and not designate it as a future industrial sanctuary. Riverside is an important recreational resource for all of Portland.

Sincerely,
Paula Patterson Wendorf
University of Oregon
First Team All American Golfer University of Oregon
1607 Pine Street
Lake Oswego, Oregon 97034
paulygolf@hotmail.com
503-507-7239

From:

Janine <j9lpdx@gmail.com>

Sent: To: Thursday, January 07, 2016 8:21 PM BPS Comprehensive Plan Testimony

Subject:

Public Testimony

Comprehensive Zoning Public Testimony

Janine Leaper

5095 SW Barnes Rd.

Portland, OR 97221

confidential phone number and email: 503-867-0676; j9lpdx@gmail.com

My property is located within both the urban growth boundary and the urban services boundary and practically touches W. Burnside, which is one of the main thoroughfares in the City of Portland. The zoning of my real property currently allows one residential dwelling per 10,000 ft; the City proposes to rezone my property in a manner that reduces the number of dwelling units that can be constructed to one per 20,000 ft.

The reasons given to the public for the proposed changes, appear to be in conflict with previous publications by or for local, state, and federal agencies—including recommendations and best practices.

A site by site analysis of actual conditions present is routinely provided by professionals engaged in development of specific parcels and or plats. Site development and construction in my immediate area is ongoing and the City's assertion that development in this area is not anticipated does not appear to be supported by the facts.

Historic studies of the area, reveal that neither the immediate area nor my property has experienced changes in the conditions of soil, fire, landslide or earthquake risk, which the City cites as its primary rationale for the proposed zoning change.

What has changed is the need for single family and or multi-family (non-apartment) housing to accommodate the influx of people moving to Portland. In 2014, more people relocated to Oregon than any other state. The

City should anticipate and be well prepared to provide citizens and visitors the much needed development and improvement of the infrastructure within the urban growth boundary.

The City's proposed changes will significantly impair and or deprive me of my constitutionally protected rights and interests, and I oppose the proposed zoning change of my property.

Thank you,

Janine Leaper

From:

chevylane@iuno.com

Sent:

Thursday, January 07, 2016 8:18 PM

To: Subject: BPS Comprehensive Plan Testimony CPU Testimony

TO Portland City Council.

Re: R5 Zone change for Powellhurst/Gilbert

We support the change from R2 to R5 in the Powellhurst/Gilbert Neighborhood and on our property.

This zone change is long over due. We have waited about 20 yrs for this.

We have been here 39 years and have had to watch frustrated home owners that we wanted to stay move out because they felt like the city of Portland didn't care about their properties. To jam all the in fill into these lots that were not designed for it, is just not suitable for livability. We end up with cars parked in the road ways and you can't see around them creating a visibility problem. Some ones going to get hit.

Little children and older kids have had near misses with cars because they can't be seen. Folks pulling out of a driveway can't see to turn due to the cars parked on each side creating a visual hazard. Can you live with that?

We have had nearly 100% turn over in the last 18 years in our area of Powellhurst/Gilbert due to the folks despising the current zones. The ugly in fill of houses that aren't built correctly or builders that don't adhere to regulations has proven to be disastrous on some of these lots.

The houses are literally falling apart. Owners have moved or abandoned houses causing blight in the area. As a neighborhood watch here, that has led to many phone calls for code compliance. The once new housing deterioration is obvious, creating blight that brings down our own home values.

The relief to know that a regular house and lot that is pleasing to the eye and fits the area will help us all to retain our livability, safety, and ability to sell some thing that looks normal, is a breath of fresh air. No one wants to live next door to some odd looking house that is 14 feet wide and 3 stories tall that looks out of place. Row house or other wise, the designs don't fit in with the typical cape cods, 50's ranch house and small cottages of post war era we have out here.

The values of our homes out here have taken a beating and its just not fair to the home owners. The FEMA enforced flood plain along with group homes that house sex offenders due to the Federal Fair Housing Act have caused home values to go down about 15+%. Then to have in fill that does not blend with post war houses to fit new regulations for flood plains makes this area look odd to say the least.

I know we speak for alot of home owners out here who want the land lots to remain normal looking. We do not want homes so tall that the residents can look out their windows and view back yards and in folks windows so that no one has any privacy.

As far as mixed use is concerned, in all the area that we live in, including Lents, we now have buildings standing vacant that look odd that have no business or tenants living in them. We know the city wants to have some sort of mass transit on main arterials with businesses and tenants with the idea of the folks living where they work. We are not set up for the infrastructure to do this. This will take millions to do and by that time taxes will be so high you will price folks right out of here.

With mixed use we are headed for more blight and vacancies. As a neighborhood watch this alarms me. When the land looks normal and houses are placed correctly, watches have less trouble with the homes staying occupied with tenants Ordinance 187832, Vol. 1.3.J, page 6873

or owners. Livability becomes an issue when you change the over all look of any community. We become an attractive nuisance and with that comes problems for keeping folks here that want their house values to remain strong.

With the zone changes pending, we would like a building moratorium placed on the area until this goes into affect. We want to make sure builders don't rush to build some thing inappropriate to get in under the deadline. That's been done as well.

Thank you so much for the change to R5 for us. We do ask that there would be no mixed use along 122nd in a fully residential area. This will cause much trouble for us here. Placing more cars parked on the sides of the road where there is no room causing major visual problems. We would also prefer our area to all be R5. We are so tired of seeing all the trees being cut down for the in fill changes.

Sincerely, Matt and Pati Hall 5230 SE 118th Ave Portland, Oregon 97266

Brian Posewitz 8508 SE 11<sup>th</sup> Ave. Portland, OR 97202 503-432-8249 brianposewitz@comcast.net

January 7, 2016

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

Re: Comprehensive Plan Recommended Draft

Dear Mayor Hales and Members of the Commission:

Please consider my following comments on the Comprehensive Plan Recommended Draft ("Draft"):

- 1. The Plan Appropriately Encourages A Compact Urban Form. I understand that a general theme of the Draft is to encourage Portland to grow in a compact urban form, in part through increased housing density and increased building heights. I strongly support this general philosophy as a way to reduce infrastructure costs and to reduce automobile transportation (and the associated environmental impacts). The compact form also creates a more aesthetically pleasing, vibrant community (relative to sprawling, disconnected development).
- 2. The Plan Should Allow For Change To "Existing Character." Recent acceleration in urban development (likely a temporary product of low interest rates and other factors) has created a backlash from residents seeking to preserve the "existing character" of neighborhoods. While that may make sense in a few old, established neighborhoods that were built with a distinct consistent theme (parts of Eastmoreland for example), it doesn't make sense for most neighborhoods. Most neighborhoods can benefit from change from having deteriorating and unkempt buildings replaced with new ones; and from having taller, denser buildings bring life and vibrancy to the neighborhood. Moreover, faced with growth at rates anticipated, we need to either accept change to the character of existing neighborhoods (including changes in density and scale) or accept sprawl into the outlying farmland and natural areas. The former is a far better alternative.

3. <u>Don't Over-emphasizes "Displacement" Concerns.</u> "Stop displacement" has been a rallying cry for many in the Comp Plan process. (I even saw a PSC member wearing a button to that effect during PSC meetings, which was not a reassuring signal of open-mindedness and neutrality.) The complaint, as I understand it, is that rising property values require some people to move. The argument, as I understand it, is that every person should be able to live in any neighborhood the person desires, or at least to stay indefinitely in the one they are in. The proposed solutions, as I understand it, are policies to force property owners and developers to make housing available at belowmarket rates and/or to building housing that is different from what market forces would dictate.

I first question how many people are really being *involuntarily* "displaced" by rising property values. If they own their homes, rising property values should just make them wealthier (which is good for "equity," right?), not force them to move, especially since the law limits how fast government can increase property taxes and the taxable value of their property (which everyone concerned about displacement should be grateful for). I understand that renters may be displaced, but the City should not prevent neighborhoods from improving (another word for "gentrifying") just so no one has to move. Our market-based economy – a system that many in this area malign but which is responsible for the extraordinary prosperity that just about everyone here enjoys relative to most of the world – means people will sometimes have to make changes: in jobs, lifestyles and locations. It makes no more sense to say a person should be able to live indefinitely in any neighborhood he or she wants to than to say every person should be able to drive whatever kind of car he or she wants to (or at least keep driving the same car no matter what).

So please don't adopt a Comp Plan that impedes neighborhood improvement out of deference to the subjective philosophical view of a loud but small contingent.

- 4. <u>Promote Environment and Watershed Health</u>. I support the Draft's efforts to promote and protect Environment and Watershed Health.
- 5. <u>Allow Sellwood To Change More</u>. I am generally satisfied with the Draft's particular prescriptions for my neighborhood Sellwood. However, I oppose the extreme downzoning of North Westmoreland, which is contrary to overall themes of the Draft. I also oppose the decision to stop the mixed use designation (allowing commercial development) on SE 13<sup>th</sup> Ave. at Sherrett Street. The designation makes sense for the entirety of SE 13<sup>th</sup> Ave., which historically has had commercial and industrial uses all the way to the southern end.

Thank you for considering my comments.

Very truly yours,

Brian J. Posewitz



January 7, 2016

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

## Mayor Hales and Council Members:

In addition to serving on the HAND Board I and others from our neighborhood association have also served on many other committees, your Climate Action Plan Update Committee, various Houselessness Working Groups, the Portland Historic Resources Coalition and the Division Design Initiative to mention a few. I mention this to demonstrate that our neighborhood association is very concerned about climate change and housing affordability. However, we have begun to fear that despite a set of excellent aspirations in the Comp Plan, good design and community livability are being lost in the shuffle. Our shorthand message is density without good design spells disaster.

The Comprehensive Plan goals and policies reflect outstanding work and thought on the part of many staff and community residents alike, but since there is also the potential for many of these policies to conflict, it is not clear how staff, the community or you as final arbiters will resolve those conflicts as we go forward. This is an issue of concern to many of us so we are calling attention to things that need to be addressed quickly:

HAND has been part of the Division Design Initiative and supports the group's efforts. We have included the Top 10 Policy recommendations for your consideration at the end of this letter. We would like to call out several related concerns.

## Update City inventories of important visual, cultural, and historic resources & promote innovative incentives for preservation.

Both the Historic Resources Inventory and the Viewsheds Inventory have not been updated since the 1980's. With the HRI there is only one property identified east of 82nd Ave. In the case of Viewsheds only one item is listed east of SE 12th Ave. Besides undermining preservation efforts, it becomes an equity issue when large portions of the city have no claim to protection for their cultural, historic and visual resources.

#### Public Viewsheds or View Corridors

As we race to accommodate growth, there seems to be little thought given to public view sheds -views from our public right of way, parkland or other public spaces that help people to enjoy beauty or orient themselves to our city. Some important visual resources need enhanced protection. They provide a connection to sense of physical place and as well as to character defining community cultural and historic resources. When we block important monuments such as the Hollywood Theater with new development, we impact neighborhood visual and cultural treasures that contribute to neighborhood identity and community history. We understand that private views are not protected, however when we build so tall in SE that we block public views of the West HOSFORD-ABERNETHY NEIGHBORHOOD DISTRICT ASSOCIATION



Hills, Mt. Tabor or Mt. Hood we lose our connection to sense of place. It is our setting, the physical realm as well as the built environment that gives Portland its character.

The Comp Plan already has 7 excellent policies that speak to this need, which I have listed below, but I'm calling them to your attention because I fear they will get left in the dust as we attend to other things. The list of public viewsheds or view corridors has not been updated since 1986 or 1989 and includes only one viewshed east of SE 12th Ave so unless these policies are implemented soon they will not be able do their job.

Policy 4.29 Significant places. Enhance and celebrate significant places throughout Portland with symbolic features or iconic structures that reinforce local identity, histories and cultures and contribute to way funding throughout the city....

Policy 4.30 Scenic resource protection. Protect designated and significant scenic resources, including public views and scenic sites and corridors; and update or reconfirm the inventory of significant views, sites, and corridors in the future.

Policy 4.31 Vegetation Management. Provide allowances for the pruning and cutting of trees and shrubs to maintain or enhance designated public views

Policy 4.32 Utility lines. Maintain designated scenic views, sites and corridors by encouraging the placement of utility lines underground.

Policy 4.33 Regulatory guidance. Avoid adverse impacts to scenic resources as part of land use reviews, where practicable

Policy 4.34 New public views. Encourage new public and private development to contribute to creating new public views of Portland's rivers, bridges, the surrounding mountains, hills and buttes, the Central City skyline, and other landmark features.

Policy 4.35 and 9.17 Street Views. Maintain public views of prominent landmarks and buildings that serve as visual focal points within streets or that terminate views at the end of streets.

#### Historic and Cultural Resources

Speaking of inventories that need updating, our thirty-year-old Historic Resources Index still lists only one property east of SE 82nd Ave. Here again having excellent policies speaking in support of preservation will not do us any good if staff and the community have no foundation from which to work. Studies like Preservation Green Lab's recent report, "Older, Smaller, Better", reinforce the conclusion that mixed vintage neighborhoods have stronger economic vitality, more jobs, and provide more cultural and income diversity. These buildings also contribute to the unique identity that defines Portland's neighborhoods. A growth strategy should provide more incentives for preservation and adaptive reuse of Portland's older viable historic buildings. We also encourage support for the work of Michael Molinaro in creating a prototype for mapping Portland's neighborhoods, identifying structures with double lots or where upzonging might lead to demolition to see if there are other strategies for adaptive reuse and remodeling that can be applied instead to preserve still useful historic homes and buildings.

#### Place Greater Emphasis on Good Design

At this time in our city's history good design is more important than ever. I would stress that although we usually think of good design as creating beauty, thoughtful design also recognizes and creates opportunities for greater sustainability, better functionalilty, and the best use of existing resources. I'm not speaking about grand buildings here, but rather everything from tiny houses and temporary shelter for our houseless neighbors to seamless infill in our residential neighborhoods that encourages adaptive reuse as well as new growth along our commercial corridors.



We need to increase the focus on good design with efforts to increase the design literacy of our community through education on design principles and the development process, the creation of design guidelines where people wish to do so. We need ways for people do more than say 'NO' when faced with changes to their neighborhoods and business districts. Better definitions of compatibility and neighborhood context are needed to support for BDS staff in reviewing plans, create clearer expectations for developers and remodelers seeking review as well as neighbors responding to those plans.

<u>Capitalize on "the Missing Middle" — Add Density Without Destroying Neighborhood Fabric</u>

The HAND neighborhood already includes many of the innovative housing types available to increase density within single family neighborhoods without causing the loss of neighborhood character. We urge the Residential Infill Task Force and others to explore these options further and here, too, compatible design will make all the difference in neighborhood acceptance.

Commit resources to monitor the impacts of your Comprehensive Plan Goals and Policies

Our city is well known for its extensive (not always effective) public involvement and planning processes, but we never seem to allocate resources to evaluate the effect of our plans and policies. With a housing crisis, unprecedented growth and a spate of new goals and policies soon to be adopted, we must ensure that the impacts and outcomes of our policies and strategies are carefully evaluated as we go forward to keep our Comp Plan a relevant, living document.

<u>Provide Better Opportunities for Meaningful Engagement in Proposed Development</u>
Provide resources and processes that lead to better projects and allow neighbors to do more than just say "NO"! Operationalize the policies in Chapter 2 on Community Involvement by implementing the DDI Notification and Engagement Proposal for review of Centers/Corridors redevelopment plans.

We are not anti-density, but we ask again that you balance longterm goals for increased density with more meaningful public involvement and more attention to the opportunities to support a more sustainable future that thoughtful design can provide. It too often feels as though we are focused on building a Portland for others to come without considering those who have already invested their money, energy and love here.

Sincerely,

Susan E Pearce HAND Chair

Please see attached



Division Design Initiative Top Ten Policy Recommendations.

Improve notification and enable constructive community engagement about growth Consider SE Division Street with eight large buildings in 18-24 months. This is major redevelopment, yet the neighborhood had no meaningful opportunity for real input in the design of these buildings which transformed their neighborhood.

(See DDI Notification and Community Engagement Policy Recommendations)

② Close the Residential Floor Area Ratio Code Gap Now - There is currently no Floor Area Ratio (FAR) requirement for the residential portion of mixed use buildings which results in overly boxy, bulky buildings as projects build to the maximum envelope allowed. The City (through their Mixed Use Zones Proposal) is recommending this be fixed as part of the Comprehensive Plan adoption but it would not take effect until 2017. We recommend this be a top priority for the City to take immediate action to fix now.

Add Permit Review Criteria for Assessing Compatibility with Neighborhood Context (see draft Division Design guide-lines Compatibility section & comment letter to the City of Portland Hearings Examiner re: land use appeal by Brentwood Darlington Neighborhood). Request additional permit submittal requirements be added including:

- a. Elevations showing proposed development in context of adjacent building/block development,
- b. Solar shading analysis, privacy and view impact drawing
- c. Statement of features/approaches used to demonstrate alignment with community design goals and preferences if formal guidelines exist
- d. If no parking is required, provide a transportation demand management plan for mitigation of impacts (this could include annual bus passes for residents, shared/conjunctive use parking, on site car or bike-share options, etc.)
- ♠ Develop Density Transition Zones & Foster the "Missing Middle" The Current Comp Plan Growth Strategy focuses on corridors and centers but leaves out small-medium "plexes", town/rowhouses, and courtyard style housing (promoted in the past with the City's "Courtyard housing design competition"). These building types may blend better within the existing neighborhood fabric and could help relieve some of the development pressure on older commercial corridors with special character like Division, Hawthorne, etc. (See Eli Spevak proposal, and Metro Innovative Design & Develop-ment Codes Transitions Section)
- © Create Incentives for Reuse & Preservation of Existing Buildings with Special Community character Are there some areas where we don't want the zoning to transfer automatically? As shown in the study noted below, retaining a mix of diverse building vintages and sizes has been proven to encourage economic vitality, more diversity, a greater number of jobs, fewer chain stores, and more affordability for small businesses and tenants. We may need other incentives that sup-port adaptive reuse of these such as waivers of SDC, transfer of development rights (not just for historic properties), etc. (See Report on "Older, Smaller, Better: Measuring how the character of buildings and blocks influences urban vitality", by Preservation Green Lab, National Trust for Historic Preservation, May 2014)
- Relate Building Height to Street Width & Consider Nodal Focus. Set different goals for narrow vs. wider streets and focus some den-sity into nodes – visualize a "Pearls on a String" concept with the pearls as the commercial focus with residential or lower scale devel-opment as the string. This was a priority expressed for future devel-opment in the Division Green Street Main Street Plan. (See Urbsworks Policy Recommendations, Division Green Street Main Street Plan)



- Consider Incentives in new Mixed Use Proposal for community amenities, including: high performance buildings/zero energy buildings, preservation and adaptive reuse of older buildings, provision of reasona-bly priced housing, and alternative transit-oriented or other community beneficial uses (daycare, small cor-ner grocery stores, affordable/senior housing).
- Incorporate solar policy into zoning code amend-ments to support more high performance buildings and minimize/mitigate solar shading of adjacent infill
- Encourage further study of more N/S corridor density which has less shading impacts than on E/W corridors.
   (See New Buildings Institute Policy, state solar access policy OR 227.190, and other Oregon community solar policies such as Ashland, Jackson County, et al).
- Enhance/maintain community livability through access to sun, air, light, privacy and public views for current and new resi-dents/businesses. Address privacy issues via increased requirements for placement of and side setbacks to maintain air and light (e.g. varied rooflines, lightwells, stepbacks and stepdowns in heights), minimize privacy impacts (i.e. increased rear landscape screening requirements, sensitive location of balconies), protection of important viewsheds (e.g. reduction of large blank walls, maintain public view of community monuments such as the Hollywood Theater, Bagdad Theater, SE Hills). (These issues influence mixed use zoning requirements in development; also see Urbsworks research on lightwells and consideration of upper level skyplane context in NY Code; DDI Comment Letter to the City of Portland Re: Comp Plan & Mixed Use Zones)
- The City should employ broader tracking of and accountability for development impacts. Portland, and state of Oregon do not re-quire documentation nor impacts analysis resulting from a new development beyond fee impacts to traffic, sewer and parks. However most states require this. Critical issues could be documented during permit submittal and review. Recommended issues to be tracked should in-clude impacts to:
- a. Health (e.g., noise, air quality, safety)
- b. Environment (e.g., loss of habitat, mature trees/heat island ef-fect, climate change)
- c. Community (e.g., loss of historic resources, important public viewsheds)
- d. Economy (e.g., loss of affordable residential and commercial spaces, loss of solar access for energy generation, food produc-tion, etc.)

"What gets measured, gets managed. What doesn't get measured gets lost." Let's not lose track of the things that matter most.



January 7, 2016

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

Dear Mayor Hales and City Council Members,

During the past year as the Hosford Abernethy Neighborhood District (HAND) board has been discussing the Comprehensive Plan, many livability issues have come to light. Of significant concern is the relationship between residential uses and commercial uses at isolated non-conforming commercial sites nestled in exclusively residential areas, and the desire to preserve and protect both the commercial and residential needs.

In the HAND neighborhood there are four such sites that we would like to bring to your attention. Planning staff has recommended a change to their designation and zoning. The HAND Board opposes a change in the Comprehensive Plan for 3029 SE 21st Ave (People's Coop), 1996 SE Ladd Ave. (Palio's Café),1540 SE Clinton St. (Northwest Naturopath Clinic), and also the garage at 2021 SE Tibbetts, added by staff in error, from their current residential designation to that of commercial.

All of these sites are in commercial use, have a non-conforming status, and are completely surrounded by residential properties. The non-conforming status provides protections to the surrounding properties, such as limiting the permissible hours of operation and providing a mechanism for review if there is a change of use. Changing the Comprehensive Plan designation and zoning would remove these protections.

Our position should not be viewed as opposing density or the broader goals of planning for vibrant neighborhoods. Nor should it be seen as critical of the existing businesses in these properties, which are great assets to our neighborhood. Our concern is the future of the sites should the zoning become commercial and a subsequent new business moves in. There would be no mechanism to ensure that the future business would remain compatible with the uniquely residential nature of these sites.

The drawbacks of changing the zoning status from residential to commercial for these sites has become more evident to us with the roll out of the Commercial Zoning update. The new commercial zoning code is missing a component critical to the success of isolated commercial sites such as these, as well as others scattered around Portland. Residents need a zone designation that allows them to have more input in the nature and neighborliness of the commercial activity that takes place. Currently the conditional use status allows this to happen.

The proposed CM1 commercial designation, as it is presently defined, does not have similar safeguards in place to ensure the livability and compatibility that currently exists. The businesses at these sites are currently good neighbors, but each has had various issues over the years. Whether it was noise, odors, parking, or early morning deliveries, the conditional use brought the businesses to the table to resolve the conflict with



# HOSFORD-ABERNETHY

neighbors. Our concern is that the businesses at these sites will lose the obligation to engage with their residential neighbors to resolve issues if the properties turn over to CM1 as it is presently defined.

The HAND Board would not oppose the proposed Comprehensive Plan designations if the zoning code were changed to offer neighbors of sites such as these the protections equivalent to those arising out of the current non-conforming status. We have offer some language below for inclusion in the Comprehensive Plan to guide additional protections for isolated commercial sites such as these.

Until the zoning code is modified to address these concerns over commercial-zoned properties in otherwise residential areas, we feel that for the specific sites listed above, the existing non-conforming designation provides the best balance between neighborhood-oriented commercial uses and residential uses given their close proximity in these three cases.

Thank you for considering these comments.

Sincerely,

Susan E. Pearce HAND Chair

Ensuring Residential Compatibility of Isolated Commercial Sites:

Limited hours of operation.

Notification and request for input sent to nearby properties following a proposed change of use other than one in the same use category or a less-intensive use category.

Change of Use Notification Procedure: An Isolated Commercial Site situation review is processed through a Type II procedure, giving consideration to the following:

1. The hours of operation;

- 2. Vehicle trips to the site and impact on surrounding on-street parking;
- 3. Noise, vibration, dust, odor, fumes, glare, and smoke;
- 4. Potential for increased litter; and
- 5. The amount, location, and nature of any outside displays, storage, or activities.



January 7, 2016

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

Dear Mayor Hales and City Council Members,

During the past year as we have been discussing the Comprehensive Plan at Hosford Abernethy Neighborhood District (HAND) meetings, many livability issues have come to light. One important concern is the potential loss of existing housing in the pockets of industrial zoning near the new MAX Orange Line Clinton Station and also west of 12<sup>th</sup> in the Central Eastside Industrial District (CEID).

Housing in these areas include historic Victorians, 1920's apartments and all types of affordable housing that existed before the industrial zoning.

Planning staff has recommended EG1 zoning in an area east of 12<sup>th</sup> Avenue and just north of the Union Pacific RR track, and that existing conditional use status for housing that exists in the area be removed. There is housing scattered within the portion of the Central Eastside Industrial District/Southeast Quadrant that has industrial zoning. In both settings much of the housing predates the current and proposed use and related zoning. The zoning proposals would essentially make all the housing unsaleable and create a substantial hurdle for renovating and mortgaging, dooming the houses to eventual demolition.

We appreciate the desire to create a uniform zone in this area and to reinforce the district's status as an industrial area. The HAND Board values the availability of industrial capacity in the inner city, but feel that some distinction should be made to ensure the existing housing can survive.



A uniform zone is not worth the price of losing some of our most affordable housing stock at a time when housing prices and rents are soaring and residents are being priced out of our community. We also do not want to see further loss of our older and more historic houses, some of which long pre-date the implementation of industrial zoning.

We recognize that the premise of the comments of this letter may seem to contradict our comments asking for continued residential-with-conditional-use status of three properties with long-time commercial use in HAND. However, in this case that case we are addressing business use that occurred on sites surrounded by existing homes, while in this case we are advocating for homes that existed before the business or industrial use grew around them.

The HAND Board asks that you find a way to protect housing in our industrial areas. We agree with Planning staff that the current situation is in some ways imperfect, but we feel that the proposed changes will exacerbate our ongoing housing affordability crisis, and will lead to an increased loss of historic resources.

Attached below please see spread sheets of addresses of homes on numbered and named streets located in the CEID. Some, notably along 11<sup>th</sup> Avenue on both the east side with residential zoning, and the west side, with IG zoning, may be or recent construction. They are, however, among the more affordable homes within HAND and should be protected.

Availability of volunteer time has prevented similar cataloging of homes in the EG zones in West Clinton, however that information should be available through City of Portland GIS mapping.

Thank you,

Susan E. Pearce HAND Chair



# NAMED STREETS

Clay	Market	Mill	<u>Stephens</u>	Harrison	Lincoln	Grant	<u>Sherman</u>	Caruth
1019 -3plex	1015 SE	616 SE	310 SE	637 SE	525 SE	925 SE	1024 SE	1021 S
		622 SE	1116 SE	627 SE	625 SE	. 1135 SE	1028-1030 SE	
		628 SE	1122 SE 1127	621 SE	923 SE 1132, 38,26	1117 SE	1124 SE 1120 & 1100	
		825 SE	(apt)	616 SE	triplex	1114 SE	(apts)	
		812 SE		604 SE 708-712	1120 SE	1103 SE	1121 multi-plex	
		1134 SE		multiplex	1121 SE			
		1122 SE		906 SE	1104 SE			
				1141 SE				
				1117 SE				
				1122 SE				
				1118 SE				

NUMBERED STREET	2TC

3rd	6th	7th	8th	9th	10th	11th	12th (only 12th)
4500.05							***
1532 SE					AND STREET, COMPANY TO SEE A PARTY WAS A PARTY		170.000.000000
#1	2033 SE	1825 SE	2324 SE	1821 SE	2000, 2, & 4 triplex	1932 SE	1903 SE
	1718 SE	1927 SE	2334 SE	2035 & 2037 SE	2129 SE 10th	1912-1924 apt	1907 SE-co
	2018 SE	1921 SE		2337 SE	2035 SE 10th	1923 SE	1915 SE
	2024 SE	2039 SE			2326 SE	1800 SE	1825 SE
	2030 SE	1736 SE			2012 SE	1812 SE	1817 SE
		1831 SE			2332 SE .	1816 SE	1809 SE
		2000 SE			2129 Granten Apts	1616 SE	1609,1607,
					2035 maybe		KK 33 - 43 (1) 2 - 4 (1)
					commercial	1612 SE	1631 SE
					2025 SE	2407- commercial	1633 SE
					1532, 34, 36, 38 apts	2442 SE	1637? Abo
						2335 SE	1711 SE- qı
						2329 SE	1717, 25, 1



2321 SE	2011 SE
2311 SE	2019 SE
2303-4plex	2021 SE
2224 SE	2117 SE
2214 SE	2115 SE
2204 SE	2123 SE
2128 SE	2203 SE
2124 SE	2215 SE
2118 SE	2225 SE
2123 SE	2237 SE
2112 SE	2301 SE
2032,34,36,38-4 plex	2305 SE
2026 SE	2315 SE
2014 SE	2323 SE
2008 multiplex	2333 SE
2015 SE (apts)	2407 SE-4p
2007 SE	2417 SE
	2421 SE



January 7, 2016

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

Dear Mayor Hales and City Council Members.

We on the Hosford-Abernethy Neighborhood District (HAND) board would like to commend the Bureau of Planning and Sustainability for composing a Transportation System Plan that embodies the values and goals crucial to Portland's success and survival in the 21st century. This includes Chapter 9 of the Comprehensive Plan. Specifically, we want to mention the plan's emphasis on safety, equity, transit mode prioritization, and protections for vulnerable users. We hope that this plan will help the City of Portland think of transportation less in terms of speed and throughput, and more in terms of livability, sustainability, and safety for all modes (Vision Zero).

One concern we have with the TSP is that of naming conventions. Specifically, while the old designation "bicycle boulevard" made it apparent who had priority on these streets, "greenway" is not as clear, especially to drivers less familiar with Portland's street system. Further, "greenway" has multiple separate meanings within the TSP itself, referring not only to surface streets with low-stress bicycle facilities, but also to trails, to bike-unfriendly streets with stormwater facilities and a tree canopy, and to land flanking the Willamette River. Between "greenways," "enhanced greenways," "greenscape streets," "green streets," and "Willamette river greenway," we wonder if the distinction and importance of our "neighborhood greenways neé bicycle boulevards" isn't being diluted.

Another concern we have with the Comprehensive Plan and the zoning update as they relate to transportation and street-use issues is that of how proximity to transit is determined. Within '\( \text{mile} \) wile of high capacity transit (MAX) stations, the policies on density and parking minimums changes. The diagrams that we have seen from the Bureau of Planning and Sustainability (BPS) relating to HAND's neighborhood high capacity transit station, Clinton St Station, appear to apply this '\( \text{mi} \) mi distance "as the crow flies" rather than by walking distance. However proximity does not equal accessibility. Due to the incomplete road grid and the freight line tracks in this neighborhood, even some buildings within sight of the new station cannot access it without a substantial detour.

We want to ensure that what we are seeing in BPS diagrams is not being translated into policy, and that actual on-the-ground distance is used to determine zoning and parking policies. A further consideration unique to our neighborhood is the delay caused by the freight tracks separating the station from the majority of homes that utilize it. Due to the proximity to Brooklyn Yard, freight trains frequently cause delays up to 40 minutes, isolating the station from the homes and businesses to the north. A pedestrian bridge was torn down for the Orange Line's construction, and its promised replacement has never been delivered despite repeated



# NEIGHBORHOOD DISTRICT ASSOCIATION

requests. Using the nearest detour, the Powell underpass, adds a full mile to the trip. Under these conditions, no properties within HAND north of the freight tracks are within 1/4 mile of the Clinton St Station.

As with the rest of the Comprehensive Plan's public outreach process, we have found the process for public feedback regarding the TSP to be confusing and difficult to follow, particularly as the TSP is both part of and separate from the Comprehensive Plan. It has also been difficult to determine how the TSP interacts with and will/will not incorporate elements of related city plans, including the Climate Action Plan, 2030 Bike Plan, etc. The online Map App was a creditable addition to the public outreach process, however it does not appear to include all transportation projects currently planned or in the works, leaving us to wonder if these missing projects do not fall within even the unconstrained budget, or if they were omitted because they are already outlined in other city plans and thus have a place secured within the transportation budget and on PBOT's/TriMet's "to-do" lists.

Therefore, we would like to take this opportunity to submit a list of crucial transportation projects within HAND for the next 20 years, to ensure they do not fall between the cracks of the various city transportation plans. Some of these projects are included in the TSP; some are not (we have attached TSP project numbers where possible). In light of Vision Zero and the goals stated in Chapter 9 of the Comprehensive Plan, we have attempted to highlight projects that benefit vulnerable road users or the safety of all road users. The following projects have been categorized by type.

#### Projects currently in progress:

- Twenties bikeway (including traffic light at SE Powell and 28th) -- #40074
- Clinton neighborhood greenway enhancement project
- Portland bike share -- #2011
- Inner Powell safety improvements -- #70045
- Powell/Division high-capacity transit and transit access projects -- #80039, #80040, #80037

#### Transit projects:

- Replace demolished ped/bike bridge over freight and light rail tracks at Clinton St/SE 12th Ave MAX Station
- Research water transit options

#### Bicycle projects:

- Create SE Harrison Greenway (includes traffic lights at 11th and 12th, above)
- Create SE 9th Ave Greenway -- #70077
- Create bicycle facilities on SE 3rd/Division Ave (west of 13th)
- Create protected/buffered bike lanes on SE Hawthorne (east of 12th)
- Enhance bike lanes on SE Hawthorne to be protected (west of 12th)
- Enhance/create bicycle facilities on SE 21st between Gladstone and Division (with possible continuation north on 20th)
- Protect and enhance bicycle facilities on SE 26th

#### Intersection improvements:

- Traffic light at SE Harrison & 11th
- Traffic light at SE Harrison & 12th
- Traffic light at SE Madison & 12th (one block north of HAND in Buckman, affects pedestrian, bike, and vehicle traffic to/from HAND)
- Traffic light or 4-way stop at SE Woodward and 8th -- possibly part of #20050



#### HOSFORD-ABERNETHY NEIGHBORHOOD DISTRICT ASSOCIATION

- Traffic light or 4-way stop at SE Caruthers and Water -- possibly part of #20050 or #20075
- Rapid flash beacon at SE Clay & 11th
- Rapid flash beacon at SE Clay & 12th
- Crosswalk enhancements on SE 26th between Clinton and Powell (at Cleveland High School and bus stops)
- Crossing enhancements on SE Hawthorne between current crossings at 16th, 20th, and 27th Ave (to allow improved ped/bike access to businesses along Hawthorne commercial corridor)
- Create protected intersection at SE Hawthorne and 7th for bicycles, including dedicated traffic signals (as part of protected bicycle facilities on Hawthorne, below)

## Projects for Further Research and Discussion:

- Research an all-modes freight and light rail overpass between SE Hawthorne and SE Powell (possible location: SE 8th and Division Ave/PI)
- Create Central City Green Loop (possibly in combination with bicycle facilities on SE 11th/12th)
- Create bicycle facilities on SE 11th and 12th (possibly as part of Green Loop)
- Implement road diet on SE 11th & 12th couplet (possibly as part of Green Loop or other new bike facilities)
- Change Hawthorne's road classification in all guides to be the same as Division's classification
- -Traffic light at SE Powell and 8th, including left turn from Powell eastbound (to relieve congestion on SE Milwaukie from Powell Blvd) -- possibly part of #20050

The HAND Board

Susan E Pearce HAND Chair



January 7, 2016

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

Dear Mayor Hales and City Council Members,

The HAND Board is concerned with the public process surrounding the Comprehensive Plan updates, especially now that the recommended plan has been submitted to City Council. We realize it is a living document, but feel that when a change in Comprehensive Plan designation or zoning is considered, a notification process should be in place to inform adjacent property owners, tenants, and neighborhood associations of the proposed change. This notification should happen before the decision is finalized, and allow an opportunity for the public to provide input and shape the final outcome. Such notification should be clear and specific.

We are finding that this level of outreach is not being conducted as a matter of policy, and that the Bureau of Planning and Sustainability has been directed to provide only the minimal notice required by law, which we believe is insufficient given the gravity and impact of the decisions being made.

One example in our neighborhood is the process surrounding the proposed Comprehensive Plan change from non-conforming residential to commercial for People's Co-op. In this case, planning staff made a recommendation to the Planning and Sustainability Commission in April to change the zoning of People's. That recommendation was made just one week before the Commission was set to make its decision, and planning staff notified no one, including People's, of the proposal. There was no practical way for residents, HAND, or even People's itself to comment on, testify for or against, or provide input into the decision. Discussions at HAND board meetings after the change was adopted brought up concerns, because the current non-conforming conditional use status provides more protections to neighbors. We feel a better decision might have been made had we been able to present this position early in the process.

People's is not the only example in our neighborhood. We also understand that planning staff has a list of Addendums and an Errata. This list is not yet publicly available, but as part of your citizen outreach policy it should be. To date, there has been no public discussion of what is on the list, no notice to potentially affected homeowners or neighbors. We feel the city council should not consider any of these changes until a process is developed to notify both property owners and their neighbors, and provide an opportunity for them to weigh in on the decision.

We feel that greater transparency by the city is needed regarding comprehensive plan changes in order for citizens to feel that the document is valid and represents their needs.



We believe this pattern is being repeated throughout the city. Planning staff have told us it is Bureau policy only to provide the minimum notification required by law, and not to notify the owners or occupants of surrounding properties. They have also told us it is policy not to inform any party (including property owners) early in the process, until well after PSC has acted on recommendations from staff, at which point it is too late to help shape an alternate decision.

We feel that public notice should include the following three elements:

- Notice should be provided early in the process, before any decisions are forwarded to the PSC, so stakeholders can have the opportunity to testify.
- Notice should be provided to all stakeholders the property owner, adjacent property owners and tenants, and the neighborhood association. Changing the zoning of one property affects those around it.
- Notice should be specific. Some notices suggesting simply that recipients "Check the Map App" may have been sent; this is not sufficient.

We understand that notifying more parties can mean increased expense, but there may be ways to reduce the financial impact, such as targeted mailings similar to Type II adjustments, posting signs at affected properties rather than sending notices by mail, or even providing an online application where people can register to receive electronic notices about changes in their area. (Such an application could easily be used in future planning, transportation, and zoning-related notification processes.)

The Comprehensive Plan update process has a significant potential to impact people and their properties in profound ways, and that it is important to have a more robust and inclusive system for public notice to bring people into the process.

With more input from the community, the updated Comprehensive Plan would be a stronger document and would better reflect the needs of Portlanders. You have already heard testimony that many residents feel that planners have made decisions that reflect a lack of understanding of the communities being "planned." It may be too late to change course on what has already occurred, but we urge you, moving forward, to ensure that timely and inclusive notice is given to all affected parties when a zoning or Comprehensive Plan change is contemplated.

Thank you,

Susan E. Pearce HAND Chair



BOOKIN GROUP LLC

Land Use & Institutional Planning

Policy Analysis

Project Management

Group Facilitation January 7, 2015

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

SUBJECT: Requested changes to the Comprehensive Plan Designations on property owned by St. Luke Lutheran Church

Dear Mayor Hales and City Commissioners:

The Bookin Group LLC (TBG) is the consulting land use planner for St. Luke Lutheran Church, which is located at 4595 SW California Street in southwest Portland. As shown in the attached tax map (Figure 1), SLLC currently owns five adjoining tax parcels (2500, 2600, 200, 202, and 501).

SLLC is in the process of reconfiguring the properties under its ownership to consolidate Tax Lot 501 and 202 and then to extend the southern lot line of Tax Lot 200 until it is the same depth as Tax Lot 2600 to the east (See Figure 2).

As shown in Figure 3, Tax Lots 200 and 202 are currently split-zoned with Neighborhood Commercial and Medium Density Single Dwelling comprehensive plan designations. This splitzoning is not desirable from a planning perspective and has been identified for correction by City staff as shown on the Recommended Comprehensive Plan Map Application.

SLLC would like to request that changes to the comprehensive plan designation for their properties reflect the future lot lines as shown on Figure 4. The current designation for the lots with frontage on SW Vermont Street is proposed to be changed to Mixed Use Dispersed. SLLC requests that this designation be extended to the south across the entirety of Tax Lot 200 and approximately 61 feet onto Tax Lot 202 - the future location of the lot's southern property line.

In addition, as Figure 4 indicates, the properties immediately to the east of St. Luke's ownership (TL 100, 300, and 400) that have frontage on SW 45th Avenue and SW Florida Street have been included in the recommended changes. Their comprehensive plan designation is recommended by staff to change from Medium Density Single Dwelling to Medium Density Multi-Dwelling. SLLC would like to request that the same consideration be given to Tax Lot 501 and the southern portion of Tax Lot 202, both under SLLC's ownership. Tax Lot 501 and 202 are similarly located within walking distance of the intersection of SW 45th Avenue and SW Vermont Street and the increased density of housing on these parcels is justified by the increased pedestrian access afforded by the sidewalk improvements on SW Vermont Street, SW 45th Avenue, and SW California to be completed as a part of a Local Improvement District formed by SLLC and later joined by Winkler Development, the owners of Tax Lots 100, 300 and 400 to the east,

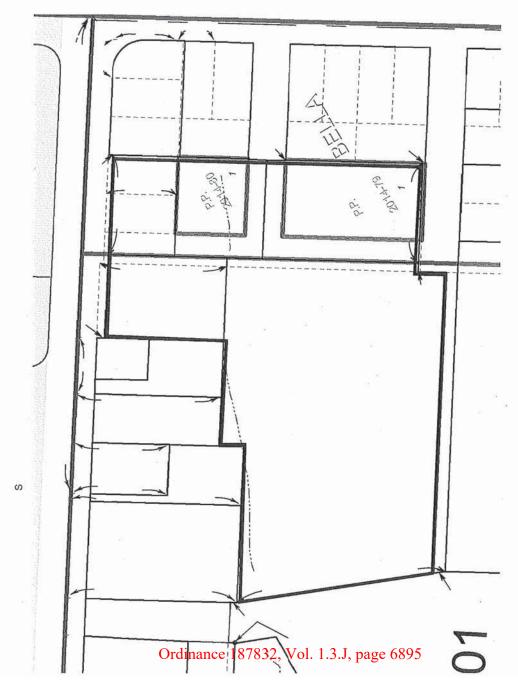
We would appreciate the Council's consideration of this request in its deliberations. Thank you.

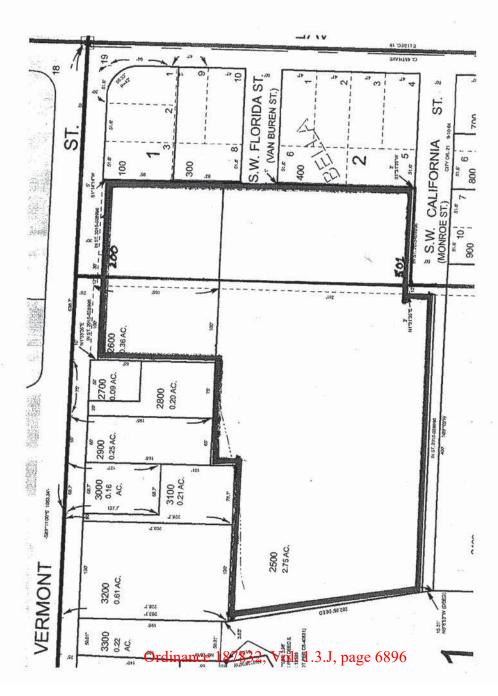
Suite 320 Sincerely, Portland, Oregon

813 SW Alder Street 97205 Telephone

503 241 2423

Chris Hagerman, PhD, Principal

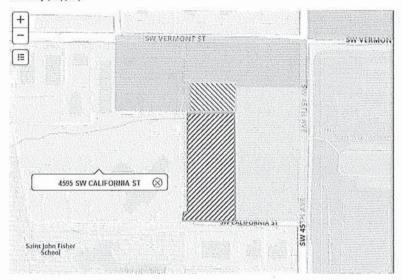




R1 CN2

Figure 3: Current split-zoning of St. Luke Lutheran Church properties

Figure 4: Designations in the Recommended Comprehensive Plan (solid) and those requested in this testimony (stripped).



Current Zoning: CN2 and R7

Current Comprehensive Plan Designations: Medium Density Single Dwelling, Neighborhood Commercial Proposed Comprehensive Plan Designation: Mixed Use Dispersed, Medium Density Multi-Dwelling

St. Luke Lutheran Church Proporties proposed for changes:

TL#200 - 4534 SW Vermont Ave - R113784

TL#202 - NE Cor/46th & SW Florida St - R666535

TL#501 - 4545 SW California St - R666528

## **PERKINSCOIE**

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January 7, 2016

Michael C. Robinson MRobinson@perkinscoie.com p. +1.503.727.2264

#### VIA PERSONAL DELIVERY

Mayor Charlie Hales City of Portland City Council 1221 SW 4th Avenue, Room 340 Portland, OR 97204

Re: Agenda Item 28 (Previous Agenda No. 1296); Adoption of New Portland Comprehensive Plan

Dear Mayor Hales and Members of the Portland City Council:

This office represents Providence Health & Services – Oregon ("Providence"). Providence's appreciates the City Council's consideration of new Portland Comprehensive Plan (the "Plan") policies addressing institutions. As explained below, Providence asks that the City Council consider changes to the proposed Campus Institution Plan policies prior to making a final decision. Providence cannot support the proposed Campus Institution Plan policies without the changes requested in this letter.

Providence submitted a letter to the Portland Planning and Sustainability Commission (the "PSC") dated March 13, 2015 (Exhibit 1) addressing many of the issues raised in this letter. I have included the letter as an exhibit so that the City Council may see all of Providence's suggestions.

The proposed Campus Institution Plan policies are contained in proposed Plan policies 6.55 through 6.60. Providence raises the following issues for these Plan policies.

1. The Plan Policies Should be Adopted before the Campus Institution Land Use Regulations (the Proposed CI-1 and CI-2 Zoning Districts) are Adopted in Order for the Plan Policies to Inform the Land Use Regulations.

The Plan policies establish the City's vision for development. Land use regulations implement the Plan's vision.

The proposed Plan policies before the City Council will be adopted concurrently with the implementing land use regulations. An institution supporting the Plan policies cannot be assured that the land use regulations will be as intended since once the Plan policies are adopted, the City has considerable discretion in their implementation.

Mayor Charlie Hales January 7, 2016 Page 2

Providence asks that the City Council consider revisiting the Plan policies following the PSC recommendation to the City Council concerning the Cl-1 and Cl-2 land use regulations. This will allow institutions the opportunity to determine that the final, proposed land use regulations are acceptable.

2. Approved Conditional Use Master Plans ("CUMP") Should be Allowed to Continue and Be Extended at the Institution's Option.

Almost every health care institution in the City has an approved CUMP. The health care institutions have worked hard with their neighbors to develop CUMPs that reflect how the health care institution can grow while being a good neighbor to its neighbors. However, the proposed Plan policies say nothing about maintaining and extending the CUMPs.

Providence asks that the City Council consider adopting the following Campus Institution Plan policy:

"Policy 6.61. Existing Conditional Use Master Plans. Existing conditional use master plans represent a commitment by a campus institution and an approval by the City to a certain kind of future growth that has been found to be compatible with adjacent neighborhoods. Implementing land use regulations should allow for approved CUMPs to be continued and extended at the campus institution's option."

3. Existing Transportation Demand Management ("TDM") Plans Should Continue to be Used.

Many of the CUMPs, including the CUMP for Providence Portland Medical Center, include successful TDM plans. Providence's TDM has successfully reduced single occupancy vehicle ("SOV") trips. The proposed Plan policies should allow for the continuation of approved and successful TDM plans. Providence requests that the City Council consider the following Campus Institution Plan policy:

"Policy 6.62. Transportation Demand Management Plans. Transportation demand management plans approved as part of a conditional use master plan that have proven to be successful in reducing single occupancy trips and encouraging use of a variety of transportation modes shall be allowed to be continued and, if a new transportation demand management plan is required, an existing transportation demand management plan shall be considered as satisfying at the

Mayor Charlie Hales January 7, 2016 Page 3

requirement for a new transportation demand management plan."

#### 4. Conclusion.

Providence appreciates the work that the professional staff, the PSC and City Council have devoted to the implementation of Portland's new Plan. Providence also appreciates the opportunity to be part of the discussion, especially as it affects Portland Providence Medical Center. Providence respectfully requests that the City Council leave the written record open in order to allow it and other parties the opportunity to respond to testimony presented to the City Council through tonight so that the City Council may have the benefit of the parties' comments on the testimony.

Very truly yours,

Muhail CRalit

Michael C. Robinson

MCR:rsr Enclosure

cc: Ms. Dana White (via email) (w/ encl.)

Ms. Karen Weylandt (via email) (w/ encl.)

Ms. Krista Farnham (via email) (w/ encl.)

Ms. Michelle Bernard (via email) (w/ encl.)

Mr. Jeff West (via email) (w/ encl.)

Mr. Trent Thelen (via email) (w/ encl.)

Ms. Marty Stiven (via email) (w/ encl.)

# perkinscoie

1120 NAV Couch Street 10th Floor Portland: GR 97/209-4128 • +1.503.727.2000 • +1.503.727.2222 perkinscole.com

March 13, 2015

Michael C. Robinson MRobinson@perkinscoie.com p (503) 727-2264 F. (503) 346-2264

Mr. André Baugh, Chair City of Portland Planning and Sustainability Commission City of Portland Bureau of Planning and Sustainability 1900 SW Fourth Avenue, Suite 7000 Portland, OR 97201

Re: Portland Comprehensive Plan ("Plan") Update; Proposed Policies 6.53-6.58

Dear Chair Baugh and Members of the Commission:

This office represents Providence Health & Services—Oregon ("Providence"). I am writing on behalf of Providence to comment on proposed Plan policies 6.53-6.58 concerning Campus institutions and to offer additional comments on the Plan update concerning Campus institutions. I have attached Providence's previous letter dated November 3, 2014.

Providence continues to support the concepts found in proposed Plan policies 6.53-6.58 for recognition of the importance of Campus institutions to the Portland economy. Providence believes, as it said in its November 3, 2014 letter, that the Plan policies should expressly provide for the following:

- The proposed Plan policies should provide for the implementing land use regulations to allow use of approved Conditional Use Master Plans ("CUMPs") by Campus institutions, such as Portland Providence Medical Center, for existing CUMPs to be modified, and for new CUMPs to be adopted as an alternative to development under a new zoning district.
- The proposed Plan policies should expressly provide that the Campus institution Plan map designation may be achieved through either legislative, or quasi-judicial implementation. Providence believes that a legislative implementation by the City is preferable to quasi-judicial implementation for a number of reasons. However, if the City proceeds with a legislative amendment, a major institution should be able to "opt out" of the legislative amendment, or if it "opts in" to the legislative amendment, that it be allowed to continue to rely upon an approved, modified or new CUMP.
- The proposed Plan policies and mapping should be adopted concurrently with the
  implementing Campus institution land use regulations. The City will implement the Plan
  policies through land use regulations. The land use regulations as adopted may not be
  satisfactory to major institutions. Concurrent implementation allows major institutions
  the opportunity to review the land use regulations before the Plan policies are adopted.

3863X-0014/LEGAL125320406.1

Mr. André Baugh, Chair March 13, 2015 Page 2

Thank you for your consideration of these comments. Please place this letter in the official file for the legislative amendment and provide me with written notice of the Commission's recommendation to the Portland City Council.

Very truly yours,

Michael C. Robinson

MCR:rsr Enclosure

cc: Ms. Dana White (via email) (w/ encl.)

Ms. Karen Weylandt (via email) (w/ encl.)

Ms. Michelle Bernard (via email) (w/ encl.)

Ms. Marty Stiven (via email) (w/ encl.)

From: Blythe Olson <br/>Sent: Thursday, January 07, 2016 8:42 PM<br/>To: BPS Comprehensive Plan Testimony

Subject: Comprehensive Plan Testimony - second addendum to testimony submitted earlier

today

Attachments: Comments - January 7th final .pages

Please add these additional 2 names to our comments submitted earlier for City Council consideration regarding the property at 2855 SW Patton Rd.

Jim Servo 2783 SW Montgomery Dr

Becki Servo 2783 SW Montgomery Dr

This brings the total number of signatories to our comments to 227 neighbors.

The updated Comments with all endorsers is attached.

From: Sent: dena higgins <denavision@gmail.com> Thursday, January 07, 2016 8:07 PM BPS Comprehensive Plan Testimony

To: Subject:

Comprehensive Plan Testimony

We are writing regarding the property at 2855 SW Patton Rd.

We are requesting that the city council keep intact the ordinance that was signed into law in 1984.

It is Ordinance No. 155609.

Stroheckers has provided an incredible service to this neighborhood community with the grocery store, post office, pharmacy and liquor store. Living in these hills, so far from other services, Stroheckers has been a life - saver!!!

We hope that when a new grocery goes in its place, that considerations will be made for parking, as many people use this store that can not walk or ride their bikes there. Also, if new housing of some kind is put in we hope the intention is to put in parking for those homes, in addition to parking for the new grocery facilities that the 1984 ordinance requires.

Thank you for your time and consideration.

Sincerely, Dena Higgins and Scott Higgins 3773 SW Blackstone Lane Portland, OR 97239

From:

Pat Willey <pat@willey.ws>

Sent: To:

Thursday, January 07, 2016 8:06 PM

Subject:

BPS Comprehensive Plan Testimony

Attachments:

Submission of Comment/Public Testimony on the Recommended Comprehensive Plan

RCPNATestimony-

TransportationParkingElementsofRecommendedCompPlanUpdate11172015-TDR.pdf;

ATT00001.htm

In addition to my comments submitted earlier today, I wish to give my endorsement to the Rose City Park Neighborhood Association comments in the attached PDF file.

Sincerely,

Patrick Willey 3371 NE Multnomah St. Portland, Oregon. 97232

From: Christopher Otero <christoph:otero@gmail.com>

Sent: Thursday, January 07, 2016 8:03 PM
To: BPS Comprehensive Plan Testimony

Cc: matt.brischetto@gmail.com

Subject: Zoning change

## Whom it concerns,

I'm writing to support the zoning proposal of the property at 2717 SE 15th Ave. Portland, OR from an R2 zoning to CM zoning code. I believe that under a CM zoning code this property would have a historical title and no one would be able to knock down the houses on the property. I believe this zoning change would be a substantial benefit to the neighborhood and would help keep the city of Portland authentic.

Thank you,

Chris Otero 2717 SE 15 Ave. Portland, OR 97202

From: Sent: Scott McAuslan <smcauslan88@gmail.com>

Thursday, January 07, 2016 7:51 PM BPS Comprehensive Plan Testimony

To: Cc: Subject:

Matt Brischetto Zoning Change

Scott McAuslan

Current resident at:

2717 SE 15th Ave. Portland, OR 97202

I, Scott McAuslan, am in support of the zoning change proposal from R2 to CM zoning. I feel this change will better benefit the neighborhood and keep it historical, and reduce town home/condominium building, which I am in favor of.

Thanks,

Scott McAuslan

From:

Rosalvn Scaife <rozscaife@hotmail.com>

Sent: To: Thursday, January 07, 2016 7:22 PM BPS Comprehensive Plan Testimony

Subject:

Testimony

I don't like the fact that people of color namely black people do not have services or activities or businesses owned and operated by us. I don't like feeling like I am being watched when I go shopping because of the color of my skin. I do not feeling like I am a visitor when I grew up here. I even worked for Fred Meyer when there was a Walnut Park location.

I would like to have more businesses invested in and opened in our community that are run by black people we don't have not one restaurant that is black owned and operated in our community.

I would like to have American-African or African-American teachers teaching my child about the contributions made to this earth by black people which is necessary ensure a healthy amount of self-esteem. This, self-esteem, is very important to the survival of black children.

With all of the crimes of hate in the media against black people we need a change in our favor and we need it fast.

Thank you for your time and attention to this matter.

Rosalyn Scaife

From:

Christopher Eykamp <chris@eykamp.com>

Sent:

Thursday, January 07, 2016 6:54 PM

To: Subject: BPS Comprehensive Plan Testimony Comprehensive Plan Testimony

Dear Portland City Council members,

I am writing to support the following three policy provisions proposed by the Division Design Initiative.

- Improve Community Notification and involvement (DDI Policy Recommendation #1) to better engage individuals and neighborhoods to have more meaningful and timely opportunities to be involved in the planning and design of future growth. This is an issue of wide concern amongst my neighbors.
- 2. Close the Floor Area Ratio (FAR) code loophole, now. (DDI Policy Recommendation #2) The lack of an FAR requirement provides an incentive for additional square footage to developers that is outdated, and has resulted in boxy buildings with flat facades, blank walls, and little room for design details that help buildings blend better within their context. Although the City is proposing to add an FAR to close this gap in future zoning updates to new Mixed Use Zones, it won't take effect until 2017. We need leadership now to fix this code loophole, to ensure as many buildings as possible will be better designed.
- 3. Support infill density with fewer impacts by conducting further refinement of the City's proposed Growth Scenarios (DDI Policy Recommendations #4, #6, #9); incorporating permit compatibility criteria (#3); and requiring development impact analysis (#10). These will help communities achieve good quality developments with less conflict and will result in more successful density through context-sensitive design.

I hope you will enact these measures to help ensure we get higher quality development as Division continues to grow.

Thank you,

Chris Eykamp 2101 SE Tlbbetts Portland 97202

From:

Leah Woods <leahwoods1027@gmail.com>

Sent:

Thursday, January 07, 2016 6:18 PM BPS Comprehensive Plan Testimony

To: Subject:

PDX Comp Plan Concerns - Zoning Change Stark/Belmont-26th/30th Aves

Dear Planning and Sustainability Commission,

Please accept the following as my written testimony regarding the 2035 Comprehensive Plan:

The current proposal includes a zoning change to the blocks between Stark and Belmont and 26th and 30th Avenues where I reside. The proposed change would take an area that is currently R5 and R2.5 zoning and would increase it to R1 and R2. I oppose this change and ask the commission to remove this up-designation from the plan. My reasons are as follows:

- The zoning change is highly focused on this small area- there are no other areas of this size that have such extensive changes proposed, yet the composition of these blocks is very similar to the rest of the Sunnyside/Buckman/Hawthorne neighborhoods. Why have our blocks been targeted for this change when virtually the rest of inner SE Portland is being left alone?
- The targeted nature of this change would encourage tear downs in our neighborhood. There are single family old Portland homes
  that would be changed from R5 to R1 in this proposal. Why would we do this except to encourage tear down and new development?
- The potential new development would alter the character and scale of our neighborhood dramatically, and would also impact current affordable housing options in the neighborhood as new development would be done for market-rate housing.
- The change is not in line with the City's own statements about development goals where there is increased density along
  commercial corridors that decreases as you get farther away from the corridor. The neighboring areas along Stark and 30th Ave
  would remain R5 and R2.5, so it would simply form a pocket zone of increased density in an existing built-out neighborhood (the
  R1 designation would reach 4 blocks beyond the Belmont corridor).
- It is not reasonable to cite that this change is being made to bring properties into zoning conformance when the proposed zoning
  changes are not more widespread. For example, there are non-conforming properties across the street from the area of proposed
  change. Why weren't more properties included throughout SE Portland in this change? In addition, property owners should be
  aware of zoning restrictions upon purchase/build, so why am 1 being forced into a change to account for their negligence?
- The first researched and proposed plan (July 2015) did not include such an extensive change to this neighborhood but was changed
  after testimony from apartment owners who do not live in the area without input from neighborhood residents.
- . The infrastructure is not in place for this targeted up-designation. We do not have a park and we are served by one bus line.

This proposal is not in the best interest of our neighborhood and unfairly targets our area. I ask that you remove the up-designation for Belmont/Stark-26th/30th Aves from the plan.

Thank you, Leah Woods 706 SE 28th Ave Portland OR 97214

From: Lindsay Jensen < lindsay@stjohnsmainstreet.org>

Sent: Thursday, January 07, 2016 5:44 PM
To: BPS Comprehensive Plan Testimony

Subject: Comp plan - addressing needs in St. Johns
Attachments: SJMS Letter to City Zoning on Lombard.pdf

Dear members of City Council:

Unfortunately, I am unable to make tonight's hearing, so wanted to send written testimony about proposed comp plan changes in St. Johns.

St. Johns has a rich history of being a vibrant and working class neighborhood. We are one of the most economically diverse neighborhoods, which is something that we value and want to hold on to. While we also recognize the need for growth, it's important to us that we can maintain our history and the people who have made St. Johns what it is today. With this in mind, it is critical that the city invest in affordable housing and living wage jobs in St. Johns.

The 15 acre industrial site (known as Steel Hammer) represents our rich history and is a site ripe for new development. Quite frankly, 15 acres is lot of land and one of the few properties left in the City of Portland at that scale. We need to be creative with that space and figure out how to make it a space that accommodates affordable housing and living wage jobs.

The city worked hand-in-hand with residents to create the St Johns/Lombard Plan back in 2004. We agreed that the 15 acre site should transition to a variety of uses. In this, we recognize that we have given away a lot of flexibility and development potential to the property owner. The current zoning is industrial, but the proposed zoning is Mixed Use. Mixed Use should mean something, not just housing (and definitely not luxury housing). What's the purpose of this zoning category?

The neighborhood wants long term affordable homes and living wage jobs that harken back to our roots. We urge you to look at the Mixed Use category and figure out ways to ensure that important community benefits come out of these "flexible" projects. We do not want to see any more of our neighbors displaced.

I am also attaching a letter, encouraging the city to NOT down-zone the section on Lombard at the intersections of N. Catlin to N. Bruce.

Sincerely, Lindsay

Lindsay Jensen, MBA Executive Director

St. Johns Main Street 8250 N Lombard Street Portland, OR 97203

lindsay@stjohnsmainstreet.org

Office: 503-841-5522 Cell: 360-450-9892



January 7, 2016

To the members of City Council:

St. Johns Main Street and the neighborhood Land Use Committee have met with neighbors on N. Lombard Street who are affected by the proposed zoning changes (as highlighted in the Comprehensive Plan) for properties north of the intersection with N. Catlin to the intersection with N. Bruce. This proposed change would down-zone properties, changing the zoning designation from medium density to single dwelling. This is proposed change 190.

The general consensus is that the zoning changes proposed will negatively affect the home owners and residents of the proposed zoning change by creating incompatible land uses. The proposed Single Dwelling designation is "intended to create, maintain and promote single-dwelling neighborhoods" (Portland BPS website). However, it is being employed on a designated truck route that carries freight to the Port. The Port estimates that approximately 1900 trucks pass along the truck route each day. This quantity of industrial traffic is not suitable for single-dwelling homes or neighborhoods. Consequently, families will not choose to live on this road because of environmental health and safety issues, thus further relegating people/families who cannot afford safer places to live in this incompatible zone. Those who currently live there may continue to do so, but will never have the opportunity to transition it to a more compatible land use. Developers who may be able to transform it over time into a street/district that is more compatible with truck traffic will not be able to because of the zoning. Homeowners will see their property values go down. This is a lose/lose strategy for mitigating the truck use and although this letter does not address feelings towards the truck route decision, it recommends leaving the zoning flexible so that home owners and residents currently living there are not fossilized in a poor land use decision as the future of the truck route may shift or change.

For all of the aforementioned reasons, we propose to leave the zoning as it is, and to consider future zoning changes as part of a larger vision that integrates transportation and land use decisions more fluidly.

Thank you for your consideration.

Kind regards,

Lindsay Jensen, Executive Director lindsay@stjohnsmainstreet.org

503-841-5522

From:

Don Q Baack <back@q.com>

Sent: To: Thursday, January 07, 2016 5:42 PM Hunting, Duane

Cc:

BPS Comprehensive Plan Testimony; Robert Hamilton (robert@phww.org); vpimont@spiritone.com; Glenn Bridger (gbridger@teleport.com); Wes Risher

(wrisher@easystreet.net); carolynraz@comcast.net; rickm@meigs.org; Barbara Bowers; Eric Wilhelm; Sheila Fink; lesliepohl@comcast.net; michael.reunert@comcast.net; mikal@windermere.com; apanitch@comcast.net; Rick Seifert (wfseifert@gmail.com); John Gould; Mike Roach; rstein@spiritone.com; Bogert, Sylvia; Frederiksen, Joan

Subject:

[User Approved] Re: "Comprehensive Plan Testimony" - HNA Comments on Wilson

High School Zoning Adjustment

Good job Duane, thanks.

Don Baack 503-246-2088 <u>baack@q.com</u> 6495 SW Burlingame Pl Portland, Or. 97239

On Jan 7, 2016, at 14:45, Hunting, Duane <duane.hunting@zgf.com> wrote:

Portland City Council:

#### MAP ZONE CHANGE REQUEST:

The Hillsdale Neighborhood Association (HNA) is requesting that the <u>Comprehensive Plan zoning designation</u> for the Wilson High School campus at 1151 SW Vermont Street, Portland, Oregon 97219 be returned to <u>"conditional use" within an R7 (Residential 7,000 sf) zone designation</u> to be consistent with all other Portland Public School (PPS) property zoning. The Wilson High School campus (Quarter Section Map 3628) is currently zoned IRd (Institutional Residential) as a holdover from the Hillsdale Town Center Plan approved in 1997 by the City of Portland. The adjacent Mary Rieke Grade School (Quarter Section Map 3627) is currently zoned R7. This requested zone change was approved by the HNA Board of Directors at last night's January 6, 2016 monthly meeting. With no time to send a letter to the Council Clerk, 1221 SW 4<sup>th</sup> Avenue, Room 130, Portland, Oregon, I'm emailing our request to the Council as directed by the Bureau of Planning and Sustainability information received to meet the Thursday, January 7, 2016, 6:00 pm deadline.

#### BACKGROUND INFORMATION:

Originally, HNA was promised a Wilson High School Campus Plan within 2 years of the Hillsdale Town Center Plan adoption by the city in 1997. However, no campus plan has been prepared to date, and the neighborhood has been advised to participate in review and comment upon the many adjustments made over the last 20 years. In developing the Hillsdale Town Center Plan, the Hillsdale neighborhood was too early at embracing the future development of the school campus through an early acceptance of the Institutional Residential (IR) zoning within the Hillsdale Plan District designation. HNA was not advised previously that accepting the IR zoning, in lieu of the "conditional use" designation within the R7 zoning of the adjacent neighborhood and schools, we would not receive the promised campus plan and not be invited to the PPS review and discussion table for improvements such as the Baseball Batting

From:

Lisa Maxfield <lamaxfield@pacificnwlaw.com>

Sent: To: Thursday, January 07, 2016 5:31 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony - Strohecker's property 2855 SW Patton Rd.

#### Good Afternoon.

I am writing regaring proposed zoning changes for the Strohecker's property 2855 SW Patton Rd. I urge the city to continue to honor Ordinance No. 155609, which was signed into law in 1984. The ordinance was enacted to help to maintain the safety, livability and property values of a lovely neighborhood. It is important that the city honor the law despite changes in the ownership of of the former Stohecker's Grocery Store.

Lisa A. Maxfield 4478 SW Greenhills Way Portland, OR 97221

"Most men would get discouraged by now. Fortunately for you, I am not most men!" -Pepe Le Pew

From: Ann Naughton <thenaughtons1@comcast.net> Sent:

Thursday, January 07, 2016 5:23 PM To: Scarzello, Christina: BPS Comprehensive Plan Testimony

Cc: 'Michael Naughton'; inaughton61@gmail.com; thenaughtons1@comcast.net

Subject: RE: Comprehensive Plan Testimony, James and Michael Naughton, 9 NE 120th Ave. and

9 NE 120th Ave #WL Portland, OR 97220

Attachments: Tax ids.pdf

To the Comprehensive Plan Council and City of Portland.

Mailing address for Zone change Testimony below:

Michael and Ann Naughton James and Paula Naughton

9 NE 120th Ave. Portland, OR 97220

Phone:

First contact: Ann Naughton cell: 503-320-1522

Second contact: Michael Naughton, Dental Office work phone: 503-253-7814

Third contact: James Naughton cell: 503-310-7072

From: Ann Naughton [mailto:thenaughtons1@comcast.net]

Sent: Thursday, January 7, 2016 4:53 PM

To: 'Scarzello, Christina' < Christina. Scarzello@portlandoregon.gov >; cputestimony@portlandoregon.gov Cc: 'Michael Naughton' <a href="mailto:smpnaughton@ipns.com">mpnaughton@ipns.com</a>; inaughton61@gmail.com; thenaughtons1@comcast.net Subject: Comprehensive Plan Testimony, James and Michael Naughton, 9 NE 120th Ave, and 9 NE 120th Ave #WI,

Portland, OR 97220

To the Comprehensive Plan Council and City of Portland.

We are writing to request a Comprehensive Plan designation and zone change on our properties located at Burnside and NE 120th Ave, from RH to the new proposed CM3/Mixed Use-Civic Corridor. Jim Naughton and Mike Naughton currently own both properties at 9 NE 120th Ave. (R175182) and the lot next to it 9 NE 120th Ave #WI. Portland. OR 97220 (R175181). See attached. Both properties are currently zoned RH. The dental office currently has nonconforming use for that zone. The building sits on Burnside. MAX runs in front with the 122<sup>nd</sup> MAX stop two lots away (there is no NE 121st Ave at that point). A low income multi family high rise has been erected next door. A mini mart is across Burnside. as well as additional multi family apartments.

Jim and his brother, Dick (deceased) are two dentists who built the office in 1972. It has continued as a large, successful dental office now occupied by Richard's son Michael Naughton and two other dentists. They have seen change throughout the years and want to keep current with zoning, codes and the City's view of the future. Because of the proximity to the commercial businesses of 122<sup>nd</sup>, the development of multi family high rises, and the variety of use in that area, we think now would be the time to request the zoning change from RH to the proposed CM3.

It is our understanding that by changing to CM3 both properties will:

- 1. Continue to keep their medical/dental use and become conforming
- 2. Continue to keep the multi family/high density (RH) use option
- 3. Add commercial and mixed use status.

A special thank you to Christina Scarzello, East District Liaison, Portland Bureau of Planning and Sustainability for her assistance.

Please email or call if you have any questions. Thank you very much for your consideration.

Thank you,

Michael and Ann Naughton owners James and Paula Naughton owners

From: Nancy Seton <Nancy Seton@comcast.net>
Sent: Thursday, January 07, 2016 5:16 PM

To: BPS Comprehensive Plan Testimony

Cc: Gloria Reich; Kady Al-Saeed; Kara Stone; Karen Healey; Kelly Reece; Lee Doss; Margaret

Gossage: Ryan Fedie: Sean Bajoni

Subject: RESEND: Comprehensive Plan Testimony - SWHRL Neighborhood Assn.

Attachments: SWHRL Comprehensive Plan Testimony 7 Jan 2016.pdf

I inadvertently left off my mailing address earlier:

Nancy Seton 2020 SW Edgewood Road Portland OR 97201

From: Nancy Seton [mailto:NancySeton@comcast.net]

Sent: Thursday, January 07, 2016 5:05 PM

To: 'cputestimony@portlandoregon.gov' <cputestimony@portlandoregon.gov>

Subject: Comprehensive Plan Testimony - SWHRL Neighborhood Assn.

Hello,

Attached are comments on the Comp Plan Land Use Map from the Southwest Hills Residential League (SWHRL) Neighborhood Association.

Thank you for your consideration,

Best regards,
Nancy Seton, President & Land Use Chair,
Southwest Hills Residential League (SWHRL) Neighborhood Association

#### January 7, 2016

From: Nancy Seton, President, Land Use Chair SWHRL (Southwest Hills Residential League) Neighborhood Association

To: Portland Planning and Sustainability Commission psc@portlandoregon.gov

Comprehensive Plan Testimony from Southwest Hills Residential League (SWHRL)
Neighborhood Association on Proposed Zoning Changes in 2035 Comprehensive Plan

Re. Proposed Change #1128 – From existing Neighborhood Commercial (CN2)
To New proposed: Commercial Mixed-Use Dispersed (CM1) (Strohecker's Property)
This property is located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

Our SWHRL Board and the neighborhood as a whole were not unanimous in our thinking on the Stroheckers property, except for agreeing that we don't want to lose a commercial component of the site – currently the only grocery on the hill (and soon to close!) We would oppose development that would raze the grocery store to install multi-dwelling only. That would be allowed under the Mixed-Use CM1 if the current restrictive land use conditions of approval (per Ordinance No. 155609 adopted 1984) didn't override the new zoning. The Board also sees the need for improved infrastructure for all modes of transport to alleviate congestion and encourage use of transit, walking and biking.

The SWHRL neighborhood has very few commercial amenities within its boundaries – this one multi-service grocery on the hill (now to close 1/31/16), one restaurant, a gas station and a few other small shops. Since our transit service is limited to weekday commuter hours, it is especially important to preserve the few commercial areas we have. For many of those without a car, it is not feasible to shop in Hillsdale, Raleigh Hills or Zupans at the bottom of the hill and then to lug the groceries 1-2 miles back up very steep hills. This is especially problematic when our streets and sidewalks are covered with snow or ice, and many can't even drive down or up the hill. Perhaps what we need is a "Food Security Overlay"!

There should be an addition to the proposed CM1 zoning that would protect existing commercial establishments from being demolished in favor of multi-dwelling only in amenity-poor neighborhoods such as ours. The definition of CM1 would seem to confirm this: "This designation allows mixed use, multi-dwelling, or commercial development that is small in scale, has little impact, and provides services for the nearby residential areas." Condos only would not provide services for the nearby residential areas. True Mixed-Use development with small scale residential over ground-floor commercial would at least still provide the services intended for the zone.

On the one hand, a substantial group of neighbors near the Strohecker's property at 2855 SW Patton Rd. feel strongly that the existing Ordinance allowing only a grocery store with the existing size should continue in effect. They have sent in their testimony separately. Others in the neighborhood would favor a little flexibility if it were essential to the viability of a market, thereby avoiding an empty building. In any case, the substantial commuter traffic on SW Patton is a serious issue affecting the livability of this area, so it would not be good to add development which would exacerbate that congestion.

Nearby residents to the grocery are also justified in their concern that additional stories of multi-dwelling units added over a store would overwhelm the neighboring homes in scale, since the wall of the store is very close to the sidewalk and street already. It would not fit in with the surrounding low density properties. These neighbors strongly feel additional development here would detract from the livability of their neighborhood.

For our few commercial zones in general, some Board members and residents would welcome the addition of a few more amenities - well-designed commercial or mixed-use development for the neighborhood in general, where the site could accommodate it, but only as long as some commercial use is preserved.

# Change nos. 467, 490 (still valid numbers?) – Change from Residential to Open Space on several properties

The SWHRL Board supports the changes from Residential R10 zoning to Open Space for all properties for which this is proposed in the SWHRL neighborhood. These steep wooded slopes are perfect for preservation as open space, and should not be developed. There are several such properties with the same change no. 490 – below SW Edgewood, SW Fairmount, and then no. 467 at the intersection of SW Talbot and SW Fairmount. I also wish some of the steep ravines / wetlands below Fairmount on the south and west sides could also be rezoned to Open Space or purchased by the city to be preserved from development. There are two currently for sale there that I'm thinking of - 3216 and 3258 SW Fairmount Blvd.

Respectfully,
Nancy Seton
President, Land Use Chair, SWHRL Neighborhood Assn.

From:

Blythe Olson <br/>
<br/>
blytheolson@gmail.com>

Sent: To: Thursday, January 07, 2016 5:10 PM BPS Comprehensive Plan Testimony

Subject:

Additional names for Comprehensive Plan testimony

Please add these additional 9 names to our comments submitted earlier for City Council consideration regarding the property at 2855 SW Patton Rd.

Thank you. Blythe Olson 2719 SW Old Orchard Rd

Derek Sandoz 2014 SW 17th Ave

Candy Yiu 1750 SW Broadway Dr

Ed Ulman 1553 SW Elizabeth St

Wendy Ulman 1553 SW Elizabeth St

Eileen Galen 1802 SW Elm St

Peter Galen 1802 Sw Elm St

Betty Norrie, 3429 SW Gale Ave

Jay Lee 2788 SW Old Orchard Rd

Helen Lee 2788 SW Old Orchard Rd



January 7, 2016

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

Dear Mayor Hales:

The Portland Business Alliance (Alliance) appreciates the opportunity to comment on the Recommended Draft 2035 Comprehensive Plan. We understand the significance of this plan in accommodating future growth; it sets the framework for both Infrastructure investment and physical development of the city over the next 20 years. We commend city staff for their hard work over the last two years conducting extensive research and technical analysis to inform the proposed goals and policies to guide the future growth of our city.

The Alliance has participated in the planning process for over two years now and appreciates the attempt to emphasize the importance of economic development. However, there are still opportunities to strengthen the goal of creating a prosperous economy and promoting middle-income jobs. We have commented on a number of ways to better achieve a "prosperous, healthy, equitable and resillent city" over the last two years including the assumption of a mid-cargo marine forecast, need for market ready industrial lands and investments in transportation infrastructure including improved access to middle-income jobs on industrial lands. The comments that we have submitted over the last two years remain a high priority, however the intent of this letter is to focus on the transportation elements of the Recommended Draft 2035 Comprehensive Plan.

First, we commend planning staff for inclusion of several significant transportation policies that, if fully implemented, would go a long way towards ensuring Portland's economic prosperity over the next 20 years. These policies include 9.29 – 9.35 and are critical to maintaining an efficient and complete freight system including air, marine, rail and truck capacity and promoting our traded-sector economy and quality middle-income Jobs.

We understand that as our population grows that there are capacity concerns about our city's transportation system and that there will be more people and increased demand on all modes. We also understand that our existing system will fail if current mode ratio levels remain the same in the face of anticipated population growth. That said, it is the degree to which those mode ratio levels need to change that we seek to better understand and review as part of the upcoming transportation demand management program and transportation system plan to be developed later this year.

Meantime, there is a pervasive bias for active transportation in the Recommended Draft 2035 Comprehensive Plan and while we understand there will be increased demand for these travel options there will also be increased demand for vehicular movement. We need to be strategic when crafting policies to ensure a balance of modal options. While there are many transportation policies

that promote economic prosperity and that we support, we have focused our attached comments on specific areas where we do have concerns.

Thank you for considering these proposed changes to create a prosperous, healthy, equitable and resilient city. Please let us know should you wish to discuss these comments.

Sincerely,

Sandra McDonough President & CEO

cc: Susan Anderson

Bureau of Planning and Sustainability

Portland City Council

Acadia medony

#### APPENDIX OF COMMENTS

#### Transportation

#### Design and Planning

Policy 9.6 Transportation strategy for people movement. Design the system to accommodate the most vulnerable users, including those that need special accommodation under the Americans with Disabilities Act (ADA). Implement a prioritization of modes for people movement by making transportation system decisions according to the following ordered list:

- 1. Walking
- 2. Bicycling
- 3. Transit
- 4. Taxi / commercial transit / shared vehicles
- 5. Zero emission vehicles
- 6. Other private vehicles

We appreciate that city staff have adopted the Vancouver, British Columbia model of differentiating between the movement of people and the movement of goods. While this "green hierarchy" of modes applies only to the movement of people, it should be made clear that it <u>does not</u> apply to freight corridors and the movement of goods. This hierarchy should not be applied to freight districts, regional truck ways, priority truck streets, and major truck streets as designated in the city's Transportation System Plan (TSP).

For facilities not identified as freight facilities in the TSP, we suggest that, in cases where there is overlap between the "movement of people" and the "movement of goods and services," that freight be prioritized and the green and active transportation hierarchy not applied.

#### Streets as Public Spaces

Policy 9.13 Streets for transportation and public spaces. Integrate both parking, place-making and transportation functions when designing and managing streets, by encouraging design, development, and operation of streets to enhance opportunities for them to serve as places for community interaction, environmental function, open space, tree canopy, recreation, and other community purposes.

Policy 9.14 Repurposing street space. Encourage repurposing street segments that are not critical for transportation connectivity to other community purposes.

Commercial arterials and freight corridors should not be considered for other community uses and on-street parking should not be compromised under this policy.

#### Modal Policies

Policy 9.34 Sustainable freight system. Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on – and off –street

loading spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

To further ensure a sustainable freight system, in addition to current policy, consider including policies such as:

- · Limit the number of housing units on freight routes.
- Maintain capacity for vehicular movement (auto and freight) on arterials and place bike lanes on parallel low traffic streets to avoid modal conflicts and traffic diversion into neighborhoods while ensuring that "vision zero" safety goals are met.
- · Freight has few alternative routes and should be prioritized on arterials as a result.

Policy 9.37 Automobile transportation. Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

The need to ensure portal capacity for vehicular movement (auto and freight) at freeway on-ramps and off-ramps and at bridgeheads should be called out in policy currently absent from this section. It is essential that we maintain existing portal capacity on central city freeway interchanges and bridgeheads to ensure the efficient movement of people and goods and to help mitigate congestion at these regionally-significant areas.

## Parking Management

Pollcy 9.56 On street parking. Manage parking and loading demand, supply, and operations in the public right of way to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand.

Our economic vitality is dependent on existing on-street parking and loading and unloading zones. Public right of way must be reserved for these uses that support adjacent businesses. Strongly encourage rapid turnover of on-street parking and discourage the long-term storage of cars in on - street parking spaces and minimize street swale systems that displace on-street parking.

Policy 9.57 Off-street parking. Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.

Parking promotes the economic vitality of businesses located in centers and corridors. On-street and in some cases off-street parking (i.e. Smart Park Garages) is also a critical revenue source for the city of Portland's own Bureau of Transportation. Reducing the number of parking spots would further decrease the city's revenue at a time when it seeks more funding from taxpayers. Policies that limit new parking opportunities or regulate parking for the purpose of encouraging lower rates of car ownership should not be included.

From: Sent: Alice Blatt <aliceb@pacifier.com> Thursday, January 07, 2016 5:01 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comp Plan Update testimony

I am in total agreement with Linda Robinsons testimony – she has granted my request to sign on to her submission.

Alice Blatt 15231 NE Holladay Portland, OR 97230 503-253-6247

From:

Blythe Olson <br/>
<br/>
blytheolson@gmail.com>

Sent: To: Thursday, January 07, 2016 5:00 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony - addendum to testimony submitted earlier today

Attachments:

Comments - January final.docx

To:

Portland City Council

From: Blythe Olson 2719 SW Old Orchard Rd Portland 97201 503-294-7141

I submitted testimony by email earlier today regarding the proposed zoning name changes and the existing 1984 Ordinance for the property at 2855 SW Patton Rd ("Strohecker's) that included a total of 213 endorsers for these comments from the neighborhood.

Subsequently, more neighbors have expressed the desire to be included with our comments.

Thus I am re-submitting our comments by attachment to this email with 9 additional endorsers, bringing the total of concerned Portland neighbors to 222.

Please consider this updated number of signatories in your review of our concerns.

Thank you.

# Comments for the City of Portland 2035 Comprehensive Plan

Hearing scheduled for January 7, 2016

Supplement to comments submitted Nov. 19, 2015 with additional signers

For Portland City Council consideration

These comments address Proposed Change #1128 (formerly #644) regarding the property located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

We are all neighborhood residents/owners with homes in the area near this property, many of us in close proximity.

We value having a neighborhood grocery store near us with its ancillary services (pharmacy, liquor store, postal service), but are strongly opposed to additional commercial development or high density housing that would add more traffic and parking stress to our residential neighborhood. Southwest Patton Road, the only street bordering this property, is routinely gridlocked by commuter traffic that has increased in recent years and safety for drivers and pedestrians is compromised daily.

We ask that the 1984 Ordinance No. 155609 that allowed Strohecker's to expand at that time and restricted use of the property to a grocery store remain intact with the new zoning name changes (relative to any future use of this property) so that we can maintain the livability and safety of our residential neighborhood.

Now that the store has announced its imminent closure and the intentions of the out-of-state developer who recently purchased the property are unknown, these Comments to the Portland City Council endorsed by over 200 near neighbors are particularly timely.

Thank you. The following neighbors endorse these comments:

Blythe Olson

2719 SW Old Orchard Rd

J. Mary Taylor

2718 SW Old Orchard Rd

Ordinance 187832 Vol. 1.3.J, page 6928

Faith Emerson 2730 SW Old Orchard Rd

Dan Rogers 2730 SW Old Orchard Rd

Sarah Anderson 2770 SW Old Orchard Rd

Steve Anderson 2770 SW Old Orchard Rd

Joanne Klebba 2766 SW Old Orchard Rd

Betsy Rickles 2754 SW Old Orchard Rd

Norm Rickles 2754 SW Old Orchard Rd

Christine Colasurdo 2776 SW Old Orchard Rd

Thomas Scanlan 2776 SW Old Orchard Rd

Maryann Mackinnon 2792 SW Old Orchard Rd

Frances Barnes 2731 SW Old Orchard Rd

Susan Corso 2721 SW Old Orchard Rd

Brian McDonagh 2710 SW Old Orchard Rd

Megan McDonagh 2710 SW Old Orchard Rd

Kent Weaver 2736 SW Montgomery Dr

Peter Miller 2775 SW Montgomery Dr

Sally Miller 2775 SW Montgomery Dr

Anthony Mantione 2842 SW Patton Rd

Kelly Mantione 2842 SW Patton Rd

Elisa deCastro Hornecker 2959 SW Montgomery Dr

Jeanne Windham 2753 SW Roswell Ave

Wilmer Windham 2753 SW Roswell Ave

Janet Conklin 2635 SW Montgomery Dr

Bob Conklin 2635 SW Montgomery Dr

Kathryn Scribner 2707 SW Homar Ave

Dan Scribner 2707 SW Homar Ave

Doug Coates 3040 SW Periander St

Marcia Hille 3040 SW Periander St

Jordan Lubahn 2907 SW Periander St

Jessica Lubahn 2907 SW Periander St

Barbara Wagner 2720 SW Montgomery Dr

Susan Dierauf 2783 SW Roswell Ave

Tim Dierauf 2783 SW Roswell Ave

Luis (Ed) Valencia 2738 SW Old Orchard Rd

John McPhee 2930 SW Periander St

Cindy McPhee 2930 SW Periander St

Jerome Schiller 2742 SW Old Orchard Rd

Juliet Ching 2742 SW Old Orchard Rd

Eric Butler 2851 SW Montgomery Dr

Alice Rogan 2724 SW Old Orchard Rd

Lauren Jacobs 2933 SW Perlander St

Zach Fruchtengarten 2933 SW Periander St

Joan L. Kirsch 4610 SW Greenhills Way

Jill Mitchell 4404 SW Warrens Way

Darren Mitchell 4404 SW Warrens Way

Michael Gann 2906 SW Periander St

Susan Gann 2906 SW Periander St

Christopher Gann 2906 SW Periander St

Louise Brix 2741 SW Old Orchard Rd

Page 3 of 10

Joe Laqueur 2741 SW Old Orchard Rd

Elaine Tanzer 4405 SW Warrens Way

Jake Tanzer 4405 SW Warrens Way

Nancy Lee 2833 SW Periander St

Steve Ascher 2833 SW Periander St

Susan Kirschner 2444 SW Broadway Drive

Aubrey Russell 4921 SW Hewett Blvd

Molly Spencer 4232 SW Greenhills Way

George Spencer 4232 SW Greenhills Way

Mark von Bergen 4200 SW Greenhills Way

Marilyn von Bergen 4200 SW Greenhills Way

Jim Ruyle 2714 SW Sherwood Dr

Joanne Ruyle 2714 SW Sherwood Dr

Angela Clark 2793 SW Old Orchard Rd

Khashayar Farsad 4622 SW Greenhills Way

Denielle Edlund 4622 SW Greenhills Way

Kathleen Brookfield 2738 SW Old Orchard Rd

Jason Gifford 2738 SW Old Orchard Rd

Robeson Kitchin 2799 SW Montgomery Dr

Leigh Kitchin 2799 SW Montgomery Dr

Bennett Goldstein 2925 SW Montgomery Dr

Patricia Clark 2925 SW Montgomery Dr

Terry Wirkkala 2798 SW Old Orchard Rd

Kester Wise 2751 SW Old Orchard Rd

Cat Wise 2751 SW Old Orchard Rd

Stuart Hogue 2844 SW Periander St

Gina Hogue 2844 SW Periander St

John Spano 2398 SW Montgomery Dr

Elisa Spano 2398 SW Montgomery Dr

Joseph Trump 2398 SW Montgomery Dr

Deborah Melian 2398 SW Montgomery Dr

Jennifer Wilson 2650 SW Montgomery Dr

Jon Wilson 2650 SW Montgomery Dr

Smita Tomkoria 2435 SW Broadway Dr

Candace Hiller 2790 SW Montgomery Dr

Phillip Hiller 2790 SW Montgomery Dr

Claudia Brown 2926 SW Periander St

Nicole Flinterman 2585 SW 16<sup>th</sup> Ave

Justin Kentor 4109 SW Council Crest Dr

Brigit Kentor 4109 SW Council Crest Dr

Kathy Robertson 2969 SW Upper Dr

John Convery 2768 SW Fern St

Amy Convery 2768 SW Fern St

Tom Tuchmann 2922 SW Periander St

Margaret Tuchmann 2922 SW Periander St

Deborah Mandell 3250 SW Donner Way Ct

Roy Pulvers 3250 SW Donner Way Ct

Shawn Mammen 3737 SW Sweetbriar Dr

Shannon Marcum 3737 SW Sweetbriar Dr

William Failing 2649 SW Georgian Place

Michele Bowler 2649 SW Georgian Place

Erez Russo 2662 SW Grenwolde Pl

Claudia Brown 2926 SW Periander St

Camille Hunt 2656 SW Upper Dr Pl

Harry Groth 1010 SW Myrtle St

Bryan Thurston 1525 SW Myrtle St

Diane Thurston 1525 SW Myrtle St

Cindy Easton 4344 SW Hewett Blvd

Michael Easton 4344 SW Hewett Blvd

Alan Jewett 2681 SW Montgomery Dr

Tami Jewett 2681 SW Montgomery Dr

Melinda O'Scannlain 4530 SW Humphrey Ct

Brendan O'Scannlain 4530 SW Humphrey Ct

Leanne Marinace 2818 SW Patton Rd

Anne-Marie Lamb 2865 SW Upper Dr

Robert Linifield 2865 SW Upper Dr

Greg Epkes 4560 SW Hillside Dr

Attilia Sawyer 4560 SW Hillside Dr

Marlene Braun 4211 SW Patrick Pl

James Braun 4211 SW Patrick Pl

Trish Greene 3640 SW Dosch Rd

Rich Greene 3640 SW Dosch Rd

Mary Welle 3836 SW Hewett Blvd

Beth Healde 4015 SW Council Crest Dr

Demian Healde 4015 SW Council Crest Dr

Gretchen Richter 2529 SW Vista Ave

Will Richter 2529 SW Vista Ave

Steve Kaplan 1312 SW Myrtle Dr

Kathryn Scribner 2707 SW Homar Ave

Dan Scribner 2707 SW Homar Ave

Diane Thurston 1525 SW Myrtle Dr

Brian Thurston 1525 SW Myrtle Dr

Michael Morich 4136 SW Nehalem Ct

Lindsay Morich 4136 SW Nehalem Ct

Christie Moore 3022 SW Periander St

Stacy Lewis 3022 SW Periander St

Elena Moore 3022 SW Periander St

Thomas Moore 3022 SW Periander St

Beau Blixseth 2468 SW Arden Rd

Tracy Blixseth 2468 SW Arden Rd

Maureen O'Scannlain 3919 SW Mt Adams

Karen Ritter 3226 SW Fairmount Blvd

Robert Ritter 3226 SW Fairmount Blvd

Lauren Danahy 5112 SW Hewett Blvd

Tom Danahy 5112 SW Hewett Blvd

Mary Lynne Chambers 2867 SW Montgomery Dr

Rhys Chambers 2867 SW Montgomery Dr

Erik Skarstad 2511 SW Arden Rd

Robin Skarstad 2511 SW Arden Rd

Howard Harris 5042 SW Hilltop Ln

Mabel Harris 5042 SW Hilltop Ln Linda Blaskowsky 2815 SW Patton Ln Daniel Herzig 2612 SW Talbot Rd

Sallie Herzig 2612 SW Talbot Rd

Bill Headley 2669 SW Montgomery Dr

Julie Headley 2669 SW Montgomery Dr

Lynn Pratt 2501 SW Ravensview Dr Steve Pratt 2501 SW Ravensview Dr

Betsy McCormick 1535 SW Elizabeth St

Charles McCormick 1535 SW Elizabeth St

Michael Fennerty 3902 SW Hewett Blvd
Maureen Fennerty 3902 SW Hewett Blvd

Chris Dolle 2791 SW Montgomery Dr

Anne Dolle 2791 SW Montgomery Dr

Mary Reed 3431 SW Brentwood Dr

Casey Carl 2804 SW Montgomery Dr

Everett Carl-Schooler 2804 SW Montgomery Dr

Adam LaMotte 4068 SW Hewett Blvd
Janet Coleman 4068 SW Hewett Blvd

Stacy Parker 4558 SW Ormandy Way

Jeff Parker 4558 SW Ormandy Way

Deb White 2464 SW Sherwood Dr

Kristin Morgan 1640 SW Davenport St

Rhys Morgan 1640 SW Davenport St

Lisa Smith 3941 SW Mt Adams Dr

Elizabeth B. Brown 5031 SW Humphrey Park Rd

William Lee 2411 SW Arden Rd
Allison Lee 2411 SW Arden Rd

Sean Donnelly 1611 SW Broadway Dr

Jeannie Prindle 4969 SW Humphrey Park Crest

Teri Simpson 2684 SW Talbot Rd

Thomas A. Wiley 2678 SW Talbot Rd

Laura Wiley 2678 SW Talbot Rd

Hunter Brown 5031 SW Humphrey Park Rd

Elizabeth Brown 5031 SW Humphrey Park Rd

Leslie Costandi 3640 SW Mt Adams Dr

Millard McClung 3640 SW Mt Adams Dr

Mary Lou McClung 3640 SW Mt Adams Dr

Richard Senders 2682 SW Talbot Rd

Lisa Senders 2682 SW Talbot Rd

Erik Skarstad 2511 SW Arden Rd

Robin Skarstad 2511 SW Arden Rd

John Moody 2769 SW Buena Vista Dr

Maggie Conrad 1750 SW Terrace Dr

Blaine Conrad 1750 SW Terrace Dr

Mia Miller 3716 SW Mt Adams Dr

Matt Miller 3716 SW Mt Adams Dr

Collette Gray 1012 SW Tangent St

Ed Wagner 2728 SW Montgomery Dr

Steve Pearson 2740 SW Talbot Rd

Anne Rogness 2740 SW Talbot Rd

Jeannie Santos 2681 SW Vista Ave

Leonard Santos 2681 SW Vista Ave

Sandra Joos 4259 SW Patrick Place

Valerie Hill 2624 SW Talbot Rd

Warren Hill 2624 SW Talbot Rd

Brook Howard 4243 SW McDonnell Terrace

Ann Howard 4243 SW McDonnell Terrace

Rachel Young 2493 SW Arden Rd

Chapin Titcomb 2846 SW Labbe Ave

Minah Titcomb 2846 SW Labbe Ave

Alison Friday 1703 SW Myrtle St

Sara Matarazzo 1909 SW Laurel Place

# Arevalo, Nora

ŕrom:

jill neuwelt < jneuwelt@hotmail.com>

Sent:

Thursday, January 07, 2016 4:59 AM

To:

**BPS Comprehensive Plan Testimony** 

Cc:

Eddie Neuwelt

Subject:

Comprehensive plan testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Strohecker Grocery Store 2855 SW Patton

I have lived on 4246 SW McDonnel since 1981 and have shopped at Strohecker's since then. 2 of my children worked there during highschool.

Unfortunately The neighborhood, especially the neighbors on SW Old Orchard Street, have a history of being hostile to customers and to employees. When the Stohecker family remodeled, they petitioned the city to have the A/C unit removed from the roof which added hundreds of thousands of dollars to the cost of the remodel; some neighbors seem to have nothing better to do than to make sure nobody parks on their street while shopping, even when the lot is full. As I was bidding good-bye and thanked the employees yesterday, they said that only few, maybe 20, customers came to he store to do their regular grocery shopping. Most customers may get a quart of milk or a loaf of bread, but they do their regular "big" shopping at other stores. Obviously the neighborhood does not think it is necessary to support a local business.

Closure of Stroheckers is a big loss for me. Since I live off Council, Crest drive i will now always have to drive down the hill for my groceries, quite a distance away. Apart from that, i enjoyed going to the store. The employees were friendly, the store was clean, and they always had what I needed. I appreciated their yearly picnics with the free hotdogs and hamburgers. They certainly did not fail due to lack of trying to please. And the post office was also a big convenience.

Of course I think we need a grocery store in the neighborhood. However, if it is not possible to run a profitable business, I cannot blame a developer for building condominiums. I think we get what we deserve.

Elizabeth Neuwelt 4246 SW McDonnel Terrace Portland, Oreogon 97239

Sent from my iPad

January 7, 2016

Marianne Fitzgerald 10537 SW 64<sup>th</sup> Drive Portland, OR 97219-6625

Mayor Charlie Hales and members of the Portland City Council City of Portland 1221 SW 4<sup>th</sup> Avenue Portland, OR 97204

Re: City Council January 7, 2016 meeting

Agenda Items 27 and 28

Testimony on Comprehensive Plan and Transportation Systems Plan

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

Thank you for the opportunity to provide final comments on the Draft Comprehensive Plan dated August 2015 and Transportation Systems Plan (TSP) Project List dated 071422015.

I agree with the Plan's overall approach of focusing growth in Centers and Corridors, but continue to have concerns that the language does not adequately address some of the issues surrounding growth in our communities.

The Transportation Systems Plan needs to be revised much more frequently than it has in the past in order to adapt to changing conditions and completed studies that identify new needs, and evaluate whether the process for prioritizing projects is achieving stated objectives in a transparent manner. In particular, the Bureaus of Transportation and Environmental Services need to analyze the infrastructure within the adopted Centers and Corridors and identify priority projects needed to accommodate growth where the infrastructure is deficient in these Centers and Corridors. The Comprehensive Plan language addresses future growth and does not consider infrastructure deficiencies that need to be remedied in order to fully achieve the Plan's goals.

A related concern is a comment on **Policy 9.62**, **New Development Impacts**. The language doesn't actually require new development to build infrastructure. I recommend adding a sentence to the end of this policy that says <u>all new development and redevelopment shall include transportation and stormwater infrastructure (pedestrian, bicycle, access to transit) consistent with its street <u>classification</u>.</u>

Citizens need to track the success of the Comprehensive Plan in achieving goals, and whether funding decisions are making progress toward achieving goals. The portion of the Comp Plan that I am most familiar with, **Transportation Chapter 9**, **Policy 9.48**, **Performance Measures**, is aspirational, but there are inconsistencies within the Comp Plan and difficulty accessing data to evaluate progress. The PSC transmittal letter (Sept. 10, 2015) references the 12 Portland Plan Measures of Success, including "80% of households live in complete neighborhoods (as measured by the Complete Neighborhoods Index)—but the public cannot easily access the data that is used to calculate the Complete Neighborhoods Index nor analyze that data for specific neighborhoods and evaluate progress over time. PBOT's Major Project Evaluation Criteria was based on seven outcomes and used 11 scoring methodologies but the public cannot easily access the data used in developing these scores. The City Council TSP Work Session presentation last to described how transportation projects were prioritized, but one cannot easily find these maps and tables on the TSP

Comprehensive Plan Testimony of Marianne Fitzgerald January 7, 2016 Page 2

website. It is my understanding that PBOT is upgrading its website to include the ability to track projects and programs, and this is a step in the right direction. Interested citizens need to be able to drill down to understand the underlying data in order to discuss how projects are evaluated and prioritized citywide and evaluate whether these investments are achieving goals.

The Bureau of Transportation should be commended for its efforts to prioritize projects based on criteria. It is clear that there is not enough funding in the TSP finance chapter to fund just the projects on the "constrained" list. PBOT needs to report back to the community (i.e. every 3 years) with a report on how the funds were spent and how the funds have (or have not) helped achieve outcomes. For example, the Major Projects and Citywide Programs list includes ten new programs without specific criteria for ranking needs within these programs. The funds set aside for these 10 programs need transparent evaluation on how projects funded from these funds meet TSP outcomes, and not just meet the needs of strong constituencies. The projects within Southwest Portland include big projects of regional significance on the constrained list (Sellwood Bridge, Ross Island Bridge) and not as many sidewalk and bike projects to meet the goals of complete neighborhoods. Other large projects (90026, SW Capitol Highway, 90064, Outer Taylors Ferry, and 90068-9, West Portland, are expensive but imperative to help citizens access Centers and Corridors and frequent transit service.

The current Transportation Systems Plan is written in a one-size-fits-all manner. While the draft plan aspires to honor different pattern areas in Portland, there are very few policies that reflect unique characteristics of SW Portland. In particular, any consideration of costs and benefits in the transportation chapter of the Comprehensive Plan must account for issues such as lengthy gaps and deficient conditions in the existing bicycle and pedestrian network, topography, lack of connectivity and lack of stormwater management system in areas with impervious soils that will add to costs of transportation projects but also provide benefits outside of the transportation realm (environment, public health, protection of property and resources, etc.). Without a grid system or alternative routes, the greatest benefits for the most people in SW Portland are on the major roadways. The primary pedestrian network needs to be accessible to people of all ages, needs, and abilities, citywide.

Finally, on another topic, I support the Comprehensive Plan approach to industrial lands which focuses on cleaning up more than 900 acres of contaminated sites, intensifying use of the existing industrial land base, and limiting conversions of industrial land to other uses, rather than converting irreplaceable natural areas to industrial use. We need to preserve the tree canopy as much as possible in order to achieve other goals including natural resources and wildlife.

Sincerely,

/s/ 1/7/2016

Marianne Fitzgerald 10537 SW 64<sup>th</sup> Drive Portland, OR 97219 (503) 246-1847, <u>Fitzgerald.marianne@gmail.com</u>

Cc: Eric Engstrom, BPS
Joan Frederickson, BPS
Art Pearce, PBOT Ordinance 187832, Vol. 1.3.J, page 6940

### Arevalo, Nora

From: Ann Naughton < thenaughtons1@comcast.net>

Sent: Thursday, January 07, 2016 4:53 PM

To: Scarzello, Christina; BPS Comprehensive Plan Testimony

Cc: 'Michael Naughton'; jnaughton61@gmail.com; thenaughtons1@comcast.net

Subject: Comprehensive Plan Testimony, James and Michael Naughton, 9 NE 120th Ave. and 9

NE 120th Ave #WI. Portland, OR 97220

Attachments: Tax ids.pdf

To the Comprehensive Plan Council and City of Portland,

We are writing to request a Comprehensive Plan designation and zone change on our properties located at Burnside and NE 120th Ave. from RH to the new proposed CM3/Mixed Use-Civic Corridor. Jim Naughton and Mike Naughton currently own both properties at 9 NE 120th Ave. (R175182) and the lot next to it 9 NE 120th Ave #WI, Portland, OR 97220 (R175181). See attached. Both properties are currently zoned RH. The dental office currently has nonconforming use for that zone. The building sits on Burnside. MAX runs in front with the 122nd MAX stop two lots away (there is no NE 121st Ave at that point). A low income multi family high rise has been erected next door. A mini mart is across Burnside, as well as additional multi family apartments.

Jim and his brother, Dick (deceased) are two dentists who built the office in 1972. It has continued as a large, successful dental office now occupied by Richard's son Michael Naughton and two other dentists. They have seen change throughout the years and want to keep current with zoning, codes and the City's view of the future. Because of the proximity to the commercial businesses of 122<sup>nd</sup>, the development of multi family high rises, and the variety of use in that area, we think now would be the time to request the zoning change from RH to the proposed CM3.

It is our understanding that by changing to CM3 both properties will:

- 1. Continue to keep their medical/dental use and become conforming
- 2. Continue to keep the multi family/high density (RH) use option
- 3 Add commercial and mixed use status.

A special thank you to Christina Scarzello, East District Liaison, Portland Bureau of Planning and Sustainability for her assistance.

Please email or call if you have any questions. Thank you very much for your consideration.

Thank you,

Michael and Ann Naughton owners James and Paula Naughton owners 1/7/2016

Ann Naughton Presented by:

Keller Williams Realty Profes.

1/7/2016 1:14:29 PM

R175182 Tax ID:

MULTNOMAH COUNTY, OR

9 NF 120TH AVE Prop Addr: City/State/Zip:

PORTLAND OR 97220-2348

Latest Listing ID:

County: Carrier Rt: Multnomah C014

OWNER INFORMATION

Owner Name: Owner Addr: CIty/State/Zip:

NAUGHTON MICHAEL P 12803 NW LILYWOOD DR PORTLAND OR 97229-8545

Phone: Carrier Rt:

C053

Lot SaFt:

LAND INFORMATION . Lot Dim: 10255

OxO

Acreage:

Garage:

0.24

Year Built: Eff Yr Built:

Style:

Stories:

# of Bldgs:

Bldg Code:

Fireplace:

1972 COLONIAL

Bldg SF: Bldg SF Ind: Bsmnt SF: MEDICAL OFFICE

0 4234

BUILDING INFORMATION

SALES INFORMATION

Sale Date

4234 BUILDING 1800

Fuel: **Heat Method:** Sewer: Roof Cover:

Parking SF:

Roof Type: Air Cond:

Fireplace Type: Foundation: Exterior Finish:

DEED OF TRUST

11/14/2014

Bedrooms:

Bathrooms:

Living SF:

\$279,600

Document No 000000117836

Vest Type: HUSBAND/WIFE

Title Co: Lender:

Current: Prior:

LAWYERS TITLE

**Deed Type** 

\*OTHER INSTITUTIONAL LENDERS NAUGHTON FAMILY TRUST (PT)

Loan Amt: \$279,600

Sale Price

PRIVATE PARTY LENDER Loan Type:

15-16

2015

\$8,956.07

TAX INFORMATION Market Land:

\$120,120 \$584,320 \$704,440

Assessed Total: \$414,710

Tax Perlod: Tax Year: Tax Amt:

Map Page:

Map Row:

Map Column:

598 A

6

-LEGAL INFORMATION-Map Code: Township: Range:

Market Impv:

Market Total:

1N-2E-34-SE-NE 01N 02E 34 Section:

Lot:

81001019 Census Tract: Census Block: 2 7

Norhd Code: School Dist:

C680

SF Qtr Section: 16th Section: NE Zoning: Tax Area Code: Tax Rate:

RH 113 0.000

Prop Class: Land Use: Subdivision: COMMERCIAL MEDICAL BUILDING HAMLER ADD

Legal Desc:

HAMLER ADD, BLOCK 2, LOT 7 EXC PT IN ST

Ann Naughton

Presented by:

Norhd Code:

School Dist:

Prop Class:

Subdivision:

Legal Desc:

Land Use:

C680

COMMERCIAL

HAMLER ADD

COMMERCIAL (NEC)

HAMLER ADD, BLOCK 2, LOT 6

Keller Williams Realty Profes. MULTNOMAH COUNTY, OR -Tax ID: R175181 Latest Listing ID: Prop Addr: 9 NE 120TH AVE #WI County: Multnomah Carrier Rt: C014 Clty/State/Zip: PORTLAND OR 97220-2348 OWNER INFORMATION Owner Name: NAUGHTON MICHAEL P 12803 NW LILYWOOD DR Phone: Owner Addr: PORTLAND OR 97229-8545 Carrier Rt: C053 City/State/Zip: - LAND INFORMATION Lot SqFt: 11039 Lot Dlm: 0x0 Acreage: 0.25 -BUILDING INFORMATION-Year Built: 0 Bedrooms: Parking SF: Eff Yr Built: Bathrooms: Garage: Style: Living SF: Fuel: Heat Method: Storles: Blda SF: 0 # of Bldgs: Bldg SF Ind: Sewer: PUBLIC Blda Code: Bsmnt SF: Roof Cover: Roof Type: Fireplace: Fireplace Type: Air Cond: Foundation: Exterior Finish: SALES INFORMATION Document No Sale Price Deed Type Sale Date **DEED OF TRUST** 11/14/2014 \$40,000 000000117829 Current: Prior: Title Co: Vest Type: HUSBAND/WIFE LAWYERS TITLE \*OTHER INSTITUTIONAL LENDERS NAUGHTON Loan Amt: \$40,000 Lender: JOANNE M TRUST (PT) Loan Type: PRIVATE PARTY LENDER TAX INFORMATION Tax Period: 15-16 Market Land: \$121,730 Tax Year: 2015 Market Impv: \$3,550 Assessed Total: \$44,790 Tax Amt: \$967.27 Market Total: \$125,280 -LEGAL INFORMATION-Census Tract: Map Page: 0 Map Code: 1N-2E-34-SE-NE 81001019 Map Column: Township: 01N Census Block: 2 02E 6 Map Row: 0 Range: Lot:

34

SE

NE

Section:

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16th Section:

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Tax Area Code: 113 Tax Rate:

1/7/2016 1:14:29 PM



January 7, 2016

Mayor Charlie Hales and Portland City Council Portland City Hall 1221 SW Fourth Avenue Portland, Oregon 97201

Dear Mayor Hales and Commissioners:

The Portland Freight Committee (PFC) appreciates the opportunity to provide our latest comments on the Planning and Sustainability Commission's (PSC) recommended draft of the Comprehensive Plan. We recognize the significance of this plan in providing direction for City decision-making on key land use and transportation issues and setting the framework for future infrastructure investments over the next 20 years. The PFC appreciates all the hard work on the part of Bureau of Planning and Sustainability and Portland Bureau of Transportation (PBOT) staff in their efforts to address many of the issues we originally raised in our comments submitted on April 30<sup>th</sup> 2013 and the improved recognition on freight transportation. We would, however, like to specifically highlight the following policy concerns - many of which were also raised in our March 9<sup>th</sup> 2015 letter to the PSC and which have not been addressed in the proposed draft Comprehensive Plan:

## Family Wage Jobs and Equity

We believe it is critical for a successful city to maintain and encourage middle-income employment opportunities. We often stress the importance of industrial jobs because they pay higher wages and have lower barriers to entry and are accessible for people with less than a four-year college degree. Employers still need welders, machinists, barge builders, truck drivers and other skilled workers. The analysis prepared by the Bureau of Planning and Sustainability on Portland's changing income distribution (Industrial Middle of Portland's Changing Income Distribution) shows an increase in high and low wage jobs but a reduction in middle-wage jobs which are held at a higher rate by people of color. With the City's current emphasis on both equity and affordable housing, we would like to see stronger language that encourages and emphasizes these important sectors of our economy. It is also necessary to provide better transit service in our industrial employment areas to improve access and provide viable transportation options for workers. We understand that TriMet and PBOT have entered into a memorandum of understanding (MOU) and we would like to see that agreement memorialized in policy language in the transportation chapter of the comprehensive plan. Specifically, we would like reference to the MOU as it relates to improved transit access to industrial employment areas.

## **Working Waterfront**

We understand the unique economic, environmental and cultural assets of the Portland harbor and the challenges associated with balancing these interests. Unfortunately, there appears to be conflicting policies within the environmental and watershed health and economic chapters of the Comprehensive Plan. We understand, for example, that strategies to update environmental zoning in the Columbia

Portland Freight Committee ■ 1120 SW Fifth Avenue, Room 800 ■ Portland OR 97204

Corridor and harbor industrial districts, are estimated to reduce industrial development capacity in these areas by 150 acres. As a result, we would like to see policy support both employment and business growth in this area. If a specific piece of Industrial land is not allowed to continue as industrial land then an offset should be made to make up for the lost industrial land elsewhere so that we do not further exacerbate our industrial lands shortfall and compromise significant opportunities for economic growth. We should also implement the proposed employment zoning project for example, to help offset environmental policies that may further increase our industrial lands shortfall.

The Portland harbor is a vital employment area; home to thousands of valuable middle-income jobs. Many of the industrial businesses in the harbor are conscientious stewards of the environment and they make significant investments to help mitigate adverse environmental impacts while also providing critically needed middle-income jobs. The Bureau of Planning and Sustainability's own *Industrial Middle of Portland's Changing Income Distribution* report finds that communities of color and east Portlanders frequently rely on jobs on industrial lands. The middle-income jobs that industrial and mixed employment areas generate are significant for achieving an equitable city as previously outlined in the adopted Portland Plan. Portland's harbor and working waterfront are critical to the economic success of the city, especially as many Portlanders face growing housing affordability challenges.

#### Central City Portal Capacity

As the city grows in both population and employment there will be greater strain on our existing transportation system to accommodate increased travel demand for both people and goods movement, particularly in the central city area which is a major regional attractor for jobs and commerce. Since the cost of providing additional freeway capacity in the central city would be prohibitively expensive, it is essential that we maintain existing portal capacity on central city freeway interchanges and bridgeheads to ensure the efficient movement of people and goods and to help mitigate congestion at these regionally-significant areas.

#### Transportation Strategy

We appreciate that PBOT staff updated Transportation Hierarchy policy 9.6 language to include "Transportation strategies for people movement," and adopted the model that Vancouver, B.C. uses to differentiate between people movement and goods movement. However, it still remains unclear how the updated strategy will be applied at the project development and design levels and what will be prioritized in areas where there is overlap between the two types of movement. Since most Portland street corridors are multi-functional, street design is based on the context sensitivity of the surrounding land uses and connecting transportation network. Unless otherwise clarified, the PFC requests that the "Transportation strategies for people movement" be excluded from designated freight districts and along major commercial corridors. We look forward to continuing to work with BPS and PBOT staff to further clarify how the proposed hierarchy will be implemented beyond the policy-making phase.

The PFC also recognizes the need for providing bicycle and pedestrian access to industrial employment areas but encourages the use of safer alternative routes that do not conflict with heavy truck movements along major freight corridors. The PFC does not want to eliminate bike lanes or pedestrian paths but rather seeks ways in which they may be accommodated without compromising vision zero safety goals and the efficient freight movement of goods.

#### Freight and Civic Corridors

The PFC appreciates that Freight Corridors have been included into the policy language and map in the Urban Form and Design chapter. As stated in Chapter 3: "Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade."

Many proposed Civic Corridors we previously identified as being in conflict with designated Priority and Major Trucks Streets are still included on the map on page 3-29 – i.e., St. Johns Bridge (US 30), MLK south of Lombard, NE Sandy Blvd, NE/SE 122<sup>nd</sup> Ave, SE Stark, 82<sup>nd</sup> Ave south of Sandy, Powell Blvd (US 26), SW Macadam Ave (Hwy 43), SW Barbur Blvd, and SW Bertha Blvd/Beaverton/Hillsdale Hwy. The PFC remains concerned that classifying these important freight streets as Civic Corridors will create potential policy conflicts and may compromise their intended function to provide truck mobility and access to surrounding commercial districts along these corridors. Much of the frontage along these truck streets has General Commercial zoning today that supports existing larger-format commercial businesses, truck circulation between urban centers, and alternative routes to freeways that accommodate high trip volumes, such as much of Barbur, Sandy, Powell, Foster, and 82<sup>nd</sup>. Street segments with predominant General Commercial zoning today should not be converted to civic corridors that are rezoned to promote mixed-use development and that do not consider freight mobility. Doing so would only result in incompatible uses and invite traffic safety concerns and noise complaints that are not in the community's best interest.

# **Emergency Vehicles and Over-Dimensional Truck Routes**

The PFC believes it is essential for Portland's emergency preparedness strategies to be addressed in a specific section in the chapter on transportation. Over-dimensional truck routes are necessary for emergency response vehicles, police, fire, ambulance, tow trucks and other emergency providers to be able to reach their destinations in an efficient and timely manner. They also serve as the main recovery routes in the event of an earthquake or other natural disaster for providing essential supply lines to impacted citizens. It is, therefore, critical that policy language regarding the preservation and importance of over-dimensional truck routes be included in the transportation chapter.

Over dimensional routes are also necessary for transporting over-sized equipment (heavy construction equipment, culverts, transit supports, building materials, etc.) A Regional Over-Dimensional Truck Route Study is currently underway and is expected to be completed by the fall of 2016. We request that the results of the Study be reviewed and policies added or refined in Comprehensive Plan and Transportation System Plan (TSP) Updates.

# Truck Parking and Loading Study

Truck loading zones are an important element in the movement and delivery of goods and services throughout the City. Policy language needs to be included to protect and provide safe loading zones for delivery personnel. We understand that a separate Central City Truck Parking and Loading Plan is currently underway that seeks to implement elements of the adopted Climate Action Plan. It is expected to be completed by late spring 2016 and the PFC requests that recommendations from this Study be included in Comprehensive Plan and TSP Updates.

# Transportation System Plan Project List

The PFC is pleased to see that the following list of project priorities are included in the TSP Project List:

- TSP 30084 (Columbia Blvd/Columbia Way Bridge Replacement): Replace the existing structurally deficient Columbia Blvd bridge (#079) over Columbia Way.
- TSP 30005 (Columbia Blvd/Railroad Bridge Replacement): Replace the existing fracture critical Columbia Blvd bridge (#078) over railroad with a new structure, and perform seismic upgrades on parallel bridge (#078A).
- TSP 10011 (Freight Priority Program): Improve freight speed, reliability, safety, and access along
  major freight routes to include signal priority, freight-only lanes, queue jumps, loading zones,
  and turning radius improvements.
- TSP 20050 (Southern Triangle Circulation Improvements): Improve local street network and regional access routes in the area between Powell, 12th, Willamette River, railroad mainline, and Hawthorne Bridge. Improve freeway access route from CEID to I-5 SB via the Ross Island Bridge.
- TSP 50016 (Airport Way ITS): Install needed ITS infrastructure to include communication network, new traffic controllers, CCTV cameras, and vehicle /pedestrian detectors.
- TSP 30038 (Marine Drive ITS): Install CCTV at N Portland Rd and changeable message signs at Portland Rd, Vancouver and 185<sup>th</sup>.
- TSP 20002 (I-405 Corridor ITS): ITS improvements at six signals between Clay and Glisan
  including communications infrastructure; closed circuit TV cameras, variable message signs for
  remote monitoring and control of traffic flow.
- TSP 116590 (Rivergate Blvd Overcrossing): Build a grade-separated overcrossing of N Rivergate Blvd.
- TSP 40009 (NE 47th Ave Corridor Improvements): Widen and reconfigure intersections to better facilitate truck turning movements to the cargo area located within the airport area.
- TSP 40061 (Columbia/MLK Intersection Improvements): Complete the unfunded project segment: northbound MLK to eastbound Columbia Blvd.

#### Other Agency Project Priorities

The PFC also supports the following projects from other agencies to form partnerships with other noncity freight infrastructure providers:

- TSP 30039 (Marine Drive Rail Overcrossing): Reroute rail tracks and construct an above-grade
  rail crossing at Rivergate West entrance to improve safety and reduce vehicle and rail traffic
  conflicts.
- TSP 30069 (Columbia Slough Rail Bridge): Construct a rail bridge across Columbia Slough to provide rail connection to South Rivergate from Terminal 6.
- TSP 103780 (T6 Internal Overcrossing): Construct an elevated roadway between Marine Drive and Terminal 6.
- TSP 108840 (I-5/Broadway/Weidler Interchange, Phase 2): Acquire right-of-way to improve safety and operations on I-5, connection between I-84 and I-5, and access to the Lloyd District and Rose Quarter.
- TSP 116540 (Time Oil Road Reconstruction): Reconstruct Time Oil Road to improve industrial land access in South Rivergate.

We urge that the TSP continue to reflect our city's 20-year multi-modal transportation needs by ensuring that the aforementioned projects remain on the TSP project list. Additionally, we urge that the following freight studies (currently absent) be included on the TSP project list:

Portland Freight Committee ■ 1120 SW Fifth Avenue, Room 800 ■ Portland OR 97204

- Freight Master Plan Update: Incorporate freight-related studies and other projects that were initiated after the FMP was adopted in 2006.
- Transportation System Capacity Analysis: Evaluate impacts from reduced freight route capacity
  from completed and planned projects impacting major freight routes and industrial districts,
  such as North Interstate Avenue, SE 17th Avenue and NE Sandy Boulevard.
- Airport Industrial District Truck Assess and Circulation Study: Evaluate freight system needs in the PDX area.
- Columbia Corridor Truck/Rail Access and Circulation Study: Evaluate the interaction between the UP Kenton line and truck access along NE Columbia Blvd and US 30 Bypass.

While these projects and studies alone will not address all of our transportation needs, they will help improve the function and resilience of our goods delivery system and traded-sector economy and provide insights to future system needs.

The Portland Freight Committee applauds the hard work of BPS and PBOT staff and looks forward to continuing our work together to help ensure a strong multi-modal transportation network that promotes a prosperous economy. Thank you for your consideration of these comments.

Sincerely,

Pia Welch PFC Chair

Ria Welch

# Arevalo, Nora

From: Sent: M.F.Andre <andme@teleport.com>

Thursday, January 07, 2016 4:41 PM

To: Subject: BPS Comprehensive Plan Testimony

DDI Top Ten Recommendations

Hello,

As a resident of the Richmond neighborhood, I have had the privilege of being a part of many meetings and events at RNA and DDI which have sought the inclusive participation of so many diverse populations to generate and hone the Top Ten Recommendations for the Comprehensive Plan.

Because of my familiarity with the way this process has developed over the many months, and because I know how it represents thorough research and voices from such broad and diverse areas, and because these recommendations address a loop hole and needs not previously addressed, I strongly urge you to adopt the The Ten Policy Recommendations for the Comprehensive Plan.

Thank you for your consideration of behalf of this work.

Mary Ellen Andre 2940 SE Brooklyn Portland, OR 97202



College of Urban and Public Affairs, School of Community Health Institute on Aging

Post Office Box 751 Portland, Oregon 97207-0751 503-725-5100 fax

503-725-3952 tel ioainfo@pdx.edu

January 7, 2016

Dear City Council Members and Bureau of Planning and Sustainability Staff:

The following comments pertain to the City of Portland's 2035 Comprehensive Plan and represent the views of the Institute on Aging at Portland State University, specifically Drs. Margaret Neal and Alan DeLaTorre, who serve as the co-coordinators for the Age-Friendly Portland and Multnomah County initiatives.

Public Testimony: These comments will accompany verbal testimony to City Council on January 7.2015.

Thank You for Advancing Policies Pertaining to Older Adults and People of All Ages and Abilities: The Institute on Aging and the Age-Friendly Portland and Multnomah County Initiatives commend the City of Portland for advancing policies that address the needs of people of all ages and abilities and will help to create a city that is a healthy, vibrant, inclusive, and just place for all. Throughout the Vision PDX, Portland Plan, and Comprehensive Plan processes, the City has been responsive to testimony concerning aging- and disability-related issues. In addition, we applaud the City for involving individuals with expertise pertaining to aging in various groups and committees related to these planning processes, including the Portland Plan Advisory Group, the Policy Expert Group focused on Neighborhood Centers, and the Resident Infill Project Stakeholder Advisory Committee.

Specific Policies that Support Older Adults and People of All Ages and Abilities: A number of policies in the 2035 Comprehensive Plan support an all-age-friendly Portland and Multnomah County. We at the Institute on Aging and the Age-Friendly Portland and Multnomah County initiatives strongly encourage the City of Portland to prioritize implementation of these policies in order to enhance our city by making it friendly to those of all ages and abilities. We suggest that implementation efforts should include regulatory approaches (e.g., zoning and building codes), incentives (e.g., bonus densities), and priority allocation of funding (e.g., grants, appropriation requests). The specific policies include:

#### Urban Form

- Policy 3.4 All ages and abilities. Strive for a built environment that provides a safe, healthful, and attractive environment for people of all ages.
- Policy 3.19 Accessibility. Design centers to be compact, safe, attractive, and accessible places, where the street environment makes access by transit, walking, biking, and mobility devices such as wheelchairs, safe and attractive for people of all ages and abilities.

# Design and Development

Policy 4.5 Pedestrian-oriented design. Enhance the pedestrian experience throughout Portland

- through public and private development that creates accessible, safe, and attractive places for all those who walk and/or use wheelchairs or other mobility devices.
- Policy 4.10 Design for active living. Encourage development and building and site design that
  promotes a healthy level of physical activity in daily life.
- Policy 4.15 Residential area continuity and adaptability. Encourage more housing choices to
  accommodate a wider diversity of family sizes, incomes, and ages, and the changing needs of
  households over time. Allow adaptive reuse of existing buildings, the creation of accessory
  dwelling units, and other arrangements that bring housing diversity that is compatible with
  the general scale and patterns of residential areas.
- Policy 4.25 Active gathering places. Locate public squares, plazas, and other gathering places
  in centers and corridors to provide places for community activity and social connections.
  Encourage location of businesses, services, and arts adjacent to these spaces that relate to
  and promote the use of the space.

### Housing

- Policy 5.18 Aging in place. Encourage a range of housing options and supportive
  environments to enable older adults to remain in their communities as their needs change.
- Policy 5.4 Housing types. Encourage new and innovative housing types that meet the evolving
  needs of Portland households, and expand housing choices in all neighborhoods. These
  housing types include but are not limited to single-dwelling units; multi-dwelling units;
  accessory dwelling units; small units; prefabricated homes such as manufactured, modular
  and mobile homes; co-housing; and clustered housing/clustered services.
- Policy 5.5 Housing in centers. Apply zoning in and around centers that allows for and supports
  a diversity of housing that can accommodate a broad range of households, including multifamily dwelling and family-friendly housing options.
- Policy 5.6 Adaptable housing. Encourage adaption of existing housing and the development of new housing that can be adapted in the future to accommodate the changing variety of household types.
- Policy 5.7 Physically-accessible housing. Allow and support a robust and diverse supply of
  affordable, accessible housing to meet the needs of older adults and people with disabilities,
  especially in centers, station areas, and other places that are proximate to services and
  transit.
- Policy 5.8 Accessible design for all. Encourage new construction and retrofitting to create
  physically-accessible housing, extending from the individual unit to the community, through
  the use of Universal Design Principles.

### Transportation

- Policy 9.6 Transportation strategy for people movement. Design the system to accommodate
  the most vulnerable users, including those that need special accommodation under the
  Americans with Disabilities Act (ADA).
- Policy 9.18 Pedestrian safety and accessibility. Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities.

 $\textbf{Specific Changes that We are Suggesting:} \ \textbf{We respectfully suggest the following two changes:} \\$ 

Policy 9.6 Transportation strategy for people movement. The prioritization of modes for
people movement should be re-ordered to best meet the needs of Portland's aging population
and the needs of people with varying abilities. In particular, rather than prioritizing bicycling

over transit, transit should be prioritized above bicycling, resulting in the following ordered list: (1) Walking, (2) Transit, (3) Bicycling, (4) Taxi/commercial transit/shared vehicles, (5) Zero emission vehicles, and (6) Other single occupancy vehicles.

• Policy 9.40 Portland International Airport. As we suggested in our October 21, 2014, written testimony on an earlier draft of the Comprehensive Plan, consider inserting the term "age-friendly" in the text as follows: "Maintain the Portland International Airport as an important, age-friendly regional, national, and international transportation hub serving the bi-state economy." PDX would be the first airport in the nation, and quite possibly in the world, to have this focus, and in fact, airport officials have already consulted with members of the Age-Friendly Portland and Multnomah County Advisory Council on design features for the renovations currently underway. To not include this language in the plan would be a missed opportunity to further enhance the City's reputation as a world leader in the age-friendly cities and communities movement.

One Additional Recommendation: As noted on p. I-34 of the Recommended Draft of the 2035 Comprehensive Plan dated August 2015, 120,000 new households in the city are expected by 2035. Institute on Aging researchers have examined data from Metro and the Office of Economic Analysis (Oregon), and we have determined that 40-45 percent of the predicted 120,000 new households in Portland by 2035 will include people who are aged 65+.

Our preliminary research has shown that between 2015 and 2025 (the next ten years), people aged 70-79 will have the highest rates of growth compared with all other age groups. Then, from 2025-2035, households with someone aged 80+ will grow at a higher rate than will all other households except those with people aged 40-44. Because the incidence of disabilities begins to increase at age 70, there are implications for the types of housing people in these age groups will need. In addition, housing costs are a particular concern for older adults living on fixed incomes. Greater understanding of the housing needs of older adults in Portland is needed, and we are pleased to be identifying issues and potential solutions with the funding you have recently provided us. Additional demographic analyses are needed to understand the implications of household growth in light of the age composition of the new households moving to the city.

Thank you for your consideration, for all you have done to date and for that which you will do in the future to make our city of Portland an all-age-friendly city.

Margaret & Menl
Acad Tone

Margaret B. Neal, Ph.D., and Alan DeLaTorre, Ph.D Institute on Aging, Portland State University and

Co-Chairs, Age-Friendly Portland and Multnomah Advisory Council

# **PERKINSCOIE**

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January 7, 2016

Dana L. Krawczuk

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F. +1.503.346.2036

VIA EMAIL CPUTESTIMONY@PORTLANDOREGON.GOV

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

Re: Comp Plan Map Testimony

Broadmoor Golf Course's Request for Industrial Comp Plan Designation

Dear Mayor Hales and Commissioners:

This firm was recently retained to represent Broadmoor Inc. ("Broadmoor"), who has owned the Broadmoor Golf Course located at 3509 NE Columbia Boulevard for over 100 years. Please include this testimony in the record of the above-referenced proceeding and provide us with notice of the final decision.

Broadmoor intends to continue to operate as a public golf course for the foreseeable future. However, as golf revenues have continued to decline over the past 10 years and the City's need for additional employment land increases, Broadmoor acknowledges that at some point developing a portion of the golf course with an industrial use, while preserving higher-quality natural resources in open space, may be the highest and best use of the land. As a result, Broadmoor <a href="supports">supports</a> the recommendation to designate approximately 22 acres of the golf course along NE Columbia Boulevard as Industrial on the comprehensive plan map.

Broadmoor testified to the Planning and Sustainability Commission ("PSC") in support of this designation, and requested that the zoning for that area be amended to IG2 concurrently with the comp plan amendment. The PSC was receptive to this request, and recommended the contemporaneous zone change as part of the Employment Zoning Project Recommended Draft. We appreciate and agree with the PSC's recommendation.

Broadmoor is also <u>supportive</u> of re-designating and re-zoning the approximately 54-acre area that Broadmoor sold to Metro as a natural area in 2012 from Industrial/IG2 to Open Space/OS.

As Broadmoor has continued to consider the long-term options for the property, evaluated the industrial development potential of the site, and better understood the demand for industrial land, Broadmoor has determined that the most appropriate location for industrial development is the approximately 33-acre area north of the Columbia Slough and south of the Metro Open Space area. Accordingly, Broadmoor requests that the comprehensive plan map designation be amended from Open Space to Industrial for the approximately 33-acre area north of the Columbia Slough, as depicted on the attached map. No amendment to the zoning map is requested at this time.

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Mayor Hales and Commissioners City of Portland January 7, 2016 Page 2

This northern portion of the property is suitable for industrial development because it is flat, is isolated from residential uses, and is compatible with Portland International Airport's operations. Environmental overlay zones and adjacent Open Space areas would ensure that the natural resources on site and nearby would be protected from development. Finally, as compared to Riverside Golf Course, who is on record objecting to an Industrial comp plan designation and has denounced any use of its property other than as a private golf course, Broadmoor is open to industrial development over the planning horizon.

Developing the area north of the Columbia Slough as an industrial use at some point in the future would not only address the City's demand for industrial land, but it provides the opportunity to create an east/west public street parallel to NE Columbia Boulevard, connecting NE 33rd Avenue and NE 47th Avenue. This connection would require cooperation from adjacent landowners and inclusion in the Transportation Systems Plan, but could provide significant relief, particularly for freight, to the congested intersection of NE Columbia Boulevard and NE 33rd Avenue.

Another opportunity presented by the eventual development of up to 55 acres with industrial uses is following the Colwood model of partnering with a non-profit or government entity to improve the functions and values of remaining open space and natural resource areas. Broadmoor has not initiated these discussions yet, but believes that the 54 acres Broadmoor sold to Metro for Open Space and the remaining approximately 67 acres of the golf course property (for a total of over 121 acres) provides a terrific opportunity for environmental lift in and around the Columbia and Buffalo Sloughs.

We appreciate the City Council's consideration of Broadmoor's request, and would be pleased to work with Council staff and/or BPS staff to craft an amendment to the comprehensive plan.

Very truly yours,

Dana L. Krawczuk

DLK:dlk

Enclosure

cc: Scott Krieger, Broadmoor, Inc. (via email) (with enc.)

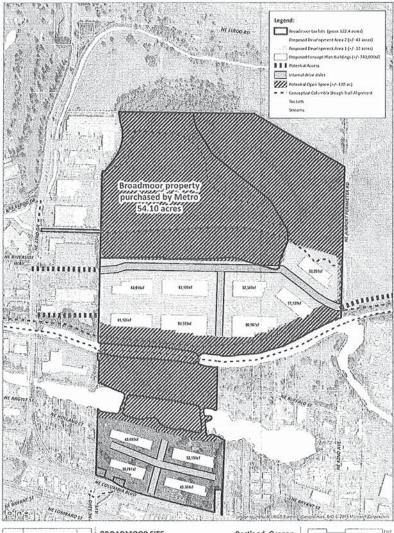
Erik Krieger, Broadmoor Inc. (via email) (with enc.)

Steve Kountz, Senior Economic Planner, BPS (via email) (with enc.)

Tom Wright, Mackenzie (via email) (with enc.)
Gabriela Frask, Mackenzie (via email) (with enc.)

129299227.1

Persons English





BROADMOOR SITE Portland, Oregon Proposed Development Areas & Concept Plan

D 200 to 800 km km l 200 km l

Ordinance 187832, Vol. 1.3.J, page 6955

# Arevalo, Nora

From: Sent:

Susan Lindsay lindsays@pdx.edu> Thursday, January 07, 2016 4:23 PM

To:

Cc:

**BPS Comprehensive Plan Testimony** 

Hales, Mayor; Commissioner Fritz; Commissioner Fish; Commissioner Saltzman;

Commissioner Novick

Subject:

Fwd: Comprehensive Plan Testimony

Attachments:

buckman house before.jpg; buckman house after.jpg

I forgot to include the photos I mention in my email.

A beautiful, amazing house...leveled...for unaffordable studio apartments.

Please make the amendments we request.

Thank you,

Susan

Susan Lindsay 625 SE 17th Avenue Portland, OR 97214

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

From: Susan Lindsay lindsays@pdx.edu>

Date: Thu, Jan 7, 2016 at 4:14 PM Subject: Comprehensive Plan Testimony To: cputestimony@portlandoregon.gov

Cc: MayorCharlieHales@portlandoregon.gov, Commissioner Fritz <amanda@portlandoregon.gov>, Steve Novick Novick@portlandoregon.gov>, Commissioner Saltzman < dan@portlandoregon.gov>, Nick Fish <nick@portlandoregon.gov>

Dear Mayor Hales and fellow City Commissioners Fritz, Novick, Saltzmann and Fish,

I write in strong opposition to the proposed rezoning of a key area of residential Buckman. This area bounded by SE Stark to the north, SE 20th to the east, SE 16th-17th to the west and SE Morrison to the south is proposed to change from R-5 to R2.5.

This change was proposed by planning staff...in particular, we were told by planning staff, by one individual who ordered the change as some kind of created "parity" to the neighborhood he resided in, that being Elliot in inner NE Portland.

The neighborhood and property owners did not initiate this change and do not support it...and the way it came to even being proposed, continued in the face of steep opposition and included in the recommended plan is quite disturbing.

This area contains many, many original, turn of the century homes that are important, historically significant and were used as contributing inventory in an effort to create a national historic district. Unfortunately that effort failed as a direct result of the concerns our, poorer than other protected historic neighborhoods, had about the high fees charged for simple remodels. In addition, this area already \*more\* than fulfills its density requirements much more than any other inner east side neighborhood.

This area needs to retain the R-5 zoning for the homes in this interior blocks, in the same way Irvington, Ladd's Edition and KERNS has stable housing areas...and to ensure they are not demolished.

The house below was a beautiful Buckman house demolished this week...even though it sold for over a half a million dollars!!

Don't let this continue.

Demolisions of existing historic inventory does not create affordable housing..in fact quite the opposite and does not solve global warming. It enrichs developers, displaces people who were able to afford housing and guts our beautiful historic neighborhood.

After over 20 continuous years of working to make Buckman be an inclusive, safe, affordable neighborhood that reflects its important historic history as the first neighborhood in East Portland, I ask you to amend the plan and keep the zoning in this area the same.

Additionally I ask you to support the BCA strong opposition to upzoning 15th-19th Morrision/Belmont and to read our letter of opposition.

I appreciate the work you do and the time you've taken to look at this plan.

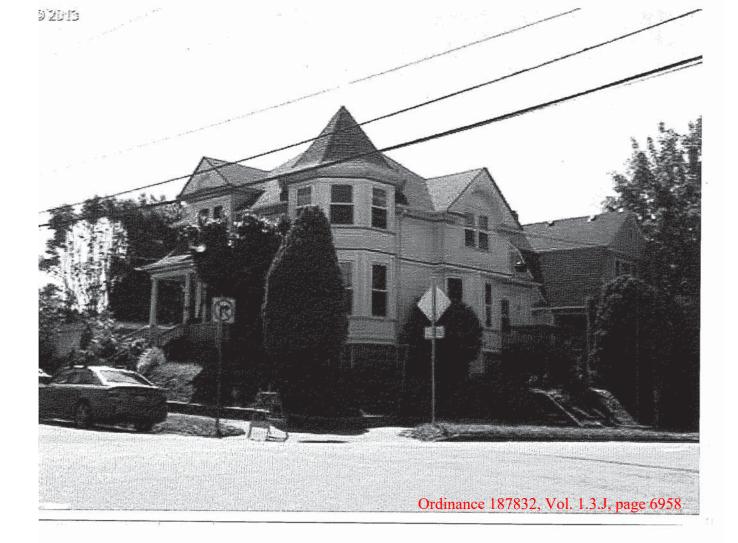
Please amend it to ensure Buckman remains affordable, accessible, livable, historic and beautiful.

Thank you very much,

Susan Lindsay 625 SE 17th Avenue Portland, OR 97214

Susan Lindsay

Susan Lindsay





January 7, 2016 Portland City Council RE: 2035 Comprehensive Plan

Dear City Council,

My husband and I, Jamaal and Christina Lane were born and raised in N/NE Portland, OR and are now raising three children in NE Portland. We own Champions Barbershop and are seeking to expand into post secondary education, by opening the only exclusive Barbering Institute in Oregon, owned and operated by a Professional Barber. We have been diligently working in the development of our Barber College and have one step remaining in the approval process within the Private Career Schools licensing process, but we cannot find an affordable location in our community. This may leave us no other option, but to take our business model to Vancouver, WA. Overall, just like many other parents and/or business owners, we take calculated risks in order to create and preserve a legacy of wealth to benefit our children, their children and our community. But, as we speak gentrification and displacement are hindering us as African American community leaders and entrepreneurs.

Why are there no action plans for the following policies, implementing economic opportunities, counteracting our displacements, and providing proactive measures focusing on wealth-creation strategies within the African American community?

- · Equitable Development, Policies 3.3, a., b., c., d. and e.
- · Growth and Development, Policy 3.9
- Impact Analysis, Policy 5.11
- Gentrification/Displacement Risk, Policy 5.14
- Involuntary Displacement, Policy 5.15
- . Land Banking, Policy 5.16
- Urban Renewal Plans, Policy 6.33

I am extremely frustrated as there has been no proactive measures put in place to counteract this unnecessary displacement we are being subjected to, in a repetitive cycle at the hands of the City of Portland. This gentrification and displacement did not happen over night and I would sincerely appreciate a timely response addressing the obstacles we are NOW facing as African American Portlanders. In addition, how will the updated comprehensive plan address and ensure that this cycle will be terminated. I strongly believe that we must start reaching the youth when it comes to implementing wealth-creation strategies. I welcome the opportunity to speak with city leaders regarding a solution being devised to meet this objective by a group of African American community leaders.

Respectfully,

Christina & Jamaal Lane Thelanegroup1@gmail.com 6129 NE 21<sup>st</sup> Ave Portland, OR 97211

### Arevalo, Nora

From:

Pat Willey <pat@willey.ws>

Sent:

Thursday, January 07, 2016 4:20 PM

To:

BPS Comprehensive Plan Testimony

Subject: Comprehensive Plan

07 January 2016

City of Portland City Council 1221 SW 4<sup>th</sup> Avenue Portland, Oregon 97204

Subject: Comments on the Recommended Comprehensive Plan Update - Transportation and Parking Elements

Honorable Mayor Hales and City Commissioners,

Thank you for accepting my comments on the Recommended Comprehensive Plan for Portland (RCPP).

My home is situated just southwest of the Hollywood District, and backs to commercial property on NE Sandy Blvd. The proposed RCPP will have a negative effect on the livability of my neighborhood. Noise, traffic congestion, and personal safety are major concerns.

I am concerned over the lack of consideration for parking of private automobiles in development areas,. According to the RCPP, the priorities for transportation are ranked as follows: (1) walking, (2) bicycling, (3) transit, (4) taxi/ commercial transit/shared vehicles, (5) zero emission vehicles, and (6) other single-occupancy vehicles. I could find not definition of "shared vehicles" in the RCPP, but it must infer vehicles like 'Cars-2-Go". It does not mean "multi-occupancy vehicles", as might be mistakenly interpreted. Please insure that when you use terms not generally established, that you provide appropriate definitions. If you must have your list, please include 'private vehicles' as a mode, and do not distinguish between single-occupancy and multi-occupancy, something over which you have little control.

I suggest you eliminate your transportation prioritization list, and instead, promote parking for private vehicles. Who can afford to go out to a restaurant when the cab fare is \$25 each way, or \$50 per meal? Add an additional \$40 to \$60 for a couple to dine, and they have consumed a half-day's pay for many Portlanders. In other words, without parking facilities, people will not be frequenting Portland's restaurants.

The first two transportation priorities, 'walking' and 'bicycling', are not widely used methods of transportation during the rainy season (October-June). It appears silly to highlight transportation methods that are least used for three-quarters of the year. Also, many residents (certainly not all residents) rely on walking and bicycling because they cannot afford a motor vehicle. That is not a good client base for boutiques and good restaurants for which Portland has become well-known. In short, how will you generate customers for the proposed business districts if they can only reach those destinations by walking, bicycles, or by taxi?

Regarding 'Transit', for urban dwellers it is only a viable transportation for those living near the transit lines who travel only to businesses along the transportation corridor. Providing more parking options along the transit lines will enhance use of public transit by urban dwellers.

I suggest you re-write the RCCP to require parking for businesses and apartment dwellings. Otherwise, lacking sufficient parking, drivers will bypass the business corridors and do their purchasing in the suburbs or in Vancouver, Washington.

Sincerely,

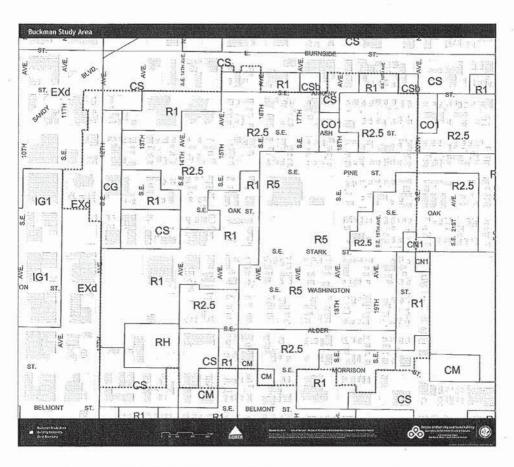
Patrick H. Willey 3371 NE Multnomah St. Portland, Oregon 97232 503-645-0875

pat@willey.ws

1.

# CITY COUNCIL PUBLIC HEARING COMP PLAN DRAFT-1/7/16

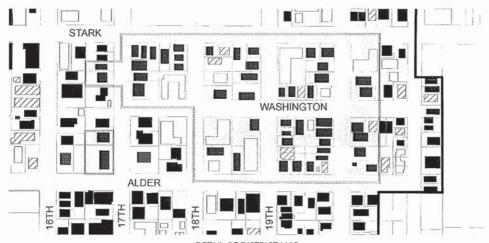
Submitted by Christine Yun, 1915 SE Alder St. Portland OR



2011 ZONING MAP OF PROPOSED HISTORIC DISTRICT IN BUCKMAN DETERMINATION OF ELIGIBILITY RECEIVED 2013



NATIONAL REGISTER ELIGIBLE DISTRICT WITH PROPOSED COMP PLAN CHANGES
UPZONING FROM R5 TO R2.5 AND R1

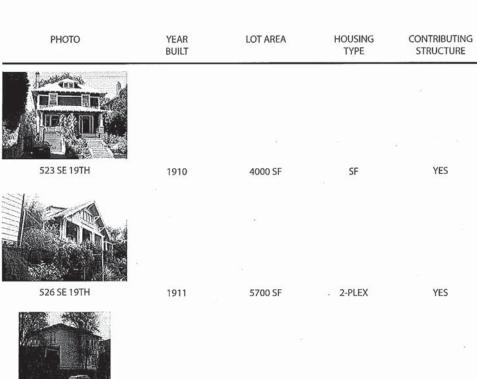


Ordinance Contributing Ville Turk. J, page 6964

РНОТО	YEAR BUILT	LOT AREA	HOUSING TYPE	CONTRIBUTING STRUCTURE
		41		5 :
517 SE 16TH	1905	3333 SF	SF	YES
		- 60		\$
525 SE 16TH	1904	5000 SF	2-PLEX	YES
615-17 SE 16TH	1909	5000 SF	2-PLEX	YES -
			© ₩ a	H 22
512 SE 17TH	1901	5000 SF	DUPLEX	NO
		*		
EDG CE ADTIL			0.202	\/FC

РНОТО	YEAR BUILT	LOT AREA	HOUSING TYPE	CONTRIBUTING STRUCTURE
		. *		
622-24 SE 17TH	1910	10000 SF	2-PLEX + 6-PLEX	YES NO
521 SE 18TH	1904	4000 SF	SF	YES
535 SE 18TH	1906	6000 SF	SF	YES
601-09 SE 18TH	1920	5000 SF	8-PLEX	YES







534 SE 19TH

1888

4300 SF

4-PLEX

YES



612 SE 19TH

1892

5000 SF

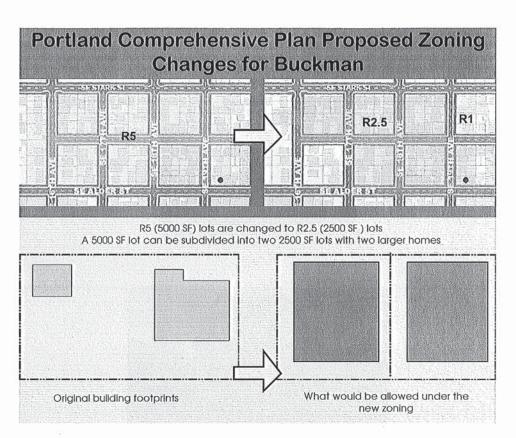
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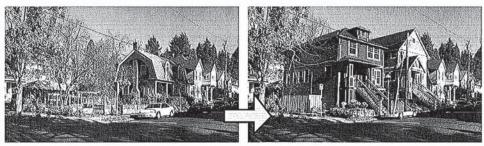
YES



622-24 SE 19TH

3				
РНОТО	YEAR BUILT	LOT AREA	HOUSING TYPE	CONTRIBUTING STRUCTURE
1535 SE ALDER	1904	10000 SF	3-PLEX	YES
	¥			
1915 SE ALDER	1905	5000 SF	SF	YES
1505 SE WASHINGTON	1905	6500 SF	SF	YES
1816 SE WASHINGTON	1904	6223 SF	SF	YES
			æ	29.1





This change will result in more teardowns and

- · the loss of affordable housing
- · the loss of historic homes

- the loss of trees and open spaces
- · the loss of neighborhood character

Ordinance 187832, Vol. 1.3.J, page 6969

This has already happened at 1206 SE Ankeny, which underwent a lot subdivision and subsequent demolition. The lot size is 4,832 SF, and a 4-story 27-unit apartment complex will be built. The house was a 1906 Stokes and Zeller duplex with all the original woodwork. Stokes and Zeller, builder-architects, built many of the houses in Buckman.







#### Arevalo, Nora

From:

Eileen Wallace <eileen.wallace@gmail.com>

Sent: To:

Thursday, January 07, 2016 3:52 PM **BPS Comprehensive Plan Testimony** 

Subject: Attachments: Testimony - City Council Hearing - Portland Comprehensive Plan Testimony - Eileen Wallace 4001-4007 SW Collins Street Comprehensive Plan Update

1.7.2016.docx

#### Council Clerk -

My name is Eileen Wallace. Attached is my written testimony that I plan to verbally present at tonight's City Council hearing regarding the Portland Comprehensive Plan, starting at 6 PM at the Self Enhancement, Inc. building. This testimony is regarding a 4-plex I own located at 4001-4007 SW Collins Street, Portland, OR 97219.

I am requesting that City Council re-designate my 4-plex from its current designation of R1 Multi-Dwelling to Mixed Use - Urban Center.

I have included a visual map diagram in addition to my written testimony for future reference.

If you have any questions or comments, please do not hesitate to contact me via email at: Eileen, wallace@gmail.com, via phone at 503-702-1811 or via mail at 8716 SW 21st Avenue, Portland, OR 97219.

Thank you for this opportunity to present testimony on this matter.

Regards, Eileen Wallace January 7, 2016

Name: Eileen Wallace

Mailing Address: 8716 SW 21st Avenue, Portland, OR 97219 Email Address: eileen.wallace@gmail.com

Testimony: Regarding property located at: 4001-4007 SW Collins Street, Portland, OR 97219 in regard

to Portland's Comprehensive Plan

My name is Eileen Wallace. I want to thank you for this opportunity to be in front of you today and thank you for your ongoing efforts in Portland's Comprehensive Plan project. I am providing testimony today regarding a 4-plex I purchased in 2004 and previously resided at for several years after graduating from college. It is located in SW Portland at 4001-4007 SW Collins Street, Portland, OR 97219, off of SW 41st and Barbur Boulevard, on an unimproved, gravel road, directly across from the Barbur Boulevard Transit Center, and kitty corner to the City of Portland water maintenance facility and a variety of commercial businesses and multi-family units.

I am requesting that City Council re-designate my 4-plex from its current designation of R1 Multi-Dwelling to Mixed Use – Urban Center. It is contiguous to other properties with this Mixed Use – Urban Center or similar designation, and within the boundary lines of the West Portland Town Center project.

As a young adult and native Oregonian, born and raised in SW Portland, I am invested in the future of this area, currently living in a nearby single family house off of SW 21st and Barbur Boulevard. I hopefully will be around to be an active participant in changes related to and the implementation of Portland's Comprehensive Plan for years to come.

My proposed request also supports any future changes related to the West Portland Town Center project and the SW Corridor high-speed transit plan that may affect this area, as well as any development that will be needed to streets, storm water systems, sidewalks etc. that would accompany such projects. These projects may be years out but I would like the opportunity now to re-designate my 4-plex to Mixed Use-Urban Center to be more consistent with neighboring properties in this specific area, and to have the flexibility to be more in line with providing a mix of residential and commercial space where residents can live, work and play.

My current tenants use bike or bus as their primary means of transportation to get to their jobs and/or to nearby colleges such as the PCC Sylvania campus and Portland State University downtown. Previous tenants have been single parents who relied on the bus transit center as their only means of transportation for themselves and their children. This is possible due to my 4-plex's convenient location directly across from the bus transit center.

However, improvements in the area need to be done, as the lack of sidewalks, unimproved roads, high traffic and limited street lighting do not always make it as convenient or safe for adults and children to rely solely on public transit or walk to nearby businesses. As a single, working mom of a 3 year old daughter, I understand more than ever the importance and convenience of having employment opportunities, housing options and safe areas where kids can play, nearby.

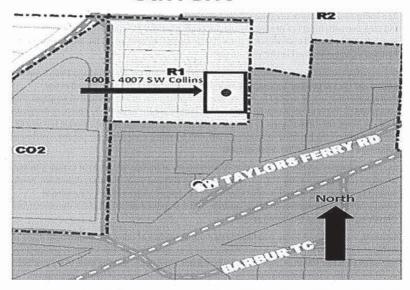
I am invested in this area and my property, doing what I can as a property owner to invest in my 4-plex and surrounding areas, for example, shortly after purchasing my 4-plex, I entered into a contract with Portland General Electric to install a street light across from my property, providing lighting also to the

nearby veterinary clinic, City of Portland water building and neighboring duplex that was previously nonexistent. I was able to personally witness my investment increasing foot traffic in the area, specifically for those walking to use the Barbur transit center. This is one example of the many investments I am willing to make to the area that not only benefit my 4-plex and tenants but that also that benefit the surrounding area.

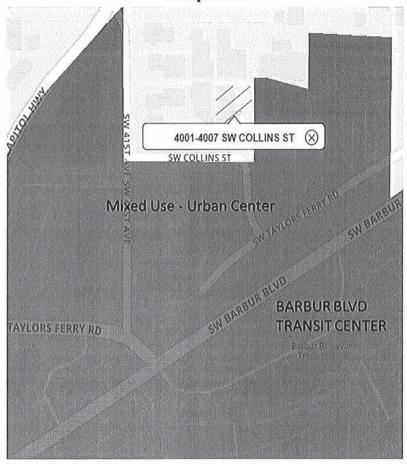
I have owned the property for 12 years and I hope that I will be around for decades to come, and my daughter, for many more decades to come, to help envision and implement these plans. I see great potential for this area and I would like to be an active part of this change. This re-designation to Mixed-Use Urban Center would allow me to have the flexibility to provide an opportunity to potentially have a mix of residential and commercial space for small business owners, adults and children to live, work and play, all of which are very important for generations to come. Thank you for your time and consideration of my proposal.

Below is a map diagram depicting my proposal to re-designate the property from R1 Multi-Dwelling to Mixed Use – Urban Center.

## Current



**Proposed** 



Thank you,

Eileen Wallace

eileen.wallace@gmail.com

#### Arevalo, Nora

From: Madeline Kovacs <madeline@orangesplot.net>

Sent: Thursday, January 07, 2016 3:48 PM

To: BPS Comprehensive Plan Testimony; Parsons, Susan

Cc: Stark, Nan; Eli Spevak; Sweet, David

Subject: CPU Testimony: Businesses along West side of NE 42nd request MUZ designation

change from CM1 to CM2

Attachments: CPU Testimony NE 42nd CMI to CM2 01.07.16.pdf

Dear Portland City Council,

The signatories of the attached testimony request that the West side of NE 42nd Ave, currently designated CM1, be changed to CM2 to match the East side of NE 42nd Ave.

Existing development along both sides of NE 42nd Ave is currently quite similar. As this "Main Street" business district matures over the next 10-30 years, it makes sense that both sides of the street would carry the same allowed density unless there is a compelling reason to 'stack' density to one side of the street or the other. We can't see such a reason.

Additionally, we conclude by noting that it would be wonderful for the long-term affordability of this neighborhood if one or more mixed-use redevelopment project(s) along NE 42nd could incorporate affordable rental housing, a development program which is much more likely to be achieved with CM2 zoning.

Thank you,

Eli Spevak Orange Splot LLC 4751 NE Going St Portland OR 97218

Madeline Jane Kovacs

Project Manager | Orange Splot LLC | orangesplot.net

+1 510.410.4176 | skype: madeline.kovacs

"The world needs beauty as well as bread..." - John Muir

City of Portland Bureau of Planning & Sustainability 1900 SW 4<sup>th</sup> Ave Portland OR 97201

December 21, 2015

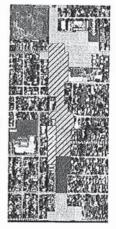
Zone Change Request for the West side of NE 42<sup>nd</sup> Ave. from 4837 - 5013 Proposal: Change comprehensive plan designation from CM1 to CM2.

As property owners along the west side of NE 42<sup>nd</sup> Ave. and other interested parties, we hereby request that Portland's comprehensive plan establish a base zone of CM2 rather than CM1, as currently proposed, for the 4837 – 5013 address range.

Existing development along both sides of this portion of NE 42<sup>nd</sup> Ave. are quite similar, characterized by 1-story commercial uses with ample surface parking. As this "Main Street" business district matures over the next 10-30 years, it seems likely that quite a few of these properties will be redeveloped into higher-density uses. As a default approach, it makes sense that both sides of the street would carry the same allowed density unless there's a compelling reason to 'stack' density to one side of the street or the other. We can't see such a reason.

Pasted to the right is the proposed zoning map from the current comprehensive plan draft. Pink represents CM1; orange represents CM2; and red represents CG. We fail to see the logic of the scheme as currently proposed, which designates the west side of this stretch CM1, while the east side (and portions of *both* sides of the street to the north and south) would be CM2 or CG – particularly since the intensity of existing development in these areas is about the same.

We'll conclude by noting that it would be wonderful for the long-term affordability of this neighborhood if one or more mixed-use redevelopment projects along NE 42<sup>nd</sup> could incorporate affordable rental housing. Currently, the housing bureau is only funding such projects if they contain 20+ units – and the practical minimum for a tax credit financed project is more like 40. Fitting this



many units onto 2 non-ground-level floors allowed on a CM1-zoned property (using an anticipated density bonus for affordable housing) would require 50% more site area than on a CM2-zoned property (that allows an additional floor of residential use). Hence providing more lots with CM2 zoning would support the creation of more housing in general – and increase the odds of getting a large enough site to support a 100% affordable housing development (over ground floor commercial/retail).

Thank you for considering this request to support a more balanced density profile along NE 42<sup>nd</sup> Ave.

Sincerely, Evan	ns Lew Eva	o President - Roses Le Cream
127	Ben Meyer	Dunor & Manage - Bld Shut Market.
	-	
Signature	Name (printed)	Affiliation

City of Portland Bureau of Planning & Sustainability 1900 SW 4<sup>th</sup> Ave Portland OR 97201

December 21, 2015

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Thank you for considering this request to support a more balanced density profile along NE 42<sup>nd</sup> Ave.

Sincerely,	Eli speva	L_Orange Spbf LL6
Hal faling	NeilJ. Gel	ed Wilshive Pental
		Shared and the same of the sam
Signature	Name (printed)	Affiliation

#### Arevalo, Nora

From:

Susan Lindsay < lindsays@pdx.edu>

Sent: To: Thursday, January 07, 2016 3:45 PM BPS Comprehensive Plan Testimony

Subject:

Buckman Community Association Comprehensive Plan Testimony

Attachments:

bca letter psc mar 15 signed.doc

Hello Mayor and Council Members,

I am resubmitting the BCA's opposition to rezoning of 15th-19th on SE Morrison and Belmont, as we were told no prior testimony submitted to PSC was forwarded to the Mayor and Council.

Is that true??

I sure hope not as many individuals submitted letters of strong opposition to the upzoning in this, the heart of residential Buckman, area.

Please read the attached and letter and feel free to contact me for any clarification. Please amend the plan, honorable Sirs and Madame.

Thank you,

Susan

Susan Lindsay 625 SE 17th Avenue Portland, OR 97214

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

From: Susan Lindsay < lindsays@pdx.edu > Date: Fri, Mar 13, 2015 at 11:14 PM Subject: BCA Comp Plan Testimony

To: Planning & Sustainability Commissioners <psc@portlandoregon.gov>, julie.ocken@portlandoregon.gov,

"Stein, Deborah" < Deborah. Stein@portlandoregon.gov>

Please see attached.

Susan Lindsay

Co-Chair, Buckman Community Association

Susan Lindsay

Susan Lindsay



# BUCKMAN COMMUNITY ASSOCIATION



c/o Southeast Uplift 3534 SE Main Portland, OR 97214 (503) 482-8252

March 12, 2015

Planning and Sustainability Commission 1900 SW 4<sup>th</sup> Avenue Portland, OR 97214

Dear Chair Baugh and fellow PSC Commissioners,

At the March 12<sup>th</sup> monthly meeting of the Buckman Community Association, the BCA Board voted write a letter to urge the Commission to leave in place the existing zoning of four contiguous blocks of SE Morrison and Belmont from 15<sup>th</sup> to 19<sup>th</sup> Avenue and to reject the proposed change. This was our second recent discussion on this proposal. Both meetings have been well attended with many neighbors expressing their concerns and opposition.

Our reasons for opposing the proposal and for requesting this area be dropped from this large scale "upzoning" effort include:

The proposed creation of four solid blocks of mixed use development will result in rows of full blocks of 4-5+ story high dense apartment buildings loaded with high-rent studio apartments.

Many residential homes and units currently exist here and provide affordable housing options that are diverse in layout and more family-friendly. These would be threatened and likely demolished.

The mixed use (CS) zoning is currently being used to build exclusively large, dense, residential structures with no commercial, little to no set-backs, no amenities, and with expensive, small studio apartments.

These blocks are within three blocks of 12<sup>th</sup> Avenue where block after block of EXD zoning currently exists, and where the large former section of residential Buckman was already demolished decades ago to make room for business and high-density growth.

Residential Buckman has historically endured periods where large chunks of the historic homes have been demolished. This proposal continues that trend to further destroy this neighborhood historic character and resources.

Although the Association was not informed directly of this proposal, when we discovered it, planning staff originally presented this rezoning proposal as a "non-conforming" use issue. Yet In fact within these 4 solid blocks are dozens of housing units properly zoned and conversely the rezoning itself would create dozens of non-conforming structures.

Ordinance 187832, Vol. 1.3.J, page 6980

This section of SE Belmont and Morrison is almost exclusively residential and an important and essential bridge between the area around Buckman School and our children's park at Colonel Summers. Creating a four block tower of five story apartment blocks creates a wall and barrier, damages the livability of the residences that line the opposite sides of Belmont and Morrison and effectively divides the neighborhood.

In stark contrast to upzoning this stretch of residential Buckman, many residents have instead spoken for years of "decoupling" the Morrison and Belmont couplet and restoring two way traffic on Morrison to slow it down and enhance its residential feature. The proposed changes would conversely intensifies the street immensely.

The existing R1 housing options in this area is \*welcomed\* in Buckman as opportunities for other than studio rental housing options. Recently two successful R1 developments have been built in Buckman which have created larger housing units suitable for housing families with children, an ongoing and long term goal of the Association. We do not want to lose the R1 along Morrison and Belmont.

Existing robust commercial corridors lie just three blocks west from 12<sup>th</sup> Avenue to the river and one block east from 20<sup>th</sup> Avenue to Cesar Chavez. We are not deficient in this category.

There are many more reasons why we believe the zoning should remain the as it is which we welcome to present directly to the Commissioners at any time.

#### 14th and SE Starks

In addition to the rejection of the proposed zoning changes from SE 15<sup>th</sup>-19<sup>th</sup>, the Association also unanimously voted to reject the proposed rezoning of two properties on SE Stark at 14<sup>th</sup> to CS from R1.

#### These reasons include:

Again, the R1 underlying zoning is acceptable and welcomed on this street as it is on SE Morrison and Belmont. In this case, it helps to maintain these low relief but popular incubator commercial spaces.

This area has already been completely "over-activated" recently with the sweeping switch without any conditional use process of 65,000 sq. ft. Washington High School from residential to 100% private commercial space. In addition to the numerous offices and business tenants, it now also has an 1100 person venue scheduled to be open 7 nights per week all within a residential neighborhood with a extremely limited parking

The area does not need further "activation".

Concern for the loss of sunlight for neighbors behind the properties which with CS zoning could now be built up 4-5 stories.

Finally, while the Board did not have time to weigh in on the rezoning of a large swath of Buckman between SE 17<sup>th</sup> and 19<sup>th</sup> from r-5 to R2.5, we have heard from neighbors quite concerned about this move.

The R5 designation was hard fought in the years of massive demolitions and open turn of the century house burnings allowed in the area for the development of track apartments in the 1960's and 70's. Maintaining options for families, for home ownership in a neighborhood with over 80% rentals is critical to supporting the schools, the parks and stabilizing the community. While much of residential Buckman is already zoned R2.5, R1 or contains apartments built in the CS zones, the interior areas away from the main streets have been kept at R5 to help maintain and protect the housing stock. Yet, by some intense focus and scrutiny, this area is now all blocked out to be upzoned. We ask for a relook at Planning staff's move to rezone this area, for further understanding of the historical and cultural reasons for the needed R5 in the is area, and for it to be left as it is for now.

The Comprehensive Plan is a work to make our city a better place for the future. We at the BCA share that desire to work to preserve what is good and change what should change. In these aforementioned places, and with a great deal of community support and concern, we strongly request these proposals be removed.

Thank you for all the work you do, and for listening to those, who like you, care so much about this city.

Sincerely Yours,

Susan Lindsay

Co-Chair, Buckman Community Association

Jeff Cole 4343 SE Madison St. Portland, OR 97215 Tel: 503.927.7748

Thursday, January 7th, 2016

Attn: Comprehensive Plan Testimony
Council Clerk (cputestimony@portlandoregon.gov)
1221 SW 4th Ave, Room 130
Portland, OR 97204

CC: Marty Stockton, Southeast District Liaison, BPS Barry Manning, Project Manager, Mixed Use Zones Project, BPS

Mayor Charlie Hales, Commissioners Nick Fish, Amanda Fritz, Steve Novick, Dan Saltzman:

Perhaps the phrase "sense of place" has had its day. I've lived in Portland for twenty years strong and the notion still resonates with me. I fell in love with this place - still love it so - and now, like many of my fellow citizens, I am feeling a bit displaced without it actually being so. Once I worried mostly about the world outside Portland (the "bubble") - today I have growing concerns about our city and its sense of self.

Not so long ago cities across America struggled to reverse a decades long decline - of flight from the often overly perceived grimness and dangers of the "big city."

After moving here in 1996 visiting family and friends always admired that Portland had the plusses of a city without the usual negatives.

Now we are in times of boom, and whether it be a Montana oil patch, or Portland, there are risks to this kind of supercharged development. In this haste, we must take care to grow carefully and continue to nurture a city with the plusses. That means density not as an end in itself but as a means to better parks, expanded museums and cultural facilities; real upsides in exchange for a little less individual elbow room. Lacking these upsides, we risk passing a tipping point where flight from our city at some point might happen again. And if we fail to nurture and protect our fabric of locally owned businesses, we risk morphing into vertical suburbs.

Too, there is the need to nurture continuity. Will a future episode of Portlandia feature a couple of newbies who can't discern one neighborhood from the next because we've reinvented them all in the same mold?

My testimony is divided into five main sections:

- 1) Commercial Viability in Neighborhood Districts
- 2) Sunnyside (and close in Southeast Portland Neighborhoods)
- 3) Affordable Housing A Path Forward
- 4) The Geese That Lays Golden Eggs: Preserving Historic Corridors
- 5) A Gateway to the Future (Keeping Portland the City of Light)

#### Commercial Viability in Neighborhood Districts

policies 6.61, 6.62, 6.63, 6.65, 6.68,

Portland is well respected for its thriving entrepreneurial community with one of the highest rates of women owned businesses. Close in Neighborhood Business Districts have provided the physical infrastructure for many enterprises. The historical richness and human scale of streets like SE Division, Hawthorne, Belmont, NW 21st & 23rd, N Mississippi and Alberta create unique physical settings for retail and dining experiences.

These historic streetcar era corridors are Geese that Lay Golden Eggs.

As competition from online retail continues to be refined, streets with irreplaceable experiential qualities become assets ever more precious. Indeed, not only do our Neighborhood Business Districts draw in customers from the greater Portland area, their distinctive character makes them prime destinations for tourists.

I have serious concerns that the rapid spread of the Mixed Use Building typology is taking place with an overemphasis on providing higher density housing at the expense of creating optimum Neighborhood Business Districts. Increased density through transit oriented development in historic corridors must not override a balanced approach to planning the future.

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

The backbone of traditional neighborhood business districts is the classic commercial storefront assembled in highly knit blocks. In it's purest form we see a one story warehouse space with massive street front glazing. Among its many positive qualities:

- provides exceptional pedestrian oriented interaction and ground floor activation
- · economical to construct & maintain
- · extremely flexible, adaptable, and reusable
  - deep clear span spaces (or with limited columns) provide optimal and generous floor space required for a wide range commercial uses
  - · larger spaces are easily configureable into smaller ones or vice versa
  - · spaces continue to be usable decades after construction; highly sustainable
- the low story configuration creates a pleasant open air pedestrian experience that is attractive. Imagine seeing the sky while dining at Bread and Ink. Today it's reality.

Variants of this prototype typically offer one or two stories of apartments above commercial space. Because these older buildings had minimal egress requirements, and modest residential density without parking, ground floor space remained generous.

#### The Challenge of Mixed Use in Tight Corridors

Although mixed use buildings now being built in Portland are often hailed as the natural successors to traditional storefront commercial, this typology becomes strained when sited in narrow corridors with 100 foot deep lots typical of close-in Southeast.

When residential units are introduced over commercial space there are a number of competing requirements that must be met separately from ground floor commercial, including:

- entry, egress and elevator access
- · mechanicals
- · trash/recycling access
- · parking for a portion of the residents

## Quick study #1: 3150 Division; 4 story Mixed Use Building

4 STORIES /2.6 FAR 20,000 SQFT LOT 52,380 SQFT BLDG. 5,5589 SQFT RETAIL 55 APARTMENTS

Although this building features nearly continuous ground floor commercial with generous glazing, the interior spaces are surprisingly limited. Initial storefront widths range from 20' to 62' and appear reconfigurable. The problem lies with limited depths that barely exceed 30 feet. For merchants there is little useable storage space nor enough room for customers to lose themselves in "browse mode." Tenants include small boutiques or a yoga studio that only needs minimal space for props and has obscured storefront glazing. A corner unit hosts a coffee house, yet none of the spaces appear adequate for a full service restaurant. In short, these are commercial spaces with limited use.

At one time the commercial space would have been king; now builders seek to maximize profits through residential floor space. Even at that, 3150 SE Division represents a relatively generous apportionment of commercial area. Projects like Burnside 26 or Hawthorne 26 offer little commercial floor space relative to residential.

A classic fifty foot wide 1-story commercial storefront, with a 15-foot rear wall height on a 100 ft. deep lot creates nearly the same amount of commercial space as 3150 SE Division over a 200 ft. lot width. As evidenced by multiple merchants on Hawthorne Blvd. these types of generous spaces result in numerous successful and more importantly, local enterprises.

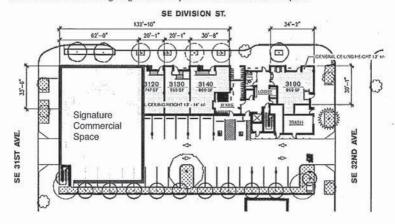
# SE DIVISION ST. 132'-10' 132'-10' 134'-2' 134'-2' 13100 131

3150 SE Division (above): The problem is programmatic. Too much residential density is accommodated at the expense of creating good commercial space.

Solution (below): Limit residential to 2-stories above commercial. Lower density requires less parking. Lower overall building height permits more sunlight into public corridor. Insert expanded commercial space on one end of building and eliminate duplicate driveway.

Resulting project now features truly versatile signature ground floor commercial space still divisible with access from either SE Division or SE 31st. In addition, at least two curbside parking spaces are preserved along 31st.

If every new mixed use building followed this recipe commercial districts would be stronger and additional floor space would help moderate commercial rents. New residents would be accommodated in existing neighborhoods yet with far less stressful impact.



Jeff Cole Comprehensive Plan Testimony

# Quick study #2: 3490 SE Hawthorne; 2-4 story Mixed Use Project (2003) (25,000 sq ft. lot) - "Dosha" Building

This building balances increased residential density (17 condominiums @ 1000 Sq. ft)) and good ground floor commercial that features:

- nearly continuous street front glazing
- · spacious, rectangular commercial spaces
- one traditional warehouse style commercial space extending lot depth
- · 100% parking for residential units
- imposes a modest overall building height (about 38' feet) with a step down to the east to match existing fabric.
- lot does includes portions150 ft. deep

Three of five original commercial tenants still operate; two expanded into vacated slots. Residential units are large by current standards and facilitate sharing. Household size may be larger than found in new studio units.

To ensure a successful Comprehensive Plan 2035, mixed use along historic corridors should:

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

- offer larger traditional ground floor commercial spaces in rectangular clear span configurations
- more moderate residential densities to soften point impacts on neighbors
- · include .5 parking spaces per unit
- · avoid the loss of curbside parking
- impose a general three story height limit, and a 2.5:1 FAR limit.

Why is this important?
In terms of Policies 6.61 & 6.63 larger contiguous commercial spaces are critical to accommodating a complete spectrum of neighborhood services. Consider these examples on Hawthorne Blvd:
(figures include back storage, etc)

- Powells Books (10.000+ sq. ft)
- One with Heart/Full Spectrum fitness (10,000. ft.)
- Portland Pet Supply (5,000 sq ft.)
- Red Light Clothing (7,500+ sq ft.)
- Four Full Service Banks (3,000-5,000 sq. ft)
- Muse Art Supply (2,500+ sq. ft)
- · Gold Door Retail (5,000+ sq. ft)
- Jicavas Bakery (8,000+ sq ft. including bakery and storefront)
- · Goodwill Boutique (4000+ sq. ft)
- · Dosha (6000 sq. ft +, two levels)
- American Apparel (5,000 sq. ft +)
- numerous stores 2500+ sq. ft

Existing businesses that have expanded on Hawthorne Blvd. in the past few years:

- Apizzascholls
- Fybreworks
- · Portland Pet Supply
- American Apparel
- · Muse Art and Supply
- Imelda Shoes (opened brother shop next door)

Further, we need to study the impact of losing larger single story ground floor commercial spaces on neighborhood business districts.

While some developers claim there is weak demand for new commercial in their mixed used buildings, this may be because constricted layouts combined with high lease rates are ill-suited to local start-up businesses.

#### Sunnyside (and close in Southeast Portland Neighborhoods)

According to the 2015 Growth Scenarios Report Sunnyside is a "complete" 20 minute neighborhood where essential services and transit are readily available. For example, residents in Sunnyside have walkable access to three grocery stores (policy 4.79)

Although Sunnsylde has many single family homes, multiplexes and apartments scattered throughout create a neighborhood surprisingly dense. At 19 residents per acre Sunnyside is only slightly less so that the Pearl (24/acre). Major factors for this are:

- 5% of the Pearl is zoned OS compared to one half block in Sunnyside our only park is shared with the elementary school.
- the Pearl's grid of 200 ft blocks means a good deal of land is devoted to public right of ways.
   Sunnyside's grid is irregular; often with long uninterrupted blocks. Many Sunnyside streets are very narrow-becoming one lane when cars park on both sides of the street. Planting strips are narrow too.
- Avg. household size in the Pearl is only 65% of a typical Sunnyside household of 2.3.
- The Pearl has numerous pedestrian right of ways between buildings; rare in Sunnyside

In short, while the Pearl has a robust street grid system and generous open space, the layout of structures in Sunnyside is considerably more compressed.

Sunnyside has virtually no vacant land. Beyond a couple of notable parking lots, there is little potential for new development that does not involve demolition.

Policy 9.13: Given there are few public spaces (parks, plazas) in Sunnyside our corridors are extremely important as de facto shared amenities. As opposed to Europe where density is balanced by generous common plazas, Hawthorne Blvd and Belmont St. are our common plazas. The low rise yet tightly knit storefronts of the commercial portions of these streets are pleasing to pedestrians. We like sitting in restaurants, looking out the window, and being able to see the sky.

#### Park Deficient - today.

The Parks Vision 2020 plans calls for a park walking distance from every household (one half mile). The qualifying park for a large portion of Sunnyside is a half block plot shared with the elementary school. The eastern half of Sunnyside is officially deemed park deficient.

New residents moving into new and often small apartments have an even greater need for park access. In some cases Laurelhurst Park is accessible. However, Parks Vision 2020 Southeast review materials note that both Laurelhurst Park and Mt. Tabor Park have "fragile resources - horticultural and natural - that can be damaged through excessive and inappropriate use."

#### Parking in Sunnyside

As noted elsewhere, many Sunnyside streets are narrow, and they connect in irregular ways often at extended intervals.

The impact of introducing multiple big box apartments without onsite parking cannot be overestimated. Even with a permit system, there will be great stress on the blocks adjacent to the corridors, as an ever increasing amount of traffic will attempt to navigate what are essentially one lane roads when curbside parking is fully utilized on both sides of the street.

The trend away from personal car ownership should not be overestimated. The year 2015 has resulted in record new vehicle sales in the United States. A younger demographic living in apartments may bike or ride the bus to work, yet still wants a car to recreate in Oregon's outdoors. Overflowing trailhead parking lots in the Columbia River Gorge is proof of that.

All new mixed use/apartment buildings need to provide at least .5 parking spaces per unit onsite. Anything less represents a taking from the current infrastructure and poses a hardship for Portland's small commercial businesses as well as residents.

#### Affordable Housing - A Path Forward (leveraging policy 5.16)

Numerous Goals and Policies within Section 5 relate to fair and equitable access to housing.

Policy 5.16 specifically calls for support of community land Trusts (CLTs) to hold land in reserve for affordable housing.

This one policy represents the best and most realistic path forward in creating a permanent and affordable housing stock in Portland because *It relies the least on an ever growing pool of rental apartments controlled by out of state Real Estate Investment Trusts.* 

However, the resources needed to create a meaningful pool of housing require actions, including:

- support policies and laws which encourage the building of condominiums instead of apartments where a portion of units could be included in CLTs.
- overturning Oregon's ban on real estate transfer taxes. Propose a model where all funds in such a tax would go directly to CLTs, which in turn would benefit the real estate industry.

I do not support proposals to offer bonus densities/heights in exchange for a meagre share of affordable housing units. The size and massing of new construction should be set to what is compatible for a neighborhood in the long run, and not overridden in singular response to density objectives.

# The Goose That Lays Golden Eggs: Preserving Historic Corridors policies 4.45, 4.46, 4.49, 4.52, 4.53

On a future collision course are two stated policies:

- the intention to introduce more residential density to historic streetcar corridors
- the intention to preserve historic resources, especially seminal commercial storefront architecture that is a draw for customers from the region and further

For close-in Division-Hawthorne-Belmont I urge the following:

- downzone to three stories or a 38ft height limit with a maximum 2.5:1 FAR
- create a complete inventory of vintage commercial storefront or residential buildings designated as high priority for preservation
- issue properties on the preservation list two stories building credits transferable to properties with no preservation status when properties are seismically upgraded
- create tax abatements for property owners that retrofit seismically deficient historic buildings

Greater recognition of the economic value of these streetcar era corridors is essential in preserving not only irreplaceable urban fabric – it is also vital to preserving Portland's vanguard in planning prowess as a city that renews, revitalizes, and moves forward at the same time.

Should Portland fail to protect these historical and economically essential assets needless to say the damage will be irreversible.

# A Gateway to the Future (Keeping Portland the City of Light) policies 3.28-3.31

Portland's best success in positioning new residential and attendant commercial growth has been in larger scale redevelopment areas where there is less potential for conflict between past and present uses. The Pearl, South Waterfront, and the upcoming Zidell Yards are all examples of converting areas from one use to another while planning for higher densities that work.

As noted the Pearl District included 5% Open Space to create a livable district.

South Waterfront has less open space yet has direct access to the Willamette.

Hopefully the Zidell Yards will feature abundant open space and river access.

By contrast, Injecting new higher densities into already working and vibrant close-in neighborhoods has resulted in numerous woes and has created ill feelings on many fronts. As the Growth Scenarios Report notes, the majority of these areas are "complete" and have already achieved goals for 20 min. neighborhoods.

Portland should back off its push into existing neighborhoods and re-embrace what has worked before: skillful redevelopment of districts with large unused and available capacity.

The Gateway Regional Center, with its zoned capacity of over 75,000 residents is the natural candidate.

I propose a "Greater Gateway" bounded roughly by Mall 205, 82nd Street, and Rocky Butte.

Gateway has the bones to become a vibrant and economically diverse civic center for East Portland and serve as a catalyst for economic growth near PDX airport.

An Expanded Gateway District already has:

- A transit center linked by three MAX lines.
- Easy access to PDX airport
- A developable and expansive reserve of parkland between I205/I84, with a potential to link up to Powell Butte
- Freeway access
- Easy access to Downtown, Mt. Hood, and the Gorge
- large developable lots on NE 82nd

What Gateway lacks the Pearl once lacked. What Gateway lacks is what the Zidell Yards lacks now.

To the extent it can, Portland should endeavor to funnel and consolidate the considerable pressures of current growth into creating a new Gateway district and not to where it poses potential risks to the well being of existing neighborhoods.

An Expanded Gateway District could well become the first of a "String of Jewels" linking nodes all along the Avenue of the Roses.

Best of all, aggressive new development or redevelopment will not disrupt or create the anxiety that "overfill" engenders in complete close-in neighborhoods. In fact, just the opposite will happen. Like the early days of The Pearl district each new building will be welcome as another piece inserted into the Gateway puzzle.

Thank you for your consideration of my testimony.

Jeff Cole

Spoken testimony: January 7, 2015

Portland's planning efforts boasts a parade of home runs.

We infilled a sea of Downtown parking lots.

We built the Pearl and transformed old warehouses and railroad yards into magical blocks.

The gleaming towers of South Waterfront come with new riverside access.

At the plate, the Zidell Yards embraces our stunning Tillkum Bridge.

An impressive string... yet lately our city's planning is starting to strike out.

Big Box Apartments in century old neighborhoods are tearing our city's fabric apart. This need not be

The Growth Scenarios Report informs us Comp Plan 35 has an excess zoned capacity of 144,000 household units or 300,000 people:

Yet Comp Plan 35 proposes to inject over 77% of new development into already complete 20 minute districts... that's nearly 100,000 units of big box apartments in neighborhoods like Sunnsyide, Richmond, Woodstock, Multnomah Village, and so on.

Yet untouched sits Gateway. Already an Urban Renewal Area. Already transit rich with the convergence of three MAX lines and direct access to interstate freeways.

Gateway alone has a zoned capacity of 33,000 household units - over 75,000 people

An expanded Gateway could house many more. We can funnel growth to where it does more good than harm.

Let's put Gateway on deck and the team behind Gateway.

Yesterday the Pearl was railroad tracks, tomorrow let's make Gateway the civic and urban center for underserved East Portland. Let's build housing options serving a wide range of incomes and actually meet our targets.

Gateway can be our next home run. Combined with future growth along the Interstate corridor Downtown, the Pearl, Broadway Postal Acreage, South Waterfront, Zidell Yards, and Lloyd Center we can house our future citizens while protecting our already complete century old neighborhoods.

#### Arevalo, Nora

From:

Cathy Galbraith <cathyg@visitahc.org> Thursday, January 07, 2016 3:42 PM

Sent:

BPS Comprehensive Plan Testimony

Cc

Hales, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Saltzman;

Commissioner Novick

Subject: Attachments: Portland's Draft Comprehensive Plan Testimony Cathy letter 2015 Comp Plan Testimony.docx

Importance:

High

Dear Mayor Hales and City Commissioners -

Attached are my comments on the draft Comprehensive Plan, given the final public meeting this evening. My husband is very ill and I need to be home with him.

I trust that you will take seriously the depth of my concerns for the traditional neighborhoods and historic districts and areas of our beautiful city; they are the reason that Portland has such enormous personal and physical appeal. Portland's architectural character matches it's physical setting - - buildings were constructed and neighborhoods were developed over time to be compatible with their settings. It has left us with a revered and respected city, to be conserved or damaged - - and the Comprehensive Plan will largely determine the outcomes.

Many of us have invested decades in our homes, neighborhoods, and our organizations. We hope that you will be mindful of the seriousness and sincerity of our concerns, especially in light of the Epidemic of Demolitions that is ravaging our city and its vintage neighborhoods.

Many Thanks - Cathy Galbraith

Cathy Galbraith, Executive Director Bosco-Milligan Foundation/Architectural Heritage Center 701 SE Grand Avenue Portland, OR 97214

503-231-7264 www.VisitAHC.org Portland Preservation Blog http://portlandpreservation.wordpress.com/



#### Architectural Heritage Center 701 SE Grand Avenue Portland, OR 97214 503 231-7264 503 231-7311 fax www.VisitAHC.org









January 7, 2016

#### Dear Mayor Hales and City Commissioners:

I deeply regret that family medical issues prevent me from attending this evening's last public meeting on the critically important update of Portland's Comprehensive Plan. Over the past 18 months, I have participated in many comprehensive plan meetings, including those for the North/Northeast, West/Northwest, and Skidmore/Old Town/ Chinatown quadrants, and commented on drafts for other neighborhoods. Given my advanced degree (MUP) and earlier career as an urban planner, I have a lasting interest in planning issues that has continued through my focus on historic preservation.

It is exceptionally difficult for me to resolve the City of Portland's very strong interest in city planning, that is coupled with a lack of <u>any</u> similar commitment to historic preservation. State Land Use Planning Goal #5 requires that all cities and counties address the preservation of their particular historic resources, and Portland's status as an Oregon "Certified Local Government" continues to provide grant funding for its preservation activities.

Your actions and decisions on the Comprehensive Plan will have lasting impacts for decades to come. You will determine the future of not only development activities, but also what you choose to carry forward of Portland's character-defining earlier development in all of our neighborhoods and downtown - - the beloved building heritage that largely defines our city and makes it the special place that it has become. It is obvious from the "Epidemic of Demolitions" that Portland's building heritage is under siege.

Considerable damage has already been done to the city's traditional neighborhoods since the start of the "Epidemic of Demolitions" and is continuing at great speed. If the Comprehensive Plan does not provide realistic land-use designations now, it is certain that the neighborhoods we know and love will continue to erode and ultimately be erased.

I have particular concerns about specific historic areas of our city: The Eliot neighborhood in particular, and it's Conservation District have already borne an unprecedented level of demolitions and displacements for grossly oversized and incompatible development, in complete disregard of its building heritage and its significant African American heritage in particular. The proposed zoning and comp plan designations will

destroy what remains of its cultural significance, especially given the tragic losses of buildings and community that have ALREADY taken place - - thanks to the earlier construction of I-5, Memorial Coliseum, Fremont Bridge, and urban renewal initiatives undertaken by the city. The well-intentioned Albina Community Plan only added to the damage, as Council members during that time have already acknowledged. How many times will promises that have been made to the community continue to be ignored?

I welcome your new focus on acknowledging the damages of displacement and loss of affordable housing so there's NO better time to address these specific concerns, and there is no better reminder than what's already happened to Eliot. The Eliot Neighborhood's request for downzoning should be approved.

The oldest portion of the **Buckman neighborhood** is proposed for upzoning, despite the National Park Service's Determination of Eligibility for listing in the National Register of Historic Places. Current zoning should be retained in the area south of Stark, between SE 17th and SE 20th rather than "upzoned" to R2.5 as proposed by the Planning Commission.

Three existing historic districts – Alphabet, Irvington, and Kings Hill - should also be downzoned from high-density residential. In particular, the high FAR allowance in the RH zones does not support the heritage conservation goals of these adopted Historic District. Eastmoreland is also working on an effort to establish as an historic district and I support the neighborhood's request for R-7 zoning.

While I share the "climate change" concerns of Commissioner Novick, continued high-density zoning and upzoning in Buckman, Eliot, Skidmore/Old Town/Chinatown, and other traditional neighborhoods is hardly any "solution" to the broader climate change culprits, such as industrial pollution. It feels more like a convenient excuse to justify upzoning and the resulting destruction of hundreds of buildings already constructed and for which resources have already been expended. Time and again, it has already been proven that the greenest building is one that has already been built. Portland's new Comprehensive Plan needs far more appropriate, and more fine-grained criteria (or perhaps alternative approaches to zoning) for the historic districts and areas about which I and many people that have invested in their properties in Portland's neighborhoods are concerned.

Yours truly,

Cathy Calbraith

Executive Director

Weston Investment Co. LLC

#76

A Real Estate Holding Company

Administrative Office

2154 N.E. Broadway, Suite 200 \* Portland, Oregon 97232-1590 Mailing Address: P.O. Box 12127 \* Portland, Oregon 97212-0127 Phone 503-284-9005 Fax 503-284-5458 E-Mail: joe@westoninv.com

City Council Hearing Proposed Comprehensive Plan Review

January 7, 2016

City of Portland

Mayor Charlie Hales and City Commissioner,

My name is Joseph E. Weston, owner of Weston Investment Co. LLC, located at 2154 NE Broadway Street, Portland, Oregon.

I formed Weston Investment Co. LLC, a 57 year old privately owned company that has developed and purchased property in the Portland area.

While the initial trust in the 1960 - 70's was apartment development, the past 35 years has been in office, commercial, retail development, and industrial acquisition and development.

Over the past 57 years I have experienced the process of the City of Portland's revision of its zoning code, starting with just the initial zone, R-residential, A-apartment/plex, C-commercial, and I-industrial.

Then in the 60's we had various break downs of the four alpha zoning designations to indicate the amount of land area that is required; R-5=5,000 square feet, R-75=7,500 square feet, A-25=2,500 square feet, and A-1=1,000 square feet, etc., etc.

This new comprehensive plan that is before you is by far the most difficult to understand and will be difficult, in my estimation, to administer.

Weston Investment Co. LLC has three parcels of property within the boundaries of the city that we are concerned with the proposed zoning, as what is being proposed is a down zoning in FAR and height with the possibility of bonus increase in FAR and height if certain factors are incorporated into the development to be built.

The three areas of concern that I want you to take into consideration are:

## 1. Sylvan Heights area (see picture)

This is an area within 2 ½ miles of City Center and the highest and best use of this site would be a class "A" office complex in place of the "woody walk up" building constructed in the 1960's that are present on the site today.

Request:

WE ASK THAT THE ZONING DESIGNATION OF  $\underline{EG2}$  BE ASSIGNED TO THIS PARCEL OF LAND.

## 2. Central City South Lloyd Center area

Close in east side, NE 12th to NE 20th, NE Sandy Blvd. to I-84 (see map area).

Over the years Weston Investment Co. LLC has acquired the following large tracts of land and improvements owned by:

- A. Jantzen Knitting Mills
- B. Nationwide Insurance
- C. Portland Bottling Company
- D. Salvation Army
- E. Lyman Slack Motors
- F. Oregon Plaza Building

Weston Investment Co. LLC owns approximately 175,000 square feet of land, which represents in the vicinity of 40 city blocks as measured by square footage of city blocks (see plan attached).

It was my intention to perhaps do another development similar to what I have been involved with in the Pearl District under Hoyt Street Properties LLC, however, because of age and the lack of patience, I have decided against this and ultimately the large privately owned parcel will be sold for a large scale development. I will, if offered, continue to acquire infill property in the area to add to the land currently owned.

Request:

THAT THE AREA IN QUESTION BE INCLUDED IN THE ZONING OF CENTRAL CITY, AS THERE IS NO QUESTION THAT THE SUBJECT AREA IS INDEED CENTRAL TO THE CITY.

Brent Lower, Executive Vice President of Washington Holdings, which owns property in the subject area, has had conversations with Barry Manning, Senior Planner with the City of Portland, and I believe through their legal council will be submitting written testimony on their property and zoning designation request. Weston Investment Co. LLC is amiable to work with Washing Holdings and the City to assure that the zoning designation assigned assures that the site can be developed to its highest and best use.

### 3. Property East end of the Broadway Bridge

Property on N. Broadway and Interstate, that property north of the Memorial Coliseum and south of the school district property. It is my understanding that this super block of land is now zoned <u>central city</u> and will remain with that zoning and have the same FAR and height possibly that are now assigned to the parcel.

A four warm one Western Investment Co. I.I.C. had see

A few years ago Weston Investment Co. LLC had some preliminary design work completed to construct a high rise condominium on the site and still preserve the former Benkins Building on the SE corner of the property, which is now occupied for self-storage,

which there is an immediate need in the core area with all of the apartment construction that provides limited storage on site.

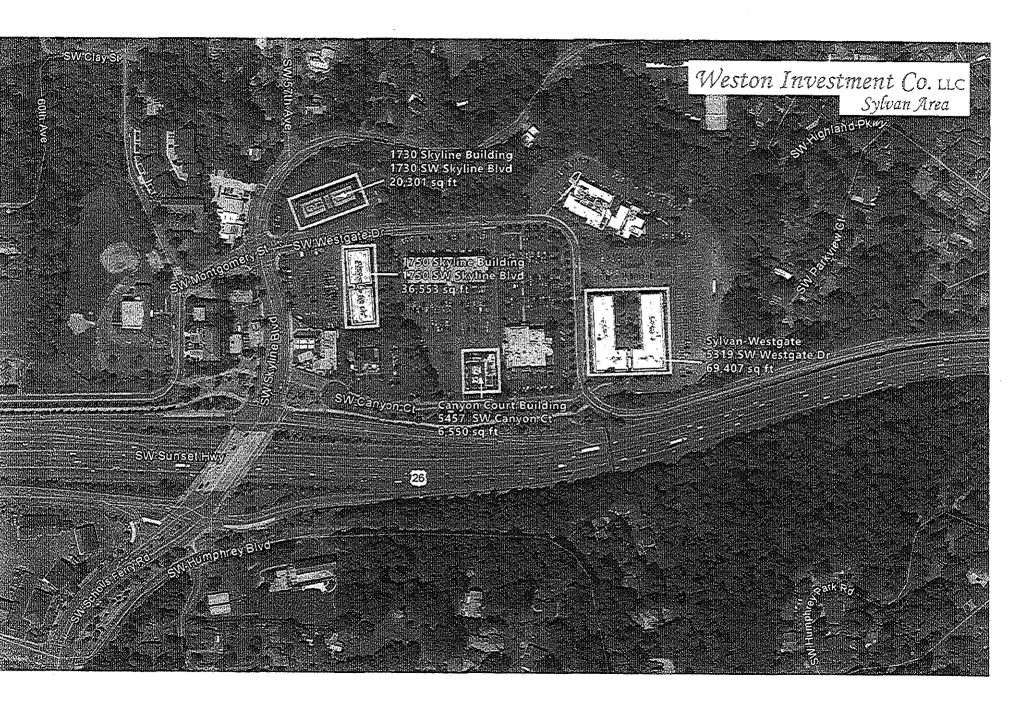
Request:

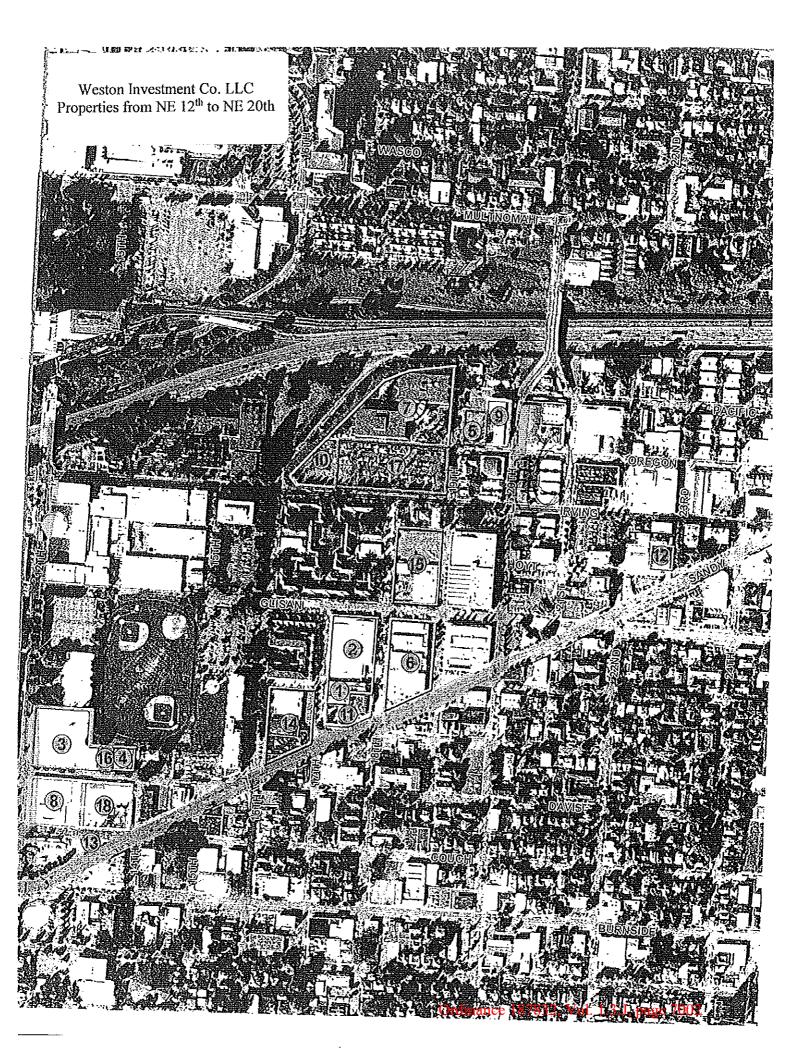
| THAT THE CURRENT ZONING REMAIN IN PLACE. |

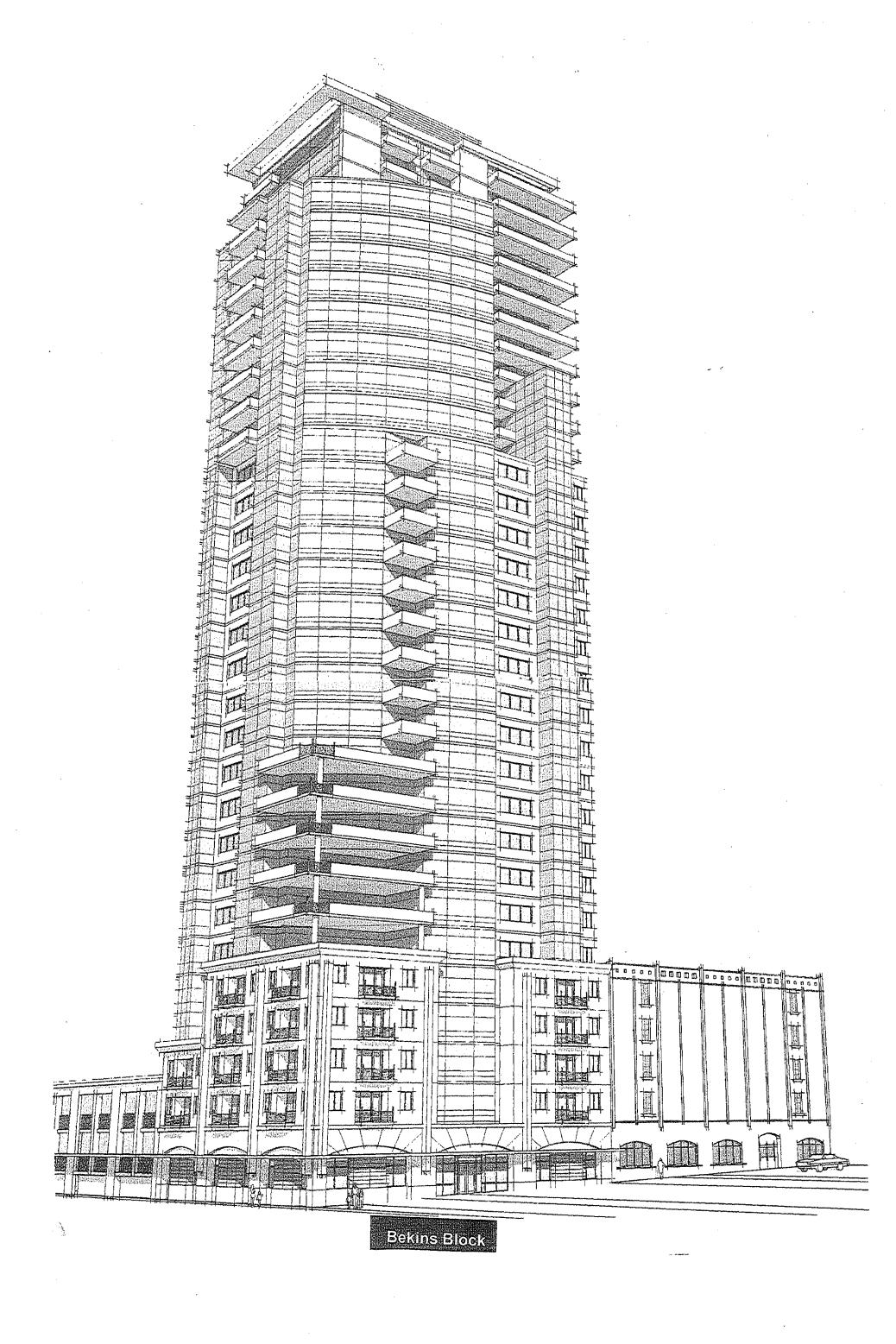
I would be happy to answer any questions you may have.

Thank you for your time.

Joseph E. Weston







SUGAN SCHUSTER 1522 SE Climbon Palor 97202 -1130

Plan: 2035

Re: Rezone SE Clinton Street From: Susan P. Schuster

To: Portland Oregon City Commissioners

Thank you for the opportunity to offer feed back on the 2035 Plan.

I have lived on SE Clinton Street for the past 20 (+) years. My home was built in 1885, and surrounding homes were built from 1886 to 1906. I have witnessed an increase in residential and commercial building.

The Draft Comprehensive Plan rezoned parts of the area under Change 330. After neighbors response, the Planning Commission recommended to continue the current zone: R2, low density residential.

I am asking you to keep that zoning. As I understand, a man purchased the property on the corner of SE Clinton Street and 15th Avenue in 2013. The parcel contains 4 houses, three houses on Clinton St and one house on 15th. He has requested a rezoning of those specific houses under the 2035 Comprehensive Plan. He would like to change the zoning from the existing and recommended zoning of R2 to CM 1, commercial mixed use, allowing commercial development. I - and many other neighbors - oppose that change.

#### **FOUR ISSUES TO CONSIDER:**

- 1. Portland needs more affordable housing;
- 2. SE Clinton area does not need more commercial options;
- 3. The employment that could result from increased commercial storefronts will probably be at or slightly above minimum wage;
- 4. The area cannot support additional commercial activity.

#### Affordable housing:

The City has been grappling with this issue for decades. You are well aware of the overall numbers and the housing crisis. The Draft 2035 Planned proposed re-zoning 13 homes to CM1: 6 on Clinton Street, 2 homes on 16th Ave, 3 on SE Ivon St, and 2 on SE 15th Ave. Six of these homes are owned and managed by REACH and the remaining 7 are privately owned. After receiving testimony, that was deleted from the Proposed Plan before you. We need all these homes to remain residential. The homes where a new zoning change has subsequently been requested are between 14th and 15th. These homes could house one family each. Sixteen people is obviously a drop in the bucket. At the same time - it is very significant to those 16 people.

We also request the building at SE 16th and Clinton, currently an apartment with a street level Naturopathic Clinic (non conforming use) remain zoned R2 and functioning as non-conforming use. This location is surrounded by homes and the existing status provides a vehicle where any

Schuster, 2035 SE CLINTON Page two

commercial activities in the building have to consider impacts the the surrounding residences. The HAND Board has testified in opposition to changing the zoning at this site to CM1.

#### Commercial options:

The owner of the parcel of four houses (1420 -1436 SE Clinton and 2717 SE 15th) wants these to be rezoned for commercial use. Some neighbors met with the parcel owner who stated Portland would continue to grow and need commercial services, and at issue is the need for jobs in Portland. The owner asked if we (the neighbors) wouldn't like a movie theater or a bar in the neighborhood. No and no. We have Clinton Street Theater, a video store, the Aladdin. Within blocks there is Night Life, a 'sports bar' at SE 20th and Division, a bar at about 12th and Division that apparently has available a large number of microbrews.

He also stated change is coming and we should not stand in the way.

I suggest to the City Council that yes, change is always coming and change does not necessarily mean progress. And more is not necessarily better.

I suggest SE Clinton area has enough commercial sites. In 11/2014 I walked throughout the neighborhood from SE 12th and Clinton to SE Division and 26th. At that time I counted more than 21 restaurants; 3 places to buy coffee ( and beans); 2 grocery stores; yoga studios, tattoo shops; 3 spas; Clinton Street Theater; mental health (private) counseling office; marital arts school; New Day School; Community Gardens; real estate office; and 3 spas.

Within walking distance: the Aladdin Theater; Classic Pianos; veterinary office; the Food Pods, many more restaurants; 3 bike shops and more.

I have a more complete list available, however it is from November and there have probably been changes.

Commercial storefront property exists near 12th and Clinton and around the MAX station area which is not leased and appears available.

There is not a need for more coffee shops, restaurants, or bars on Clinton Street. There is a need for affordable housing.

#### Need for jobs:

Absolutely agree Portland needs more job opportunities. However, the need is for jobs that pay enough to support a family. Clinton Street does not need another job opportunity for a barista.

#### Area cannot support additional activity:

Clinton Street is a designated Neighborhood Greenway. Portland Bureau of Transportation (PBOT) is currently exploring options to reduce traffic. Commercial development on Clinton Street is contrary to that agenda.

Schuster, Clinton Street Page three

Think Out Loud (NPR program 9/9/2015 @ 1220) interviewed Nancy Thornton (Portland Bureau of Developmental Services), Cathy Galbraith (Executive Director Architectural Heritage) and Randy Sebastian (Renaissance Homes). There was discussion about change and growth in Portland neighborhoods. Among the comments made:

vintage homes are the most sought after in residential areas... people value the beauty about their neighborhood, and it is being lost. There was discussion about air quality and other environmental concerns. A comment was made: we do not have an infinite capacity for population and traffic..... we cannot accommodate every single person who wants to live here. (please note these comments are paraphrased not direct quotes).

I cannot imagine the time, energy, expertise, passion, *Blood Sweat and Tears* that staff and volunteers contribute to designing the 2035 plan. And on the other hand - how exciting to be a part of defining the vision for this City.

As a citizen I do want change and I do have a vision. My vision includes:

- \* increased funding for k-12;
- \* decrease number of hungry children, adults throughout the State;
- \* increase mental health services;
- \* increase affordable housing:
- \* improved relationship Portland Police and the community;
- \* increase jobs with family wages;
- \* improved traffic, streets;
- \* increase affordable, accessible child care;
- \* increase services for people experiencing domestic violence.
- \* decrease the number of men, women and children living in substandard/unsuitable conditions including cars and on pieces of cardboard under the bridges.

Thank you.



222 NW Davis Street Suite 309 Portland, OR 97209-3900 503.222.1963 www.oeconline.org

January 7, 2016

Portland City Council 1221 SW 4th Ave, Room 130 Portland, OR 97204

RE: Portland's Comprehensive Plan Update

Dear Council Members,

Forty-three years ago, Oregon Environmental Council (OEC) was one of the lead advocates for the adoption of Oregon's unparalleled statewide land use planning framework—legislation that has succeeded in protecting Oregon's productive farms and forests, while fostering cohesive urban areas that use resources efficiently. OEC remains strongly committed to the state's land use planning laws and has continued to play a role in ensuring our cities grow wisely. Chief among our goals is a healthy, stable climate, and we worked with 1000 Friends of Oregon and others to pass the legislation that spurs Oregon's major urban areas to use climate-friendly transportation and land use planning to reduce greenhouse gas emissions.

Portland's comprehensive plan is an essential component of a climate-friendly future. The decisions we make today about what infrastructure to build and where to build it will have climate implications far into the future. We are pleased that Portland's Climate Action Plan is among the foundational documents informing the 2035 Comprehensive Plan.

OEC applauds the Plan's commitment to equity. Displacement of lower-income residents and people of color is an unwelcome byproduct of neighborhood improvements. The city must ensure enough affordable housing stock exists to make the city—including the city's core—affordable for young people, the elderly, and low-income residents. This issue must be dealt with head on and with all haste, including advocacy by Portland decision-makers for a removal of the state ban on Inclusionary Zoning.

We understand that one of the most controversial elements of the Comprehensive Plan is Portland's continued commitment to compact development. But, like it or not, the region is growing, and sprawl is simply not an option. Sprawl wastes natural resources, increases air pollution and greenhouse gas emissions, costs residents more in taxes for city and county services, and impinges on important economic sectors in Oregon: farming and forestry. Portland must do its part to welcome and manage the integration of new residents to the city by developing in a compact way. OEC appreciates the city's commitment to growing "up" not "out" even though density has impacts that not all residents appreciate. Ultimately, having people living closer together is key to addressing climate change and reducing pollution while providing the many other community benefits outlined in the Comprehensive Plan.

In addition, the Comprehensive Plan recognizes that the days of widening freeways and roads to facilitate ever increasing automobile travel are over. Future transportation investments must focus on providing people more transportation options and on building "complete neighborhoods" (aka 20-minute neighborhoods) that allow people to access many of their needs a short distance from their homes. This will help reduce the need to drive and increase healthy physical activity by facilitating more walking and biking.

example, stormwater swales are key to protecting water quality and reducing water infrastructure costs.

The Comprehensive Plan's focus on compact urban development, more transportation choices, and sustainable infrastructure provides a wide range of benefits.

#### Cleaner air & water and a stable climate:

In Oregon, cars and trucks are responsible for more than half of our air pollution and nearly 40% of our greenhouse gases. When we drive less, we generate less pollution—keeping smog and soot at bay and lowering heat-trapping greenhouse gas emissions. Less driving, along with greener street and parking infrastructure, also protects our rivers and streams because less polluted water runs off our streets and parking lots.

#### Less expensive infrastructure:

Many studies comparing compact growth to sprawl have found that the total costs of buildings, land, infrastructure and transportation are far less in compact communities. And (at the heart of Oregon's land use planning framework) curtailing sprawl reduces pressure to expand urban development onto Oregon's valuable farm and forestlands.

#### Household cost saving & economic benefit:

Transportation is the second largest expense for most households. In communities with transportation choices, families can save a bundle on cars and gas. In the Portland region, where residents travel about 20% fewer miles by car than residents of other major U.S. metropolitan areas, transportation cost savings are calculated at \$1.1 billion per year. Every dollar not spent on imported oil frees up money for local goods and services that benefit Oregon's economy.

#### Healthy lifestyles & more time with family:

In communities where there are no safe and practical bicycle or pedestrian routes and little or no transit service, people have no choice but to drive. As a result, people spend more time in traffic driving long distances, limiting family time and undermining opportunities for exercise. Complete communities reduce drive times. Safe streets, sidewalks and bikeways make it easier for people make healthy lifestyle choices.

#### Neighborhoods that people want to live in:

A 2011 study by the National Association of Realtors found a majority of Americans prefer smart growth neighborhoods over neighborhoods that require more driving between home, work and recreation. This is especially true of younger Americans. Metropolitan areas are finding that features like bikeways and trails, access to public transportation, and plentiful parks and natural areas are a primary factor in attracting talented workers.

Thank you for the opportunity to provide comment on the Comprehensive Plan.

Chris Hagerbaumer
Deputy Director
Oregon Environmental Council
(and Portland resident)
503-222-1963 x102
chrish@oeconline.org

# WHY CREATING AND PRESERVING AFFORDABLE HOMES NEAR TRANSIT IS A HIGHLY EFFECTIVE CLIMATE PROTECTION STRATEGY

# **Executive Summary**

California is currently debating how to invest greenhouse gas (GHG) cap-and-trade auction proceeds so that they result in real, quantiDable and veriDable greenhouse gas reductions.

A new analysis of data from Caltrans' California Household Travel Survey (CHTS) completed in February 20 13 shows that a well-designed program to put more allordable homes near transit would not just meet the requirements set by the California Air Resources Board (ARB), but would be a powerful and durable GHG reduction strategy – directly reducing driving while creating a host of economic and social beneats.

Conducted by the nationally recognized Center for Neighborhood Technology (CNT), the analysis identified 36,000-plus surveyed households that had provided all relevant demographic and travel data and divided them into five income groups, living in three types of locations based on their proximity to public transportation:

- Transit-Oriented Development (TOD) as defined by the California Department of Housing & Community Development (HCD) requires homes be built within a 1/4 mile radius of a qualifying rail or ferry station or bus stop with frequent service.
- TOD as delined by the Sustainable Communities and Climate Protection Act of 2008 (SB 375) requires housing to be built within a 1/2 mile radius of a rail or ferry station, or a bus stop but with lesser frequencies than HCD's delinition.
- Non-TOD areas that do not meet either of these de□nitions.

#### Two key Undings include:

- Lower Income households drive 25-30% fewer miles when living within 1/2 mile of transit than those living in non-TOD areas. When living within HCD's 1/4 mile of frequent transit they drove nearly 50% less.
- Higher Income households drive more than twice as many miles and own more than twice as many vehicles as Extremely Low-Income households living within 1/4 mile of frequent transit. This underscores why it is critical to ensure that low-income families can allord to live in these areas.

Ordinance 187832, Vol. 1.3.J, page 7009

In response to soaring demand from Higher-income households for condos and luxury apartment developments near public transit, there has been a surge of new development. The CNT report shows the tremendous greenhouse gas reductions the state can achieve by ensuring that more low-income households can also live in these areas through investment of cap-and-trade auction proceeds.

# Designing a Cap-and-trade Investment Program that Maximizes GHG Reductions

The CNT analysis provides robust evidence that an investment by the state in the creation and preservation of allordable housing located within 1/4 mile of frequent transit can dramatically reduce GHGs.  $\Box$ 

Using conservative assumptions, TransForm and the California Housing Partnership calculated that investing 10% of cap and trade proceeds in HCD's TOD Housing program for the three years of FY 20 15/16 through FY 20 17/18 would result in 15,000 units that would remove 105,000,000 miles of vehicle travel per year from our roads.

Over the 55-year estimated life of these buildings, this equates to eliminating 5.7 billion miles of driving old of California roads. That equates to over 1.58 million metric tons of GHG reductions, even with cleaner cars and fuels anticipated.

What's more, the State can signideantly increase these GHG reductions. The savings in miles driven described above is based solely on location and income, but HCD has a variety of ways their program could further reduce GHGs such as giving priority to developers who provide free transit passes for residents, adjacent carsharing pods, bicycle amenities and who exceed energy and water ell ciency requirements.

Finally, TransForm and CHPC oller a methodology for verifying and reporting the reductions. I

## To read the full report please visit:

- www.chpc.net
- www.transformca.org





UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION TESTIMONY on COMPREHENSIVE PLAN January 7, 2016

The Board of the University Park Neighborhood and its Land Use Committee requests that you consider the following comments and concerns about the proposed Comprehensive Plan.

1) The Water Bureau property known as the Carey Boulevard property be zoned OPEN SPACE. The creation of the Mid Peninsula Trail has created a park like setting. The UPNA's comments to the Planning and Sustainability Commission requested that this land be OPEN SPACE. Alternatively, the UPNA requests that the current R5 zoning be maintained and that the one R2 parcel be rezoned to R5.

This request is based on two heritage trees being on the property, its historical use as a park, and the Equity Goals of the Comprehensive Plan. Two hundred years of experience show that Railroads and Residential Housing are not compatable. This is one of the few parcels in the City of Portland where no residences abut railroad lines. In addition, upzoning to allow multi-family housing would create an inequity -- the poorest residents in the neighborhood would live adjacent to a rail line, in an area which already has some of the worst air quality in the US.

This set of parcels is used by over 1200 people every day in the summer to walk dogs, run, bike, play ball, or enjoy the birds and fauna (August 2015 activity census performed by UPNA). It is also used by over 20 and as many as 50 houseless individuals each day of the year.

- 2) The UPNA Board strongly urges the City Council to FIX a problem created by the current Comprehensive Plan south of Willamette Boulevard and to the east of the railroad line. Five residences are zoned Commercial. The City does not own the bridge and there is a dangerous blind curve at this location which makes vehicular and pedestrian access very difficult. We request that this be DOWNZONED to R5. The addresses of the subject properties are: 6858, 6946, 6838,6832 and 6822 N. Willamette Blvd.
- 3) The UPNA Board urges the City to rezone the property south of Oberlin and east of Minerva to R5 to be consistent with the rest of the zoning west of Macrum Ave.
- 4) The UPNA Board DOES NOT support the creation of an Institutional Campus Zone, but WEAKLY SUPPORTS the reclassification of the Baxter-McCormick property as proposed by the proposed Comprehensive Plan to a lower than Industrial employment zone. The UPNA preferred option is to Reclassify and ReZone the Baxter-McCormick property to OPEN SPACE.
- 5) The UPNA Board and Land Use and Open Space Committees supports the proposed rezoning and reclassification from Industrial to Open Space of a parcel of land south of Willamette Blvd.

- 6) The UPNA Board supports the proposed replacement of the viaduct on Willamette Blvd, the replacement of a private bridge across the railroad on Willamette Blvd. and rail line improvements. It also supports the proposed watershed infrastructure improvements.
- 7) The Map App did not work properly initially and even in its latest version is difficult to use, loses input and is user unfriendly. It isn't alway clear what map is being examined, the directions were unclear and it wasn't available in any languages other than English. This suggests that it did not adhere to the goals for inclusivity and community input found in the Comprehensive Plan.
- 8) The UPNA Board and Land Use Committee strongly supports the inclusion of a Health Overlay for North Portland as proposed by the North Portland Land Use Group and Neighborhood Association Chairs.

Submitted,
Thomas Karwaki
University Park Neighborhood Association Vice Chair & Land Use Committee Chair
7139 N. Macrum Ave
Portland OR 97203
253-318-2075 cell
karwaki@yahoo.com

## Wendy Chung

1729 NW Irving Street • Portland, OR 97209 • (720.218.2925) • wcrossiter@yahoo.com

January 7, 2016

Mayor Charlie Hales and City Commissioners
City of Portland, City Hall
1221 SW 4th Avenue
Portland, Oregon 97204
RE: Comprehensive Plan Update – Historic Districts

**Dear Mayor Hales and Commissioners:** 

I am a member of the NWDA Board and its Planning Committee. I am privileged to live in the Alphabet Historic District in northwest Portland. The Historic District enhances livability in Northwest and attracts tourism and development, but out-of-scale, incompatible apartment buildings are dwarfing historic buildings and homes, jeopardizing its character. This is not an only a Northwest Portland issue. There is a city-wide concern about the destruction of <u>neighborhood character</u>, especially in historic districts.

The draft Comp Plan describes Northwest as an "Inner Ring District" where "historic preservation and design review tools" should be used "to accommodate growth in ways that preserve historic resources and enhance [its] distinctive characteristics." Too often, however, existing tools fail to effectively prevent incompatible development. This is because 1) underlying base-zoning conflicts directly with historic district guidelines such as those that apply to the Alphabet Historic District, causing confusion during the development and design review process; and 2) only a small number of Portland's historic properties are protected under our current code.

There are many examples of this in our neighborhood. For instance, my home, and the single-family Victorian houses on either side of it, are zoned RH, or high-density residential. In fact, much of the Alphabet Historic District is zoned RH or EXd, which allows for 6-story apartment buildings that are inconsistent with the fine-grain, small-scale development contemplated by the Alphabet Historic District Guidelines, which City Council adopted as an addendum to the Community Design Guidelines in 2000.

While some properties, like mine, enjoy protection from demolition because they are described as "contributing properties" on the US National Register of Historic Places, most of the properties in the Alphabet Historic District and in other historic districts are "non-contributing" and are therefore not protected. Many other historic properties in Portland are located outside of historic districts yet still deserve protection. Thirty years ago, 5,000 properties were listed on the City's Historic Resources Inventory "HRI." The list has not been updated since. Many properties originally listed have since been removed. In addition to being incomplete and outdated, the HRI has no teeth because there is virtually no protection for HRI properties under the Portland Code.

The Landmarks Commission has urged Council to update the HRI, and to allow for a mandated waiting period for removal. We support this recommendation and also recommend updating the draft Comp Plan by 1) including protection for all HRI properties and 2) reconcile base-zoning to comport with historic design guidelines.

Specific suggestions for editing the draft Comp Plan language are attached.

Thank you,

W. QCZ\_

Wendy Chung

1729 NW Irving Street • Portland, OR 97209 • (720.218.2925) • wcrossiter@yahoo.com

Sincerely,

Wendy Chung

Encl.

1729 NW Irving Street • Portland, OR 97209 • (720.218.2925) • wcrossiter@yahoo.com

#### **Suggested Comp Plan Edits**

#### Inner Ring Districts (PAGE GP3-14)

The Inner Ring Districts include some of Portland's oldest neighborhoods, with several historic districts and a broad diversity of housing types. These areas include distinct <u>plan</u> districts, such as Albina and Northwest Portland (within which the Alphabet Historic District resides), that have multiple mixed-use corridors in proximity (see the shaded areas in the Urban Design Framework), allowing most residents to live within a quarter-mile distance of frequent-service transit and neighborhood businesses. The Inner Ring Districts are also served by a highly interconnected system of streets and sidewalks, and are within a three-mile biking distance of the Central City's array of services, jobs, and amenities.

These policies acknowledge that growth in the Inner Ring Districts plays an important role in allowing more people to have access to their many opportunities, but also acknowledge that this growth should be integrated into these areas' historic urban fabric. The Inner Ring Districts, especially along their corridors, play a similar role to Town Centers in accommodating growth.

Policy 3.40 Growth. Expand the range of housing and employment opportunities in the Inner Ring Districts. Emphasize growth that replaces gaps in the historic urban fabric, such as redevelopment of surface parking lots and 20th century auto-oriented development.

Policy 3.41 Corridors. Guide growth in corridors to transition to mid-rise scale close to the Central City, especially along Civic Corridors.

Policy 3.42 Distinct identities. Maintain and enhance the distinct identities of the Inner Ring Districts and their corridors. Use <u>and expand existing</u> historic preservation and design review tools to accommodate growth in ways that <u>identify and preserve</u> historic resources and enhance the distinctive characteristics of the Inner Ring Districts, especially in areas experiencing significant development.

Policy 3.43 Diverse residential areas. Provide a diversity of housing opportunities in the Inner Ring Districts' residential areas. Encourage approaches that preserve or are compatible with the range of existing historic housing properties in these areas. Acknowledge that these areas are historic assets and should retain their established characteristics and development patterns, even as Inner Ring centers and corridors grow, by applying adopted historic design guidelines in a manner that takes precedence over conflicting base zoning.

#### Goal 4.B: Historic and cultural resources (PAGE GP4-5)

Historic and cultural resources are integral parts of an urban environment that continue to evolve and are preserved.

#### Policy 4.27 Historic buildings in centers and corridors. (PAGE GP4-8)

<u>Designate</u>, <u>Pprotect</u> and encourage the restoration and improvement of historic resources in centers and corridors.

Historic and cultural resources (PAGE GP4-11)

## Wendy Chung

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Portland has several hundred designated historic landmarks and historic and conservation districts. These special places help create a sense of place, contribute to neighborhood character, and recognize Portland's history. More than half of Portland's buildings are over 50 years old, creating a vast pool of potentially significant properties to be evaluated for historic designation. These policies support the identification, protection and preservation of historic and culturally significant resources in a city that continues to grow and change.

Policy 4.45 Historic and cultural resource protection. <u>Identify</u>, <u>Pprotect</u> and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

Policy 4.46 Continuity with established patterns. Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources—by prioritizing historic design guidelines over conflicting base zoning.

Policy 4.47 Demolition. Protect historic resources from demolition. Provide opportunities for public comment, and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

Policy 4.48 City-owned historic resources. Maintain City-owned historic resources with necessary upkeep and repair.

Policy 4.49 Historic Resources Inventory. <u>Update and Mregularly maintain and periodically update</u>
Portland's Historic Resources Inventory to inform historic and cultural resource preservation strategies.

Policy 4.50 Preservation equity. Expand historic preservation-resource inventories, regulations, and programs to encourage historic preservation in areas and in communities that have not benefited from past historic preservation efforts, especially in areas with high concentrations of under-served and/or under-represented people.

Policy 4.51 Cultural diversity. Work with Portland's diverse communities to identify and preserve places of historic and cultural significance.

Policy 4.52 Cultural and social significance. Encourage awareness and appreciation of cultural diversity and the social significance of <u>both beautiful and ordinary</u> historic places and their roles in enhancing community identity and sense of place.

Policy 4.53 Community structures. Encourage the adaptive reuse of historic community structures, such as former schools, meeting halls, and places of worship, for arts, cultural, and community uses that continue their role as anchors for community and culture.

Policy 4.54 Archaeological resources. Protect and preserve archaeological resources, especially those sites and objects associated with Native American cultures. Work in partnership with Sovereign tribes, Native American communities, and the state to protect against disturbance to Native American archaeological resources.



Testimony to Portland City Council Provided by Maggie Long Executive Director of SEIU Local 49 3536 SE 26th Ave Portland, OR 97202

Re:

Promoting livability and affordability via the Comprehensive Plan's updates to Floor-Area-Ratio bonus and transfer options

January 7, 2016

Good evening Mayor Hales and Commissioners,

My name is Maggie Long and I am the Executive Director of the Service Employees International Union, Local 49. SEIU Local 49 is a 12,000 healthcare and property service member union. Combined with our brothers and sisters at SEIU Local 503, SEIU is the largest union in the state representing over 65,000 public and private sector workers throughout Oregon and Southwest Washington. Our mission as a union is to improve the quality of life for our members, their families, and dependents by achieving a higher standard of living, by elevating their social conditions, and by striving to create a more just society.

On behalf of our members, I am here today to voice Local 49's support for the Comprehensive Plan update's process to revise the existing Floor-Area-Ratio bonus system to incentivize affordable housing, and to further propose the Floor-Area-Ration portion of the Western Quadrant Plan be amended to promote livability and good jobs.

SEIU Local 49 has long been a champion of livability and affordability for working families in the Metro area. We participated in a coalition urging the legislature to end the ban on inclusionary zoning, we opposed the ban on the real estate transfer tax, and we have worked with coalition partners to advocate for more affordable housing in the South Waterfront and appreciate the City's recent commitment towards that effort.

In accordance with those principles, SEIU applauds the on-going effort via the Comprehensive Plan update to revise existing Floor-Area-Ratio (FAR) bonus and transfer provisions of the Portland Zoning Code to incentivize affordable housing. But we also feel strongly that these efforts are not enough to combat the growing challenges facing working families and see the Comprehensive Plan update as an opportunity to make more significant improvements for working families.

Portland is gaining national recognition as a world-class city with a desirable quality of life, but working families are being left behind.

SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 49

3536 SE 26th Avenue Portland, OR 97202-290I 503.236.4949 Fax 503.238.6692 Toll Free 800.955.3352 Toll Free Fax 888.595.7979 www.seiu49.org



We are seeing an ever-growing income disparity that is pushing working families farther and farther from the City core; for many of our members, affordable housing in proximity to where they work is simply unattainable. Our political program analyzes and maps voter registration data prior to every election and we have seen, year-after-year, striking evidence of our members being forced to move deeper into the City's outer zones and away from their jobs downtown. This reality, combined with stagnant wages and a steady erosion of important benefits such as affordable family healthcare and retirement security, give rise to a host of additional hardships disproportionately borne by working families.

This growing inequality is not who we want to be as a city and is inconsistent with the vision espoused by our Comprehensive Plan. The benefits of Portland's prosperity should be shared by *all* residents, and not just the wealthy few. Portland's development sector is booming again with dozens of new commercial and residential projects in the works, but the City could do more to ensure that working families get to share in this progress. Our built environment should reflect our City's commitment to livability, and we are presented with such an opportunity now via the update to the Comprehensive Plan and its proposed updates to the Floor Area Ratio bonus and transfer provisions.

The Western Quadrant component of the Comprehensive Plan contains important recommendations for substantially incentivizing the creation of additional affordable housing. Calibrating the density bonuses in favor of affordable housing could be a powerful way to reflect and achieve the City's affordable housing goals and values. Creating a mechanism for a cash contribution towards an affordable housing fund would likewise provide an important avenue for developers to reach their desired density while helping to ensure that Portland is a city that works for all of its residents.

There is, however, a crucial component missing from these current recommendations. Access to affordable housing is of critical importance to working families, but so is access to good jobs. Local 49 therefore proposes a Floor Area Ratio bonus and transfer option aimed at ensuring the jobs created by new developments are good, quality jobs. Developers enjoy numerous financial benefits resulting from increased building density; likewise, the people that work to build, clean, and secure our City's buildings deserve a fair shot at participating in Portland's growing prosperity. To that end, a Floor Area Ratio bonus and transfer provision should be created that incentivizes the creation of jobs in our community that provide a family wage, meaningful benefits, and important worker protections.

With the City's rising development momentum coinciding with the Comprehensive Plan update, the time is now to consider new ways for the City's code to incentivize community benefits. I urge the Council to accept these recommendations as we move forward with the process of updating the Floor Area Ratio bonus and transfer provisions.

Thank you for the opportunity to testify. I would be happy to answer any questions.

SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 49

3536 SE 26th Avenue Portland, OR 97202-2901 503.236.4949 Fax 503.238.6692 Toll Free 800.955.3352 Toll Free Fax 888.595.7979 www.seiu49.org January 7, 2016

Name: Eileen Wallace

Mailing Address: 8716 SW 21st Avenue, Portland, OR 97219 Email Address: eileen.wallace@gmail.com

Testimony: Regarding property located at: 4001-4007 SW Collins Street, Portland, OR 97219 in regard to Portland's Comprehensive Plan

My name is Eileen Wallace. I want to thank you for this opportunity to be in front of you today and thank you for your ongoing efforts in Portland's Comprehensive Plan project. I am providing testimony today regarding a 4-plex I purchased in 2004 and previously resided at for several years after graduating from college. It is located in SW Portland at 4001-4007 SW Collins Street, Portland, OR 97219, off of SW 41<sup>st</sup> and Barbur Boulevard, on an unimproved, gravel road, directly across from the Barbur Boulevard Transit Center, and kitty corner to the City of Portland water maintenance facility and a variety of commercial businesses and multi-family units.

I am requesting that City Council re-designate my 4-plex from its current designation of R1 Multi-Dwelling to Mixed Use – Urban Center. It is contiguous to other properties with this Mixed Use – Urban Center or similar designation, and within the boundary lines of the West Portland Town Center project.

As a young adult and native Oregonian, born and raised in SW Portland, I am invested in the future of this area, currently living in a nearby single family house off of SW 21<sup>st</sup> and Barbur Boulevard. I hopefully will be around to be an active participant in changes related to and the implementation of Portland's Comprehensive Plan for years to come.

My proposed request also supports any future changes related to the West Portland Town Center project and the SW Corridor high-speed transit plan that may affect this area, as well as any development that will be needed to streets, storm water systems, sidewalks etc. that would accompany such projects. These projects may be years out but I would like the opportunity now to re-designate my 4-plex to Mixed Use-Urban Center to be more consistent with neighboring properties in this specific area, and to have the flexibility to be more in line with providing a mix of residential and commercial space where residents can live, work and play.

My current tenants use bike or bus as their primary means of transportation to get to their jobs and/or to nearby colleges such as the PCC Sylvania campus and Portland State University downtown. Previous tenants have been single parents who relied on the bus transit center as their only means of transportation for themselves and their children. This is possible due to my 4-plex's convenient location directly across from the bus transit center.

However, improvements in the area need to be done, as the lack of sidewalks, unimproved roads, high traffic and limited street lighting do not always make it as convenient or safe for adults and children to rely solely on public transit or walk to nearby businesses. As a single, working mom of a 3 year old daughter, I understand more than ever the importance and convenience of having employment opportunities, housing options and safe areas where kids can play, nearby.

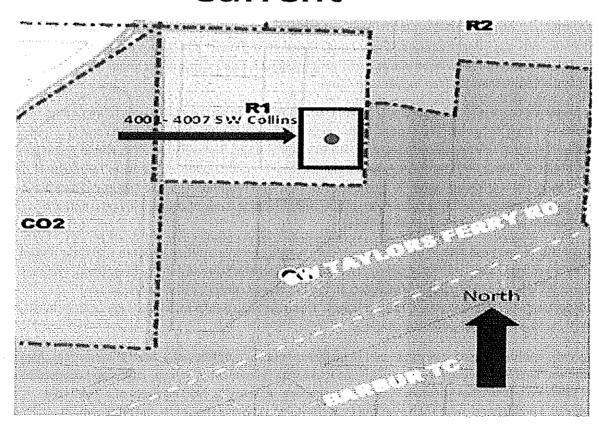
I am invested in this area and my property, doing what I can as a property owner to invest in my 4-plex and surrounding areas, for example, shortly after purchasing my 4-plex, I entered into a contract with Portland General Electric to install a street light across from my property, providing lighting also to the

nearby veterinary clinic, City of Portland water building and neighboring duplex that was previously non-existent. I was able to personally witness my investment increasing foot traffic in the area, specifically for those walking to use the Barbur transit center. This is one example of the many investments I am willing to make to the area that not only benefit my 4-plex and tenants but that also that benefit the surrounding area.

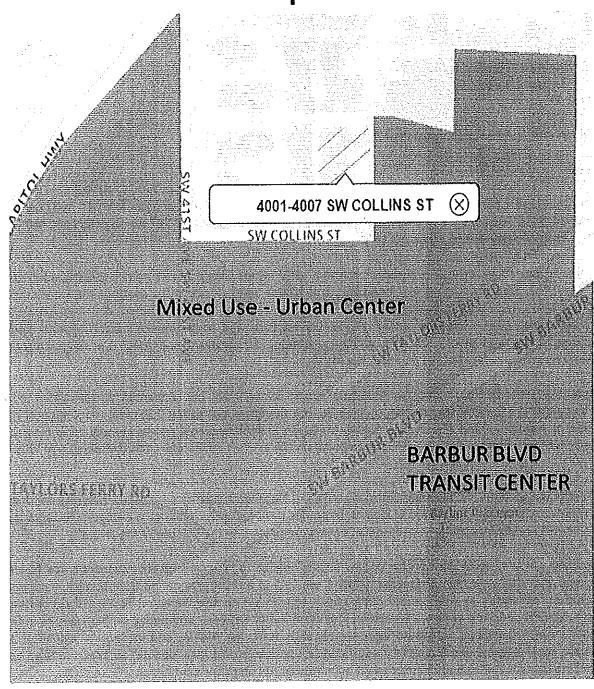
I have owned the property for 12 years and I hope that I will be around for decades to come, and my daughter, for many more decades to come, to help envision and implement these plans. I see great potential for this area and I would like to be an active part of this change. This re-designation to Mixed-Use Urban Center would allow me to have the flexibility to provide an opportunity to potentially have a mix of residential and commercial space for small business owners, adults and children to live, work and play, all of which are very important for generations to come. Thank you for your time and consideration of my proposal.

Below is a map diagram depicting my proposal to re-designate the property from R1 Multi-Dwelling to Mixed Use – Urban Center.

# Current



# **Proposed**



Thank you, Elleen Wallace

eileen.wallace@gmail.com



January 7, 2016

Portland City Council Bureau of Planning and Sustainability 1900 SW 4<sup>th</sup> Avenue | Suite 1700 Portland, OR 97201

RE: City of Portland Comprehensive Plan Update -- 2135 NW 29<sup>th</sup> Ave

Dear Council:

We are currently under contract to purchase a 55,000 SF parcel of land located at 2135 NW 29<sup>th</sup> Ave (Tax IDs: R307720 & R307719). The sites are bounded by NW Niccolai St. on the North, NW 29<sup>th</sup> Ave. on the East, NW 30<sup>th</sup> Ave. on the West, and NW Wilson St. on the South.

The property is located in an underutilized 'transition area' where single family homes directly abut light industrial uses. The property is currently zoned EG1 and EG1(b) and is located just south of the Guild's Lake Industrial Sanctuary (across NW Nicolai St.), and directly adjacent to the established Willamette Heights neighborhood to the west – just one block north of Forrest Park. The southernmost parcel currently abuts residential uses along and across NW Wilson Street, creating an awkward and harsh transition between industrial and residential uses. See site plan (Exhibit A).

Currently, both EG1 and EG1(b) zones allow residential as a Conditional Use, but residential uses are slated to be removed as part of the Comprehensive Plan Update. We are therefore requesting that the Council support the preservation of residential and mixed uses in this transition area to promote better compatibility between existing residential and light industrial uses, and to maintain the existing residential character along NW Wilson Street.

We have discussed preliminary development plans with the Northwest District Association (NWDA) and have begun outreach to immediate neighbors as well. Both groups have indicated initial verbal support for a project that preserves residential uses along NW Wilson and a mixture of uses on the balance of the property.

Given the timing of the Comprehensive Plan Update and its mission to manage land development in the face of dwindling industrial stock and high residential demand, we believe a recommendation from Council in support of our proposal represents an appropriate "fine grain" adjustment to the Plan Update to protect existing residential neighborhoods and ensure a successful long-term buffer between potentially conflicting uses in the future. With Council's support, we would work closely with Staff, the NWDA, and immediate neighbors to determine the most appropriate zoning (per the pending Comprehensive Plan Update) to preserve both the benefits of Employment zoning <u>and</u> the residential benefits that the neighborhood desires,

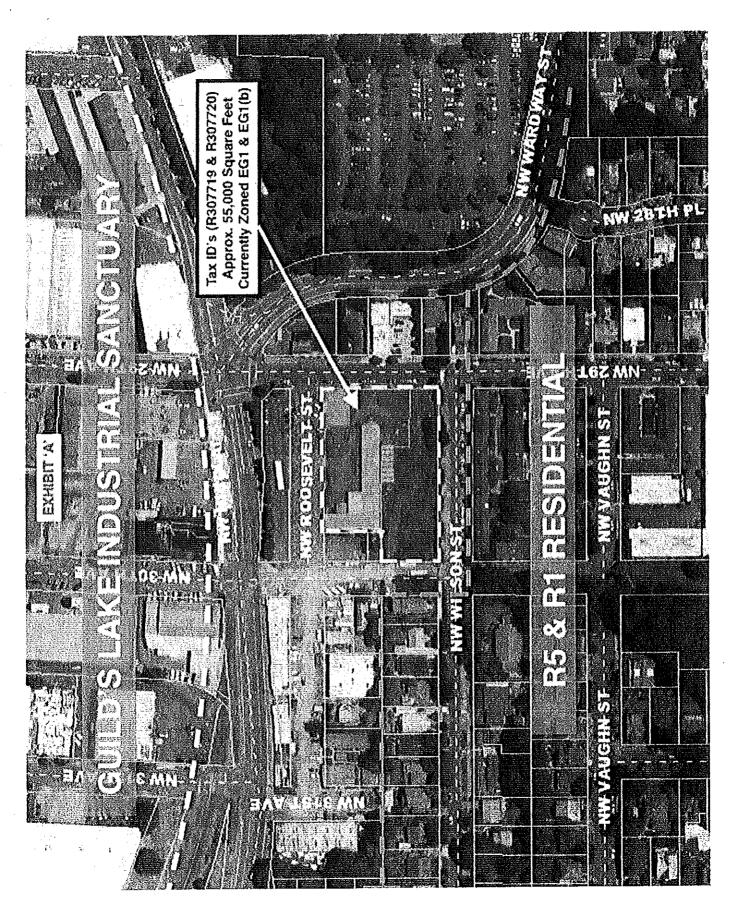
Thank you for considering our proposal. We also want to thank Joan Fredericksen of Portland Planning staff for advising us in our efforts regarding this proposal. We appreciate the work the City is doing to ensure that Portland uses its land supply wisely to promote a prosperous, healthy, and diverse economy for all Portlanders.

Sincerely.

Travis A. Henry

Senior Vice President of Development

Cairn Pacific, LLC



Comprehensive Plan Testimony January 7 2016 Laurie Kovack

I live in SE Portland in the area between Belmont and Stark and 26th and 30th. This area is proposed for a zoning change from single family R 5 and R2.5 to multi family R1 and R2. I am opposed to this change. I do not think it is fair to change the zoning of single family properties to allow 45 foot tall buildings to be built next door.

Our neighborhood has more density than most, with a pleasant mix of housing types. Many are historic buildings built before 1930, and used as single family homes, duplexes, and triplexes. We also have a handful of apartments built in the 70s and 80s, and a few older apartment and condo buildings. The primary thing that makes this mix of housing types work is the fact that the vast majority of the buildings are two story.

On the July 2014 Proposed Comprehensive Map Plan Designations most of the single family zoning in our neighborhood was left in place. The areas proposed for changes were capped at R2. No R1 zoning changes allowing 45 ft tall buildings were proposed. Most of the neighborhood members I talked with were OK with these changes. The zoning change to R1 came after the the community/meetings with the July 2014 map proposals.

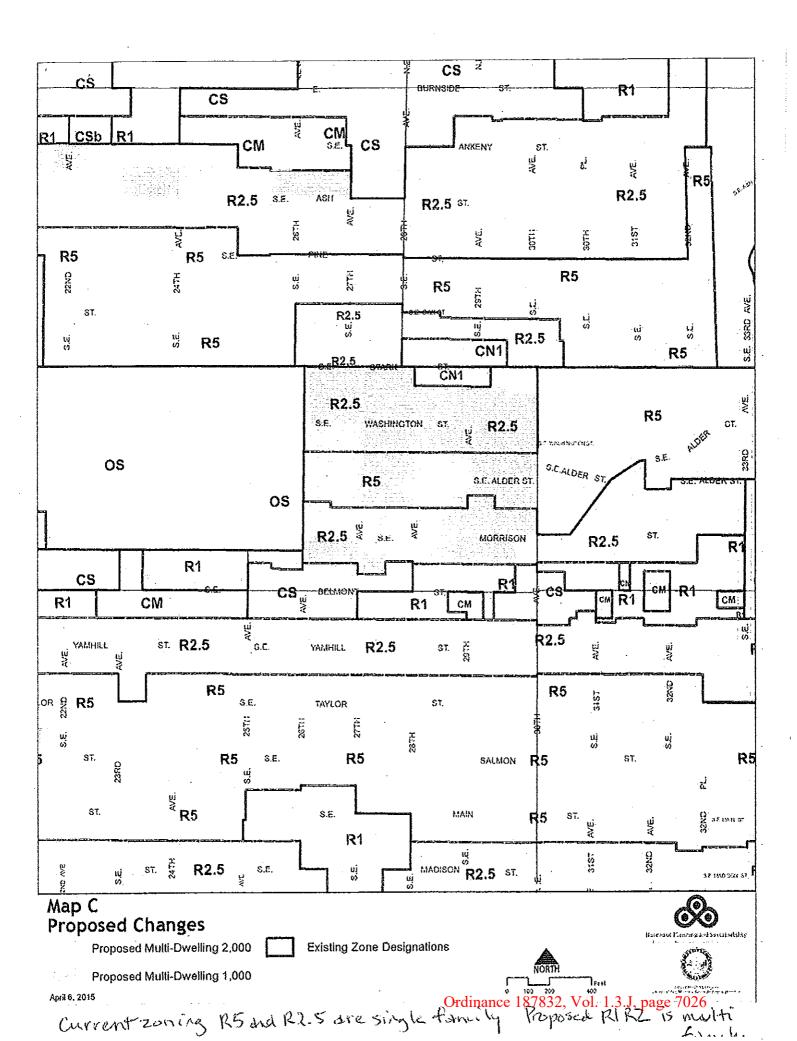
The primary advocates for the up zoning to R1 and R2 are apartment owners and investors who do not live in the area. There are no vacant lots being considered for the proposed up zoning, which leads to the conclusion that the investors are looking to demolish the existing buildings and construct as big a building as possible in their place. Under the proposed R1 zoning that would be 45 feet.

I ask the City Council to leave our zoning in place with no changes. If you decide not to do that I would like you and the planning department to create a compromise that does not include any R1 zoning. This could be accomplished by stepping back to the the zoning changes proposed on the Comprehensive Map Proposal published in July 2014.

I also ask you to delay any final decisions implementing zoning changes for our neighborhood until the planning department's current single family residential infill project, and companion multi dwelling zone projects are complete. This would allow our neighborhood to be evaluated with the information developed under those two studies, considering appropriate density, light, height, privacy, and parking standards, before deciding on any zoning changes for our neighborhood.

Respectfully submitted,

Laurie Kovack 736 SE 28th Ave Portland OR 97214



Proposed Comprehensive 1120 Designations July 8017.

# STARK

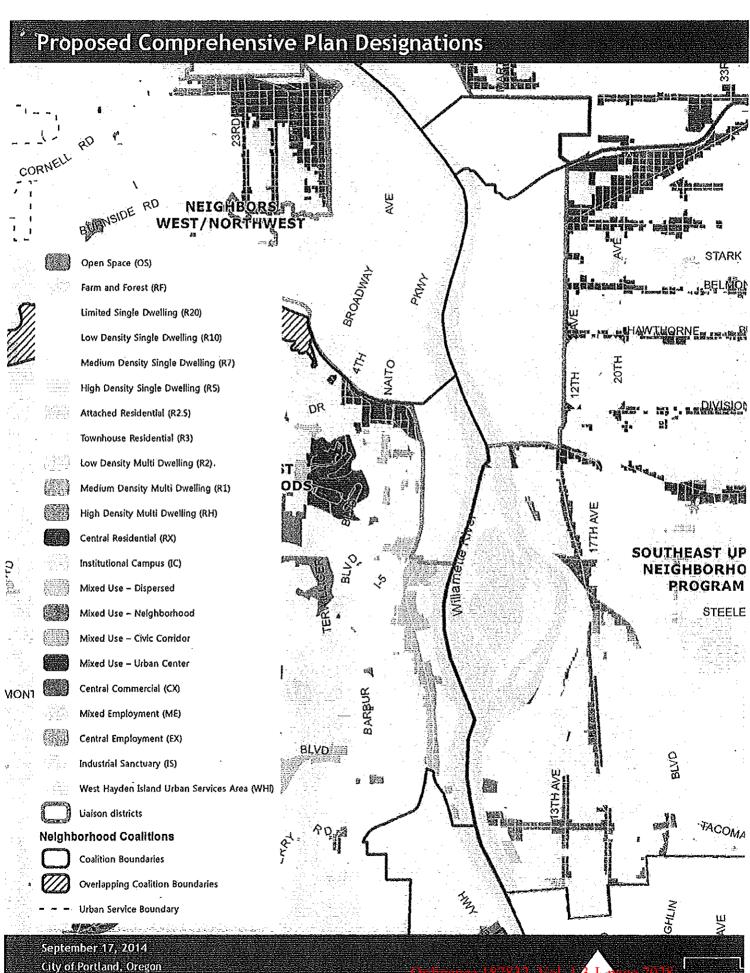
R.Z

R2 5

2.2.5

Grey area - unchanged zoning Blue area - changed from single family to R. 2 Yellow area - changed from single family R5 to SF 2.5

Ordinance 187832, Vol. 1.3.J, page 7027



City of Portland, Oregon Bureau of Planning & Sustainability Geographic Information System

NORTH

Hello Mr. Mayor and Commissioners:

I am here to testify on 1403-1415 SE Stark Street.

The planning team during a neighborhood walk around tagged this as a non conforming R1 property and proposed a change to CN 1 on half of the block. The garage which was deemed an addition to the original building was left as R1.

This change was agreed to after much back and forth with neighbors and Buckman Community Association members. Neighbors were concerned that the building would be leveled and replaced with high density apartments with no commercial use. Recall that SE Stark is not a corridor street, but rather a highly residential street east of this building.

When the property was sold earlier this year neighbors were elated to find out that new owner Mr. Tim O'Leary was going to restore it. I totally support is endeavor and believe he is a developer with high standards and integrity.

The problem arises with the request to change the garage from R1 to CN1. Mr. O'Leary is reasonable in his request that it allows him to use the space as commercial and not to have to jump through non conforming hurdles. The surrounding neighborhood is reasonable in their request that the addition of another lot of CN1 increases the risk of the whole block becoming CN1 and being replaced with studio apartments. My concern is not the building as it is restored but rather the future building that would replace it in the event of some catastrophic loss ( earthquake or fire).

The neighborhood has already lost a large amount of R1 when Washington High School was turned from a residential building into a Corporate Headquarters/music venue.

Ultimately what happens is zoning creep where the residential neighborhoods become overwhelmed by commercial/apartments. Families move out because who wants to live in a neighborhood where you have to park blocks away and try to get your 1 and 3 year olds with all your groceries back to your residence. Buckman School is only two blocks away and if this building were torn down it would be nice to have some larger R1 type buildings in the neighborhood to encourage families to live here.

The solution to this problem is really straight forward and "Portland being the City that Works" should embrace it. Allow Mr. O'Leary's property to be zoned CN1 with a covenant placed on it that that stipulates that if the building is removed the property under question will revert back to R1. Both sides win.

Finally I would like to kindly disagree with the way this public process works. My neighbors and I spent countless hours contacting planning and testifying about this issue. When I talked to the SE liaison, Marty Stockton and she told me that none of the previous testimony was moved forward I couldn't believe it. Nothing like disenfranchising a whole group of people or making decisions without all sides represented. That's why I took some more of my precious time to testify tonight. Unlike land use attorneys I don't get paid for this.

Thank you for your time,

Rick Johnson, Patricia Cain, Homeowners and Residents 1414 SE Oak Street Portland, OR 97214 Mayor Charlie Hales Commissioner Nick Fish Commissioner Amanda Fritz Commissioner Steve Novick Commissioner Dan Saltzman 1221 SW 4th Avenue, Room 110 Portland, OR 97204

#### Portland Comprehensive Plan

Riverside Golf and Country Club would like to offer additional comments on the Draft Portland Comprehensive Plan. We are including with this letter a report entitled "U.S. Golf and Riverside's Prospects" which provides a more detailed look at golf.

To restate our position, 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. We oppose an industrial designation on our property. It will hurt our business operation and creates a false impression.

We believe the Economic Opportunities Analysis (EOA) characterization of Metro area golf courses is inaccurate; and its prediction of Riverside's demise in the next twenty years is wrong.

The specific EOA language we refer to is (March 15 Proposed Draft, Section 4- Community Choices, p 23):

...While the Broadmoor and Riverside golf courses could potentially remain in operation indefinitely, national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner city locations. Given these trends and continuing intensification of industrial development in the surrounding area, it is reasonable to expect potential reuse of these sites in the 2035 planning horizon and the proposed Comprehensive Plan proposal would accommodate that change...."

We take issue with the explicit statement targeting Riverside as ceasing operations by 2035. It's rather unusual for a City approved document to make such a statement targeting an existing area business based on limited information.

The golf industry has, of course, undergone changes and a "correction" as a result of the Recession and demographic changes. However, the industry has stabilized and Riverside is experiencing strong growth. Golf courses are closing, but they were greatly overbuilt. However, since 2006, only 4% of the total courses have closed, 90% of which are public.

The attached report takes a more detailed look at the industry. It examines our operating model compared to other courses. In looking at the data, one can be assured that the golf industry is here to stay.

If Riverside had been experiencing declining membership and severe financial hardship, I could understand the conclusion. On the contrary, we weathered the recession and are doing quite well. We are planning for the future and continue to make improvements to our facility.

We thus don't see Riverside as a viable candidate for many years and staff should look for other opportunities that have more potential. Broadmoor is embracing the City's proposal, and the City should look at additional Broadmoor property over and above the currently identified 15 acres for additional industrial land.

#### We would request that:

- 1. The EOA be revised to remove the speculative language specifically calling out Riverside's eventual demise.
- 2. That the City removes the map designation of industrial from Riverside.

In closing, to paraphrase Mark Twain, "Rumors of our demise are greatly exaggerated."

Sincerely,

Lucas Miller, General Manager

Jim Laubenthal, Member

# U.S. Golf and Riverside's Prospects

Prepared by: Lucas Miller, RGCC General Manager Jim Laubenthal, Member

January 7, 2016

#### Summary

The City of Portland has concluded that Riverside Golf and Country Club is unlikely to continue operating after twenty years. The evidence does not support this conclusion.

#### Some key points:

- Riverside's membership has rebounded from the economic recession.
- Riverside operates on a member-based model and not pay-per-use.
- · Riverside has no intention of closing.
- The golf industry has rebounded to a fairly stable number of golfers. The industry is not going away.
- Golf course supply was overbuilt and grew by 40% in the twenty years through 2005. There has been a 4% reduction in courses since then. 90% of these were public use courses.
- Millennial participation is down but rebounds as they reach into their 30's.
- A growing metro-area population, and our close-in location gives Riverside a marketing advantage..

#### Introduction

This report looks at the current state of the golf industry and discrete trends to provide a more detailed perspective on Riverside Golf and Country Club's (Riverside) long-term future. This is prompted by the City of Portland's Economic Opportunities analysis regarding the future of golf. The City's report states that:

#### March 15 Proposed Draft, Section 4, Community Choices (p.23)

Airport Area Golf Courses "The Trust for Public Land and property owners of the 138-acre Colwood golf course obtained conditional approval of a quasi-judicial plan map and zoning amendment in 2014 to rezone 49 acres for industrial uses with the remainder as public open space and natural area. The proposed Comprehensive Plan includes this map change at the Colwood site and similar land use proposals at two nearby golf courses, designating approximately 90 additional acres at Riverside and 15 acres at Broadmoor as Industrial and retaining the Open Space designation on 215 acres.

...While the Broadmoor and Riverside golf courses could potentially remain in operation indefinitely, national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner city locations. Given these trends and continuing intensification of industrial development in the surrounding area, it is reasonable to expect potential reuse of these sites in the 2035 planning horizon and the proposed Comprehensive Plan proposal would accommodate that change...."

We believe that this analysis over-simplifies a rather dynamic picture, and is inaccurate. The conclusion statement that "national market trends indicate an oversupply of golf courses in the coming years relative to population demographics, particularly in inner city locations" is misleading and we believe an examination of data suggests other conclusions.

There are a number of factors that differentiate Riverside from Broadmoor and Colwood, and there are market trends that paint a different picture.

#### Riverside vs Broadmoor's Operating Model

A golf course such as Broadmoor operates on a pay per use basis. This is the typical model for most public use courses. Riverside is a privately operated membership-based course with a steady monthly income stream. Thus, its revenue is more buffered from weather disruptions.

#### **Overall Goals of Riverside**

While the privately owned Broadmoor (and previously Colwood) have decided to consider other uses, Riverside has no intention of changing or seeking higher returns. Riverside is operated under IRS regulations as a not for profit entity. Thus, increasing nearby land values are not a relevant factor. Riverside has been in operation for 90 years and plans to continue operations for another 90 years. Riverside has survived the depression, a fire, a foreclosure, World War II, the Great Flood of 1948 when it was under 18 feet of water, the Columbus Day storm and countless economic ups and downs. This is because of its strong membership base from throughout the Portland metropolitan area and a consistent commitment of its members.

#### Riverside's Membership

The following graph shows Riverside's membership over the last 16 years.

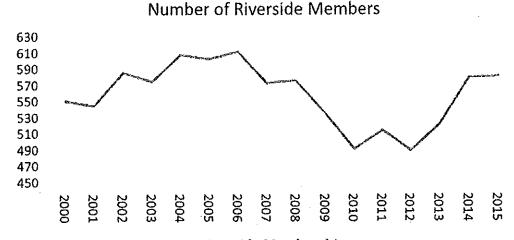


Figure 1. Riverside Membership

What this shows is clearly the impact of the recession 2007-2012 with a drop of 19% from the 2004-2006 peaks. However, it also shows a good recovery back within 3% of our peak. This most recent fiscal year just ended for 2015 was a good year for Riverside in spite of major unanticipated capital repairs on our building.

#### The State of the Golf Industry

The golf industry has changed over the last 20 years and certainly faced significant declines in 2006-2007 as a result of the Recession. There have been course closures and changes in the number of rounds played. Media stories also have made portrayals of golf falling off a cliff. However, a closer examination of industry

information paints a more discerning picture. The National Golf Foundation (NGF), the leading industry trade group, publishes annual statistics and periodic research reports. We will use this material to describe the current state of the industry.

The following illustrates US Golfers (mill.)

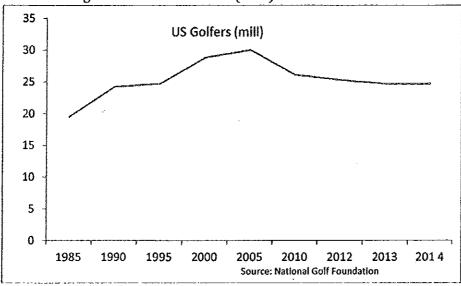


Figure 2. US Golfers

What this shows is that from a peak of 30 million golfers the annual number is leveled off at 25 million. This is contrary to the "falling off a cliff" media narrative. Also, the many of the golfers who have left the game are the more infrequent players. Thus the average rounds per player has increased as the following chart shows:

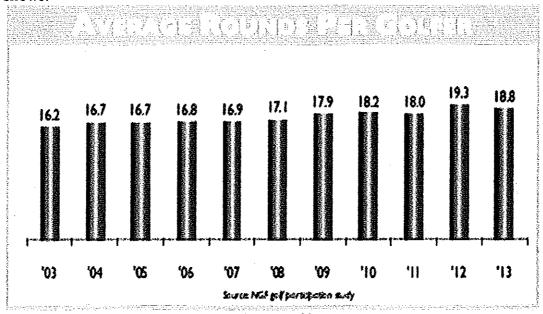


Figure 3. Rounds per Golfer

#### **Golf Course Closures**

The National Golf Foundation, in their 2015 Golf Industry Overview, looked at the issue of Golf course supply. They note that "Since the beginning of 2006, the healthy reduction in golf courses amounts to less than 4% of the total supply. For perspective, golf supply grew by 40% in the previous 20 years (1986-2005)." They saw this adjustment as a healthy shake-up given the 17% decline in the number of golfers. The following shows the supply of US courses and illustrates the overbuilding they cite:

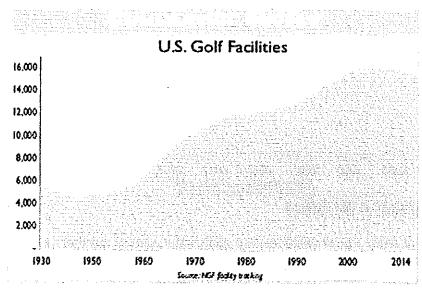


Figure 4. US Golf Facilities

Another interesting illustration is to look at a breakout of course closures over time. What this shows is that only 10% of the closures over the 12-year period through 2012 were private and 90% were public courses (either daily fee or municipal).

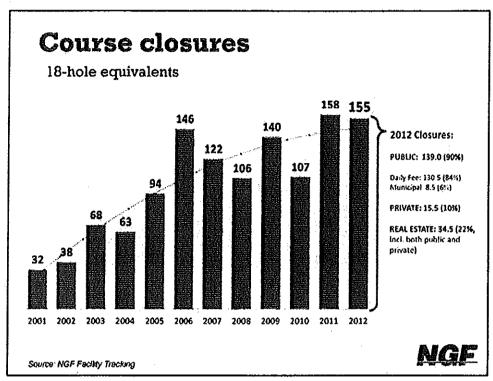


Figure 5. Golf Course Closures

What this suggests is that a public use course would be nine times more likely to close than a private, member-owned course like Riverside.

### **Demographics**

There are certainly demographic changes underway in the industry. The NGF several years ago identified a drop in the golf participation rate among 18-34 year old Millennials. This led to additional research to better understand this segment. This research confirmed that 26% of all golfers, approximately 6.4 million, are Millennialls. There are also another "12 million non-golfers among the generation that are 'very or somewhat interested' in playing golf now."

In looking at a more detailed breakdown of age stratification participation by Millennials we see the following:

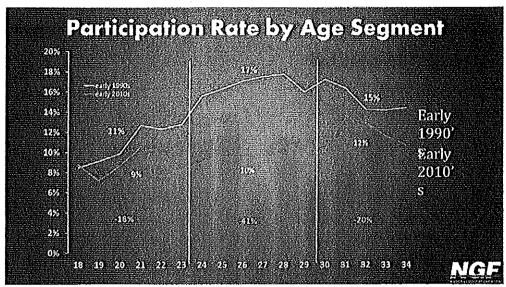


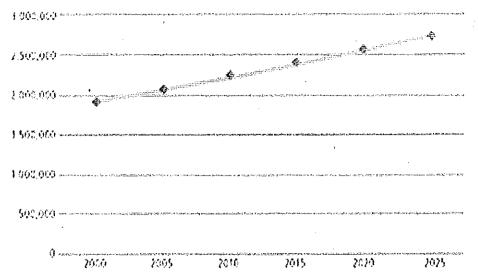
Figure 6. Millennial Participation by Age

This graph shows a large drop in the 24-29 year old category. This is the group just starting out after school with lower salaries and underemployment. NGF sees a narrowing of the gap in the 30-34 year olds resulting from individuals being more established in their careers with better incomes. As Millennials earn more they play more golf. NGF expects this trend to continue and that as they age golf participation will increase. At Riverside the 30+ Millennials category is one of our strongest new member categories.

Junior golf has seen an increase from 2012-2014 of 19% to 3.2 million golfers. This is a result of the golf industry focus on junior golf with programs like The First Tee, PGA Junior League Golf, the LPGA-USGA Girls-Golf and the Drive-Chip-Putt Championships. Female golfers in this same 2012-2014 period increased 14% to 5.7 million golfers.

The participation rate of the population six and above who have played at least one round per year varies from 8.5 %-11% and is holding steady at 8.5%-8.8% from 2012-2014 (NGF). In a robust metropolitan area like Portland, population is projected to increase to 2.7 million by 2025. This is a 40% increase from 2000 (City of Portland 2030 Vision for the Future). The chart below illustrates this trend.





Sources: Diegon Department of Fronomic Analysis, Washington State Diffice of Financial Management If Bata for Chickemas, Esiumbia, Mushomah, Washington and Yamhili counties in Dregon and Clark County in Washington

Figure 7. Metro Area Population Forecast

What this translates to is that even with a leveling off of the participation rate, a strongly growing population base will be seeking golfing opportunities, both public and private.

The City's conclusion that Riverside is likely to convert because of its inner-city location is wrong. Accessibility and livability are key reasons that Portland's inner-city residential neighborhoods have strengthened and thrived over the last thirty years. The same rationale applies to Riverside. Nearby neighborhoods in Portland and Vancouver are prime customers for us. Increasing traffic congestion leads people to seek closer recreation opportunities.

#### Conclusions

Riverside is well positioned to thrive into the future. It has a stable loyal, membership, and demographics will continue to drive potential customers. The golf industry, while going through some changes and corrections, is not going away and has not by any means "fallen off a cliff." It has rebounded from the recession and stabilized.

# TERRY PARKER P.O. BOX 13503 PORTLAND, OREGON 97213-0503

January 7, 2015

Subject: Testimony to the Portland City Council supporting the official Rose City Park Neighborhood Association testimony on the comprehensive plan -also supported by CNN - to make room for cars and provide for parking on Sandy Boulevard as presented at Parkrose High School on December 10th, 2015

I am here this evening for the purpose of supporting the official Rose City Park Neighborhood Association testimony - also supported by CNN and presented at the December 10th, 2015 hearing - to make room for cars in the Sandy Boulevard corridor, provide adequate off-street parking with new development and oppose the addition of bike lanes on Sandy Boulevard itself.

Adding bike lanes to Sandy would either require the removal of on-street parking that will hurt small businesses, or the removal of one or more travel lanes which would add more congestion to an already congested street. Neither are favorable outcomes. Alternate bike routes need to supplant any concept for bike lanes on Sandy.

One of the biggest hot buttons related to new development creating a public uproar is the construction of new apartment houses without parking that in turn have a negative impact on neighborhood livability. Design and Development policies 4.32 and 4.33 specifically address the mitigation of off-site impacts on adjacent residential areas. Additionally, Urban Form corridor policies 3.45 through 3.47 address accommodating growth and mobility needs for people of all ages and abilities, accommodating multimodal uses and balancing all modes of transportation.

These design, development and urban form policies must supersede the fantasy world mindset of Parking Management policies 9.54 through 9.57 that seek to encourage lower car ownership and limit adequate parking for car storage in new multi-unit residential development; and supersede the discriminatory strategy for people movement in policy 9.6.

You were elected to represent all of the people in Portland, not just the special interests. Nearly 80 percent of the trips in Portland are made by car. Over the next 20 years, car trips are expected to increase by 49 percent regardless of how much mass transit service is added.\* Per the city's own studies, 72 percent of the households in new multi-unit developments have one or more cars. The people who drive are currently the primary financial stakeholders for all TSP projects. You need to start representing these core taxpayers and reject all the anti-car/<u>car hater</u> Transportation policies in Chapter 9.

Respectively submitted,

Terry Parker Northeast Portland

<sup>\*</sup> Figures gathered by the Portland Business Alliance.

## Testimony on Historic Preservation and the 2035 Comprehensive Plan - Before Portland City Council

By James S. Heuer, Chairperson, Portland Coalition for Historic Resources January 7, 2016

Mayor Hales and Members of the Portland City Council, my name is Jim Heuer, and I speak today as Chair of the Portland Coalition for Historic Resources. This volunteer organization represents the largest historic districts in the City, plus preservation and neighborhood activists. A number of our members will be addressing specific issues following my comments, but here's the bigger picture:

Portland is an old city. Many people like to think of Portland as a hip and happening place, but much of its appeal both to tourists and to new arrivals is our historic built environment. The numbers tell the tale -- excluding the areas annexed to Portland in the 1990s, the age of our housing stock is comparable not to that of western cities like Los Angeles or Phoenix, but instead to Chicago, Philadelphia and Baltimore.

To protect its heritage of historic homes and buildings, the City of Portland has signed a Certified Local Government agreement with the State of Oregon, which, under state law, obligates Portland to establish zoning and land use regulations that protect and preserve our designated historic buildings during key planning processes.

Alas, current Comprehensive Plan documents provide no indication of these facts. Indeed, the Plan's refusal to systematically align zoning designations with historic resource review guidelines covering the thousands of contributing properties in our historic districts is an affront to this legal commitment – a commitment that is every bit as binding on the City as the requirement to create the Comprehensive Plan in the first place.

The Comp Plan's lack of attention to these issues is not due to a failure of the community to speak up. Neighborhood associations and citizens' groups have repeatedly raised these issues over the last several years.

Our speakers will present specific requests to modify the Comp Plan to better protect our precious historic resources and the vital cultural and historic fabric of our traditional neighborhoods. We are asking the Council to take our concerns seriously and act accordingly, mandating that the Bureau of Planning and Sustainability undertake a detailed review of our Historic District zoning as part of the "fine tuning" phase of the Comp Plan process as well as recognizing National Register-eligible areas like Buckman for more sensitive treatment.

## Written Testimony on Historic Preservation and the 2035 Comprehensive Plan-Before Portland City Council

By James S. Heuer, Chairperson, Portland Coalition for Historic Resources January 7, 2016

Mayor Hales and Members of the Portland City Council, my name is Jim Heuer, and I write this as Chair of the Portland Coalition for Historic Resources. This volunteer organization represents the largest historic districts in the City, preservation activists, and the two major regional non-profits dedicated to historic preservation: the Bosco-Milligan Foundation and Restore Oregon. I am one of the PCHR representatives from the Irvington Historic District, and we have representatives from the Alphabet District, the proposed Buckman historic district, the Ladd's Addition Historic District and several neighborhoods which are not officially designated but are every bit as important historically at both the State and National level, including Laurelhurst and Eastmoreland.

PCHR representatives will be supplying detailed remarks on neighborhood-specific concerns, but here is the bigger picture:

Portland is an old city. Many people like to think of Portland as a hip and happening place, but much of its appeal to tourists and the influx of the creative classes is our built environment... our picturesque downtown and historic Old Town and Chinatown areas, our vast bungalow neighborhoods dating to the early 20th Century -- providing the same cozy, practical housing for the middle and working classes as they did 100 years ago, and the precious survivors of the halcyon days of the 19th Century when Portland was the richest city per capita west of Chicago. The numbers tell the tale -- if you exclude the areas annexed to Portland in the 1990s, the age of our housing stock is comparable not to that of western cities like Los Angeles, Phoenix or Houston, but instead to Chicago, Philadelphia and Baltimore.

And unlike cities like Cleveland, Buffalo, Philadelphia and others in the east with shrinking populations and a desolate historic core, our historic neighborhoods are vital, popular places to live -- cherished by their residents, appreciated by thousands of heritage tourism visitors, and drawing ever greater numbers of eager buyers – indeed their very popularity threatening the affordability, cultural diversity, and character that has drawn people to Portland in the first place. Moreover, they include some of the highest density areas in the City – many, like the Irvington Historic District, having a population density more than double that of Portland as a whole. But you'd never know this from reading the Comprehensive Plan documents..

Sure, there are some lovely goals and sub-goals that mention these issues, but in the proposed zoning, where the rubber meets the road, the Plan exhibits the same destructive one-size fits all aspirational zoning that has resulted in the current cacaphonous state of development in Portland... Development which has succeeded in disrupting the fabric of our traditional neighborhoods and business streetscapes while achieving minimal overall increases in the concentrated residential density required for meaningful reductions in transportation-based carbon footprint.

The problem is that aspirational zoning applies higher density zone designations wherever the planners hope some-day greater density might happen -- without regard to what is already there. The "hope" is that the real-estate market will produce the density and help the city achieve its carbon footprint reduction goals. Since the planners freely admit that the "realization" of the build-out of those areas will never approach 100%, the only solution is to over zone in hopes of someday getting to the desired density. Sadly, the result is a scattershot of higher density projects -- eroding the character of our neighborhoods -- without ever once achieving the critical mass of density to support 10-minute transit intervals or a major expansion of bicycle corridors crisscrossing the city.

But not only is the already-observed outcome of this scatter-shot approach to increasing density a failure... it is also a direct violation of state law. Portland is a signatory to an agreement with the State of Oregon and is thus designated as a Certified Local Government, which requires Portland to apply its zoning powers to protect and nurture its designated historic districts and to stay current on what parts of the city are or should be historically designated. The Comp Plan's refusal to align zoning with historic resource review guidelines covering thousands of contributing structures in both Historic Districts and Historic Conservation Districts is an affront to this legal commitment.

The Planning and Sustainability Commission and BPS have put increasing density at the forefront of all priorities. This priority has trumped the preservation of Portland's historic character, traditional neighborhoods, and cultural richness -- but un-necessarily so. The fine print of the Comp Plan admits that the Buildable Lands Inventory shows that current zoning designations provide for substantially more residential unit capacity than is called for between now and 2035. Moreover, the vast expanses of Portland that are currently zoned for R10 and R20 densities -- suburban or even rural density levels which have no place in a city aspiring to ever greater population density – encompassing at least 12 square miles of land within the city limits -- seem to have escaped the planners entirely.

The Comp Plan's lack of attention to these issues is not due to a failure of the community to speak up. Neighborhood associations, and citizens' groups, not to mention countless individuals via the Map App, have repeatedly raised these issues over the last several years. Nearly all such appeals have been ignored.

Our goal is to present specific requests to modify the Comp Plan to better protect our precious historic resources and the vital cultural and historic fabric of our traditional neighborhoods. We are asking the Council to take our concerns seriously and act accordingly by setting aside resources and time in the "fine tuning" stage of the Comp Plan to address the identified gaps in protection of historic resources in the current Comp Plan proposals.

James R. Harries – PE 10500 SW 25<sup>th</sup> Ave Portland, OR 97219

January 7, 2016

Honorable Portland City Council Zoning Testimony – Comprehensive Plan

Request to Restore R-10 Designation to Lots 93 and 94 Edgecliff

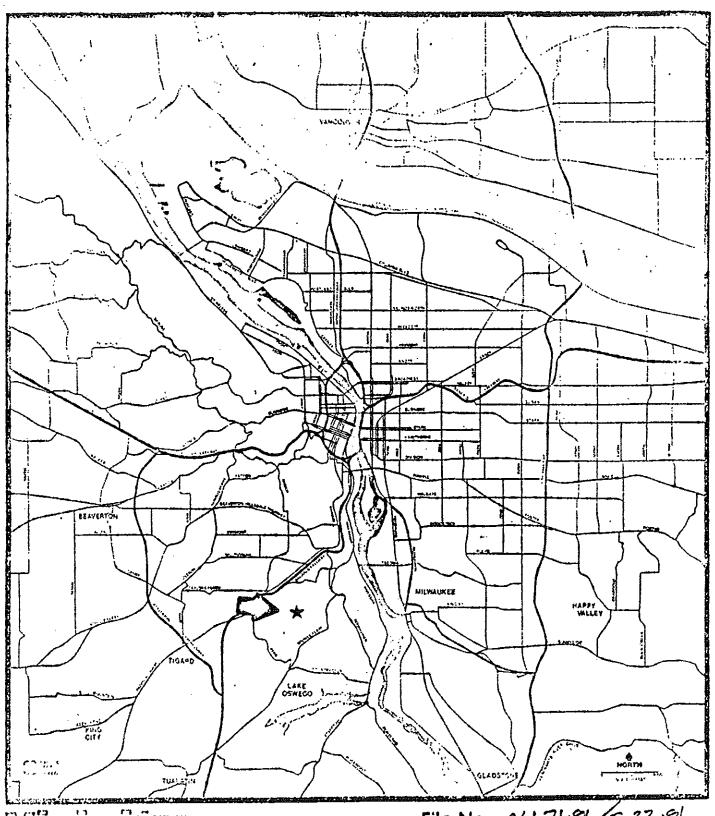
My family and I reside at the above address on lot 93. I have lived here for 36 years, and neighbors Ann and Dick Fish have been here for over 50 years. Our lots were plotted well before annexation by the City of Portland, with a then rural designation of R-20. When the City came, they added an overlay of R-10, permitting 10,000 square foot lots.

In 1992, I received approval by the City to subdivide, adding a second lot, but did not pursue at that time. In 2006, when my neighbors and I later asked to re-open and further subdivide lot 94 as well as lot 93, we were informed that a comprehensive plan revision had removed overlays including our R-10 designation. We were then advised that re-zoning would be difficult, expensive, and likely unsuccessful.

Please rectify this oversight and restore the R-10 zoning designation. Adjacent and nearby properties are either R-10 or R-7. Our land use goals call for increasing density within city limits. There are no distinguishing geological features or plants that would preclude development. There are a few second growth fir trees in a conservation zone that can be retained. The remaining property has garden space, wild blackberries, ivy, holly, unproductive fruit trees, and obnoxious grasses.

Sincerely

Janus R Harris

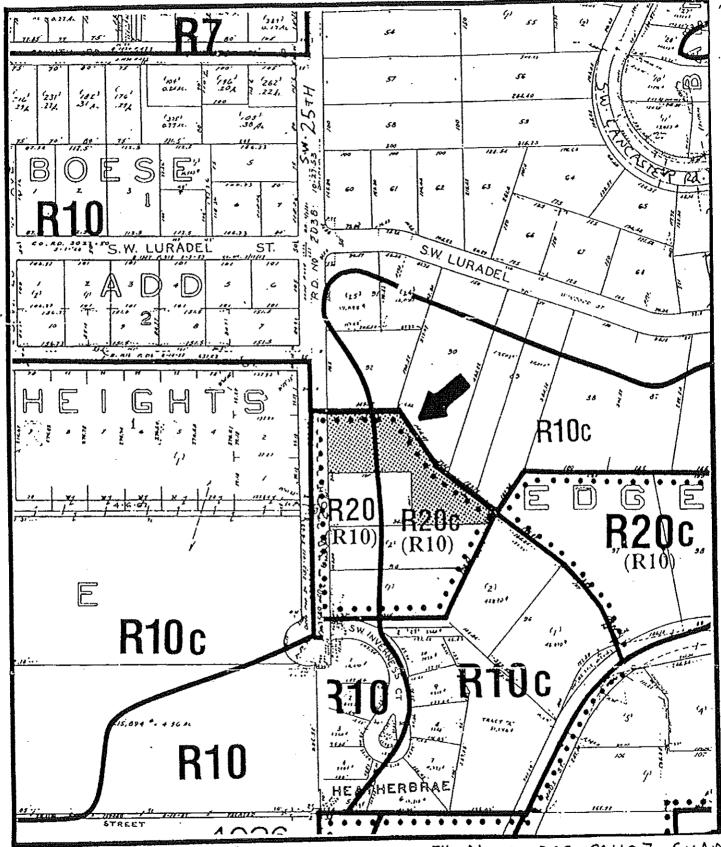


Yiskaliy

File No. <u>CU 71.81</u> /5 22.81 1/4 Section <u>4027</u> Scale <u>1-: [2,500]</u>

Request 10 Lot P.O.D. SUCOMSON

Ordinance 18/832, Vol. 1.3.J, page 7045



## zoning

File No. Lurgz -00407 - ENAD

1/4 Section 4027

Scale 1"=200'

OrdRequest3 Environmental Region & Adjustment
Exhibit C

January 7, 2016

Comp Plan Public Hearing

Testimony presented by: Susie Peterson 7330 SE Franklin St. Portland 91206

#### **Community Involvement:**

Neighborhood Trees Specialist at Friends of Trees

ISA Certified Arborist #235424

Member of the Urban Forestry Commission's Education & Outreach Committee

PP&R Neighborhood Tree Steward

South Tabor Tree Team

#### Testimony:

Thank you for hearing testimony this evening on the Draft Comprehensive Plan. My name is Susie Peterson and I support stronger efforts to protect and preserve mature tree. I'm here tonight to comment on sections 7.11.a Tree Preservation, 7.11.c Tree Canopy, and 7.11.g Trees in Land Use Planning.

I would like to encourage that Policy 7.11.a Tree Preservation be strengthened to read "Require <u>and Incentivize</u> preservation of large healthy trees." Large healthy trees bestow millions of dollars of benefits to our city and yet there are no substantive measures to protect them. We need to do more to protect these trees, as it takes decades to grow trees to a large stature, and to a large extent new trees being planted are small or medium stature. If we are losing millions of dollars in public benefits so that individuals and businesses that build can make a profit, then that's not right. We need to encourage preservation of large trees by offering incentives to leave them standing.

I would like to encourage that Policy 7.11.c Tree Canopy be changed from "Support progress toward meeting City tree canopy targets" to "Coordinate plans and investments toward meeting City tree canopy goals." My occupation is as a Neighborhood Trees Specialist at Friends of Trees. Part of my job is working with Urban Forestry to plant trees that they approve and that will help meet their goals. Two years ago we were prohibited from planting any maple trees. This was a huge adjustment for us as maple trees are in huge demand from homeowners. We went through the hard work of changing all of our processes to remove maple trees and are having to continually explain to participants of our program why we're not able to offer them maple trees. The reason is that maples are over planted in Portland, and overplanting easily leads to situations where mass dieoffs can occur. So it's best for all of the trees in our city not to plant too many of one genus. This makes a lot of sense. And yet what we see on a daily basis is that all of the agencies within the city that plant trees are not holding to this goal. BDS seems to allow every developer and homebuilder to plant maples exclusively. Same with PBOT. It's very frustrating to see.

I would also like to encourage that Policy 7.11.g Trees in Land Use Planning be strengthened to read "Identify priority areas for tree preservation and planting in land use plans and <u>incentivize these</u> <u>actions</u>." The argument for adding this language about offering incentives for the preservation of large trees is the same as my argument for Policy 7.11.a. That being that we are losing millions of dollars in public benefits so that individuals and companies that build new homes and other types of construction can make a profit. This isn't right. We need to encourage preservation of large trees by offering incentives to leave them standing.

Thank you for your time and your listening ear.

Susie Peterson

South Tabor, Portland

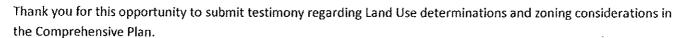


## MICRO ENTERPRISE SERVICES OF OREGO

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MESO provides capital, coaching, and comprehensive support to entrepreneurs in rural and urban Oregon. A 501(c)(3) non-profit organization, MESO is a Small Business Administration (SBA) micro lender, an Individual Development Account (IDA) Fiduciary, and a Community Development Financial Institution (CDFI). Our mission is "to improve the economic opportunities of underserved individuals through empowerment, education, and entrepreneurship for the benefit of the greater community." In MESO's 10 years, we have provided assistance to over 2000 entrepreneurs, provided more than \$2,500,000 in loans and over \$2,539,058 in Individual Development Accounts, and seen clients increase net revenues upwards of 1600%.

We are requesting the City include 4008 NE MLK, 4009 NE Grand and 4003 NE Grand in the Comprehensive Plan and change the zoning to EXd Zone (Central Employment zone). The Property IDs are R207414, R207415, and R207416.

Below we outline bullet points for why we request this re-zoning:

- MESO seeks to buy our leased buildings at 4008 NE Martin Luther King Jr Blvd, and 4009 and 4003 NE Grand
- 2. We seek for these buildings to be Re-Zoned as commercial/office use as part of the Comprehensive Plan. The locations have a long history of commercial use and commercial zoning
- 3. These properties are currently zoned as RHd, high density residential. Our current office use is considered nonconforming use; however the history of these buildings' use is commercial/office

#### Details about the MLK building

- a. The MLK building was built 1910. In 1933 street re-numbering throughout the city revised the address to 4008 NE Union Avenue. In 1945 it was renovated to be a tavern. In 1969 it was permitted to be used as an office for Towne Finance. In 1973 there were repairs made - the listed reason was due to bombing of the United States Navy recruiting center located at 4008 NE Union Ave. Union avenue was renamed in 1989 as Martin Luther King Jr Blvd
- b. The 1987 and 1991 zoning maps show this property as M3 (Light Manufacturing). This was a manufacturing zone similar to the current EXd zone (central employment). Office use was allowed
- c. On the zoning map, effective January 1991, the property was in the EG1 zone (General Employment). This was an employment zone where housing was a conditional use. Office use was allowed

#### Details about the Grand buildings

- a. For the two Grand Properties 4009 and 4003 NE Grand these two buildings are built like houses in 1923 and 1906. It is possible they were homes or rental homes in the past
- b. However, 4009 & 4003 NE Grand zoning in 1987 was R2/C2B (General Commercial with a Buffer). In 1992, these were zoned CGB (General Commercial Business). Then in 1993, as with the MLK building,

the zoning became RH (Residential High Density). It shows as RHd in the comprehensive plan. We argue Legal Non-Conforming Use since businesses were using the two Grand Ave buildings since zoning was CGB in 1992 and we request this change be made as part of the comprehensive plan update

- c. These houses do not have installed kitchens and are only usable as office space. It would require significant upgrades and kitchen installations completed in order to establish livability
- d. One of these NE Grand buildings is currently rented by three non-profits, including Impact NW, the other is rented by MESO. We seek to rectify the zoning inaccuracy and return these properties to their rightful commercial use
- 4. All around us is commercial zoning [The lots across NE Shaver, to the south, are zoned EXd] and these specific sites [MLK and two Grand buildings] were zoned commercial/office use until changed in 1993. After that change, all were still used as Offices by Irvington Covenant as well as other agencies who leased the spaces
- 5. The neighborhood has a long history of entrepreneurship. The African American community was successful in entrepreneurial endeavors and built a vibrant community that we seek to fortify
- 6. MESO provides wrap-around entrepreneurial services to low-income underserved individuals. We provide a true "one-stop" solution for struggling entrepreneurs. We help them achieve phenomenal results in business retention, job creation, increase in net revenues, and increase in credit scores
- 7. The zoning change will enable us to establish a resource center for entrepreneurs in the heart of N/NE Portland
- 8. We believe the zoning for these building returning to commercial use will help mitigate adverse impacts of gentrification by improving the financial stability of families in the community

Thank you for reviewing our testimony. We are happy to share more about our services at a later date, or you can visit our website <a href="https://www.mesopdx.org">www.mesopdx.org</a>.

Sincerely,

Nita Shah

Executive Director

nshah@mesopdx.org

Nita M. Shal

(503) 914-6147

January 7, 2016 Comprehensive Plan Testimony Mark Bello for Urban Forestry Commission

Thank you for a thoughtful set of policies that acknowledge the value of Portland's trees, our all-encompassing natural habitat.

Policy 7.11 provides a durable policy platform for our efforts to promote and protect Portland's trees. The following two sets of edits would emphasize the value of large healthy trees (deleted language struck through and new language underlined):

### I. Policy 7.11 Urban Forest

Strengthen the current language used in Policy 7.11.a -- Tree Preservation to "Require or encourage and incentivize preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas."

Strengthen the current language used in Policy 7.11.c -- Tree Canopy with new language. Support progress toward meeting City tree canopy targets. "Coordinate plans and investments toward meeting City tree canopy goals."

Strengthen the current language used in Policy 7.11.g -- Trees in Land Use Planning to "Identify priority areas for tree preservation and planting in land use plans <u>and</u> incentivize these actions."

II. Also, as trees can play a significant role in making Portland's future growth a positive for residents, the following polices are important to adopt as part of our new Comprehensive Plan.

- 3.48 Green infrastructure in corridors
- 3.49 Integrated land use and mobility
- 3.64 [Greenway] Design

In particular, large form trees provide added benefits and can often be planted in place of decorative or small form trees. Adding a reference to "large form trees" in place of "extensive tree plantings", "prominent trees" or reference to "tree plantings" clarifies what may be planted.

Thank you for consideration.

Mark Bello for Urban Forestry Commission 2146 NE 9<sup>th</sup> Avenue Portland, OR 97212

## LINNTON NEIGHBORHOOD ASSOCIATION

10614 NW St. Helens Rd. Portland Oregon 97231

January 6, 2016

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

Re: Comprehensive Plan comments

Dear Commissioners:

The Linnton Neighborhood Association has previously submitted written and oral testimony regarding the proposed new Comprehensive Plan to the Department of Planning and Sustainability. This document summarizes the key issues raised in that testimony.

## Industrial zoning in Linnton's central business district

The LNA has raised a variety of issues about the plan's provisions regarding land which falls within the Industrial Sanctuary. As a concept the LNA supports the idea of a sanctuary, but finds the implementation problematic. The plan paints with too broad a brush, and imposes unjustifiable constrains on many parcels that are included in the sanctuary for merely historical reasons unrelated to current industrial needs. Examples exist in Linnton. After discussions between Linntonites and Bureau staff, including the director, regarding three specific properties, the staff has agreed to recommend those three sites be excluded from the Prime Industrial Overlay. A copy of a map provided to the LNA by Bureau staff is attached to this document as Exhibit A. The three sites are Kingsley Park, at the north end of the town center, off NW 114th, where a community garden will be established, the riverfront property along Front Ave., which fronts onto the last remaining sandy beach on the west side of the Willamette River north of downtown., and a thin stretch of Linnton Mill site along St. Helens Rd. south of the Community Center. Unlike the rest of the mill site, this narrow strip of land between the railroad and the highway will not be part of the planned habitat project. In addition to excluding these three sites from the Prime Industrial Overlay, the last of these, the land along the highway, will be zoned ME.

City Council January 6 2015 Page 2

The LNA lobbied for and supports these changes, and appreciates the Bureau's thoughtful attention to the concerns of the neighborhood.

The LNA also lobbied for, but was unable to achieve, an exclusion from the Prime Industrial Overlay for the central section of the mill site. The LNA believes it is in the best interest of the city and the neighborhood to rezone the mill site to ME. This would have no effect in the short term, since the property is currently owned and occupied by an active business, but would become critical when the owner decided to sell and an opportunity arose to create a much needed riverfront park for NW Portland. The existing business is not river dependent or even river related.

## Earthquakes and other hazards

Linnton is at the heart of Oregon's energy industry. We have pipelines and tank farms. We also have concerns about the ability of the energy industry to function safely when the expected earthquake occurs. The comprehensive plan is not reassuring. In regard to "energy infrastructure" the plan, in policy 8.104, speaks of coordination with energy providers to encourage investments that ensure reliable, equitable, efficient, and affordable energy for Portland's residents and businesses. Safety ought to be on that list. It ought to be listed first. But, instead of providing a long term vision of moving Oregon's fuel storage and pipelines out of the high earthquake danger zone, the plan ignores safety issues. Transitioning the tank farms out of their current risky locations before liquefaction dissolves the ground beneath them ought to be a comprehensive plan goal.

## Hillside density

We have supported the draft designation of Linnton as a "Stormwater Management Challenge Area" as one tool to control hillside development through management tools such as storm water, landslide and habitat regulations. The plan acknowledges the constraints facing Linnton including soil types and steep slopes that limit storm water infiltration into the ground, lots that cannot easily connect to existing storm water pipes, and landslide and wildfire hazards.

This position follows the neighborhood position adopted almost ten years ago in the Council approved Linnton Hillside Plan which began to address these challenges by rejecting higher density zoning. Nonetheless, the potential for future increased density still remains as Linnton has many "buildable" lots even though it does not have the infrastructure to support the added population.

City Council January 6 2015 Page 3

Given the city's commitment to increased density the LNA expects there will be growing interest in the available land in Linnton, particularly since most Linnton lots come with a great view. It would be easy for new construction to overwhelm services. Managing growth is the prime justification for a comprehensive plan, but this plan doesn't provide the management that our neighborhood needs.

## The role in the plan of the Neighborhood Associations

The current draft regarding community engagement is an improvement over earlier drafts. But there is still concern the draft does not adequately acknowledge the contribution neighborhood associations can make to the achievement of the Community Involvement Goals. Many of those goals could best be achieved by enhancing the role neighborhood associations starting with an explicit commitment to neighborhood participation in planning process.

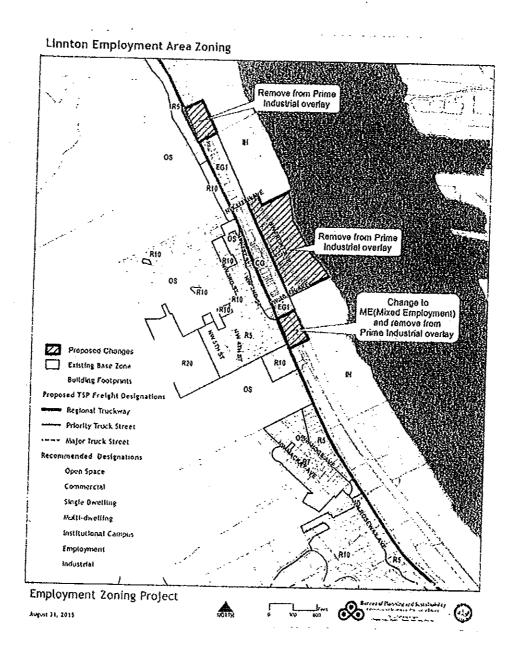
For example, the plan needs to set realistic timelines for participation in the planning process by the neighborhood associations. The LNA has general membership meetings every other month, timelines which call for comments or appeals within 10 or 30 days are unworkable; they send a strong message that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

These issues and others were discussed in the Comments on Community Engagement in the Comp Plan sent to the council on December 14, 2015. A copy of those comments is attached as Exhibit B. The LNA endorses those comments.

## Health Overlay Zones

The LNA has seen a proposal for a Health Overlay Zone in North Portland. The LNA supports the creation of such zones and would like to see Linnton included in one. The attached document, Exhibit C, sets out the goals and strategies of the proposed zones.

Shawn Looney Chair Linnton Neighborhood Association



DATE:

December 14, 2015

TO:

Portland City Council

FROM:

Neighborhood Coalition Leaders and Staff

RE:

COMMENTS ON COMMUNITY ENGAGEMENT IN THE COMP PLAN

Neighborhood coalition leaders and staff, from all seven of Portland's neighborhood coalitions, want to share with you some important concerns about the community engagement in the update of Portland's Comprehensive Plan (Comp Plan).

Our group held a special three-hour meeting on November 12, 2015 to discuss community concerns about how BPS engaged the community in the update of the Comp Plan.

We recognize that lots of process took place, but we also are hearing strong concerns in the community about the quality of these processes, who was heard, and what impact community member input has had on the development of the recommended draft.

A key message is that both planning staff and community members need more time, and that the process needs to have enough resources and realistic timelines to ensure that the community effectively is involved in shaping the final products.

As leaders and staff for Portland's seven neighborhood coalitions, we want to share with you below what we are hearing.

#### SUMMARY OF KEY THEMES

## Process did not follow Proposed "Chapter 2—Community Engagement" goals and policies

 We recognize that the recommended "Chapter 2: Community Engagement" language includes goals and policies that set strong expectations for good community engagement. We find it ironic and disturbing that the process used to engage the community in the Comp Plan Update did not follow these recommended goals and policies.

## Community input appears to have had little effect

- We found many instances in which community members and neighborhood and community organizations provided extensive and detailed input but did not see that their input had any effect on the final product.
- Neighborhood and community groups and community members often did not receive a formal acknowledgement that their input was received, and often received no feedback on what was done with their input.

In some cases, more savvy neighborhood and community activists who really
understood the system and had good inside relationships were able to move some of
their priorities forward. However, community members, in general, appear to have had
little effect on the outcomes.

## Decision making processes were not transparent

- Rather than a transparent, "additive," process by which community members could see
  how different products and documents evolved, community input seemed to go into a
  BPS "black box" in which decisions were made without any explanation of how
  community input was or was not used and why. Community members complain that
  they are not able to "reverse engineer" BPS decisions to understand how these
  decisions were made.
- Community members want to know: What was the decision making logic? Were
  decisions just made by senior planners? What criteria did they use and what level of
  understanding of the prior community input and existing plans did they bring to their
  decisions?
- Recommendations in this process often appear to have gone forward without support
  of the groups that had been involved in helping develop the recommendations.

## Lack of Community Access to Planning Commission

Many community members feel that the Planning and Sustainability Commission (PSC)
was not accessible to the community during the process. Community input to the PSC
was filtered through the staff. Community members do not feel confident that PSC
members adequately were aware of and understood community concerns and
recommendations.

## Disconnect with prior, existing plans and earlier products

- The Comp Plan Recommended Draft proposals and recommendations do not appear to reflect earlier aspirational goal and policy language—e.g. visionPDX, Portland Plan, earlier Comp Plan aspirations, goals for specific zoning, Zoning Code density standards, existing plan districts, etc. For instance, the Comp Plan map and zoning updates and changes being proposed do not seem to correlate with the aspirational language in the Comp Plan goals and policies.
- The Comp Plan Recommended Draft does not appear to incorporate and reflect other existing plans that often were developed with significant community input: e.g. District Plans, Parks Vision 2020, Climate Action Plan, Age-Friendly City Plan, etc.

Community engagement processes were not designed to be appropriate to different audiences

Ordinance 187832, Vol. 1.3.J, page 7057

- Community engagement should focus on helping community members understand how
  a project or proposed policies will affect them and their community and how they can
  have an effect on the issues that are most relevant to them.
- Many community members and organizations did not have the capacity to get themselves up to the level at which planning staff were working.
- Much of the community outreach and engagement was done in language and formats
  that many community people could not understand. Outreach and engagement also
  was not designed to be accessible to many different groups of people in our community
  and often was not tailored adequately to the needs and context and communication
  styles of different cultural communities.
- Outreach also was not tailored adequately to different areas of the city. Too many
  presentations had a general city-wide focus and were not relevant or useful to
  community members—community members could not see how the issues and
  processes would affect them and what they could do to affect outcomes that mattered
  to them.
- Outreach also needed to be staged and tailored to audiences with different levels of
  interest and expertise. Too much of the information came all at once. Processes needed
  to make sure that the right people were in the room for the content being presented—
  e.g. "101" sessions for people who are very new to planning, and more advanced
  sessions for more experienced people.

## Multiple Projects were underway in parallel without being clearly integrated

- Too many different planning projects were underway at the same time. It was not clear
  to most community members how they all fit together. Even the most savvy and
  experienced neighborhood and community activists had trouble following and
  understanding what was happening.
- BPS staff also often were overwhelmed and said they did not understand how all the
  pieces fit together. This made it difficult for them to help the community engage
  effectively.
- The Comp Plan is about much more than just land use, including transportation, bikes, parks, etc. This process affects so many different areas important to the community that is was easy for community members to lose track. Many felt that the whole picture was not being looked at.

## Projects were not pursued in a logical sequence with adequate time

 Projects at different levels of the planning process were happening all at the same time, rather than a logical progression from the most broad to the most specific.
 Implementation projects were started before goals and policies were finished, and often shared the same deadlines.

- The process also was marked by a feeling that BPS staff were rushing to get everything
  done to meet what appeared to be artificial deadlines. This appeared to sacrifice the
  goals of producing a quality product and ensuring that the community understood and
  was able to provide meaningful input and have an effect on the outcomes.
- In some cases, staff reports were released to the community with only a week for the community to review and respond. This was completely inadequate given the complexity and importance of many of these products.
- Many community members feel overwhelmed and exhausted trying to follow, understand, and participate in all the different processes that were happening at the same time.
- Both planning staff and community members need more time.

## **Inadequate Resources**

- BPS staff were overwhelmed by the scope and complexity of the processes and products they needed to deliver. While some planning staff tried hard to engage the community, BPS did not have enough people and resources to adequately involve the community in all the different projects.
- BPS staff did not have the resources to acknowledge, consider, and respond adequately
  and effectively to all the community input. This resulted in many community members
  and organizations feeling that their input was not heard or considered.

## "One-size fits all policies" do not work for many parts of Portland

- The Mixed Use Zoning project proposes a one-size fits all approach at the general level
  that amplifies the drive toward greater density and other effects that often contradict
  the goals of existing plan districts and disregard existing plans and public input. The
  more fine grain levels and impacts of these proposed policies are not clear.
- The "five Portlands" approach does not describe the Portland community members see. We need zoning and planning that reflects the neighborhoods in question.
- No mechanisms exist for neighborhood associations to have a say in design and development in their neighborhoods.
- Neighborhood livability is being sacrificed for regulatory simplicity.

## Lack of adequate analysis and modeling-identification of unintended consequences

- BPS generally has not analyzed adequately the different proposed policies to identify their likely, real-world outcomes in the community.
- Analysis has been limited primarily to static studies. Finer grained studies of the likely
  impacts on local areas have not been done. Analysis tools have not been responsive to
  the questions that the community is asking.
- BPS also does not track the actual impact of adopted policies on different neighborhoods in Portland.

7832, Vol. 1.3.3, page 7039 9441R B - 4. Community members already are seeing unintended consequences of this process. It's
important to daylight these consequences earlier rather than later. Some additional
mechanism is needed to identify and respond to these unintended consequences as the
many elements of the Comp Plan are implemented.

### Subject: Health Overlay Zone

#### Introduction

North Portland is a vibrant, diverse community of single and multi-family homes, commercial centers, and industrial preserves situated at the confluence of the Columbia and Willamette rivers. Our eleven neighborhoods face increasing growth and density in the coming years. The City of Portland Comprehensive Plan identifies inner neighborhood areas such as North Portland as ideal for increased density. The plan recognizes, however, that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers.

In order to meet the coming growth in our community without compromising the health and well being of our residents, North Portland's neighborhood representatives recommend a health overlay zone. This zone applies specific land use, design, and monitoring requirements on new development in North Portland to mitigate negative health and safety impacts. The health overlay zone supports a vision along with goals and strategies outlined below that together preserve and enhance our way of life while accommodating new development in our community.

Our community draws inspiration for our recommendations from two key sources. Portland's comprehensive plan update, Policy 4.28.d, encourages design and land use patterns that mitigate negative air quality and noise impacts in Portland neighborhoods, especially near high vehicle traffic areas, and other sources of air pollution. Similarly, Portland's Climate Action Plan (CAP) goals 1-4 aim to reduce the environmental impacts of new development through more sustainable land use and design principles.

#### Vision

A North Portland community that preserves and enhances the health and well being of its residents while accommodating growth and density needs.

#### Goals

To achieve our vision, North Portland's neighborhoods propose the following three goals:

- Better Air and Water Quality: Land use, design, and monitoring requirements that
  reduce or minimize the negative impact of future development on energy demand,
  air conditioning use, air pollution and greenhouse gas emissions, heat-related illness
  and mortality, and water quality.
- Reduced Noise Pollution: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- Increased Safety: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on criminal activity and emergency preparedness.

## Strategies

Goals provide benchmarks by which to measure progress towards our vision. Each goal, however, is supported by specific, actionable strategies that residents, community leaders, and City of Portland staff can use to better our community. We provide an illustrative list of strategies below based on NPLUG discussions, but we expect individual neighborhood association meetings to generate and refine strategies to best fit our community vision.

### Better Air and Water Quality

- Improve storm water management design standards for new developments
- Require air filtration in all new residential developments
- Improve ventilation requirements for new residential developments
- Require building features that facilitate less energy use
- Require moisture-infiltration and ventilation features that reduce mold formation
- Eliminate exposure to harmful asbestos materials
- Install traffic-calming, pedestrian, and bicycle features to minimize the use of singleoccupancy vehicles (SOVs)
- Install more and better transit infrastructure to encourage more energy-efficient transportation modes
- Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments
- Install air-monitoring stations in North Portland neighborhoods<sup>1</sup>

#### Reduced Noise Pollution

- Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

### Increased Safety

- Educate residents on emergency preparedness procedures
- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

#### Conclusion

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.

Monitoring stations do not directly affect air quality, but do allow for on-going evaluation of air quality mitigation of control of the cont



#### **Rossi Farms Development Strategy**

The Rossi Family owns approximately 22+/- acres in NE Portland on the south quadrants of the intersection of NE Shaver and NE 122<sup>nd</sup> Sts. The land has been farmed by the family continuously since 1920. During the course of history, the Argay neighborhood has grown around the farm and new public improvements including schools and parks have or are being added adjacent to the property. Using the Comprehensive Plan for 2035 as the primary guide, the family wants to create a master plan for the future development of the site consistent with and complimentary of land uses in the area. To that end the family has engaged Costa Pacific Communities, developer of the major master planned communities of Orenco Station and Villebois in the Metro region, to assist in the planning of the Rossi Farm property.

Based on its market research and experience with complete communities, Costa Pacific and the Rossi's are committed to planning for a complete walkable, mixed-use neighborhood with *diverse and integrated* land uses and a mix of housing which reflects the needs of the potential new home buyers for the neighborhood. The neighborhood lies just south of the Airport Way Industrial area where jobs abound but housing is void. Adding housing on the Rossi Farm, ostensibly would attract job-holders to the immediate north thereby reducing the region's Vehicle Miles Traveled (VMT).

Current home prices and median family income in Argay are among the lowest in Portland neighborhoods and the growth over the past several years has been stagnant even with an otherwise rapidly growing regional economy.

The area's residents have consistently expressed the need for a neighborhood market which could anchor a mixed-use development on the site. However, a grocer has not emerged because there simply is not enough density within walking distance of the intersection (1/4-mile radius). Our master plan would help remedy this deficiency. In addition, an increase in the number of household's will, of course, create a greater return on investment for the new and existing parks and schools all within walking distance of the Rossi Family properties involved.

Current infrastructure surrounding the site exists and creates a classic infill opportunity. We believe that the current R-3 zoning on the site allows for the size and type of for sale housing which will meet the household income levels and provide the necessary density to support neighborhood commercial uses.

Changing the residential zone to R-5 as suggested by some would render the property economically unfeasible as the cost of developing 5000 SF lots and the subsequent construction cost of new housing to support the finished lot cost would not be absorbed for decades and at a density incapable of supporting a mixed-use commercial zone It is our belief that the Mixed Use Civic Corridor zoning proposed at the intersection provides the best opportunity to plan an integrated neighborhood of diverse housing, retail and service retail for the neighborhood and best opportunity to create an attractive gathering place for local residents. In fact, it would be best to expand that zone into the proposed Mixed Employment Zone in order to integrate uses across a greater portion of the site. The Mixed Employment zone is strategically out of place for this potential master plan as it sits adjacent to existing and new park land and school land would create a dark zone in the midst of what could otherwise be a pedestrian friendly neighborhood of residential, retail, schools and parks.

We believe that our thoughts are consistent with the Comprehensive Plan Goals and vision and we respectfully request that for the property east of  $122^{nd}$  that you change the comp plan map back to the current designations – mixed use commercial and R3, without the Mixed Employment in the middle 5 acres. On the West side of  $122^{nd}$  we request that the mixed use commercial be expanded to include the entire 6 acres to provide the flexibility to allow for a potential neighborhood grocer on the "going home" side of the street with a mix of residential. Once again, it is our goal to use the Comprehensive Plan for 2035 as a guide to create the most complete and vibrant community possible here in Parkrose/Argay.

#### Major Policy Initiatives to City of Portland Comprehensive Plan:

- Complete Neighborhoods Most new growth will be focused in Centers and Corridors, which
  include clusters of shops, restaurants, offices and housing. This approach promotes
  convenience, walkability and access to services. Development will be scaled to the size and
  character of Portland's various centers and corridors.
- Jobs The 2035 Draft Plan includes areas where a variety of new jobs can be created, including campuses for colleges and hospitals, as well as policies to support more efficient uses of industrial land.
- Risks and Service Gaps Proposed changes will help protect public health and safety, avoid
  exacerbating natural hazard risks, and acknowledge limited infrastructure or services. This
  includes changes to slow the pace and scale of development in East Portland, while maintaining
  a strong commitment to continued investment in essential infrastructure.
- Neighborhoods, parks and open space Changes to some residential densities and updates to
  open space designations will better reflect existing neighborhood character and acknowledge
  recent park land acquisitions.

## Hayden Island Plan Reality

## History

The Hayden Island plan that was approved about 6 years ago was formulated around the drastic changes that were going to be presented by the CRC. This included:

- 1. The complete redesign of the on and off ramps.
- 2. Local bridge between Hayden Island and Marine Drive.
- 3. Extension of the Light Rail to Hayden Island/Vancouver.
- 4. Extension of Tomahawk Drive under the bridge.

The cancelation of the CRC essentially moves any new replacement at least 15 to 20 years into the future, but with a current Hayden Island Plan that is geared for the more robust infrastructure that it would have provided.

Hayden Island is serviced by the 15 off-ramps at the Columbia River. These ramps are overloaded during peak rush hours, especially during the afternoon-evening hours by all the Northbound Washington residents who work in Oregon. Holidays create other congestion periods, especially Christmas.

Access to the east of I-5 is provided by N Tomahawk Island Dr. This 2-lane road dead-ends on the east side of the Island. During the spring and summer months, parking on N Tomahawk Island Dr frequently closes the road down to a single lane, creating significant congestion and sometimes dangerous traffic problems. Note that there are no alternative routes, nor the ability to provide any due to the narrowness of the Island.

The Yacht Harbor Apartments recently added 373 units to the Island located near the east end of NE Tomahawk Island Drive. Currently at about 30% occupancy, the additional traffic is already significant.

Hayden Island currently has about 2800 residents – Yacht Harbor will add about 27% more residents based on an occupancy of 2 people per unit! Yet the single 2-lane, dead-end road is the only access. This is a very significant increase in the population of the Island without any changes in the currently marginal infrastructure and access!

Current zoning on the East end of the Island will allow an overall increase to about double the current population.

#### Additional Issues

- Hayden Island is a sand and gravel Island that is very susceptible to earthquake new studies need to be
  made based on the projected 7-9 magnitude earthquake that is projected for the NW.
- There are no evacuation or emergency plans for the Island in case of disaster.
- Yacht Harbor is ~1 mile from bus service and there are no plans to extend it.
- Fire Engine access is greatly restricted to the East end of the Island during Spring/Summer months.

## Change the Hayden Island Plan

The zoning needs to properly reflect actual available infrastructure and should reset the overall zoning to C-1 that has a maximum height of 32 feet.

The Hayden Island Plan made two maximum height changes on the east end of the island reflecting the anticipated upgrades in infrastructure. These changes were to 80' and 90'. These no longer make any sense given the limited infrastructure, the difficulty of evacuating the Island in an emergency, and growing congestion, nor does the height fit with the current character of the Island.

Presented by: Ron Ebersole - 11630 N Island Cove Ln - Portland 97217- rie242@amail.com - 503 320-8398



## City of Portland, Comprehensive Plan Testimony Nanci Luna Jiménez Thursday January 7, 2016

Good evening and thank you for taking the time to hear our testimony. My name is Nanci Luna Jiménez. I am a resident of 215 N Stafford Street in Piedmont Neighborhood. I'm also the President and Founder of Luna Jiménez Seminars and Associates, a training, consulting, leadership coaching and facilitation social enterprise committed to social justice. I've owned Luna Jiménez Seminars for 22 years and have licensed and registered my small business in the City of Portland and Multnomah County since I moved here in 1998. My business is a certified Minority-Owned, Woman-Owned, Disadvantaged and Emerging Small Business with the State of Oregon. Among other national and international professional associations, I have been a member of OAME, the Oregon Association of Minority Entrepreneurs and the Hispanic Metropolitan Chamber of Commerce.

I am here tonight with one of my employees, Tshombé Brown, to testify to recommend removing restrictions on Home Permitted Business Occupation for ADU's and expanding the definition of Type B Home Permits for small businesses. He and I will each take our allotted 3 minutes to read this complete testimony and then submit it for the record. He has a separate written testimony to submit as does one of my clients, Nichole June Maher, President of the NW Health Foundation, who couldn't be here with us this evening.

For the first 20 years, I ran my business out of one of the bedrooms of my home. With the value of keeping overhead costs low, reducing the impact on the environment and since the nature of my business requires that I travel extensively, I have always intended to keep my business in my home.

Besides myself, I currently have one full-time and one part-time employee. I have had as many as two additional full-time employees as well as an intern in addition to remote Associates and contractors—depending on the workflow and needs of my business and personal life.

I purchased my North Stafford home with a basement ADU in July 2013 with the *express* purpose of having a designated separate physical space for my business away from personal space. I also wanted a bit more room to flexibly grow (or shrink) as a small business. Although I

LUNA JIMÉNEZ SEMINARS & ASSOCIATES

was aware of the restrictions on Home Permits in my new location, I assumed that there would at least be an appeal process to continue to have a legal permit to operate my home business.

When I tried to renew my permit I was told I couldn't. When I contacted BPS I was informed the code expressly "prohibits" any home-based business in an ADU and therefore I had no recourse. End of story. When I explained that my next door neighbors, who have the exact same floor plan as I do, have four people with two vehicles and rent out their ADU as an Air BnB with as many as two additional people with at least one additional vehicle—which is allowable—yet I as a single woman and small business owner couldn't have my business in my ADU, which, even with 2 additional full-time employees, has less impact on the neighborhood and parking than my neighbors I was told that is just the way it is. In fact the person at BPS said, and I quote: "This code works for 90% of businesses; I'm sorry it doesn't work for you."

I countered that given that this code has not been updated since 1991, the establishment of home-based businesses, especially by women and minorities, has substantially increased since the Great Recession and permitting and building of ADUs is also rising dramatically I seriously doubt this code is responding to, let alone anticipating, the needs of small business owners, like myself. I was counseled by more than one City employee with whom I spoke over the last two years to not testify or bring attention to my situation but to continue to "stay below to radar" because I hadn't been contacted by the City and I wasn't being fined for being out of compliance. I have colleagues who have chosen this path and I understand their decision given how time intensive, stressful and a drain on precious resources as a small business this experience has been on me and my staff for the last two and a half years.

I am testifying tonight so that you can hear how these restrictions have placed an unnecessary, unfair and even discriminatory burden on small business owners. Clearly these outdated code restrictions were meant to protect home owners' property value. The defense that ADUs are somehow meant to address Portland's housing crisis—both in terms of availability and affordability—belies the City's decision to allow ADUs to be rented as Air BnBs. Air BnBs certainly make housing more affordable for those who have enough money to buy a home. It fails to address neither the housing shortage nor affordability for people who do not have the resources to buy a home. The idea that additional parking from a small business would be a burden on the neighborhood doesn't take into account the number of adults nor vehicles at a residence without a small business—it simply penalizes the small business.

For those of us small business owners who also own homes we should be allowed to leverage our investment to make home-ownership more affordable by having our small business operate in an ADU. In addition to supporting myself, my small business supports my employees



and the livelihood of many others as well as providing a valuable service in the community. I would argue the same cannot be said for Air BnBs.

At a minimum, I am requesting that the City code allow for a Home Permit, either Type A or Type B, an appeal process to be in an ADU. Although this is still time-consuming and cumbersome on the small business it is better than the current prohibitions. I think the City of Portland, though, can do much better than the minimum. I recommend the City revise the code to support small businesses and even anticipate how home-based small businesses are evolving.

I propose the code allow either Home Permit Type A or B to be located in an ADU. I also propose that the Type B Home Permit be expanded to include 1-5 employees as well as a limited number of client visits.

Small businesses with 1-5 employees is a standard distinction in size and scope and my recommendations are consistent with this typical size break down. This allows the necessary flexibility for small businesses to expand and contract to meet the needs of their clients and be responsive to the economy. These small businesses are an incredibly important part of our economy, providing jobs, benefits, and opportunities for larger city wide development and, in fact, helped pull Portland and much of the US out of the Great Recession. Women- and Minority-owned businesses are over-represented in this size category, and limitations and impediments on small minority owned firms negatively disproportionately impact communities of Color. I believe this is an unfair burden and a practice of structural discrimination.

Thank you for listening and seriously considering these recommendations as you update the code to remove undue burdens and restrictions for home-based small businesses.

Nanci E. Luna Jiménez, President and Founder 215 N. Stafford Street Portland, Oregon 97217

Luna Jiménez Seminars PO Box 12371 Portland, Oregon 97212



## Testimony for City of Portland Comprehensive Plan Hearing Self Enhancement, Inc., 3920 N Kerby Avenue

DATE:

January 7, 2016

TO:

City of Portland, Oregon

FROM:

Tshombé Brown, Former Independent Business Owner & Current Employee of

Luna Jiménez Seminars & Associates

RE:

Request to Remove Zoning Restrictions & Allow for Specific Expansions to

Support Survival of Small, Home-Based Business

As a former business owner who operated his coaching and consulting business out of his apartment, I am intimately familiar with how important City zoning policies are to the sustainability (and growth) of a micro business. Portland's commitment to the success of small businesses keeps goods and services local, strengthens community, and contributes to the financial stability of all. We pride ourselves that "box stores" and larger commercial enterprises are not permitted in our neighborhoods because they do not contribute meaningfully in these ways.

Home ownership also contributes to the stability and upward mobility of a community. When the City creates conditions that allow diversity in leveraging a home so that it pays for itself and that places no additional adverse impact on neighbors than what is already permitted under current zoning, everyone wins. This includes the business owner and who she employs, as well as the City itself, which receives revenue from the business.

Portland's legacy of supporting small business (like Luna Jiménez Seminars & Associates) is not honored by the current zoning restrictions. It also does not support simple fairness and equity. For example, under current zoning, ADUs are permitted to operate Air BnBs. In contrast to a small business like ours, they leave a greater carbon imprint, do not promote and strengthen community, and do not employ local talent (i.e., employees). What they do have in common is the creating of personal wealth/income for a homeowner so that they can complete purchase of their home, pay taxes, and create their version of The American Dream.

LUNA JIMÉNEZ SEMINARS & ASSOCIATES

I am asking you today for a vote in favor of small business and for simple fairness. Remove the restrictions from Type B Home Accessory Occupation for ADUs, conditions that put undue hardship on a business (Luna Jiménez Seminars) that has contributed to the City for over 2 decades in both financial terms and in serving local organizations to eliminate Oppression and its effects. Additionally, I request the Type B permits also be expanded to permit the hiring of up to 5 employees.

Thank you for your time and attention, and for your commitment to ensuring Portland City Zoning is reasonable, fair, equitable, and values both entrepreneurship and community-building.

In Gratitude,

Tshombé Brown

PO Box 5861

Portland, OR 97228

Jehombie N. Mrown



## City of Portland, Comprehensive Plan Testimony Nichole June Maher Thursday January 7, 2016

#### Greetings,

My name is Nichole June Maher. I am a resident of 1735 N. Terry Street, a parent of three, an active member of the Portland Native American community and the President of the Northwest Health Foundation. My husband is a small business owner and principle of Against the Current Consulting, a firm that he operates out of our home. I am also a client of Luna Jiménez Seminars and, as such, participate in twice monthly Executive Coaching sessions with Nanci Luna Jiménez in her North Portland home office.

I am here today to testify in support of removing restrictions on Type B Home Permit Occupation for ADU's. I am also advocating to expand Type B permits to include 1-5 employees as well as client visits. I am open to limiting the number of client visits per day or per month under this recommendation.

Small businesses with 1-5 employees is a standard distinction in size and scope and my recommendations are consistent with this typical size break down. These small businesses are an incredibly important part of our economy, providing jobs, benefits, and opportunities for larger city wide development. Minority owned businesses such as my husbands and Luna Jiménez Seminars are over-represented in this size category, and limitations and impediments on small minority owned firms have a deeper and harsher impact on communities of color. This is an unfair burden and I hope you will consider remedying this issue.

Thank you, Nichole June Maher

# Sabruffed by Alem Gebrehiwo Petition to Change Zoning on NE Freemont from North Mississippi Street to North Vancouver Avenue

Petition summary and background	As long time business and property owners in NE, we are having serious concerns regarding current zoning limits in a rapidly developing inner N/NE. We have watched as outside developers have procured property, changed zoning and prospered off of our neighborhood community. To balance the scales of equitable distribution of wealth, This petition is proposing that the City of Portland change the zoning of Freemont Street from North Mississippi Street to Vancouver Ave from its current zone of Residential Zone to Mix Use Zone
Action petitioned for	We, the undersigned, are concerned citizens who urge our leaders to act now to change the use of North Freemont extending from North Mississippi Street to North Vancouver Ave. from its current zoning of Residential Use to Mixed Use.

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Ben Martin	253 Per March	3536 N Commercial		1-7-16
Jacob Silberger	In Land	404 N. Fremont		1-7-16
Breanne Austin	Dance,	3515 N Harsht		1-7-16
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COLUMBIA STREE

Christe White cwhite@radlerwhite.com 971-634-0204

January 7, 2016

1518.001

Mayor Hales and Council Members
City of Portland
1221 SW 4<sup>th</sup> Avenue, Room 340
Portland, Oregon 97204

Re:

ESCO request to be included in the new Mixed Employment designation for its NW Portland property.

Dear Mayor Hales and Council Members,

As you know, ESCO has requested that the City incorporate its NW Portland property shown in the attached Exhibit A into the boundaries of the new Mixed Employment Comprehensive Plan designation and corresponding EG zone designation.

We understand that the Council is currently considering only the Comprehensive Plan map. Therefore, our request in this hearing phase is to include ESCO's property in the Comprehensive Plan map designation of Mixed Employment. This designation will allow the City to evaluate the transportation impacts, if any; of the ME designation and either carry the map change forward or remove it, depending on the results of the study.

As we have previously shared with you, this Comprehensive Map change and study is critically important to ESCO for a number of reasons:

- 1. This property is the location of ESCO's world corporate headquarters. ESCO would like to keep its headquarters in this location. The current operation also includes a 100-year old foundry. ESCO recently announced the closure of the foundry. When that occurs, ESCO's corporate headquarters will no longer be associated with a primary industrial use and will become non-conforming. ESCO cannot be in a position of risk with its corporate headquarters and does not want to foreclose a modernization of its operations over the long term that may not fit into the Industrial designation but would fit into the Mixed Employment designation and its implementing zone.
- 2. The ME designation remains an industrial and industrially-related designation under the code. Industrial uses continue to be permitted with significant prohibitions and restrictions on non-industrial uses. These constraints fit ESCO's use profile.

Ordinance 187832, Vol. 1.3.J, page 7074

PORTLAND, OREGON 9720.

SUITE 1100

Mayor Hales and City Council Members January 7, 2016 Page 2

- 3. The ESCO site will remain within the Guild's Lake Industrial Sanctuary Plan District and will comply with the already existing limitations on non-industrial uses within that Plan District. These constraints also fit ESCO's profile.
- 4. The ME designation (and EG implementing zone) has always been an integral part of the industrial area north of Vaughn and has helped accommodate major crossover employers like ESCO. In this way, this request both recognizes that part of the ESCO site is already designated Mixed Employment south of Wilson and that extending the ME designation north of Wilson is compatible with the existing zoning pattern and other industrial uses in the area.

ESCO has worked very closely and productively with the NWDA, NINA and other stakeholders over the last few months to communicate our needs and to understand any concerns. We understand that there is uncertainty around the traffic impacts of the ME designation. We believe those uncertainties will be resolved if we are part of this process.

- This request is only to be included in the Comprehensive Plan map as ME. That
  designation will allow the site to be studied for any impacts on the system. We think
  those impacts will be minimal as the existing designation and the proposed
  designation, with all of its limitations on non-industrial uses, have similar trip rates.
- The study will determine if the site can be re-mapped. If it is re-mapped, a more rigorous study will be required prior to rezoning. Again, because the implementing zone of EG1 is an industrially-focused zone and with restrictions on non-industrial uses under the Guild's Lake Industrial Sanctuary Plan District, we expect that the traffic study will justify the request. But if it does not, the site will not be rezoned.
- Lastly, if ESCO decides to sell any part of the site, a land division will be required and such an application comes with the opportunity for yet another traffic study.

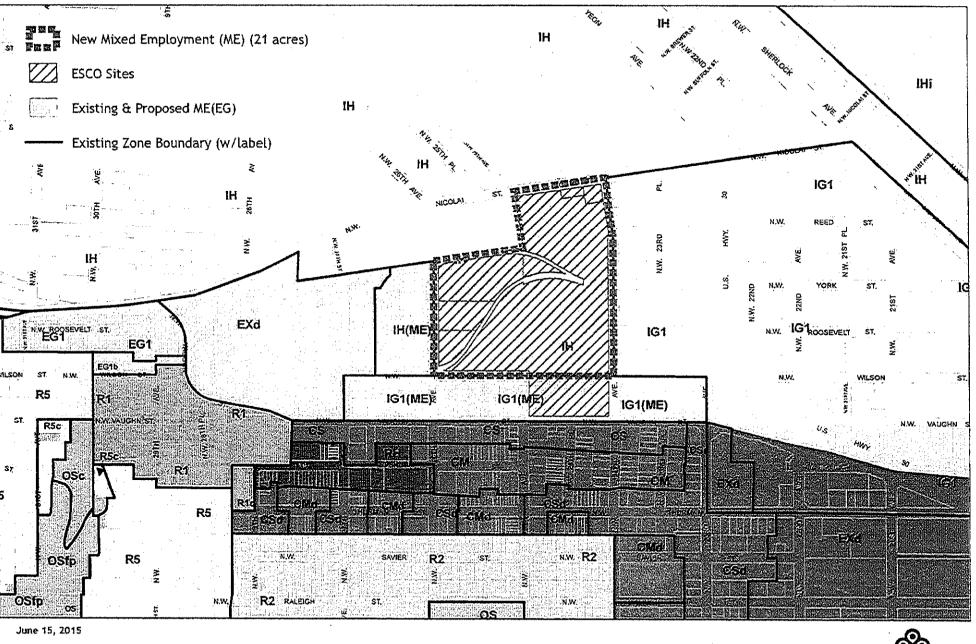
For these reasons, we are requesting that the Council approve the map change to ME for ESCO and allow the transportation studies to determine whether the request can be adequately accommodated.

ESCO is at an important crossroads and we are hopeful that our continued work with the City, NWDA, NINA and other stakeholders will result in a mutually beneficial planning outcome.

Sincerely,

Christe White

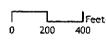
#### Comprehensive Plan Amendment - New Mixed Employment (ME)



City of Portland, Oregon // Bureau of Planning & Sustainability // Geographic Information System

The information on this map was derived from City of Portland GIS databases. Care was taken in the creation of this map but it is provided "as is". The City of Portland cannot accept any responsibility for error, omissions or positional accuracy.







P. Michael Dubinsky 3734 NE Hassalo Street Portland, Oregon 97232 510-541-4951 Foxrun9@comcast.net

06 January 2016

City of Portland
City Council <u>kerla.racore-leve@portlandoregon.gov</u>
1221 SW 4th
Portland, OR 97204

Subject: Comments on the Recommended Comprehensive Plan Update-Transportation & Parking Elements

Honorable Mayor Hales and City Commissioners:

I appreciate the opportunity to provide comment on the Recommended Comprehensive Plan for Portland. As a recently arrived resident of the City I have not been present to watch the plan evolve over time but the Transportation Section-Chapter 9 of the current version concerned me and I am certain others in my neighborhood. Our home is relatively close to Sandy Boulevard, a Corridor that is expected to accommodate some of the additional residential and businesses build out in the City. In particular I see the potential for adverse impact to existing residential neighborhoods in terms of residents, employees and patrons vehicles using the neighborhood as a parking refuge.

The language in the policy statements in the Chapter gave me the perception that the City's expectation was that all new residents of multi-unit residences would not own autos and employees and patrons of businesses would not use autos to access the area. Therefore no accommodation for automobile parking would be necessary. Everyone would walk, bike and use public transit. I believe that type of thinking is naive in today's world. Even if people walk, bicycle and use transit, as I do, they will in many cases still have and use a vehicle from time to time as I do. Absent some accommodation for parking they will utilize the close by neighborhoods as their parking lot.

As an additional step I studied the policy statements published by the Federal Department of Transportation and Federal Highway Administration concerning the implementation of bicycle and pedestrian accommodations for livable communities. The Federal policy and implementation guidance in no way suggests or recommends that communities (cities) undertake initiatives which result in adverse impacts on existing neighborhoods.

I have learned that at least to a degree my concerns were shared by others in nearby neighborhoods and they had already conducted an in depth assessment and prepared a submission in November of 2015. I have studied the submission of the Rose City Park Neighborhood Association Board of Nov 17, 2015 and agree with it and wish the record to so reflect.

Sincerely,

P. Michael Dubinsky

#### Attachments

 Nov 17, 2015 RCPNA Proposed Amendments to the Recommended Comprehensive Plan Update-Transportation & Parking Elements

2. United States Department of Transportation Policy Statement on Bicycle and Pedestrian

Accommodation Regulations and Recommendations

3. Internet links for Federal Policies and Guidance on Bicycle and Pedestrian Accommodation.

January 7, 2016

Re: City of Portland 2035 Comprehensive Plan Comments
Updated from previous submission and with additional signatures

Dear Portland City Council Members,

As neighbors of the historic "Strohecker's Market" in Portland's West Hills, we ask to have our voices heard with respect to any zoning changes/variances/language changes for this property in the midst of our residential neighborhood.

Our attached comments with over 200 neighbors' endorsements are submitted for your review and consideration.

Sincerely,

Blythe Olson

Cell 503-849-9616

Attach: Comments with endorsements (10 pages)

#### Comments for the City of Portland 2035 Comprehensive Plan

Hearing scheduled for January 7, 2016
Supplement to comments submitted Nov. 19, 2015 with additional signers

For Portland City Council consideration

These comments address Proposed Change #1128 (formerly #644) regarding the property located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

We are all neighborhood residents/owners with homes in the area near this property, many of us in close proximity.

We value having a neighborhood grocery store near us with its ancillary services (pharmacy, liquor store, postal service), but are strongly opposed to additional commercial development or high density housing that would add more traffic and parking stress to our residential neighborhood. Southwest Patton Road, the only street bordering this property, is routinely gridlocked by commuter traffic that has increased in recent years and safety for drivers and pedestrians is compromised daily.

We ask that the 1984 Ordinance No. 155609 that allowed Strohecker's to expand at that time and restricted use of the property to a grocery store remain intact with the new zoning name changes (relative to any future use of this property) so that we can maintain the livability and safety of our residential neighborhood.

Now that the store has announced its imminent closure and the intentions of the out-of-state developer who recently purchased the property are unknown, these Comments to the Portland City Council endorsed by over 200 near neighbors are particularly timely.

Thank you. The following neighbors endorse these comments:

**Blythe Olson** 

2719 SW Old Orchard Rd

J. Mary Taylor

2718 SW Old Orchard Rd

Faith Emerson	2730 SW Old Orchard Rd
i didi Lilici 3011	2/30 3 W Old Oldinala Na

Dan Rogers 2730 SW Old Orchard Rd

Sarah Anderson 2770 SW Old Orchard Rd

Steve Anderson 2770 SW Old Orchard Rd

Joanne Klebba 2766 SW Old Orchard Rd

Betsy Rickles 2754 SW Old Orchard Rd

Norm Rickles 2754 SW Old Orchard Rd

Christine Colasurdo 2776 SW Old Orchard Rd

Thomas Scanlan 2776 SW Old Orchard Rd

Maryann Mackinnon 2792 SW Old Orchard Rd

Frances Barnes 2731 SW Old Orchard Rd

Susan Corso 2721 SW Old Orchard Rd

Brian McDonagh 2710 SW Old Orchard Rd

Megan McDonagh 2710 SW Old Orchard Rd

Kent Weaver 2736 SW Montgomery Dr

Peter Miller 2775 SW Montgomery Dr

Sally Miller 2775 SW Montgomery Dr

Anthony Mantione 2842 SW Patton Rd

Kelly Mantione 2842 SW Patton Rd

Elisa deCastro Hornecker 2959 SW Montgomery Dr

Jeanne Windham 2753 SW Roswell Ave

Wilmer Windham 2753 SW Roswell Ave

Janet Conklin 2635 SW Montgomery Dr

Bob Conklin 2635 SW Montgomery Dr

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Jerome Schiller	2742 SW Old Orchard Rd

Juliet Ching	2742 SW Old Orchard Rd
Junet Chins	Z74Z SW DIO Urcharo Ro

Eric Butler	2851 SW Montgomery Dr

Alice Rogan	2724 SW Old Orchard Rd

Lauren Jacobs	2933 SW Periander St

Zach Fruchtengarten 2933 SW Periander St

Joan L. Kirsch 4610 SW Greenhills Way

Jill Mitchell 4404 SW Warrens Way

Darren Mitchell 4404 SW Warrens Way

Michael Gann 2906 SW Periander St

Susan Gann 2906 SW Periander St

Christopher Gann 2906 SW Perlander St

Louise Brix 2741 SW Old Orchard Rd

Jake Tanzer 4405 SW Warrens Way

Nancy Lee 2833 SW Periander St

Steve Ascher 2833 SW Periander St

Susan Kirschner 2444 SW Broadway Drive

Aubrey Russell 4921 SW Hewett Blvd

Molly Spencer 4232 SW Greenhills Way

George Spencer 4232 SW Greenhills Way

Mark von Bergen 4200 SW Greenhills Way

Marilyn von Bergen 4200 SW Greenhills Way

Jim Ruyle 2714 SW Sherwood Dr

Joanne Ruyle 2714 SW Sherwood Dr

Angela Clark 2793 SW Old Orchard Rd

Khashayar Farsad 4622 SW Greenhills Way

Denielle Edlund 4622 SW Greenhills Way

Kathleen Brookfield 2738 SW Old Orchard Rd

Jason Gifford 2738 SW Old Orchard Rd

Robeson Kitchin 2799 SW Montgomery Dr

Leigh Kitchin 2799 SW Montgomery Dr

Bennett Goldstein 2925 SW Montgomery Dr

Patricia Clark 2925 SW Montgomery Dr

Terry Wirkkala 2798 SW Old Orchard Rd

Kester Wise 2751 SW Old Orchard Rd

Cat Wise 2751 SW Old Orchard Rd

Stuart Hogue 2844 SW Periander St

Gina Hogue 2844 SW Periander St

John Spano 2398 SW Montgomery Dr

Elisa Spano 2398 SW Montgomery Dr

Joseph Trump 2398 SW Montgomery Dr

Deborah Melian 2398 SW Montgomery Dr

Jennifer Wilson 2650 SW Montgomery Dr

Jon Wilson 2650 SW Montgomery Dr

Smita Tomkoria 2435 SW Broadway Dr

Candace Hiller 2790 SW Montgomery Dr

Phillip Hiller 2790 SW Montgomery Dr

Claudia Brown 2926 SW Periander St

Nicole Flinterman 2585 SW 16th Ave

Justin Kentor 4109 SW Council Crest Dr

Brigit Kentor 4109 SW Council Crest Dr

Kathy Robertson 2969 SW Upper Dr

John Convery 2768 SW Fern St

Amy Convery 2768 SW Fern St

Tom Tuchmann 2922 SW Periander St

Margaret Tuchmann 2922 SW Periander St

Deborah Mandell 3250 SW Donner Way Ct

Roy Pulvers 3250 SW Donner Way Ct

Shawn Mammen 3737 SW Sweetbriar Dr

Shannon Marcum 3737 SW Sweetbriar Dr

William Failing 2649 SW Georgian Place

Michele Bowler 2649 SW Georgian Place

Erez Russo 2662 SW Grenwolde Pl

Claudia Brown 2926 SW Periander St

Camille Hunt 2656 SW Upper Dr Pl

Harry Groth 1010 SW Myrtle St

Bryan Thurston 1525 SW Myrtle St

Diane Thurston 1525 SW Myrtle St

Cindy Easton 4344 SW Hewett Blvd

Michael Easton 4344 SW Hewett Blvd

Alan Jewett 2681 SW Montgomery Dr

Tami Jewett 2681 SW Montgomery Dr

Melinda O'Scannlain 4530 SW Humphrey Ct

Brendan O'Scannlain 4530 SW Humphrey Ct

Leanne Marinace 2818 SW Patton Rd

Anne-Marie Lamb 2865 SW Upper Dr

Robert Linifield 2865 SW Upper Dr

Greg Epkes 4560 SW Hillside Dr.

Attilia Sawyer 4560 SW Hillside Dr

Marlene Braun 4211 SW Patrick Pl

James Braun 4211 SW Patrick Pl

Trish Greene 3640 SW Dosch Rd

Rich Greene 3640 SW Dosch Rd

Mary Welle 3836 SW Hewett Blvd

Beth Healde 4015 SW Council Crest Dr

Demian Healde 4015 SW Council Crest Dr

Diane Thurston	1525 SW Myrtle Dr

Lindsay Mor	ch	4136 SW Nehalem Ct

Danie Dilimath	2400 044 Amileo Del
Beau Blixseth	2468 SW Arden Rd

Tracy Blixseth 2468 SW Arden R
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Maureen O'Scanniain	3919 SW Mt Adam
ivialiteen Cracanniain	AGIG SW/ Wit Adam

Karen Ritter	3226 SW Fairmount Blvd
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Robert Ritter	3226 SW Fairmount Blvd

Lauren Danahy 5112 SW Hewett Blvd

Tom Danahy . 5112 SW Hewett Blvd

Mary Lynne Chambers 2867 SW Montgomery Dr

Rhys Chambers 2867 SW Montgomery Dr

Erik Skarstad 2511 SW Arden Rd

Robin Skarstad 2511 SW Arden Rd

Howard Harris 5042 SW Hilltop Ln

Mabel Harris 5042 SW Hilltop Ln

Linda Blaskowsky 2815 SW Patton Ln

Daniel Herzig 2612 SW Talbot Rd

Sallie Herzig 2612 SW Talbot Rd

Bill Headley 2669 SW Montgomery Dr

Julie Headley 2669 SW Montgomery Dr

Lynn Pratt 2501 SW Ravensview Dr

Steve Pratt 2501 SW Ravensview Dr

Betsy McCormick 1535 SW Elizabeth St

Charles McCormick 1535 SW Elizabeth St

Michael Fennerty 3902 SW Hewett Blvd

Maureen Fennerty 3902 SW Hewett Blvd

Chris Dolle 2791 SW Montgomery Dr

Anne Dolle 2791 SW Montgomery Dr

Mary Reed 3431 SW Brentwood Dr

Casey Carl 2804 SW Montgomery Dr

Everett Carl-Schooler 2804 SW Montgomery Dr

Adam LaMotte 4068 SW Hewett Blvd

Janet Coleman 4068 SW Hewett Blvd

Stacy Parker 4558 SW Ormandy Way

Jeff Parker 4558 SW Ormandy Way

Deb White 2464 SW Sherwood Dr

Kristin Morgan 1640 SW Davenport St

Rhys Morgan 1640 SW Davenport St

Lisa Smith 3941 SW Mt Adams Dr

Elizabeth B. Brown 5031 SW Humphrey Park Rd

William Lee 2411 SW Arden Rd

Allison Lee 2411 SW Arden Rd

Sean Donnelly 1611 SW Broadway Dr

Jeannie Prindle 4969 SW Humphrey Park Crest

Teri Simpson 2684 SW Talbot Rd

Thomas A. Wiley 2678 SW Talbot Rd

Laura Wiley 2678 SW Talbot Rd

Hunter Brown 5031 SW Humphrey Park Rd

Elizabeth Brown 5031 SW Humphrey Park Rd

Leslie Costandi 3640 SW Mt Adams Dr

Millard McClung 3640 SW Mt Adams Dr

Mary Lou McClung 3640 SW Mt Adams Dr

Richard Senders 2682 SW Talbot Rd

Lisa Senders 2682 SW Talbot Rd

Erik Skarstad 2511 SW Arden Rd

Robin Skarstad 2511 SW Arden Rd

John Moody 2769 SW Buena Vista Dr

Maggie Conrad 1750 SW Terrace Dr

Blaine Conrad 1750 SW Terrace Dr

Mia Miller 3716 SW Mt Adams Dr

Matt Miller 3716 SW Mt Adams Dr

Collette Gray 1012 SW Tangent St

Ed Wagner 2728 SW Montgomery Dr

Steve Pearson 2740 SW Talbot Rd

Anne Rogness 2740 SW Talbot Rd

Jeannie Santos 2681 SW Vista Ave

Leonard Santos 2681 SW Vista Ave

Sandra Joos 4259 SW Patrick Place

Valerie Hill 2624 SW Talbot Rd

Warren Hill 2624 SW Talbot Rd

Brook Howard 4243 SW McDonnell Terrace

Ann Howard 4243 SW McDonnell Terrace

Rachel Young 2493 SW Arden Rd

Chapin Titcomb 2846 SW Labbe Ave

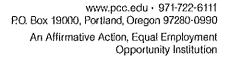
Minah Titcomb 2846 SW Labbe Ave

Alison Friday 1703 SW Myrtle St

Sara Matarazzo 1909 SW Laurel Place

Derek Sandoz 2014 SW 17th Ave
Candy You 1750 SW Broadway Dr
Ed Ulman 1553 SW Elizabeth St
Wendy Ulman 1553 SW Elizabeth St
Eileen Galen 1802 SW Elm St
Peter Galen 1802 Sw Elm St

Betty Norrie, 3429 SW Gale Ave





January 7, 2016

Mayor Charlie Hales and Members of the Portland City Council Portland City Hall 1221 SW Fourth Avenue Portland. OR 97294

Dear Mayor Hales and Members of the Portland City Council,

Thank you for this opportunity to comment on the Campus Institutional Zoning Project. Portland Community College (PCC) supports the proposed Institutional Campus (IC) Comprehensive Plan designations and companion Campus Institution (CI1 and CI2) zoning designations with reservation. Although we applaud City staff for offering a new approach for continued development of existing institutional campuses and proposing a reasonable legislative transitional process, the recent inclusion of a mandatory Transportation Demand Management Plan (TDMP) is not defined sufficiently enough for PCC to fully endorse the new concept.

The intention of the proposed IC Comprehensive Plan designation is to provide sufficient development capacity and flexibility for institutional growth in a less onerous regulatory framework. The new designation is in response to the City's finding that more than one-third of the forecasted job growth in Portland over the next 20 years is expected to be in the health care and education sectors, which is particularly concentrated in the existing 19 large college and hospital campuses dispersed throughout the city. PCC is the largest institution of higher-education in the state with four campuses, three of which are located in the city; more than 90,000 students; and 3,200 employees. To better support institutions as economic drivers for the region, new development requirements should be no more arduous than they are for commercial development.

The proposed TDMP requirement aims to "improve the effectiveness of transportation and parking demand management requirements for mid-to large-scale development" and "clarify and standardize performance-based requirements." Currently little information is available detailing such items as criteria used for plan review and approval by City staff; acceptable TDM strategies and performance targets; and enforcement and penalties, including future development restrictions.

PCC is an avid supporter of TDM and recently updated its college-wide plan, which is frequently used as a model for other institutions. The plan offers a menu of strategies that can be implemented in a tiered approach based on level-of-demand. We worked closely with our neighbors to craft the plan and determine appropriate performance targets. Proper TDMP implementation can be expensive and is not easily standardized, which is why PCC is asking for

additional information on city involvement in TDMP oversight before fully supporting the Campus Institutional zoning approach.

Also, it is unclear if TriMet has been involved in the drafting of the TDMP requirement. Its involvement is essential in the success of any TDMP, especially one of this scope and with such potential impact upon the region. We urge the City of include TriMet in future discussions.

PCC understands the monumental effort needed to update the City's Comprehensive Plan and will continue its active participation and ongoing dialogue with City staff to assure a quality outcome.

Sincerely,

Linda Degman

Director, Bond Program

cc: John Cole, Senior Planner, Bureau of Planning and Sustainability

#### Comprehensive Plan Testimony 1/7/2016 Open Space

Please modify the Comp Plan Map by adding OS classification to the Sellwood Gap parcels acquired by Metro and managed by PP&R. A segment of the Springwater Trail is scheduled to be constructed in 2016; it will pass through or will be adjacent to those parcels. They are viewed by Sellwood neighbors as an open space asset that needs to be developed and preserved by Portland Parks both for our enjoyment and to make possible the proposed habitat corridor from Oaks Bottom Wildlife Refuge to the Johnson Creek Natural Area.

The southern portion of Sellwood has no public park; it is more than ½ mile from Sellwood Park and from the Johnson Creek Playground. To correct this deficiency, please designate this group of parcels as Open Space, as future parkland. Then rezone the parcels from the current residential land use designation to OS. Please eliminate the ambiguity about the future use of this land. We want a park environment along the Springwater Corridor.

Four years ago several neighbors began an ad hoc planning process envisioning a Sellwood gap park to complement and expand upon the promise of a Willamette Greenway adopted by the City Council in 1987. In the first two years, more than a hundred of our neighbors participated in this envisioning process. A couple years ago, our neighborhood association, the Sellwood-Moreland Improvement League (SMILE) joined in the effort. SMILE has gone on record asking you the designate those "metro parcels" as Open Space on the Comprehensive Plan Map. I join in that request.

Michael Hayes 8848 SE 11<sup>th</sup> Avenue Portland 97202 Jan. 7, 2016

Council Members
City of Portland

Greetings.

The Comp Plan gives us, as a community, an opportunity to look toward our future. The future that I see includes more bicycles. Portland is already recognized as a world class cycling city. We can make it better. Every dollar we spend on building safe and efficient bike networks and facilities has a direct return on our investment. Active transportation, in all it's modes, improves public health, reduces our carbon footprint, positively impacts our economy, and creates opportunities to build community.

I would like to ask the council to move the Sullivan's Gulch Trail funding forward, with each segment of the trail allocated funds in the next ten years. I would also like to add a segment to the trail from Gateway Green/I-205 trail to the trail that already exists on the south side of I-84 further east.

The Sullivan's Gulch Trail can be an important part of our bike network. Off street trails eliminate potentially fatal accidents between between cars, trucks and cyclists. The opportunities for development along the trail encourages us to seek ROW, with publicly owned parcels given some priority. As an example, the segment between the Esplanade and 21st is on predominantly publicly owned land. Proposed development at 21st and Multnomah will have an impact on the connection between the trail and 21st. at street level. Grant Park Village is also planning construction on phase II, this will also impact the connection from the trail to 32nd. As the city follows an infill policy, the north side of Sullivan's Gulch has a number of opportunities for business and residential improvements and new projects. We need to be at the table with a plan. This will require some engineering, designing and ROW.

I have a vision of friends traveling to Portland, checking into a hotel downtown, then hoping on a bike and riding a safe bike path all the way through the Columbia River Gorge. Also, I can see cycling commuters taking less time to travel from Gateway to Downtown Portland than the cars and trucks on I-84 at rush hour.

The Sullivan's Gulch Trail connects to north/south bike routes at most of the bridges that cross the freeway. The trail connects East Portland, Gateway, Hollywood, Lloyd District, Rose Quarter, and our City Center.

Building the Sullivan's Gulch Trail will improve the environmental quality of this green corridor now overrun with invasive plants.

A safe off street trail will encourage new cyclists, and others will likely bike more frequently.

Thank you for letting me share my thoughts. I do believe that the people of Portland are being heard in this process. We have a lot of tough choices to make, and we make better decisions when everyone is included.

Respectfully,

Dan Lerch-Walters 2174 N.E. Multnomah Portland, OR 97232

Dear City Counsil: #102 47/16 My Wame is MARIH Alyn Clair I Live at 10253 SE Bell AND P/0 97222 A Senior, Native of Pertend OR WHA disability, Section 8 Recipient About to be displaced bleaue of seneral hundreds of dulars/month in Rent, increwed within SIX months. My cent has increwed by 40% in less Them 3 yrs. My Income 13 SSD only - Very Low Income There Searched for replacement housing and I'm on over 20 wait-135 for low income hortsing: I few I my bleme homeless. As a Senior I need housing stability I Can't afford Moving Costs. I has already striggly before howy my rent incremsed beyind what section 8 Cun Supplement; So I ASK" 1) Seniors; disabled; Low incomer terunts who are ben displaced be put on a Emerging call
List. - sixen proving in Wont-lists

2) Funds for relocation/moving be granted to Visplaced tenants; issued directly to Trem. 3) It reflacement housing is not Available In time before displaced tenants leaves Exfire, - peopers nauve short form stelfer, and Storage Junds for belonging. 4) To create stability in rent prices we Ask for a meratorium on rent incrues antil Emergeny Measures can be Established.

5). We request Keal Emergency Kesponse. to prevent surther hometeseness. Estarement-legistry Funding Ex Ostay in place funds 2) Displacement-legistry Funding 6) For Those who are homeless - Step ne sweeps Make Shetters; ortdoor cumps sure, ysanitation, Empervision, Medical " Social Services Support. 8) Make it Ensiee for Vary low IC to gulify For Honsing. In Cenclusion We need lead Emergeny Measured we need you to act now 9 prevent More homelessness Thuk you for listening. Sineerily, MAKIL Algorelaire

#### Brian Posewitz 8508 SE 11<sup>th</sup> Ave. Portland, OR 97202 503-432-8249 brianposewitz@comcast.net

January 7, 2016

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

Re: Comprehensive Plan Recommended Draft

Dear Mayor Hales and Members of the Commission:

Please consider my following comments on the Comprehensive Plan Recommended Draft ("Draft"):

- 1. The Plan Appropriately Encourages A Compact Urban Form. I understand that a general theme of the Draft is to encourage Portland to grow in a compact urban form, in part through increased housing density and increased building heights. I strongly support this general philosophy as a way to reduce infrastructure costs and to reduce automobile transportation (and the associated environmental impacts). The compact form also creates a more aesthetically pleasing, vibrant community (relative to sprawling, disconnected development).
- 2. The Plan Should Allow For Change To "Existing Character." Recent acceleration in urban development (likely a temporary product of low interest rates and other factors) has created a backlash from residents seeking to preserve the "existing character" of neighborhoods. While that may make sense in a few old, established neighborhoods that were built with a distinct consistent theme (parts of Eastmoreland for example), it doesn't make sense for most neighborhoods. Most neighborhoods can benefit from change from having deteriorating and unkempt buildings replaced with new ones; and from having taller, denser buildings bring life and vibrancy to the neighborhood. Moreover, faced with growth at rates anticipated, we need to either accept change to the character of existing neighborhoods (including changes in density and scale) or accept sprawl into the outlying farmland and natural areas. The former is a far better alternative.

3. <u>Don't Over-emphasizes "Displacement" Concerns.</u> "Stop displacement" has been a rallying cry for many in the Comp Plan process. (I even saw a PSC member wearing a button to that effect during PSC meetings, which was not a reassuring signal of open-mindedness and neutrality.) The complaint, as I understand it, is that rising property values require some people to move. The argument, as I understand it, is that every person should be able to live in any neighborhood the person desires, or at least to stay indefinitely in the one they are in. The proposed solutions, as I understand it, are policies to force property owners and developers to make housing available at belowmarket rates and/or to building housing that is different from what market forces would dictate.

I first question how many people are really being *involuntarily* "displaced" by rising property values. If they own their homes, rising property values should just make them wealthier (which is good for "equity," right?), not force them to move, especially since the law limits how fast government can increase property taxes and the taxable value of their property (which everyone concerned about displacement should be grateful for). I understand that renters may be displaced, but the City should not prevent neighborhoods from improving (another word for "gentrifying") just so no one has to move. Our market-based economy – a system that many in this area malign but which is responsible for the extraordinary prosperity that just about everyone here enjoys relative to most of the world – means people will sometimes have to make changes: in jobs, lifestyles and locations. It makes no more sense to say a person should be able to live indefinitely in any neighborhood he or she wants to than to say every person should be able to drive whatever kind of car he or she wants to (or at least keep driving the same car no matter what).

So please don't adopt a Comp Plan that impedes neighborhood improvement out of deference to the subjective philosophical view of a loud but small contingent.

- 4. <u>Promote Environment and Watershed Health</u>. I support the Draft's efforts to promote and protect Environment and Watershed Health.
- 5. <u>Allow Sellwood To Change More</u>. I am generally satisfied with the Draft's particular prescriptions for my neighborhood Sellwood. However, I oppose the extreme downzoning of North Westmoreland, which is contrary to overall themes of the Draft. I also oppose the decision to stop the mixed use designation (allowing commercial development) on SE 13<sup>th</sup> Ave. at Sherrett Street. The designation makes sense for the entirety of SE 13<sup>th</sup> Ave., which historically has had commercial and industrial uses all the way to the southern end.

Thank you for considering my comments.

Very truly yours,

Brian J. Posewitz

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#### City Council Hearing on Draft 2035 Comp Plan Goals

January 7, 2016

Good evening City Council,

My name is Evan Stravers and I am here this evening on the behalf of Benjamin Kaiser. Mr. Kaiser was unable to attend this evening's meeting but asked that I read this testimony so that it will be integrated into the ongoing 2035 Comp Plan conversation. This is in regard to the parcel of land at the corner of North Williams Avenue and Fremont Street, commonly known as 19 N.E. Ivy.

"It was not long ago that we all met to discuss this exact parcel of land. After a very lengthy and very public process, the City agreed to rezone the parcel from a residential only zone (R-1) into a mixed-use zone (RX), with a design review overlay. This recently approved zone change process was privately funded, took approximately one year, involved both the Eliot and Boise Neighborhood Associations, as well as the Hearing's Officer, City Staff, and many of the other city bureaus.

At the time of the rezoning, it was agreed that this very active intersection of Portland was much better served by the RXd designation than the previously residential only designation. City Council agreed and the zone was changed to an RXd, with additional height restrictions placed on it for the neighborhood's benefit.

The Comp Plan Draft now depicts this exact parcel as returning to a residential only designation despite all of these recent efforts.

The request to change the parcel back to a residential only zoning evidently came from a neighborhood association, however just last week the Northeast Coalition of Neighborhoods voted to write a letter to City Council confirming that they too believe that this parcel should remain as a mixed-use designation of RX.

As a side note, the zone change triggered the private funding of the recently activated intersection signaling (stoplights and crosswalks) at the North Vancouver/ Cook intersection. What was previously one of the most dangerous intersections in the city is now safe due to the zone change conditions.

I respectfully request that the City agrees with their recent zone change approval, the Northeast Coalition of Neighborhoods and us to keep the parcel as the RX designation (or Comp Plan equal) that it presently is."

Thank you all for your time.

EVAN STRAVERS 5231 E. BURNSIDE ST. #25 POETLAND, OR 97215 City Council Stravers 010716

Ordinance 187832, Vol. 1.3.J, page 7102



9200 SE Sunnybrook Boulevard, #410 | Clackamas, OR 97015 1-866-554-5360 | Fax: 503-652-9933 | TTY: 1-877-434-7598 aarp.org/or | oraarp@aarp.org | twitter: @aarpor facebook.com/AARPOregon

#### Testimony on Portland Comprehensive Plan January 7, 2016

My name is Elaine Friesen-Strang. I want to thank the city for its extensive public outreach and for this opportunity to testify.

My husband and I have lived in NE Portland for many years--in fact, our children attended the same public grade and high schools that my husband did. It is our hope that we will continue to live in our neighborhood as we grow older. As with other residents, we have a personal stake in this plan--both for our children who intend to raise their families here, as well as in how our city responds to the needs of an aging demographic.

In addition to being a long-time Portlander, I am here today as a volunteer leader for AARP Oregon. On behalf of the 60,000 AARP members who live in the City of Portland, I thank you for the City's continued commitment and work to make Portland a great place for people of all ages and abilities. We commend you for your guiding principles and emphasis on equity. Specifically, with respect to transportation, we applaud your intent to design a system that accommodates the most vulnerable users.

The fact that Oregon's residents 65 years and older have 83% higher pedestrian fatality than for those 64 years and younger indicates we obviously have work to do. We thank you for putting walking as the top priority and encourage you to continue prioritizing pedestrian safety and accessibility.

However, we ask that you move transit to the second place after walking in the transportation mode priority ranking as it currently appears in the plan.

According to an AARP study, a man who is 70 years old today is likely to outlive driving by 6 years. A woman who is 70 is likely to outlive her driving ears by 11 years. Fifty percent of people age 50 and older say they could not continue living in their current neighborhood if they could no longer drive.

Having mobility options other than driving is critical to enable people to continue living in their own home and neighborhood. In moving transit higher in the priority of transportation modes, you will be serving the greater good--meeting the needs of older adults, families with children who cannot afford a car, and individuals for whom transit is their only option due to physical or mental challenges. Portland needs to make transit a priority so all its residents can meet their needs and live quality lives.

Thank you.

Elaine Friesen-Strang ()
AARP Oregon Volunteer Leader

# Working Waterfront Coalition

# Comprehensive Plan Comments

January 7, 2016



City of Portland City Council Portland City Hall 1221 SW Fourth Avenue Portland, OR 97204

January 7, 2016

Dear Mayor Hales and Portland City Commissioners:

The Working Waterfront Coalition (WWC) respectfully requests that City Council return to the mid-range growth forecast in the Economic Opportunities Analysis (EOA) -- the forecast that Council adopted in the 2012 EOA and the forecast used by Metro in their urban growth report.

## A Medium Growth Forecast Is Supported by Substantial Evidence, Is Consistent with Other Adopted Plans and Is Good Policy

Based upon historic data and future projections, the City must assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types, and <u>not</u> assume a low forecast (Attachment A). A low forecast is not supported by substantial evidence in the record and does not comply with Statewide Planning Goal 2's requirement for consistency among all adopted City plans. A low forecast contradicts historical trends and recent harbor infrastructure improvements that have resulted in substantial private sector investment (Attachment B). The low forecast as proposed by the Planning and Sustainability Commission (PSC) is a policy choice that retreats from historic cargo trends and plan for a decline in harbor business, despite contrary private sector investments and adopted plans. The PSC's recommendation sends the wrong message to Oregon businesses and to the public about the importance and future of the Portland Harbor, and the many businesses and employees who rely upon it.

### Harbor Jobs are Middle-Income Jobs that Further the City's Equity and Housing Affordability Goals

The City should support additional middle-income job growth in the Portland Harbor, which will help the City achieve its equity and housing affordability goals. Harbor businesses are major Portland employers that employ more than 31,000 men and women, and support 29,000 more employees, which are largely paid middle-income wages. The harbor is a place of job diversity and predominantly middle-income wages (Attachment C). One harbor employer has more than 19 languages spoken on site. Many harbor businesses work directly with community college programs for job placement and skill development for existing employees. Job growth in the harbor is exactly what our City needs to ensure future work force diversity and middle income wages so more Portland citizens can afford a reasonable standard of living in Portland. Middle income wages are also one way to address Portland's housing affordability gap. Income disparity is part of our community's housing crisis, and that disparity is in part because of the flattening of middle income wages and loss of middle income jobs.

Harbor businesses are also a major source of revenue for the City of Portland's small and medium sized business. More than fifty percent of harbor business procurement of supplies, raw



materials, capital goods and services comes from small local businesses. This relationship is meaningful to the neighborhoods and the people employed as a result (Attachment D). The PSC recommended low forecast assumes one percent or less of annual growth in the harbor – limiting job opportunities and procurements of supplies, raw materials and services from local businesses.

# The EOA Overestimates the Supply of Industrial Land and Potential for Additional Capacity -- Brownfields, Transportation Improvements and Shifting of Some Jobs

The WWC strongly supports brownfield redevelopment. However, we are concerned that the City's assumption that 60% of the brownfields in the harbor will be cleaned up and available for industrial use over the planning horizon is unsupported by data and is unrealistic without financial and policy support. Brownfield redevelopment to industrial use is difficult due to time and costs associated with addressing contamination, ownership issues, uncertainty about Superfund liability and market constraints on industrial property (Attachment E). These factors influenced the City Council to assume that only 40 percent of the brownfields in the harbor would be remediated when the Council adopted the 2012 EOA. At that time owners of industrial properties in the Portland Harbor were skeptical about that assumption because it did not account for the uncertainty related to Superfund. The PSC's assumption about brownfield redevelopment is a 20% increase over what Council adopted 2012, but the policy, economic or evidentiary basis for this increase has not been identified.

The City cannot assume that unfunded transportation improvements will create more cargo efficiency and increase industrial land capacity in the Portland Harbor. The PSC recommended a Transportation System Plan (TSP) with 78 percent of city resources targeted to active transportation projects instead of improvements to road and rail that would support harbor businesses (Attachment F). The City Council cannot rely upon improvements to the transportation system to create more cargo efficiency and increase industrial land capacity until improvements to road and rail that support harbor businesses are funded.

There is no evidentiary basis for an assumption that moving some existing office jobs associated with harbor businesses offsite will increase industrial land capacity in the harbor. There are a limited number of jobs with administration functions located on site of harbor businesses and they provide a critical function specific to onsite business operations and industrial activity. Moving office functions would both affect the efficiency of the operation and add cost, and not significantly increase industrial land supply.

#### WWC's Request and Why the Middle-Range Cargo Forecast Matters

The WWC requests that the City Council assume a more robust harbor forecast consistent with data and trends and support for middle-income jobs growth by:

- Targeting infrastructure and brownfield investment and polices to support harbor business expansion
- Expediting permitting
- Addressing conflicting regulations that hinder harbor business investment



The Comprehensive Plan is an aspirational document, a document filled with hopes and dreams for Portland, and a document that addresses and plans for expected growth over the next 20 years. Planning for growth, housing, jobs and people is addressed in every part of this policy document - - except for harbor industrial lands. How can we have a document that addresses growth for everything except for Portland harbor industrial lands?

The Planning Commission recommended a low growth forecast as a policy choice that is not based on data. The Working Waterfront Coalition requests that Council base its decision upon the data, and to make a choice that supports Portland's future, our industrial harbor's future, and our middle-income job future.

Why does this matter so greatly to harbor businesses? It matters because it sends a negative message, the wrong message about what is happening in the harbor. Substantial investment in the harbor has occurred since the Columbia River channel deepening in 2010. More than \$370 million investment has occurred since 2010 - generating an estimated \$4.5 million annually in tax revenues. The tonnage generated from these facilities is significant. Even with the recent loss of container service at the Port of Portland's Terminal 6 the volume in the Portland harbor is about equal to the volume in either Seattle or Tacoma. Portland Harbor tonnage, coupled with the Columbia River tonnage, creates the second largest gateway on the West Coast behind only Los Angeles /Long Beach (Attachment G).

It matters because it will discourage opportunities for future investment by private and public entities. This low forecast will impact our ability to obtain public or private funding for infrastructure, brownfield re-development and even harbor business expansion. All grant and investment concepts require future forecast information as justification for the requested investment. We will not compete well if our own assessment of our future is not positive and below the growth rate established by the region.

And finally, it matters because the harbor employs more than 31,000 men and women and supports 29,000 more employees. If there is any place in this City that leadership should support job growth, it is the Portland Harbor. If you care about the diverse employment opportunities and middle-income wages for Portland residents, then you should ensure that there is adequate growth in the harbor. The WWC urges you to change the Portland Harbor lands forecast back to the "most likely" moderate growth as originally adopted by City council in 2012.

Making a policy choice to adopt a low growth forecast sends the wrong message – that our City does not support harbor businesses and harbor jobs. We are open for business and with your help would like to continue to be so for years to come.

Sincerely.

Selen

Ellen Wax, Executive Director



### Attachments:

Attachment A: WWC Issue Matrix and Recommendations

Attachment B: Impacts of Channel Deepening on the Columbia River and Investment Growth and the Continued Impact of the Portland Harbor

Attachment C: Portland Harbor Workforce Demographics

Attachment D: Economic Linkages from Marine Industrial Businesses

Attachment E: Brownfield/Greenfield Development Cost Comparison Study

Attachment F: City Recommended Projects - TSP Summary Chart

Attachment G: West Coast Ports Tonnage

Established in 2005, the Working Waterfront Coalition, with its extensive knowledge of harbor industry needs and active industry participation, is dedicated to working with its partners to ensure an appropriate balance between environmental concerns and the needs of river-related, river-dependent employers. Portland's Harbor is a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. In addition, WWC members are conscientious stewards of the environment, making significant investments in the harbor consistent with state and federal laws.

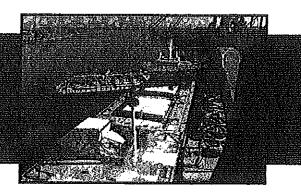
### Attachment A

### City of Portland EOA / Comprehensive Plan Amendments WWC Issue Matrix

Issue	WWC's Position	PSC Recommendation	WWC's Response
1. <u>Cargo Forecast</u> . Should the City assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types?	<ul> <li>Yes.</li> <li>A low-growth cargo forecast is not supported by substantial evidence in the record.</li> <li>A low forecast overlooks historical trends, recent infrastructure improvements and it sends the wrong message to Oregon businesses and the public.</li> <li>A low cargo forecast is inconsistent with region's forecast assumptions</li> </ul>	No. PSC adopted a low cargo forecast due to land supply challenges.	The City Council should adopt a medium-growth forecast for harbor-related tonnage across all cargo types.
2. Brownfield Redevelopment. Should the City assume that a large amount of brownfield redevelopment to industrial uses will occur in the harbor during the 20 year planning period?	<ul> <li>No.</li> <li>Brownfield re-development to industrial is difficult due to time and cost associated with addressing contamination, ownership issues and the market constraints on industrial property (industrial attracts only \$5-7 /foot, regardless of what it costs to bring it to market readiness).</li> </ul>	Yes .PSC assumed 60% brownfield redevelopment in Portland harbor, which is 20% higher than what they assumed in the 2012 adopted EOA.	The City Council should assume a more modest amount of brownfield redevelopment along the harbor during the 20 year planning period, until brownfield redevelopment returns a reasonable amount of land to the industrial supply along the harbor.
3. <u>Unfunded Transportation Improvements</u> . Should the City assume that unfunded transportation improvements will create more cargo efficiency and acrease industrial land capacity along the harbor?	No.  • The city should not take credit for the additional through-put that could result from transportation investments and the elimination of bottlenecks if there isn't certainty (funding or other commitments) around specific rail and road projects that support harbor businesses.	Yes. PSC adopted the TSP with 78% of city resources targeted to active transportation projects instead of improvements to road and rail to support harbor businesses.	The City Council should not assume that improvements to the transportation system will create more cargo efficiency and increase industrial land capacity until such improvements are funded.
4. Office Job Relocation. Should the City assume that office jobs associated with harbor businesses will move elsewhere and increase industrial land capacity along the harbor?	No.  • The admin functions for the harbor businesses are limited and intended to serve the business operations. Moving that function would both affect the efficiency of the operation and add cost.	Yes. PSC low forecast assumes a share of harbor businesses' administration functions move to free up more industrial land in the harbor.	The City Council should not assume that office jobs associated with harbor businesses will relocate and increase industrial land capacity along the harbor, until there is substantial evidence over a period of time that job movement is occurring and land capacity is increasing as a result.
5. Middle Income Jobs. Should the City support additional middle income job growth in the Portland harbor?	<ul> <li>Yes</li> <li>The harbor employs more than 31,000 men and women and supports 29,000 more employees that are largely paid middle income wages. This is a place of job diversity and predominantly middle wages. Job growth here is what our City needs to ensure future work force diversity and wages to afford a reasonable standard of living in Portland.</li> <li>The businesses in the harbor are major employers in this City. More than fifty percent of their procurement of supplies, raw materials, capital goods and services comes from small local businesses. This relationship is meaningful to the neighborhoods and the folks employed as a result.</li> </ul>		The city council should assume a more robust harbor forecast consistent with data and trends and provide support in the Comprehensive Plan for middle income jobs growth by  • Targeting investment and polices to support harbor business expansion  • Expediting permitting  • Addressing conflicting regulations that hinder harbor business investment

### Attachment B

# Investment Growth and the Continued Economic Impact of the Portland Harbor



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

### \$370 Million

Total Investment at the Portland Harbor

### \$4.5 Million

Estimated Increased Annual Tax Revenue from Investments at the Portland Harbor

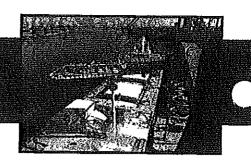
### Investments on the Portland Harbor Since the 2010 Deepening of the Columbia River Channel

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





# Impacts of Channel Deepening on the Columbia River



### IMPORTANCE OF THE SHIPPING CHANNEL

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

### IMPORTANCE OF CHANNEL MAINTENANCE

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

\$370 Million Total Investment in the Portland Harbor

\$1 Billion
Total Investment on the blumbia River Since 2010

\$5.15 Billion
Additional investments Planned for the Columbia River

Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
	Port of Kalama (2014-15)	\$7 million	Rail upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
Vancouver	United Grain Corporation (2012)	\$80 ภายีโดก	Enlarge storage and handling capacity
	West Vancouver Freight Rail Access (2015)	\$228 million	Rail expansion, new loop track, and road improvement
	Tidewater Barge Lines (2015)	\$30 million	Three new tugboats
Portland	Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
	Kinder Morgan Bulk Terminal (2013)	\$10 million	New ship loading facilities
	International Raw Materials (2014)	\$2 milson	Improvements to rail and storage tanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
	Vigor Industrial (2014)	\$50 million	Largest drydock in the US
	Rivergate Road and Rail Improvements (2012)	\$82 million	Improve road and rail access and capacity
	Canpolex - Portland Bulk Terminal (2013)	\$140 million	Increase efficiency of shiploading
	Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Sub Total  Proposed investments		\$1.08 Billion	The state of the s
Longview	Millannium Bulk Terminal (2018)	\$600 million	New coal terminal
	Millennium Bulk Terminal (2018)	\$25 million	Smelter removal and environmental cleanup for new bulk terminal
Kalama	NW Works (2017-18)	\$1.8 billion	New methanol plant
St. Helens Port Westward	Global - Columbia Pacific Bio-Retinery (2018)	\$80 million	Increased storage and rail improvements
•	NW Works (2017-18)	\$1.8 billion	New methanol plant
	Ambre Energy (2018)	\$242 million	Coal transport
ta a	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
/ancouver	Amicooter Flierdy (5019)	2 100 HEROH	usu anhioseverus suo pagniñ (schilles



### Attachment C

# Portland Harbor Workforce Demographics 31,000 jobs

### Bachelor's degree or advanced degree

Portland Harbor workforce

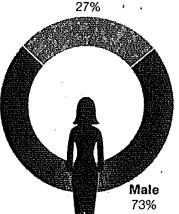
No 76%



### **Gender**Portland Harbor

Portland Harbon workforce

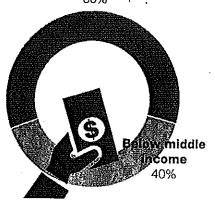
Female



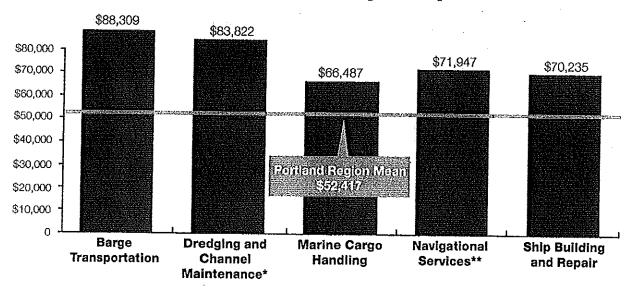
### **Earnings**

Portland Harbor workforce

Middle Income or above 60%



### 2014 Portland MSA wage comparison



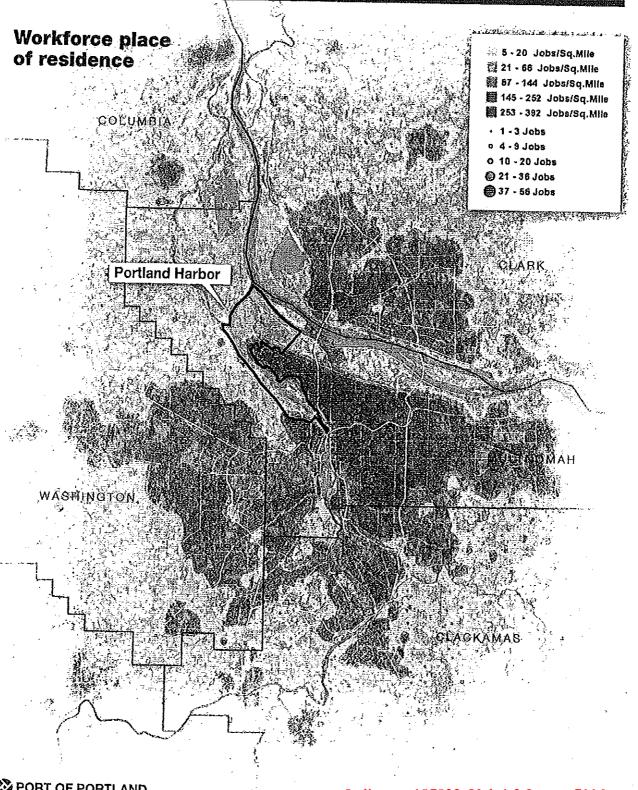
Sources: U.S. Census Bureau, ECONNorthwest, with data from U.S. BLS 2014

Note: Wages chart based on Average Annual Pay for these NAICS cods (from left to right): 483211 (Inland Water Freight Transportation), 237990 (Other Heavy and Civil Engineering Construction), 488320 (Marine Cargo Handfing), 488330 (Navigational Services to Shipping), 336611 (Ship Building and Repairing)

\*2013 data used

"2012 data used (current is not disclosed)

### Portland Harbor Workforce Demographics 31,000 jobs



### Attachment D

### Economic Linkages from Marine Industrial Businesses

### Prepared for:



August, 2013





#### **Executive Summary**

The motivation for conducting this analysis is an interest in better understanding the relationships between large local businesses and the small to medium sized businesses who serve as vendors and suppliers to the larger industries, and to quantify this to the extent possible. Five marine industrial firms (firms located in the Portland Harbor area who rely on access to waterborne transportation modes) were interviewed regarding their spending on direct and indirect materials, services, and capital goods during 2011 and 2012. In order to secure complete information, the firms requested anonymity to protect their competitive interests. The data submitted for analysis by these firms was analyzed by these spend categories as well as by where the spending occurred: in the local area, regionally, nationally, or internationally.

Major areas of research interest included aggregate spend by category and geography, however interesting linkages were demonstrated between marine industrial firms and other enterprises in the Portland market through this research and analysis. For the two calendar years under examination, these five firms spent in excess of \$1.29 billion in procuring materials, capital/plant equipment, and services to produce and deliver their final goods and services to markets near and far. Aggregate spending increased by 5% year-over-year and became significantly more localized, from 49% of spending in 2011 falling within the combined local and regional areas, to 56% in 2012, an increase of over \$63 million with nearly all of that deriving from an increase in local spending (regional spending remained nearly constant).

The sampling represents roughly 10% of the approximately 20,000 direct jobs in the Portland Harbor area (Martin Associates, 2006), thus extending these outcomes as representative of the Harbor area on this basis, one might reasonably conclude that aggregate spending by such firms is on the order of \$6 billion to \$7 billion annually. The reader should also bear in mind that this analysis did not examine firm outlays for direct and indirect labor, taxes, debt service, and so forth — this analysis is limited to examining firm to firm interaction in procurement markets.

Marine industrial firms sampled demonstrated rich, complex connections and economic linkages to a variety of local sectors. Spending occurred in a variety of local markets

as firms procured the services of planning and architecture firms, law firms, engineering firms, trades such as electricians, graphic arts/media production firms, suppliers of advanced manufacturing plant production equipment, transportation companies, suppliers of software and information technology, energy and utilities, and so forth. Many vendors/suppliers of these firms are common among the sample. It is evident that marine industrial firms engaged in a wide array of activities are intrinsically linked to the health of the local and regional economy.

### Marine Industrial Businesses have a significant impact on local business

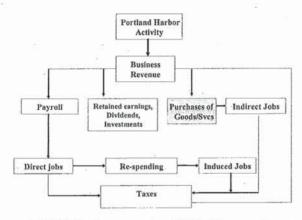
Businesses in the Portland harbor earn revenue from the goods and services they sell. These firms then spend this revenue in a number of ways that can be grouped into just a few buckets (see figure below). The recent analysis for the Portland Business Alliance identifies the economic relationships between these businesses and other sectors of the local economy. The results show that those harbor firms surveyed are reliant upon a variety of local businesses for the goods and services they need every day to keep their businesses running.

The Portland Business Alliance Study looked solely at the purchases of goods and services to see how the revenue from harbor activity flows to other local employers. While much of this spending is local (42% in 2012) creating local jobs [indirect jobs in economic terms], some does leave the region.





#### FLOW OF PORTLAND HARBOR BUSINESSES' REVENUE THROUGH THE LOCAL ECONOMY



- In 2012 the five firms surveyed spent \$660 million on goods and services, an amount nearly equal to the regional investment in Tri-Met's new orange line (half the total construction cost).
- Of this re-spending by these harbor businesses more than 40 percent of it (\$280 million, the equivalent of 3.5 Rose Festivals) is infused into the local economy.
- More than 80 percent of the re-spending by these harbor firms locally (\$230 million) is
  in the areas of raw materials and components, and professional services, maintenance,
  catering and other services.
- Other expenditures include machinery, spare parts, and construction materials.
- Common among the firms surveyed were 288 local employers from whom they
  purchase goods and services (see Appendix 3 for a sample listing of those firms). Of
  these, 30 are suppliers of capital goods, 28 are suppliers of direct materials, 115 are
  suppliers of indirect materials, and 114 are providers of services.

Examples of local employers from whom subject firms purchase goods or services:

· Catering/Food and Lodging: Elephant's Delicatessen, Oxford Inn & Suites



- Construction, Equipment, Maintenance, and Repair: Buckaroo Thermoseal, Christenson Electric, Milwaukie Crane & Equipment, Rodda Paint
- Manufacturing Inputs, Components, and Services: Albina Pipe Bending, Evraz, Swan Island Sandblasting, West Coast Metals,
- <u>Supplies and Parts</u>: Baxter Auto Parts, General Tool & Supply, Parr Lumber, Vancouver Bolt & Supply
- Technology/Communications: Centurylink, Integra Telecom
- <u>Transportation Equipment, Services, and Repair</u>: FedEx, Les Schwab, Oak Harbor Freight Lines, Oregon Tractor, Redmond Heavy Hauling
- Miscellaneous: Elmer's Flag and Banner, Legacy Laboratory Services, Portland Community College

#### Introduction

In March, 2012, Martin Associates (Lancaster, PA) prepared a report for the Port of Portland entitled, "The Local and Regional Economic Impacts of the Port of Portland, 2011."

That report summarized three separate studies, including:

- The Economic Impacts of the Portland Harbor
- The Economic Impacts of the Real Estate Tenants of the Port's Business and Industrial Parks
- Economic Impacts of PDX and General Aviation Airports

As follow up work, Martin Associates produced a report in July, 2012 entitled, "The Local and Regional Economic Impacts of Portland Working Harbor, 2011." This latter report measured impacts related to industrial land use in the Portland Harbor such as employment (direct, induced, and indirect), personal income, direct business revenue, and tax revenue (state, county, and local).

The Portland Business Alliance retained One Northwest Consulting, LLC (ONWC) to recruit a sample cohort of firms in the Portland Harbor area engaged in marine industrial activity, generally defined as enterprises whose proximity to and connection with marine infrastructure for transportation purposes is "business critical". ONWC was tasked with conducting

an analysis of annual procurement spend and performing analysis of the economic links between the sample cohort and local enterprise, including various small and mid-sized businesses in common among the sampling distribution as vendors. Of interest was the categorization of procurement expenditures by type or purpose, and the geographic location of the associated vendors. Procurement expenditures were categorized into four major areas:

- Direct materials defined as material inputs to final goods and services; this can be unprocessed raw steel, energy such as electricity and natural gas, power plants/engines and components such as pumps and motors, finished steel and metal alloy products, and propulsion and navigation equipment and related components
- Capital goods defined as investment on plant, property, and equipment; examples include
  investments in IT systems (both hardware and software systems), production machinery
  such as plasma cutting tables and punches, buildings and structures, and mobile machinery
  for material handling such as forklifts and excavators
- Indirect materials defined as items indirectly associated with final goods and services, such as supplies not tied to a single specific project or output; this includes fasteners and bolts, bulk paints and coatings, welding supplies, production machinery wear parts, valves and fittings, lumber and pallets used for packing and shipping, and some tools and related parts/components
- Services which includes professional services, skilled trade services, repairs, and
  maintenance services; examples of services procured include architecture, planning,
  engineering, law, environmental consulting and testing, transportation, graphic arts, media
  production, public affairs/advertising, accounting and financial services, and skilled
  labor/trades

Procurement expenditure was also segmented geographically into one of four categories:

- Local comprised of Clackamas, Multnomah, and Washington counties in Oregon, and Clark county in Washington
- Regional comprised of the remaining areas of Oregon and Washington, excluding the aforementioned local area



- National comprised of the United States and Its territories, excluding Oregon and Washington
- International comprised of all non-US spend

#### Sample Recruitment and Description

Portland Business Alliance suggested a list of firms to participate in the study on the basis of location in Portland's industrial harbor area and related marine industrial land use, as well as likelihood of willingness to share proprietary business information for the purpose of the study effort. Firms expressed a willingness to participate and were generally supportive of this analysis, but willingness for direct attribution and identification as study participants varied significantly among firms, with strong tendency towards anonymity to protect individual company's competiveness. The data are therefore reported in aggregate, illustrating general procurement tendencies and associated economic impacts across firms without singling out a single participant.

General descriptions of firm business activity include: heavy civil and marine construction; marine vessel repair and construction/manufacture; steel fabrication; metals processing; bulk material handling; general manufacturing; steel/metals products manufacturing; marine terminal operations. Cohort firms are located on large lot, industrial lands characterized as marine and rail transportation dependent, and also relying on freight truck/highway access.

#### Data Collection, Processing, and Analysis

The five participant firms were asked to submit their expenditures on procurements (raw materials, utilities, work-in-process, finished goods purchases, professional services, skilled trade services, durables, non-durables, materials, supplies, capital goods, etc.) for calendar years 2011 and 2012. This approach excludes firm expenditure on direct and indirect labor, taxes, depreciation, amortization, and payments to shareholders such as dividends. This is important in examining firm to firm interaction, particularly in establishing the local linkages between firms associated with procurement activities.

In geographically segmenting the data, an issue in determining whether spend qualified as local versus a different category was encountered. Many firms purchase capital goods, services, materials and supplies from national and international firms, remitting payment to a non-local location such as a central accounts receivable processing center associated with a particular vendor. However, many of these firms provide services to customers via a local presence in the form of a distributor or local warehouse, with local employees and representatives. This is done in order to reduce fulfillment cycle times and provide competitive levels of responsiveness. Where a vendor possessed such a local presence, the associated procurement spend was categorized as local, versus another geographic designation.

Another point to bear in mind is that one firm's direct material is another firm's capital good. For instance, a firm using concrete to construct a structure as a final good for a customer considers the concrete to be a direct material. Spending on concrete by the customer would be considered a capital good or capital expense were they to procure it themselves. Thus, perspective is important, particularly considering the rich complexity of the economic linkages of these firms, as well as the self-organizing, symbiotic relationships which firms have developed with each other over time. Some firms' business is centered on a continuous process such as one might envision in the production of paint in bulk liquid form, whereas other firms employ a job costing approach, such as what one would expect from an engineering and construction firm contracted to build a structure. The nuance between these is significant, as it is much easier to consider job costing formats using discrete boundaries whereas in continuous process production this may be extremely difficult. The emerging level of detail is reflected in the procurement data: job costing format firms' data was substantially more detailed and granular, making the distinction between direct and indirect materials much simpler.

Participant firms submitted data in a variety of formats, primarily submitting raw data in Microsoft Excel, having queried a purchasing system or equivalent to generate the data. At a minimum, firms submitted the vendor legal name and related expenditure amount for calendar years 2011 and 2012. Aggregate results are reported in Appendix 1. Generalizability of these results is limited due to the small sample size, however this sampling represents approximately



10% of the direct employment in the Portland Harbor area (based on the findings of Martin Associates' July, 2012 report).

#### **Dynamic Structures**

When a firm receives revenue, that revenue is employed by the firm in a variety of uses which establish the linkages between the subject firm, firms considered vendors to the subject firm, and other economic sectors. Consider the illustration in Appendix 2. Firm revenues flow to the following categories:

- Cost of goods such as direct and indirect materials, and certain services
- Administrative expenses known as SG&A (selling, general, and administrative) which
  include payment of wages to management and executives, philanthropic activities,
  some capital expenditures, and some services which are difficult to tie to the production
  of specific goods and services (SG&A tends to be a large "bucket" for expense items
  which do not easily lend themselves to division among units of output)
- · Direct and indirect labor
- Interest/debt service
- Transfers to shareholders (known as dividends)
- Retained earnings
- · Payment of taxes
- Depreciation and amortization charges

The connection between firm "financial health" and the well-being of the public sector can be demonstrated by examining the flows and linkages (the shaded box on Exhibit II): for this purpose we will call the system of linkages "Cycle of Firm's Revenue".

Philanthropy clearly constitutes a public good. Employee wages (direct, indirect, and SG&A) drive personal income, which bears strong linkages to the public sector. Additionally, there is likely a propagation mechanism in financial markets (hypothesized here) connecting a firm's debt service (interest payments) and distributions to shareholders (dividend payments) to societal well-being. Retirement investment accounts and portfolios such as 401k and 457 plans, and Public Employee Retirement Systems (PERS) investment generally hold

shares in publicly-traded firms (which distribute dividends to shareholders and whose stock value growth benefits shareholders) and financial firms (who received debt service payments from firms, both privately-held and publicly-traded). It seems reasonable to conclude that good firm financial performance is beneficial in this way to retirement systems of both public sector and private sector workers.

Of interest in this research is the connection to other firms, considered vendors or suppliers to the subject firm, from whom the subject firm procures direct and indirect materials, services, and capital goods. A portion of the subject firm's revenue flows to the vendor/supplier firms, whose revenue also flows through the cycle illustrated. This cycle repeats ad infinitum.

The public sector derives revenues through the payment of taxes on corporate income and other things such as real property, personal income, and taxes on dividends and interest. These revenues are used to support public services, fund schools, and build infrastructure. A firm's decision to invest in their capital stock in a given area depends not only on market conditions, but local and regional "business climate" conditions, largely signaled on a community's willingness to invest in infrastructure, education, and the level and efficiency of public services provided. Weak signals in these areas do not inspire confidence in firms' willingness to invest in a particular area, and the variation in the quality and strength of these market signals given by communities largely constitutes the competitive environment in which states and municipalities strive to attract capital investment.

#### Discussion

Linkages to smaller enterprises were readily evident through an analysis of the data.

Large industrial firms avail themselves of professional services as well as services of skilled trades, primarily locally sourced (except in somewhat rare cases where highly specialized expertise was required). Examples of professional services procured include: technical engineering (information technology, civil, and structural), architecture, environmental consulting/engineering, law, public accounting, human resources/training, occupational health and safety consulting, financial services, and general business consulting/advisory (such as business process engineering). Skilled trade services procured include:

plumbing, electrical, general construction (earth-moving and excavating), specialty machining and tooling, sheet metal, HVAC/refrigeration, and mechanical repair and maintenance services.

Firms sampled also availed themselves of the services of local small businesses as varied as: sign and awning businesses; freight transportation services (by water and truck); restaurants, delicatessens, and catering; equipment rental; mail services and printing; florists; and site security.

Examples of Service sector firms commonly engaged by the subject firms include: Bernert Barge Lines, Carlson Testing Inc., Cascade Architectural & Engineering, Integra Telecom, and Morgan Industrial Inc.

Local procurement of raw materials, intermediate production inputs, and capital goods were also evident in the data. Examples include:

- Steel and other metals purchased from local steel service centers, mills, and other local sources
- Concrete purchased from local suppliers for capital projects to construct new plant and equipment, or in the case of the marine-related construction firm surveyed – as an input to delivery of a final good/service
- Fabricated/machined steel parts and components sourced locally for capital projects and as intermediate inputs to final goods and services
- Machinery, plant equipment, power systems, and material handling equipment (all capital goods) purchased from a local manufacturer, dealer, or distributor

Firms commonly engaged as vendors among the sample include: Evraz Oregon Steel Mills Inc., Farwest Steel Corp., LaGrand industrial Supply Co., Oregon Ironworks Inc., and Pape Material Handling Inc.

Geographic analysis of the spending data revealed that firms demonstrate a preference to working with firms in the local and regional area due to proximity, ease of obtaining ongoing service, and the value of enlarging ties and relationships to the local market and community. Where spending occurred nationally and internationally, this was typically because the goods and services sought were not locally available. A large amount of the international service spending, for example, consisted in payments to foreign flagged marine vessels and

companies for export transportation and logistics services. Additionally, certain legal and technical services were procured by the firms in 2011 – 2012 which comprises highly-skilled expertise not locally available. Some raw material components are highly specialized and not manufactured locally, such as brake systems parts for transportation equipment. Likewise, certain capital goods are produced only in select areas in the national and international geography, such as specialized manufacturing machinery, software systems, technical and navigational components of marine vessels, environmental control systems for storm water treatment and management, and power plant/engine equipment and components.

Roughly 80% of the indirect materials these firms purchased were from local distributors and suppliers. Some examples of these include: safety supplies, paint and coatings, bolts and fasteners, industrial cleaning supplies, fuels and gases (to operate equipment), welding supplies and gases, hardware, hand/power tools, coffee and drinking water service, employee gifts and recognition incentives, auto and equipment parts, restaurant and food services, and office supplies. Expenditures in this area by these five firms alone amounts to tens of millions of dollars annually.

Though only two years of data were provided and analyzed, a notable year over year increase in spending on capital goods, indirect materials, and services stood out. The rate of change in capital goods spending was much lower than that seen in indirect materials and services, an expected result considering the longer time frames involved in planning and executing capital spend. Capital spend is considered less elastic in the short-run (i.e. less than one year), though long run capital spending trends respond, with some lag, to market conditions. This should be an intuitive result: many capital projects in the industrial sector are multi-year projects, and once committed generally follow through to completion. This being the case, it takes a longer period of time for firms to respond to both favorable and unfavorable market conditions as reflected in capital spending. Spending on direct and indirect materials is much more responsive in the short run to business cycle changes and perturbations, regardless of the direction of the change (increase in output or decrease).

An important consideration with respect to direct materials is seen in the proportion sourced outside of the local area. Considering that direct materials (or raw materials)

are largely imported into the local market (about two-thirds originates outside of the local area) for the purposes of value-added manufacturing in the production of final goods and services, this seems to speak to the importance of robust transportation infrastructure and the public investment required to facilitate efficient movement of these goods. Additionally, because they constitute the raw material inputs to final goods and services, they are generally of significantly lower value relative to the final good or service, and thus are highly sensitive to changes in transportation costs, such as are induced by roadway congestion and volatility in energy markets (rapidly rising fuel costs).

#### Conclusion

Five marine industrial firms were surveyed, which represent approximately 10% of direct jobs in the Portland Harbor. Wages for employment in Portland's marine industrial areas associated with trade, transportation, and manufacturing tends to be about 5% higher than the average wage level in the Portland region (Port of Portland Columbia Multimodal Corridor Study, 2012). Key findings include:

- Much of the procurement spending of these firms is in the local area (about 42% in 2012), with an additional substantial proportion coming from Oregon and Washington outside of the local area (14% in 2012), helping to drive job creation locally and regionally.
- Businesses in the Portland Harbor area are characterized as having profound, complex long-term economic connections to a variety of local firms including:
  - o Planning and architecture firms
  - o Law firms
  - o Engineering firms
  - Skilled trades such as electricians
  - Graphic arts/media production firms
  - Suppliers of advanced manufacturing plant production equipment
  - o Transportation companies
  - o Suppliers of software and information technology

#### o Energy and utilities

- Firms purchase capital goods, services, materials and supplies from national and
  international firms, many of whom maintain a local presence such as a distributor,
  service center, of local warehouse, with local employees and representatives (in many
  such cases, firms remit payment to a non-local location such as a central accounts
  receivable processing center).
- Geographic analysis of the spending data revealed that firms demonstrate a preference
  to working with firms in the local and regional area due to proximity, ease of obtaining
  ongoing service, and the value of enlarging ties and relationships to the local market and
  community. In this way, firms form vertically-related clusters of industrial sectors,
  achieving scale and efficiency through the colocation of services and specialization of
  related activities.
- The activity of marine industrial firms in Portland in producing final goods and services generates hundreds of millions of dollars of revenue for local businesses annually through economic linkages.

Firms are competing in an increasingly volatile, uncertain global marketplace. Policy stability and certainty results in a public good as beneficiaries of the firms' economic activity. The rate of local spending grew faster than the change in overall spending year-over-year, suggesting that firms find efficiency in proximity and other aspects of local market procurement.

The activity of marine industrial firms in Portland in producing final goods and services generates hundreds of millions of dollars of revenue for local businesses annually through economic linkages. The ability of these key industrial firms to locate in Portland and achieve the necessary scale to compete globally derives from an interactivity of production factors, including land (appropriate sites to conduct business activity, complete with amenities and site characteristics such as water, rail, and highway access), labor (skilled professional and trades), and capital.

Portland (and regional) residents and businesses benefit from the many healthy marine industrial firms located within the harbor. Annually, these firms spend hundreds of millions of



dollars on goods and services with local businesses. The study confirmed that there is a strong economic linkage between big and small firms.

This analysis also illustrates the importance of considering indirect effects of public policy, in particular as they apply to the trade-offs between public investment in industrial reinvestment and expansion. The impact of land use or other policies and their specific impact on industrial development decisions have wider, aggregate economic implications which should be given consideration. When the effects of industrial development are considered in terms of procurement linkages, personal income, and employment (direct, induced, and indirect), an understanding of a significantly interlinked, interdependent economy emerges.



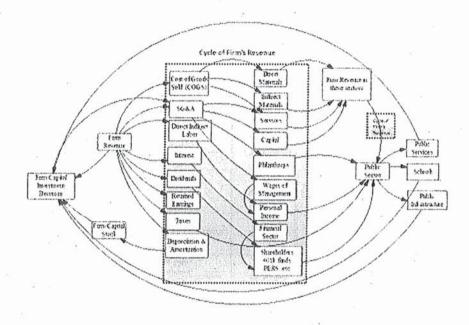
Appendix 1
Aggregate Procurement Data of Sample

	2012 Spe	nd	2011 Spend		
Direct Materials	Amount	Proportion	Amount	Proportion	
Local	\$121,676,718.27	31%	\$126,247,855.38	27%	
Regional	\$55,540,720.46	14%	\$73,117,590.90	16%	
National	\$160,258,221.42	41%	\$201,088,333.52	44%	
International	\$56,275,305.72	14%	\$59,991,510.37	13%	
TOTAL	\$393,750,965.87	100%	\$460,445,290.17	100%	
Capital Goods					
Local	\$8,707,653.10	45%	\$8,673,134.40	60%	
Regional	\$2,761,046.06	14%	\$2,531,092.16	18%	
National	\$7,205,226.91	37%	\$2,908,180.49	20%	
International	\$676,690.29	3%	\$307,011.19	2%	
TOTAL	\$19,350,616.36	100%	\$14,419,418.24	100%	
Indirect Materials	A 50 844		N 0		
Local	\$40,693,241.42	82%	\$21,232,594.02	79%	
Regional	\$4,273,852.99	9%	\$2,461,732.39	9%	
National	\$4,690,663.32	9%	\$3,166,615.53	12%	
International	\$184,311.79	0%	\$77,576.18	0%	
TOTAL	\$49,842,069.52	100%	\$26,938,518.12	100%	
Services Procured					
Local	\$108,426,986.85	54%	\$60,560,288.04	48%	
Regional	\$33,362,383.58	17%	\$17,202,489.93	14%	
National	\$35,704,977.60	18%	\$25,079,799.57	20%	
International	\$21,573,835.04	11%	\$24,191,778.90	19%	
TOTAL	\$199,068,183.07	100%	\$127,034,356.44	100%	
AGGREGATE SPEND			(4		
Local	\$279,504,599.64	42%	\$216,713,871.84	34%	
Regional	\$95,938,003.09	14%	\$95,312,905.38	15%	
National	\$207,859,089.25	31%	\$232,242,929.11	37%	
International	\$78,710,142.84	12%	\$84,567,876.64	13%	
TOTAL	\$662,011,834.82	100%	\$628,837,582.97	100%	

Notes on data processing: The level of data processing performed by ONWC varied based on a respective firm's reporting capability robustness. One firm supplied summary data in the final format, as this was relatively simple for them to generate. In one case, a firm supplied ONWC with annual 1099 tax reporting data in Adobe pdf format, requiring the data to be extracted and re-entered into Excel format. Using internet search engines, each vendor's legal name, line of business, and geographic location(s) were ascertained. Perfect accuracy is not assumed as a result of this data analysis process.

Appendix 2

System Dynamics Model of Procurement



Appendix 3

Table Listing Examples of Local Businesses in Common among Sample

Company Name	Street	City State	<u>Zip</u>	Description	Category
ACME Construction Supply	330 SE Salmon St	Portland, OR	97214	Headquartered in Portland with multiple locations in different states; Sells power tools and building supplies	Indirect Materials
Advanced Finishing Systems	2304 N Killingsworth St	Portland, OR	97217	Headquartered in Portland with additional location in Kent, WA; sales and service of equipment and supplies for industrial coating, sealing, and finishing processes; designs and builds custom finishing equipment and systems; general contractor for on site building and installation of systems	Capital Goods
Ahern Rentals	3836 NE Columbia Blvd	Portland, OR	97211	Headquartered in Las Vegas, NV with several branch locations in many states; equipment rental company serving commercial, residential, industrial, and public market segments	Services
Air Liquide	6529 NW Front Ave	Portland, OR	97210	International supplier of industrial gases headquartered in France with presence in 80 countries; two local branches	Direct Materials
Airgas	3632 NE Columbia Blvd	Portland, OR		Supplier/distributor of industrial gases, machinery, tools, and supplies headquartered in Radnor Township, PA; several local branches	Indirect Materials
Alaska Copper & Brass	2440 SE Raymond St	Portland, OR	97202	Headquartered in Kent, WA with local location and other branch locations in CA and BC, Canada; supplier of metal products and fabrication services	Direct Materials
Albina Pipe Bending Co	12080 SW Myslony St	Tualatin, OR	97062	Single location company headquartered in Tualatin, OR; supplier of bent steel, metal tube bending, and pipe bending products and services	Services
Alliance Steel Distributors	3000 SE Hidden Way	Vancouver, WA	98661	Steel distributor/service center with single location/headquarters in Vancouver, WA	Direct Materials
Allied Electronics	6700 SW 105th Ave	Beaverton, OR	97008	Distributor of electronic components and electromechanical products with over 50 locations in US and Canada; headquarters in Ft. Worth, TX	Indirect Materials
AMEC	7376 SW Durham Road	Portland, OR	97224	Global engineering, project management, and consultancy company headquartered in London, UK with local office	Services



American Equipment Co	89 NE Columbia Blvd	Portland, OR	97211	Sales, rental, and service of industrial cleaning equipment such as pressure washers, parts washers, and steam cleaners; single location/headquarters in Portland, OR	Indirect Materials
American Metal Cleaning	9940 N Vancouver Way	Portland, OR	97217	Single location company headquartered in Portland, OR; provides industrial metal cleaning, stripping, and recovery services	Services
American Steel	525 S Sequoia Pkwy	Canby, OR	97013	With multiple locations in OR, WA, and CA with headquarters in Canby, OR, company is a metals processor and distributor/service center	Direct Materials
Anixter Inc	5107 NE 158th Ave	Portland, OR	97230	Global company in over 50 countries with two local locations headquartered in Glenview, IL; supplier of communications and security products, electrical and electronic wire and cable, fasteners, and components	Indirect Materials
Apex Laboratories	12232 SW Garden Pl	Portland, OR	97223	Chemical, mechanical, metallurgical, and environmental testing services provider located in Portland, OR	Services
Applied Industrial Technologies	5041 NW Front Ave	Portland, OR	97210	Global supplier/distributor of industrial products and supplies headquartered in Cleveland, OH	Indirect Materials
Argo International	13481 SE Johnson Rd	Portland, OR	97222	Giobal supplier/distributor of new units and spare parts for industrial motors, drives, controls, and pumps headquartered in New York, NY with a local office	Indirect Materials
Arjae Sheet Metal	8545 SE McLoughlin Blvd	Portland, OR	97222	Sole proprietorship in Portland, OR; sheet metal fabrication, commercial and industrial installation, HVAC/R service and repair	Direct Materials
Associated Hose Products	6326 NE Columbia Blvd	Portland, OR	97218	Single location distributor of industrial hose, fitting, and assembly products	Indirect Materials
Atlantic & Pacific Freightways	3001 SE Columbia Way	Vancouver, WA	98661	Locally-based truck transportation and logistics company operating throughout the US and Canada	Services
Atlasta Lock & Safe Co.	702 SE Grand Ave	Portland, OR	97214	Single location business providing locksmith services	Services
Batteries Plus	4812 SE 82nd Ave	Portland, OR	97266	Supplier of batteries and light bulbs with franchise locations in 46 states and Puerto Rico; multiple local locations; headquartered in Hartland, WI	Indirect Materials
Baxter Auto Parts	9444 N Whitaker Rd	Portland, OR	97217	Auto parts supplier with multiple locations in OR, WA, and CA	Indirect Materials

Beckwith & Kuffel Inc.	1614 NE 99th St	Vancouver, WA	98665	Offices in Seattle, WA, Vancouver, WA, and Spokane, WA; sales and service for industrial pumps, compressors, and blowers	Capital Goods
Benchmark Industrial Services	2245 NW Suffolk St	Portland, OR	97210	Industrial contractor providing services from equipment maintenance to complex capital projects with offices in Portland, OR, Seattle, WA, and Spokane, WA	Services
Bernert Barge Lines	421 High Street	Oregon City, OR	97045	Provider of inland waterway transportation services (tug and barge) with local history dating back to the late 1800s	Services
BestBuy	1772 Jantzen Beach Center	Portland, OR	97217	International electronics retailer headquartered in Richfield, MN	Indirect Materials
Blast Cleaning Services	21720 SW Oregon St	Sherwood, OR	97140	Single location contractor/manufacturer supplying and constructing blast cleaning systems (blastrooms, shotblast machines, automated airblast machines, shot peening machines, etc.)	Capital Goods
BNSF Railway	3930 NW Yeon Ave	Portland, OR	97210	Transcontinental railroad transportation and logistics service provider headquartered in Ft. Worth, TX	Services
Brake Systems Inc	2221 NE Hoyt St	Portland, OR	97232	Single location manufacturer, remanufacturer, distributor and engineer of brakes, valves, compressors, and related products and equipment	Indirect Materials
Branom Instrument Co	8435 N Interstate PI	Portland, OR	97217	Seattle, WA headqurtered supplier/servicer of products and services for industrial and municipal testing, control, monitoring, and calibration instruments and equipment; locations in multiple states	Indirect Materials
Buckaroo Thermoseal Inc	5410 NE 109th Ave	Portland, OR	97220	Single location roofing contractor	Services
Cal-Cert Co	6709 SE Lake Rd	Portland, OR	97222	Portland, OR based provider of calibration certification equipment and services	Services
CalPortland	1050 N River St	Portland, OR	97210	Glendora, CA headquartered supplier of cement, concrete, aggregates, asphalt, building products, and construction services with multiple local locations	Direct Materials
Carlson Testing Inc	8430 SW Hunziker Rd	Portland, OR	97223	Tigard, OR headquartered construction inspection, materials testing, and geotechnical engineering services company with branch office locations in Oregon	Services
Carson Oil Co	3125 NW 35th Ave	Portland, OR	97210	Portland, OR headquartered supplier of petroleum products and services with branch offices throughout Oregon	Indirect Materials



ride Architectural & Engineering	8916 NE Alderwood Rd	Portland, OR	97220	Seattle, WA based company providing equipment, supplies, reprographics and related support for the architectural and engineering sectors	Services
Cascade Columbia Distribution	14200 SW Tualatin Sherwood Rd	Sherwood, OR	97140	With offices in Sherwood, OR, Seattle, WA, and Spokane, WA, company provides chemicals and related supplies and equipment with expertise in aerospace, compounding, electronics, food manufacturing, metal plating, and water treatment industries	Indirect Materials
Cascade Controls	19785 NE San Rafael St	Portland, OR	97230	Portland, OR based contract manufacturer of engineered production systems and controls for semiconductor, agriculture, food processing, marine, crane and hoist, municipal, petrochemical, forest products, power generation, solar, wind, recycling, and soil/water reclamation industries	Services
Cascade Pipe & Supply	2519 N Hayden Island Dr	Portland, OR	97217	Bakersfield, CA based supplier, distributor, and manufacturer of industrial pipe, fittings, and supplies	Direct Materials
Centurylink	2201 NE Lloyd Blvd	Portland, OR	97232	Monroe, LA headqurtered telecommunications service provider	Services
C o Inc	4222 NE Columbia Blvd	Portland, OR	97218	Single location company providing sales and rental of construction equipment and supplies	Capital Goods
Chapel Steel Co	4200 NW Yeon Ave	Portland, OR	97210	Steel service center based in Philadelphia, PA with locations in US and Canada	Direct Materials
Chas H Day Co Inc	602 SE 11th Ave	Portland, OR	97214	Single location business providing sales and service of electric and pneumatic tools and supplies	Indirect Materials
Christenson Electric Inc	111 SW Columbia St	Portland, OR	97201	Portland, OR based electrical contractor	Services
Christenson Oil	3865 NW St Helens Rd	Portland, OR	97210	Single location supplier of petroleum products and services	Indirect Materials
City Club of Portland	901 SW Washington St	Portland, OR	97205	Nonprofit education and research based civic organization	Services
Coast Crane & Equipment Co	1601 NE Columbia Blvd	Portland, OR	97218	Sales, rental, and service of industrial cranes and equipment with locations throughout the Western US, including Alaska and Hawaii	Capital Goods
Conrey Electric	1903 SE 7th Ave	Portland, OR	97214	Single location sales and service provider of electric motors	Capital Goods
Consolidated Electrical Distributors	2555 NW Nicolai St	Portland, OR	97210	Single location supplier of electrical components and supplies	Indirect Materials
Continental Western Corp	12021 NE Erin Way	Portland, OR	97220	San Leandro, CA based distributor of of industrial supplies	Indirect Materials



Contractor Plan Center	5468 SE International Way	Milwaukie, OR	97222	Milwaukie, OR based membership organization connecting contractors, owners, architects, manufacturers, and suppliers to facilitate project bidding	Services
Control Factors Inc	3271 NE Cleveland Ave	Portland, OR	97030	Manufacturers representative and distributor located in Gresham, OR of process flow and filtration/separation components	Indirect Materials
Cook Engine Co	530 NE Tomahawk Island Dr	Portland, OR	97217	Marine engine repair and service provider	Indirect Materials
Copiers NW Inc	11000 SW 11th St	Portland, OR	97005	Provider of copy and printing equipment, software solutions, and services based in Seattle, WA	Capital Goods
Cummins Northwest Inc	4711 N Basin Ave	Portland, OR	97217	Distributor and supplier of Cummins engine products and services; Portland, OR based with locations throughout the Pacific NW and Alaska	Indirect Materials
Curran Coll Spring Inc	9265 SW 5th St	Wilsonville, OR	97070	Manufacturer of custom industrial torsion springs, extension springs, and compression springs	Direct Materials
Daily Journal of Commerce	921 S.W. Washington St.	Portland, OR	97205	Supplier of media services	Services
DEX Media West LLC	10200 SW Greenburg Rd	Portland, OR	97223	Supplier of media services	Services
DHL	15509 NE Airport Way	Portland, OR	97230	Worldwide transportation and logistics services provider	Services
Direct Transport Inc	27600 SW 95th Ave	Wilsonville, OR	97070	Provider of regional courier and freight services	Services
Documart	3310 NW Yeon Ave	Portland, OR	97210	Supplier of print services	Services
Don Thomas Petroleum Inc	2727 NW St Helens Rd	Portland, OR	97210	Petroleum, fuel, oil, and lubricant distributor in the Portland Metro area since	Indirect Materials
Earle M Jorgensen Co	16440 N.E. Mason Street	Portland, OR	97230	Supplier/service center of steel and aluminum bar, tubing, and plate; headquartered in Lynwood, CA	Direct Materials
EC Powersystems	1805 NW 21st Ave	Portland, OR	97209	Portland, OR based sales, rentals, and service of generators and engines	Capital Goods
EJ Bartells Co	19039 NE Portal Way	Portland, OR	97230	Distributor, fabricator, manufacturer and refractory services contractor in the Western U.S., and insulation services contractor in the Pacific NW; based in Renton, WA	Services
Elephant's Delicatessen	115 NW 22nd Ave	Portland, OR	97210	Catering and food services	Services
Elmer's Flag & Banner	1332 NE Broadway St	Portland, OR	97232	Manufacturer and distributor of flags, banners, and related suppliesand materials	Services



ald Services	1300 W 12th St	Vancouver, WA	98660	Seattle, WA based supplier of processing and recycling services of wastewater and oil products	Services
Empire Rubber & Supply	80 SE Taylor St	Portland, OR	97214	Supplier and installer of conveyor belt and related industrial goods with locations in Portland, OR and Pasco, WA	Indirect Materials
EOFF Electric Co	1624 SE Grand Ave	Portland, OR	97214	Provider of electrical supplies, components, and equipment based in Portland, OR with locations throughout OR and SW WA	Indirect Materials
ERM West Inc	1001 SW 5th Ave	Portland, OR	972043	Global provider of environmental, health, safety, risk, and social consulting services	Services
Evraz Inc	14400 N Rivergate Blvd	Portland, OR	97203	Chicago, It. based international producer of steel products with pipe, tube, and plate rolling mills in Portland, OR	Direct Materials
F&F Grinding Inc	9442 N Ramsey Blvd	Portland, OR	97203	Single location provider of grinding, sawing, burning, and cutting services	Services
Farwest Steel Corp	3703 NW Gateway Ave	Vancouver, WA	98660	Eugene, OR based steel service and fabrication/manufacturing center	Direct Materials
Fastenal Co	308 SE Taylor St	Portland, OR	97214	Winona, MN based supplier of industrial products and services	Indirect Materials
Fastsigns	10309 SE 82nd Ave	Portland, OR	97086	Provider of signs, banners, and vehicle graphics based in Carrollton, TX	Indirect Materials
Faulkner / notive Electric	1831 NW 28TH Ave	Portland, OR	97210	Single location car parts and accessories manufacturing services provider	Services
FE Bennett	739 NE Broadway St	Portland, OR	97232	Portland, OR based vendor of material handling equipment and supplies	Indirect Materials
FedEx	4344 N Port Center Way	Portland, OR	97217	Global transportation and logistics provider based in Memphis, TN	Services
Ferguson Enterprises Inc	2121 N Columbia Blvd	Portland, OR	97217	Plumbing and building products supplier based in Newport News, VA; subsidiary of UK-based Wolseley	Indirect Materials
Ferrellgas	641 NE Lombard St	Portland, OR	97211	Provider of propane distribution and services headquartered in Overland Park, KS	Indirect Materials
Finishing Technologies	5924 NE 112th Ave	Portland, OR	97220	Portland, OR based technical finishing equipment distributor and servicer	Capital Goods
First Response Systems	4970 SW Griffith Dr	Beaverton, OR	97005	Alarm, security, and surveillance services provider based in Beaverton, OR	Services
Fisherman's Marine Supply	901 N Columbia Blvd	Portland, OR	97217	Marine equipment and supplies provider based in the Portland, OR area with three local facilities	Indirect Materials
Fluid Connector Products Inc	2929 NW 31st Ave	Portland, OR	97210	Portland, OR based provider of hydraulic systems equipment and supplies	Indirect Materials
Forklift Services of Oregon	7001 NE Columbia Blvd	Portland, OR	97218	New and used forklift sales, rental, and service	Capital Goods



Fred Meyer	3800 SE 22nd Ave	Portland, OR	97202	Retail department store chain; subsidiary of Cincinnati, OH based Kroger Co.	Indirect Materials
Galvanizers Company	2406 NW 30th Ave	Portland, OR	97210	Portland, OR based galvanizing manufacturer	Services
Gasket Technology Inc.	23605 NE Halsey St	Troutdale, OR	97060	Troutdale, OR based manufacturer of industrial gaskets	Indirect Materials
General Tool & Supply Co	2705 NW Nicolai St	Portland, OR	97210	Supplier of industrial bearings, hydraulics, material handling, and other related supplies and services	Indirect Materials
Grabber Construction Products	13011 SE Jennifer Street	Clackamas, OR	97015	International distributor and manufacturer of fasteners, tools, equipment, and building materials for construction industry; based in Alpine, UT	Indirect Materials
Grainger	6335 N Basin Ave	Portland, OR	97217	Global supplier of maintenance, repair and operating products based in Lake Forest, IL	Indirect Materials
Graybar Electric Co Inc	901 NE 60th Ave	Portland, OR	97213	St. Louis, MO based supply chain management services provider and distributor of high-quality components, equipment and materials for the electrical and telecommunications industries	Indirect Materials
Green Transfer & Storage	10099 N Portland Rd	Portland, OR	97203	Warehousing, transloading, storage, trucking and logistics provider	Services
Gresham Transfer Inc	24001 NE Sandy Blvd	Wood Village, OR	97060	Specialized/heavy haul and dry bulk truck transportation and logistics provider	Services
Gunderson LLC	4350 NW Front Ave	Portland, OR	97210	Lake Oswego, OR based international manufacturer of railcars, marine barges, and related components and services	Direct Materials
Hall Tool Co	1724 SE Grand Ave	Portland, OR	97214	Single location provider of hand tools and industrial supplies	Indirect Materials
Harbor Freight Tools	1335 N Mason St	Portland, OR	97217	Supplier of hand tools, generators, power tools, air tools, and related hardware and equipment with over 400 retail locations; based in Southern CA	Indirect Materials
Hardchrome Inc	1152 NW Commerce Ct	Estacada, OR	97023	Single location plating and polishing business	Services
Harmer Steel Products Co	9933 NW 107th Ave	Portland, OR	97231	Portland, OR based supplier of rail and track accessories with locations in the US and Canada	Direct Materials
Harsco Infrastructure Americas	3909 Nw Fruit Valley Road	Vancouver, WA	98660	Provider of construction and industrial maintenance services with operations in 32 countries; headquartered in Camp Hill, PA and Fair Lawn, NJ	Services
Hertz Equipment Rental Corp	4939 NE Columbia Blvd	Portland, OR	97218	Rental and sales of generators, construction equipment, and material handling equipment	Services



Hua Inc	316 SE Taylor St	Portland, OR	97214	Liechtenstein based supplier of tools and fastening systems; operates in over 120 countries; N. American headquarters in Tulsa, OK	Capital Goods
Home Depot	1728 N Jantzen Ave	Portland, OR	97217	Atlanta, GA based home improvement retailer	Indirect Materials
Honey Bucket	2301 SE Hidden Way	Vancouver, WA	98661	Puyalfup, WA based supplier of mobile sanitation services	Services
Hydra Power Systems Inc	5445 NE 122nd Ave	Portland, OR	97230	Portland, OR headquartered supplier of fluid hydraulic parts and components	Capital Goods
Hydraulics Inc	713 W 11th St	Vancouver, WA	98660	Single location provider of hydraulic supplies and hose manufacturing services, as well as cylinder, pump, and motor repair	Indirect Materials
IGI Resources Inc	415 W 6th St	Vancouver, WA	98660	Petroleum bulk stations and terminals provider	Indirect Materials
IKON Office Solutions	851 SW 6th Ave	Portland, OR	97204	Global provider of Ricoh copy and printing equipment, software solutions, and services	Services
IMR KHA Portland LLC	5687 SE International Way	Portland, OR	97222	Mechanical, chemical, metallurgical, and corrosion testing and analysis services provider	Services
Industrial Tire	7331 NE Killingsworth St	Portland, OR	97218	Industrial tire, wheel, and auto repair services based in Portland, OR with six Pacific Northwest facilities	Indirect Materials
Integra Telecom	825 NE Multnomah St	Portland, OR	97232	Portland, OR based telecommunications services provider	Services
Integrated Power Services	2315 NW 21st PI	Portland, OR	97210	Provider of repair and maintenance services for electric motors, generators, and mechanical power transmission components based in Greenville, SC with locations throughout the US	Services
nternational Inspection Inc	10521 N Lombard St	Portland, OR	97203	Provider of nonddestructive testing and examination services	Services
RC Aluminum & Stainless Inc	9038 N Sever Ct	Portland, OR	97203	Single locationnonferrous metal service center	Indirect Materials
ron Horse Group	5501 NE 223rd Ave	Fairview, OR	97024	Single location utility and industrial services provider	Services
J Calibrations Inc	7007 SE Lake Rd	Portland, OR	97267	Instrument calibration services provider based in Portland, OR	Services
ohn C. Murdoch Inc	5555 N Channel Ave	Portland, OR	97217	Marine surveyor located in Portland, OR	Services
ohnstone Supply	11632 NE Ainsworth Circle	Portland, OR	97220	Wholesale distributor to the HVAC/R and property maintenance industries	Indirect Materials
ubitz Corp	33 NE Middlefield Road	Portland, OR	97211	Transportation services company offering commercial fueling and travel services to fleets, professional drivers, and the local and traveling public based in Portland, OR	Services



Kaman Industrial Technologies	1703 NE Argyle St	Portland, OR	97211	Provider of a wide range of products and systems related to bearings, mechanical and electrical power transmission, automation & control, material handling, and fluid power for the MRO and OEM markets based in Bloomfield, CT	Indirect Materials
Kleen Blast Co	3747 North Suttle Road	Portland, OR	97217	Provides abrasives, sandblasting equipment and supplies	Indirect Materials
Koldkist Bottled Water	909 N Columbia Blvd	Portland, OR	97217	Producer, marketer and distributor of high- quality packaged ice	Services
KY-RO Inc	18209 SW Boones Ferry Rd	Tigard, OR	97224	Single location provider of profile and plate rolling services	Direct Materials
LaGrand Industrial Supply Co	2620 SW 1st Ave	Portland, OR	97201	Single location distributor of foundry supplies, equipment and industrial products	Indirect Materials
Lampros Steel Inc	9040 N Burgard Way	Portland, OR	97203	Specialty structural steel service center and warehousing based in Portland, OR	Direct Materials
Landa Northwest	11811 NE Marx St	Portland, OR	97220	Single location business selling and servicing industrial pressure washers, parts washers, water treatment systems, and heaters	Capital Goods
Landmark Equipment	625 NE Killingsworth St	Portland, OR	97218	Single location business providing equipment sales, rentals, parts, and repair and maintenance services	Capital Goods
Legacy Laboratory Services	1225 NE 2nd Ave	Portland, OR	97232	Laboratory services provider serving physicians, hospitals, employers, IPAs, and patients; based in Portland, OR	Services
Les Schwab	2140 NE Columbia Blvd	Portland, OR	97211	Provider of tires and automotive repair services based in Prineville, OR	Indirect Materials
Locates Down Under Inc	16119 S Clackamas River Dr	Oregon City, OR		Providing underground wire and cable laying contracting services based in Oregon City, OR	Services
Mac's Radiator & Repair	6147 SE Foster Rd	Portland, OR	97206	Cooling system repairs, products, and services provider based in Portland, OR with nine Pacific NW facilities	Services
Magnetic Specialties	9812 SE Empire Ct	Clackamas, OR	97015	Provider of wholesale magnets and magnetic devices based in Clackamas, OR	Indirect Materials
Marco	7105 SW Varns Street	Portland, OR	97223	Portland, OR based supplier of promotional products, awards, company apparel, and incentive items	Indirect Materials
Marine Lumber Co	11800 SW Myslony St	Tualatin, OR	97062	Single location wholesale lumber sales and distribution	Indirect Materials
Mariner's Supply Co Inc	4865 N Lagoon Ave	Portland, OR	97217	Supplier of marine parts and products based in Bainbridge Island, WA	Indirect Materials
Marks Metal Technology	10300 SE Jennifer St	Clackamas, OR	97015	Single location metal and steel processor, specializing in rolling plate and structural profiles, concrete pipe forms and custom fabrication	Direct Materials



C ic	435 NE Hancock St	Portland, OR	97212	Sales, service, and installation of petroleum equipment	Services
Mason's Supply Co	2637 SE 12th Ave	Portland, OR	97202	Construction supplies business with locations in OR and WA; based in Portland, OR	Indirect Materials
Matheson Tri-Gas Inc	13129 NE David Cir	Portland, OR	97230	Global supplier of industrial and scientific gases and gas handling equipment; subsidiary of Tokyo, Japan based TNS Corp	Indirect Materials
McGuire Bearing Co Inc	947 SE Market St	Portland, OR	97214	Regional distributor of bearings and power transmission products headquartered in Portland, OR	Indirect Materials
McKinney Trailers & Containers	12008 NE Inverness Dr	Portland, OR	97220	Tractor trailer and shipping container rental, leasing, sales and service	Capital Goods
Mesher Supply Co	312 SE Stark St	Portland, OR	97214	Wholesale plumbing supply company based in Portland, OR	Indirect Materials
Metro Overhead Door Inc	2525 NE Columbia Blvd	Portland, OR	97211	Repair, service and installation of garage doors and gate automation based in Portland, OR	Services
Milwaukie Crane & Equipment Co	10250 SW North Dakota St	Tigard, OR	97223	Designs, manufactures, installs and services complete overhead material handling systems and stocks hoists, trolleys, accessories, replacement parts and provides service based in Portland, OR	Services
Mobile Mini Inc	5940 NE Cully Blvd	Portland, OR	97218	Global company providing rental and sales of portable self storage containers, shipping containers, and mobile offices based in Tempe, AZ	Capital Goods
Modspace Corp	13132 N. Woodrush Way	Portland, OR	97203	Providing modular building and construction trailer rental, leasing, and sales based in Berwyn, PA	Services
Monster Fuses	5440 SE 26th Ave	Portland, OR	97202	Two location company with offices in Portland, OR and Fairfield, NJ; Supplier of new, surplus, and out of production fuses and switchgear components	Indirect Materials
Morgan Industrial nc	23810 NW Huffman St	North Plains, OR	97124	Providing specialized heavy rigging, transportation, machinery moving, millwright, architectural, and process equipment movement services based in the Hillsboro, OR area	Services
Motion Industries nc	940 Northeast 57th Avenue	Portland, OR	97213	Distributor of industrial MRO supplies based in Birmingham, AL; subsidiary of Genuine Parts Company of Atlanta, GA	Indirect Materials
ASC Industrial upply Co Inc	12207 NE Marx St	Portland, OR	97230	Distributor of MRO supplies, industrial equipment and tools based in Melville, NY	Indirect Materials
At Hood Solutions	14546 N Lombard Street	Portland, OR	97203	Subsidiary of Charlott, NC based Swisher; supplier of industrial hygiene products and services	Indirect Materials

Napa Auto Parts	10515 N Lombard St	Portland, OR	97203	Distributor and retailer of auto parts, tools, and supplies; subsidiary of Atlanta, GA based Genuine Parts Company	Indirect Materials
NDE Professionals Inc	13339 NE Airport Way	Portland, OR		Provider of quality control consulting, and nondestructive testing and training services including radiography, ultrasonic, penetrant and magnetic particle based in Portland, OR	Services
Ness & Campbell Crane Inc	5730 NE 138th Ave	Portland, OR	97230	Main division offices in Portland, OR and Seattle, WA with branch offices throughout Western OR and WA; provider of fixed and mobile crane and lift services	Services
Norlift of Oregon Inc	7373 SE Milwaukie Expressway	Portland, OR	97222	Supplier of new, used, rental and material handling products and services based in Portland, OR	Services
North Coast Electric Co	625 N Thompson St	Portland, OR	97227	Provider of electrical supplies, components, distribution and related services with locations throughout the Pacific NW and Alaska	Indirect Materials
Northside Ford	6221 NE Columbia Blvd	Portland, OR	97218	New and used Ford truck dealership	Capital Goods
Northwest Pump & Equipment Co.	2800 NW 31st Ave	Portland, OR	97210	Distributor of petroleum equipment, industrial pumps, and car wash systems and related services with locations throughout the Western US	Indirect Materials
Northwest Scaffold Service Inc	11211 SE Foster Rd	Portland, OR	97266	Provides services in the estimation, design, supply, erection & dismantling of suspended scaffold (swingstaging), frame scaffold, temporary weather enclosures, and shoring based in Portland, OR	Services
NRC Environmental Services Inc	6211 N Ensign St	Portland, OR	97217	Provision of environmental, industrial and emergency solutions; global company based in Great River, NY	Services
NW Natural Gas Co	220 NW 2nd Ave.	Portland, OR	97209	Natural gas utilities service provider/supplier based in Portland, OR	Services
Oak Harbor Freight Lines Inc	9026 NE 13th Ave	-Portland, OR	97211	Truck transportation and logistics services provider based in Auburn, WA with terminal locations throughout the Western US	Services
Office Depot	323 SE Martin Luther King Jr Blvd	Portland, OR	97214	National retail chain/supplier of office products, business machines, computers, computer software and office furniture, and business services including copyling, printing, document reproduction, shipping, and computer setup and repair; based in Boca Raton, FL	Indirect Materials



lter Service Co	615 SE Market	Portland, OR	97214	Single location provider of filters and hose assemblies, and manufacturer of custom fittings and adapters	Indirect Materials
Olympic Tug & Barge Inc	7900 NW St Helens Rd	Portland, OR	97210	Division of Seattle, WA base Harley Marine Services and provider of marine tug, barge, and port assist transportation and logistics services	Services
Oregon Bolt Inc	14965 SW 72nd Ave	Tigard, OR	97224	Provider of industrial threaded fasteners and related items based in Tigard, OR	Indirect Materials
Oregon Breakers Inc	3365 SE 17th Ave Portland	Portland, OR	97202	Single location supplier of electrical components and supplies	Capital Goods
Oregon Carbide Saw	1713 SE 7th Ave	Portland, OR	97214	Provides precision sharpening and manufacturing service for saws, cutters, routers, and coldsaws; based in Portland, OR	Services
Oregon Ironworks Inc	9700 SE Lawnfield Rd	Clackamas, OR	97015	Engineering, fabrication, and manufacturing business based in Clackamas, OR	Direct Materials
Oregon Sandblasting & Coating Inc	10000 SW Herman Rd	Tualatin, OR	97062	Provider of industrial painting, coating, sandblasting, and finishing services based in Tualatin, OR	Services
Oregon Tractor	6455 NE Columbia Blvd	Portland, OR	97218	Portland, OR based supplier of new and used heavy equipment sales, rentals, and repair and maintenance services with branch location in Roseburg, OR	Capital Goods
OTS Wire & Insulation Inc	9155 SW Barber St	Wilsonville, OR	97070	Supplier of electrical supplies & equipment for the motor repair and transformer industry based in Wilsonville, OR	Capital Goods
Ott's Friction Supply Inc	201 N Columbia Blvd	Portland, OR	97217	Portland, OR based distributor and supplier of automotive and mechanical friction products such as brakes and clutches; branch location in Eugene, OR	Indirect Materials
Oxford Inn & Suites	12226 N Jantzen Dr	Portland, OR	97217	Local hotel and hospitality provider	Services
Pacific Fence	13770 SE Ambler Rd	Clackamas, OR	97015	Supplier of fencing installation and manufacturing services specializing in railings, gates, chain link, and vinyl; single location in Clackamas, OR	Services
Pacific Machinery & Tool Steel	3445 NW Luzon St	Portland, OR	97210	Portland, OR based specialty metal service center	Indirect Materials
Pacific Power Products	600 S 56th Pl	Ridgefield, WA	98642	Ridgefield, WA based provider of sales and service of diesel engines, transmissions and parts for trucks, buses, coaches, heavy duty construction equipment, marine, rail and power generation; locations throughout OR, WA, AK, and HI	Services
Palm Abrasive &	905 SE 14th Ave	Portland, OR	97214	Wholesaler of abrasives, tools, and related supplies in Portland, OR	Indirect Materials

Pape Material Handling Inc	7000 SW Sandburg St	Portland, OR	97223	Provider of sales, rental, and product support of lift trucks and material handling equipment based in Eugene, OR	Capital Goog
Paramount Supply Co	816 SE Ash St	Portland, OR	97214	Supplier of pipe, valves, fittings, pumps, filters, gaskets, steam products, and other industrial specialties with branches throughout the Western US and Alaska	Indirect Materials
Parr Lumber Co	6250 NE Martin Luther King Jr Blvd	Portland, OR	97211	Supplier/distributor of building products, hardware, and tools based in Hillsboro, OR with 31 locations in OR, WA, and AZ	Indirect Materials
Peninsula Truck Lines Inc	3182 NW 26th Ave	Portland, OR	97210	Regional less-than-truckload truck transportation and logistics provider based in Auburn, WA with locations throughout the Pacific NW and Vancouver, BC	Services
Performance Contracting Inc	5555 N Channel Avenue,	Portland, OR	97217	Specialty contractor providing services to Industrial, commercial, and non-residential markets based in Lenexa, KS; services include interiors, insulation, scaffold services, and abatement	Services
Peterson Industrial Products Inc	2300 NW 29th Ave	Portland, OR	97210	Supplier of Industrial hoses, fittings, cylinders, pumps, valves, meters, and othe products for use in hydraulics, pneumatics, instrumentation, and sanitary applications based in Portland, OR	Indirect Materials
Peterson Machinery Co	4421 NE Columbia Boulevard	Portland, OR	97218	Supplier of new and used heavy equipment sales, rentals, and repair and maintenance services headquartered in the San Francisco, CA Bay Area	Capital Goods
Petrocard Systems Inc	9885 SE Mather Rd	Clackamas, OR	97015	Supplier of fleet fueling, mobile fueling, cardlock fueling, and lubricant supply services based in Kent, WA	Indirect Materials
Pinnell Busch Inc	6420 SW Macadam Ave	Portland, OR	97239	Project management consultancy for the design and construction industry based in Portland, OR	Services
Pioneer Wiping Cloth	10707 N Lombard St	Portland, OR	97203	Supplier of industrial wiping cloth, absorbent products, and recycling services based in Portland, OR	Indirect Materials
Platt Electric Supply Inc	3053 NW 29th Ave	Portland, OR	97210	Distributor and wholesaler of electrical, industrial, lighting, tools, fuses, control and automation products with locations throughout the Western US	Indirect Materials
Pope Rigging Loft Inc	2355 NW 21st Pl	Portland, OR	97210	Supplier of marine rigging products and services based in Portland, OR	Indirect Materials
Port Plastics	7500 SW Tech Center Dr	Portland, OR	97223	Supplier of plastic materials, components, and related products based in Chino Hills, CA	Indirect Materials



Supply	1176 N Hayden Meadows Dr	Portland, OR	97217	Watsonville, CA based wholesale distributor of marine related products	Indirect Materials
Portland Business Alliance	200 SW Market St	Portland, OR	97201	Local commerce association	Services
Portland Community College	12000 SW 49th Ave	Portland, OR	97219	Local higher educational institution	Services
Portland Compressor	310 SE 12th Ave	Portland, OR	97214	Single location distributor, dealer, and service center of compressors, sprayers, pressure washers, and related products and services	Capital Goods
Portland Fasteners Inc	3103 NW St. Helens Road	Portland, OR	97210	Single location supplier of industrial fasteners and construction supplies	Indirect Materials
Portland General Electric Corp	3700 SE 17th Ave	Portland, OR	97202	Investor-owned utility engaged in the generation, transmission and distribution of electricity to industrial, commercial and residential customers	Services
Portland Valve & Fitting Co	815 SE Sherman St	Portland, OR	97214	Supplier/distributor of hoses, flexible tubing, fittings, filters, regulators, measurement devices and related products and support services; trade name of Portland, OR based Swagelok Northwest US, part of global Solon, OH based Swagelok Company	Indirect Materials
.r Webster Co	41 NE Walker St	Portland, OR	97211	Supplier of new and remanufactured truck and trailer parts headquartered in Portland, OR with branch locations throughout the region	Indirect Materials
Power Serv Inc	10931 N. Vancouver Way	Portland, OR	97217	Kansas City, MO based distributor, reconditioner, and remanufacturer of railcar moving equipment	Services
PPI Group	6015 NE 80th Ave	Portland, OR	97218	Portland, OR based supplier of software and hardware solutions to the architecture, engineering, and construction industries	Services
Praxair Distribution	603 SE Victory Ave	Vancouver, WA	98661	Supplier of industrial gases and related services based in Danbury, CT	Indirect Materials
recise Manufacturing & Ingineering	12403 Ne 60th Way	Vancouver, WA	98682	Provider of engineering services to operators of blast furnaces and steel mills based in Vancouver, WA	Services
recision Equipment	8440 N Kerby Ave	Portland, OR	97217	Industrial parts repair and custom manufacturing based in Portland, OR	Services
recision Hydraulics LC	2715 NW St Helens Rd	Portland, OR	97210	Portland, OR based tooling hydraulic outfitter	Services
remier Gear & Nachine Works	1700 NW Thurman St	Portland, OR	97209	Portland, OR based manufacturer of machinery, gears, and controls and machine and gear shop services	Services
remier Rubber & unoly	9841 N Vancouver Way	Portland, OR	97217	Portland, OR based rubber products wholesaler	Indirect Materials

Proctor Sales Inc	27180 SW 95th Ave	Wilsonville, OR	97070	Sells & services engineered mechanical solutions including boilers, pumps, controls, valves, burners, stack, tanks, hydronic and steam solutions; offices located in OR, WA, and AK	Services
Production Sawing	18205 Sw Boones Ferry Rd	Tigard, OR	97224	Tigard, OR based metal slitting and shearing business	Services
PSI Inc	6032 N Cutter Cir	Portland, OR	97217	Oakbrook Terrace, IL based company provides engineering, scientific, technical and management solutions to public and private sector clients	Services
Rain for Rent	11035 NE Marx St	Portland, OR	97220	Provider of temporary liquid handling solutions including pumps, tanks, filtration and spill containment based in Bakersfield, CA	Services
Red-D-Arc Inc	7315 NE 43rd Ave	Vancouver, WA	98661	Subsidiary of Radnor Township, PA based Airgas Inc.; provider of welding and welding-related rental products and services throughout North America	Capital Goods
Redmond Heavy Hauling Inc	613 NE Columbia Blvd	Portland, OR	97211	Portland, OR based provider of heavy hauling and specialized truck transportation and logistics services	Services
Reed Electric Co	2539 NW Vaughn St	Portland, OR	97210	Single location provider of motor repair and field services, and new motor sales	Services
Rem Steel Sales Inc	9109 N Wilbur Ave	Portland, OR	97217	Portland, OR based distributor of prime, excess prime, and secondary flat rolled steel products	Direct Mater
Rexel Inc	20171 SW 95th Ave	Tualatin, OR	97062	Subsidiary of Rexel Group based in Paris, France; Distributor of electrical supplies	Indirect Materials
Rigging Products Inc	2242 NE Columbia Blvd	Portland, OR	97211	Single location provider of rope, rigging, logging, industrial chain, and related products and services	Direct Materials
Rodda Paint Co	6107 N Marine Dr	Portland, OR	6	Portland, OR based provider of paint color matching services, spray equipment sales and rentals, and paint sales	Indirect Materials
Rogers Machinery	14600 SW 72nd Ave	Portland, OR	97224	Portland, OR based industrial equipment supplier, providing technical services, engineering, consultation, and products such as compressed air systems, process and house vacuum systems, and blower and pump systems; branch locations throughout the Western US	Capital Goods
Rogers Marine	3445 NE Marine Dr	Portland, OR	97211	Single location provider of sales, service, and installation of boat equipment, marine electronics, radar, GPS, depth sounders, and related marine products	Capital Goods



i City Awning Co	1638 NW Overton St	Portland, OR	97209	Portland, OR based sales and service of awnings, tarps, canopies, flags, flagpoles, accessories and custom applications	Services
RSC Equipment Rental	3133 NW Saint Helens	Portland, OR	97210	Part of Stamford, CT based United Rentals Inc.; global equipment rentals company	Services
Ryerson	6330 N Basin Avenue	Portland, OR	97217	Distributor and processor of metals based in Chicago, il.	Direct Materials
Safety Kleen Systems Inc	16540 SE 130th Ave	Clackamas, OR	97015	Re-refiner of used oil and provider of parts cleaning services based in Dallas, TX	Indirect Materials
Safway Services LLC	1960 NW Marine Dr	Troutdale, OR	97060	Full-service scaffold company offering rental, engineering, training and safety; based in Waukesha, WI	Services
Sam A Mesher Tool Co	1704 NW Johnson St	Portland, OR	97209	Single location supplier of machinery and cutting tools	Indirect Materials
Sanderson Safety Co	1101 SE Third Ave	Portland, OR	97214	Supplier of safety systems and products for a variety of industries and applications based in Portland, OR with locations throughout the Western US	Indirect Materials
Schroeder's Machine Works Inc	8010 NE 19th Ct	Vancouver, WA	98665	Single location machining, fabrication, and manufacturing facility	Services
Seal Source Inc	16027 NE Cameron Blvd	Portland, OR	97230	Single location supplier of seals and gaskets	Indirect Materials
Se-1< Unlimited Inc	23050 NW Jacobson Rd	Hillsboro, OR	97124	Distributor of rubber molded, rubber extrusion, and gaskets; In-house steel rule die shop with water jet cutting services available; based in Hillsboro, OR	Indirect Materials
Service Steel Inc	5555 N Channel Ave	Portland, OR	97217	Steel service and fabrication center based in Portland, OR	Direct Materials
Shaver Transportation	4900 NW Front Ave	Portland, OR	97210	Provider of inland waterway transportation and logistics services (tug and barge services) and port assist services	Services
Sherwin Williams Co	30 NE Broadway St	Portland, OR	97232	Global supplier of paints and finishes based in Cleveland, OH	Indirect Materials
Siemens Building Technologies	15201 NW GREENBRIER PKWY	Beaverton, OR	97006	Supplier of products and services for building/facility automation, energy efficiency, fire safety, power distribution, and security; part of Munich, Germany based Siemens	Capital Goods
Speedometer Service and Instrument Corp	3551 NW Front Ave	Portland, OR	97210	Single location company selling gauges, cables, and adapters to the truck and automotive industries	Services
Spencer Fluid Power	2230 NE Columbia Blvd	Portland, OR	97211	Distributor of hydraulic components and systems; subsidiary of Cleveland, OH based Applied Industrial Technologies	Indirect Materials
Stack Metailurgical Services	5938 N Basin Ave	Portland, OR	97217	Single location provider of heat treating and metallurgical manufacturing services	Services



Staples	1760 Jantzen Beach Center	Portland, OR	97217	National retail chain/supplier of office products, business machines, computers, computer software and office furniture, and business services including copying, printing, document reproduction, shipping, and computer setup and repair; headquartered in Framingham, MA	Indirect Materials
Star Rentals Inc	1735 SE Martin Luther King Jr Blvd	Portland, OR	97214	Construction equipment rental supplier with locations in OR and WA	Services
State Pipe & Supply	3508 NE 68th St	Vancouver, WA	98661	Supplier of pipe, tubing, fittings, and related products to mechanical, plumbing and general contractors, pipe fabricators, petroleum, fire protection and fencing industries, water well and irrigation companies, pipe distributors, and other pipe users; Rialto, CA based subsidiary of Korean company SeAH Steel Corp	Indirect Materials
Stellar Industrial Supply Inc	12831 NE Whitaker Way	Portland, OR	97230	Tacoma, WA based provider of industrial supplies and tools	Indirect Materials
Stud Welding Supply	2119 SE Columbia Way	Vancouver, WA	98661	Single location wholesale welding equipment and supplies provider	Indirect Materials
Suburban Grinding Inc	13025 SW Herman Rd	Tualatin, OR	97062	Single location provider of industrial grinding services and engineering	Services
Sunbelt Rentals Inc	7626 NE Killingsworth St	Portland, OR	97218	Construction equipment and tool rental company; subsidiary of London, UK based Ashtead Group	Services
Swan Island Sandblasting	55S5 N Channel Ave	Portland, OR	97217	Portland, OR based sandblasting and painting facility with two Portland facilities	Services
Tacoma Screw Products Inc	2797 NE Columbia Blvd	Portland, OR	97211	Supplier of fasteners, tools, hardware, and related construction supplies and equipment based in Tacoma, WA	Indirect Materials
Tarr Inc	2429 N Borthwick Ave	Portland, OR	97227	West coast distributor of commodity and specialty chemicals, lubricants and fuels headquartered in Portland, OR	Indirect Materials
Technical Controls	12119 NE 99th	Vancouver, WA	98682	Vancouver, WA based provider of products and services in instrumentation, fluid-handling products, mobile and general hydraulics, pneumatics, process filtration, compressed air and gas filtration markets, and seal applications with locations in WA, ID, and MT	Indirect Materials
Test Equipment Distributors	5476 S.E. International Way	Portland, OR	97222	Stone Mountain, GA based distributor of equipment and supplies for the nondestructive testing industry	Indirect Materials
The Lynch Company Inc	4706 SE 18th Ave	Portland, OR	97202	Single location general steel fabricator	Direct Materials



iteel Yard Inc	6880 NE Columbia Blvd P	Portland, OR	97218	Single location distributor of steel products (plate, tubing, pipe, bars, etc.)	Direct Materials
The Western Group	4025 NW Express Ave	Portland, OR	97210	Portland, OR headquartered supplier of woven wire, rubber screens, polyurethane screens, and perforated plate with locations in the US and Canada	Direct Materials
Thermo Fluids Inc	12533 SE Carpenter Dr	Clackamas, OR	97015	Recycler of used oil, antifreeze, filters, oily water and oily absorbents based in Scottsdale, AZ	Indirect Materials
Torgerson Forest Products	16055 SW Walker Rd	Beaverton, OR	97006	Single location supplier of forest products and building materials	Direct Materials
Total Filtration Services	1015 SE Grant St	Portland, OR	97214	Subsidiary of Franklin, TN based Clarcor Inc; provider of filtration management and service	Indirect Materials
Transco Industries Inc	5534 NE 122nd Ave	Portland, OR	97230	Portland, OR headquartered engineering and fabrication business involved in steel fabrication, conveyor repair, and water screening with locations throughout the US	Services
Triad Machinery Co Inc	4530 NE 148th Ave	Portland, OR	97230	Sales, leasing, rental, and service of heavy equipment in forestry, construction, and material handling with locations in OR and WA	Services
Tri-Motor & Machinery Co Inc	24460 Pacific Hwy E	Canby, OR	97013	Single location provider of new motor and gear box sales, repair, parts and related services	Services
Tube Service Co	6650 N Ensign St	Portland, OR	97217	Santa Fe Springs, CA based tubular product distribution and laser tube processing services with locations throughout the Western US	Indirect Materials
Union Pacific Railroad	1525 N River St	Portland, OR	97227	Transcontinental railroad transportation and logistics service provider headquartered in Omaha, NE	Services
Unisource Mfg Inc	8040 NE 33rd Dr	Portland, OR	97211	Supplier of industrial hose, hydraulic hose, connectors and accessories headquartered in Portland, OR	Indirect Materials
United Battery Inc	109 NE Columbia Blvd	Portland, OR	97211	Supplier/distributor of batteries, alternators, starters, generators, and accessories based in Portland, OR with three total area locations	Indirect Materials
United Rentals	4621 NW St Helens Rd	Portland, OR	97210	Global equipment rentals company based In Stamford, CT	Services
United Site Services	12215 SE 122nd Ave	Portland, OR	97015	Westborough, MA provider of portable toilet rentals and site sanitation solutions	Services
United Welding Supply Inc	2313 NE Martin Luther King Jr Blvd	Portland, OR	97212	Single location supplier of welding materials, supplies, and equipment	Indirect Materials



United Western Supply Co	15540 N Lombard St	Portland, OR	97203	Distributor of foundry products, equipment, parts, supplies, abrasive products, blasting media, and abrasive equipment, parts, and supplies with offices in Seattle, WA and Portland, OR	Indirect Materials
UPS	6235 N Basin Ave	Portland, OR	97217	Global transportation and logistics provider based in Atlanta, GA	Services
US Distributing	7750 NE 17th Ave	Portland, OR	97211	Distributor of marine parts and accessories to boat dealers, boat repair shops, marine accessory stores, boatyards, boat builders, government agencies and other marine related businesses; locations in Portland, OR, Phoenix, AZ, and Missoula, MT	Indirect Materials
Valin Corp	18977 NE Portal Way	Portland, OR	97230	Provider of process control, measurement, heat, filtration, and automation application solutions based in San Jose, CA	Capital Goods
Vancouver Bolt & Supply Inc	805 W 11th St	Vancouver, WA	98660	Single location provider of bolts, fasteners, and industrial supplies	Indirect Materials
Verizon	616 SW Broadway	Portland, OR	97205	New York City, NY broadband and telecommunications company	Services
Versa Steel Inc	1618 NE 1st Ave	Portland, OR	97232	Supplier of new and used steel beams located in Portland, OR	Indirect Materials
Viking Automatic Sprinkler Co	3245 NW Front Ave	Portland, OR	97210	St. Paul, MN based company provides fire sprinkler systems including automatic fire sprinklers for industrial, commercial, residential, and government markets	Services
Walter E Nelson Co	5937 N Cutter Cir	Portland, OR	97217	Portland, OR based distributor of Janitorial supplies and paper with locations throughout OR and WA	Indirect Materials
Washington Crane & Hoist	4707 NE Minnehaha St	Vancouver, WA	98661	Seattle, WA based industrial overhead crane and material handling solutions provider	Services
Waste Management	7227 NE S5th Ave	Portland, OR	97218	National supplier of waste/refuse transportation and disposal services based in Houston, TX	Services
WC Winks Hardware	200 SE Stark St	Portland, OR	97214	Single location hardware retailer	Indirect Materials
West Coast Metals Inc	2555 NW Nicolai St	Portland, OR	97210	Single location supplier of stainless steel, aluminum, and carbon steel	Direct Materials
West Coast Wire Rope & Rigging	2900 NW 29th	Portland, OR	97210	Full service rigging fabrication facilities serving the logging, construction, marine, and equipment manufacturing industries with locations in Portland, Seattle, and Oakland	Direct Materials



t Rail Construction	504 NE 192nd Ave	Vancouver, WA	98684	Vancouver, WA headquartered railroad construction and services provider involved in projects throughout the US and abroad	Services
Western Integrated Tech Inc	8900 N Ramsey Blvd	Portland, OR	97203	Bellevue, WA based manufacturer and integrator of fluid power and electronic systems	Capital Goods
Western Tool & Supply	12518 NE Airport Way	Portland, OR	97230	Livermore, CA based supplier of hand tools, cutting tools, power tools, abrasives, and other industrial products and supplies	Indirect Materials
Working Waterfront Coalition	200 SW Market St	Portland, OR	97201	Local trade/business association	Services
Xylem Dewatering Solutions Inc	2630 N Marine Dr	Portland, OR	97217	White Plains, NY based global provider of water handling, transport, distribution, wastewater and process treatment applications across commercial, industrial and municipal market	Capital Goods
YRC	6845 N Cutter Cir	Portland, OR	97217	Overland Park, KS based global transportation and logistics provider	Services



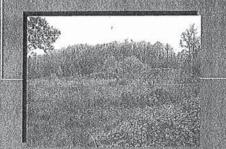
# Attachment E

# Brownfield/Greenfield Development Cost Comparison Study EXECUTIVE SUMMARY

Detember 2004



Port of Portland Portland Development Commission City of Portland METRO



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MACKENZIE

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#### EXECUTIVE SUMMARY

#### PROJECT OVERVIEW

The availability and location of industrial land as a resource for the creation of new employment is a major economic and policy issue throughout the State of Oregon and the Portland metropolitan area. A number of efforts have occurred or are currently underway to understand and address this issue.

As part of this ongoing regional discussion on industrial land, a consortium of public agencies (the Port of Portland, Portland Development Commission, METRO and the Portland Bureau of Planning) sponsored this Brownfield/Greenfield Development Cost Comparison Study. The goal of the project is to provide the project sponsors with a better understanding of costs and issues associated with industrial development of greenfield sites and the redevelopment of brownfield sites. In addition, a methodology was developed that calculates and compares brownfield and greenfield development costs. The challenge was to develop a model that could be replicated in future studies. Therefore, the uses could change and the sites could change, but the methodology would remain constant.

Using a case-study approach, the project compared the public and private development costs associated with specific industrial projects between brownfield sites and greenfield sites. Four types of industrial development projects were identified: general manufacturing, high tech, warehouse and distribution, and industrial park. A specific profile and site plan for each use was completed. Four greenfield sites and three brownfield sites were also identified. The site plan for one of the uses was then tested on one greenfield and one brownfield site. An analysis of costs was then prepared for each project on the two sites.

#### METHODOLOGY

#### Uses

Four industrial uses that were appropriate for the Portland metropolitan area were identified.

- High Tech Manufacturing includes high technology industries that are primarily related to manufacturing and processing. In this study, a 350,000 SF high-tech facility is tested that includes two 125,000 SF fabrication plants, one 40,000 SF central utility building, one 60,000 SF office building and 725 parking spaces.
- Industrial Park is a series of larger individual buildings whose uses could include light industrial manufacturing, distribution or industrial services. For this project, 630,000 SF of industrial park space, divided into multiple buildings, was tested on both sites.
- Warehouse / Distribution includes industries primarily engaged in the warehousing, storage and distribution of goods. For this project, 400,000 SF of distribution space in a single building with 200 parking spaces and 300 trailer spaces was tested on both sites.

General Manufacturing includes industries utilizing manufacturing processes. For this project, three single-user general manufacturing facilities were tested on each site. These facilities totaled 450,000 SF in three buildings – a 100,000 SF user, a 150,000 SF user, and a 200,000 SF user – and 1,100 parking stalls to serve all three facilities.

#### Site Selection

Since the goal of the study was to compare costs for industrial projects, it was necessary to identify sites appropriate for the user profiles based on size, zoning and location. Additional issues considered in choosing the sites included distribution around the region, extent of brownfield contamination, adjacency to the Urban Growth Boundary, surrounding industrial uses, level of existing infrastructure, and specific needs of the identified uses.

#### Brownfield

For this study, appropriate sites needed to be over 25 acres and zoned industrial. While the overall inventory of brownfield sites in the region is significant, with over 1,100 acres of vacant land listed in the City of Portland's Brownfield Site Inventory; the availability of large, viable brownfield sites in industrial areas in the region is limited. In addition, certain sites were identified and eventually discarded for reasons of concern about the market impacts of inclusion in the study and for potential liability issues. While the goal was to identify four brownfield sites to include in the study, at the end only three sites were used. To compensate and still meet the original goals of the study, two different uses were put on one of the brownfield sites.

#### Greenfield

Four sites were selected in the Portland metropolitan region. Three of the sites are in areas where land was recently brought into the Urban Growth Boundary (UGB). One site is located within the existing UGB. The sites range between 70 and 350 total acres. Therefore, only portions of each of the greenfield sites were used for each conceptual site plan.

The following table provides site overviews, and the uses proposed on each:

Use	Site Type	Site Size (acres)	Building Area (SF)	Parking Stalls
High - Tech	Brownfield	35.75	350,000	725
Manufacturing	Greenfield	53.20	350,000	725
Industrial Park	Brownfield	45.50	630,000	1,130
	Greenfield	44.50	630,000	1,130
Warehouse /	Brownfield	37.95	400,000	200
Distribution	Greenfield	23.85	400,000	200
General Manufacturing	Brownfield	35.75	450,000	1,100
17) 1775	Greenfield	37.95	450,000	1,100

As the study progressed, issues relating to liability and publicity were raised and concerns were expressed regarding the identification of actual brownfield sites in the report. It was determined that the brownfield sites should be generic in the final report. To make all the

Some sites that were initially considered for inclusion in the study are currently being actively marketed for sale. The site owners indicated that they were not comfortable including their properties in this study due to potential stigma and negative sale price impacts to their properties, regardless of the author's intentions to conceal the identities of individual sites.

sites equal, it was then decided that the greenfield sites would also be made generic. Therefore, while actual sites were utilized, for the purposes of this study, all geographic identifying features have been removed.

#### Costs

The primary focus of this study was on quantifiable costs, including hard and soft costs both on-site as well as off-site. The cost information was classified into four major categories:

#### On-Site Construction Costs

On-site construction costs include all building costs and on-site infrastructure and parking costs, plus additional on-site costs, including site grading, lift stations, tank removal and pilings associated with several of the brownfield and greenfield sites.

#### System Development Charges (SDC's) and Credits

Large, one-time user fees paid with the development of the site were included in this category. This includes System Development Charges (SDC's) for sanitary sewer, water, storm drainage, street improvements and parks. SDC credits were based on the extent of existing development on the site.

#### Off-Site Construction Costs

These are the costs associated with the public utilities, including sanitary sewer, water and storm drain mains, necessary to accommodate the build-out of each concept. The delivery of private utility (electric, natural gas, telecommunications) costs were not identified separately, and were assumed as part of the estimated street costs. Major utility upgrades, such as substations, transformers, water reservoirs, and treatment facility expansions were not included (the presumption is that SDC fees are intended to finance these public facility expansions).

#### Environmental Remediation Costs (Brownfield Sites Only)

The potential environmental remediation requirements for each site were based on publicly available information and the project team's experience with similar properties. The estimated costs represent the minimum estimated effort required to obtain a No Further Action (NFA) letter from the Oregon Department of Environmental Quality (DEQ) for the properties. Environmental remediation costs were divided into two categories: Hard Costs and Other Costs. Hard Costs included remediation costs associated with soil and groundwater; compliance with state and local stormwater regulations; ongoing operation and maintenance of remediation efforts and remedies; and costs associated with the coordination and processing of the remediation plan, application and follow-up with DEQ and management of the remediation.

Other Costs included soft costs for insurance, environmental studies, planning and legal expenses, figured at 20% of the hard costs. Of these soft costs, 20% is insurance. The second component of Other Costs is carrying cost interest, which is the interest cost accrued during remediation, for an assumed 24-month timeline at a 30% cost of equity and 8.50% for debt. The third component of Other Costs is a risk premium, assumed to be 0.5% of total development costs based on the perceived additional risk associated with the brownfield contamination.

#### Financial Analysis

The financial characteristics of individual development concepts were evaluated, with a focus on determining the residual property value associated with these concepts. The residual value represented the maximum value that the development concept yields for the property (land and improvements), and equates to the maximum price that a developer would be willing to pay for the property based on the study's assumptions. If the residual value is below the market value of the property, or what the owner perceives to be market value, then the development is not considered to be viable. In some cases in this analysis, the residual land value was negative, implying that the development program yields a property value of less than zero under the assumptions used (i.e., upside-down).

#### Public costs and benefits

A comparison of public costs and benefits was conducted for the specific brownfield and greenfield development concepts. To the maximum extent possible within the scope, public costs and revenue streams resulting from development were estimated. The comparisons were informed by a literature review of national trends and experiences.

#### CASE STUDIES

The case studies provided the means to compare the four uses on both brownfield and greenfield sites. The following provides a summary of the findings of these studies.

#### Site Development Overviews

#### High Tech Manufacturing

With the proposed development, the brownfield site had an estimated negative residual land value of (\$7.80) per square foot. This reflects a site that would be considered "upside-down" under the case study assumptions, with a value well below zero. In contrast, the greenfield site had a positive residual land value of \$6.42 per square foot.

#### Industrial Park

With the proposed development, the brownfield site had a positive residual land value of \$0.80 per square foot and the greenfield site had a positive residual land value of \$1:33 per square foot.

#### Warehouse / Distribution

With the proposed development, the brownfield site had a negative residual land value of (\$0.85) per square foot, while the greenfield site has a positive residual land value of \$6.88 per square foot.

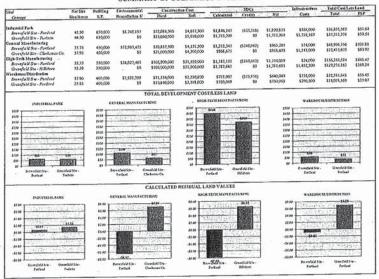
#### General Manufacturing

With the proposed development, the brownfield site had a negative residual land value of (\$6.47) per square foot. The greenfield site has a positive residual land value of \$6.96 per square foot.

#### Financial Findings

The case studies evaluated revealed the general findings that greenfield sites have an overall lower development cost than brownfield sites, and brownfield sites require lower marginal infrastructure investment than greenfield sites. The following table provides a summary of the financial comparison between the case studies.

#### SUMMARY OF SCENARIOS EVALUATED



It had designed but and soft costs associated with restrofactive, as well as #53 found earlying costs, developer risk promium and fender risk premium.

#### Key financial findings include:

- Under each of the scenarios, the greenfield site delivered the lowest development cost per square foot, as well as the highest residual land value. The differential was least in the Industrial Park scenarios; with the \$8.7 million cost of environmental remediation on the Portland brownfield site offset by a \$3.0 million cut and fill requirement on the greenfield site and a \$5.2 million differential in infrastructure costs.
  - Infrastructure costs, as defined in this analysis, were substantially higher on three of the greenfield sites, with the exception being the Warehouse/ Distribution program sites.
- The brownfield site used in the General and High-Tech Manufacturing scenarios has extremely high clean-up costs, related to soil and groundwater contamination. These add \$11.1 million in hard costs, which also dictates

higher insurance costs, which are \$1.9 million. As a result, the overall environmental remediation cost under these scenarios is estimated at \$22.0 for the General Manufacturing program and \$28.0 million for the High-Tech program. Higher remediation costs were assumed under the High-Tech scenario, with the higher overall costs of development increasing the impact of the risk premium.

#### PUBLIC COST BENEFIT ANALYSIS

Public benefits and costs were evaluated and compared for the brownfield and greenfield sites, based on a review of existing published studies and estimated public costs and revenue streams for the case study jurisdictions. For each of the sites, public benefits and costs were identified as Quantifiable — Direct or Qualitative and Other Quantifiable. Quantifiable — Direct public benefits that were similar across jurisdictions included SDC income, property tax revenue, Tri-Met payroll revenue and jobs. Annual tax revenues are greater for all of the case study examples that occur on sites located in the City of Portland and/or Multnomah County. This is due to the greater array of revenue streams within these jurisdictions compared to sites outside of Portland/Multnomah County.

Qualitative and Other Quantifiable benefits that were shared between brownfield and greenfield jurisdictions include state business tax revenue, state and local income tax revenue, utility tax revenues and achievement of economic development goals. Additional public benefits realized by the redevelopment of the brownfield sites include efficiencies realized through the utilization of existing infrastructure and the enhancement of surrounding property values.

In regard to Quantifiable – Direct public costs, standard public service infrastructure needs like fire, police, schools, public transportation and roads can generally be expected to incur costs due to increased development and population from brownfield redevelopment or greenfield development. However, the brownfield and greenfield case study development concepts in this analysis are, relatively speaking, of insufficient size to warrant significant marginal cost increases.

Marginal System Development Charges (SDC's) would be one Quantifiable-Direct public cost. While SDC's are intended to recover public costs associated with a development, they are typically set at a level below full marginal cost. The proportion of costs that are not recovered represent a public cost associated with the project.

Qualitative and Other Quantifiable costs shared between brownfield and greenfield jurisdictions include state, regional and local administrative costs. Legal costs can also be assumed for both types of sites. Public legal costs for brownfield sites, related to the risk of remediation activities, can be significant among other legal costs. Alternatively, greenfield sites can be expected to also incur significant legal and administrative costs related to UGB inclusion, site planning and other related issues unique to the Oregon land use system.

#### CONCLUSIONS AND IMPLICATIONS

Site Development Costs

Under each of the scenarios, the greenfield site delivered the lowest development cost per square foot, as well as the highest residual land value. And while infrastructure costs, as defined in this analysis, are generally higher on the greenfield sites, they do not exceed the brownfield remediation costs, therefore resulting in an overall cost advantage for the greenfield sites. The infrastructure costs are internalized into the development pro forma, reflecting an assumption that the development would be required to bear these costs as a condition of approval. While these costs could be defined as public costs, in this study they are the responsibility of the developer as opposed to being borne by the public.

Major off-site infrastructure and utility system upgrades, such as electrical substations and transformers, water reservoirs, waste water treatment facility expansions, state highway expansions, etc., are not required as a result of the development programs placed on the greenfield sites. While these types of major system upgrades may, and often would, be required as part of large acreage expansions of the Urban Growth Boundary, this is not the case for these sites.

The following table summarizes the estimated remediation costs of the brownfield sites, and the cost differential to produce an equivalent product relative to the greenfield option. As shown, the cost of remediation in these instances outpaces the savings in infrastructure costs.

	The second secon	Brownfield Greenediation Costs Infrastr			Overall Differe	
Use	Total	PSF-Bldg.	Total	PSF- Bldg.	Total	PSF- Bldg.
Industrial Park	\$8,471.756	\$13.45	(\$5,181,167)	(\$8.22)	\$982,055	\$1.56
	\$22,980,475		(\$1,323,000)	(\$2.94)	\$21,581,081	\$47,96
High-Tech Manufacturing	\$28,027,465	\$80.08	(\$1,428,500)	(\$4.08)	\$27,030,361	\$77.23
Warehouse/Distribution	\$7,821,799	\$19.55	\$444,500	\$1.11	\$8,553,079	\$21.38

The general findings of this study do not support the hypothesis that the costs associated with the remediation and redevelopment of brownfield sites can be on par with the costs to develop new greenfield sites; however, it would be unreasonable to draw any final conclusions based on the limited number of comparisons completed as part of this contract. A variety of issues can affect site development costs and these vary between sites. The methodology developed as part of this study does provide a foundation from which to look at a variety of sites and development scenarios to aid in addressing this policy question.

Brownfield Remediation Costs

Brownfield remediation costs, in all of the case studies, were greater than the infrastructure costs associated with development of the greenfield sites. It is important to understand however, what makes up the site development costs and how the assumptions can influence costs. The total brownfield development costs are composed of hard and soft construction costs, hard and soft remediation costs, carrying costs during cleanup, and the risk premium. These latter three remediation costs (soft, carrying and risk premium) have a significant impact on the overall redevelopment costs.

Methodologically, the analysis in this study approaches the development scenarios from the perspective of a private sector developer doing a speculative development. This assumption limits the direct applicability of the findings to this type of development. Alternative development approaches under a different scenario could include remediation by an end user, or remediation by a public sector entity. Under both approaches, remediation costs would be considerably less, particularly under a public sector remediation scenario.

## No Two Sites Are the Same - The Difficulty of Generalizations

Generalizations are difficult to make because each site, whether brownfield or greenfield, has its own unique characteristics. No two sites are the same, whether they are brownfield or greenfield. Each has unique issues and characteristics that affect costs and development issues; e.g. the types of constituents that make up the contamination, adjacency to a body of water, the potential for migration of the contamination, the location of the site in relation to existing infrastructure, location in relation to specialized infrastructure, the size of the site, etc.

The study showed that there is a continuum of site preparation costs for both brownfield and greenfield sites. Taking remediation and infrastructure factors into account it would be possible to categorize the sites in this study by their intensity of color – a continuum of brownness or greenness. For the brownfield sites, a light brownfield site would be one that has minimal contamination issues and low cost clean-up requirements. A dark brownfield site would have major contamination issues, and high cleanup costs. A moderate brownfield site would be in the middle.

The same type of continuum of color could be created for the greenfield sites in the study, only focusing on availability of infrastructure and site development costs. A light greenfield site would have readily available infrastructure and be "shovel ready" with few additional requirements. A dark greenfield site would have major infrastructure needs and require substantial site preparation work. A moderate greenfield site would be in the middle.

These continuums, as applied to the case studies, are shown in the following table:

Use	Brownfield site		PSF Differential	Conclusion
High Tech Manufacturing	Dark	Light		Same site as General Manufacturing site - more expensive use
Industrial Park	Moderate	Dark		Difficult greenfield site
Warehouse/Distribution	Moderate	Light	\$21.38	Greenfield site is better served than brown
General Manufacturing	Dark	Moderate	\$47.96	Very difficult brownfield site

#### Public Sector Costs

The case study development concepts in this analysis were not of sufficient size to pose significant, measurable public costs for affected jurisdictions. By design of the study, these costs are borne by the private sector. Internalization of brownfield remediation and infrastructure costs by the developer, rather than incurred by the affected jurisdiction(s), clear the public sector of the largest potential public cost disadvantage of brownfield redevelopment compared to greenfield development. To the extent that a jurisdiction assumes remediation costs, which may be a favorable policy option to enhance financial

feasibility of clean up and crystallize actual site remediation and redevelopment, public cost streams would increase by the magnitude of remediation costs estimated for each brownfield concept.

Public Sector Benefits

Benefits to the public sector, particularly in terms of revenue enhancement, were substantially greater for brownfield redevelopment concepts compared to greenfield development for the case studies considered in this analysis. By location of the case study sites, the revenue differential is largely due to the greater array of revenue streams within Multnomah County and the City of Portland compared to suburban jurisdictions. The following table provides a comparison of annual revenue stream differences for each development concept.

100	Brownfield Public Benefits	Greenfield Public Benefits	Public Benefit Differential
Use	Annual	Annual	Annual
Industrial Park	\$1,400,000	\$977,000	\$423,000
General Manufacturing	\$1,300,000	\$465,000	\$835,000
High-Tech Manufacturing	\$3,430,000	\$2,100,000	\$1,330,000
Warehouse/Distribution	\$482,000	\$308,000	\$174,000

In addition to the quantifiable public benefits cited above, a wide variety of benefits would also accrue to affected jurisdictions that are not quantifiable due to the limitations of the case study approach and sizes of sites considered in this analysis. The scope of these benefits is broader for brownfield remediation and redevelopment, also due in part to the location of case study sites in Multnomah County. In general, however, brownfield redevelopment poses the following public benefits not accrued by greenfield development:

- · Local income tax revenues;
- · Public land conservation and environmental policy goals;
- Social benefits of contaminated site remediation and economic revitalization; and
- Enhancement of surrounding property values.

It is a Challenge to Keep Brownfield Sites Industrial

There is an economic challenge to maintaining industrial zoned brownfields as industrial properties after they are cleaned up. The remediation costs of bringing an "upside down" brownfield site "right side up" often cannot be recovered when the site can be developed only for industrial land values. Industrial land values in the Portland metropolitan area tend to range from \$3.50 to \$6.50 per square foot, the lowest value of any major land use. For comparison, office and residential land ranges from \$7.50 to \$10.00 per square foot, while commercially zoned land is valued at significantly higher levels. As remediation costs must be deducted from land value, industrially zoned property has the most limited ability to absorb clean up costs while still maintaining a positive residual land value.

It's "Easier" to Develop Greenfield Sites

Brownfield sites come with stigmas. For many developers, the unknowns and the difficulties of developing a brownfield site are too great. It is perceived that suburban greenfield sites are easier to develop and less constrained than urban brownfields. This

perception is also shared by site selectors, who are under contract for users to find them a location for a new industrial investment. Issues of liability, cost and risk are all part of this challenge. This dilemma can make it difficult for brownfield sites to get full exposure in the market and make it difficult for sites to be considered for redevelopment. The result of this is that most difficult brownfield sites require experienced developers who have extensive knowledge with redeveloping these sites. Traditional developers tend to shy away from these sites. It is therefore necessary for outside parties, such as public agencies with a desire to have brownfield sites redeveloped, to create relationships with experienced brownfield developers.

An Inventory of Sites is Required to Meet a Variety of Industry Needs

Physical site issues can play a role in a specific type of user choosing between or having the ability to locate on a brownfield or a greenfield site. However, the physical site that a company chooses is only one issue in a diverse mix of criteria that they use in deciding investment locations. Some users are very specific about the location of the property they are interested in using. Factors that can influence this include: access to transportation infrastructure (i.e., rail, water); proximity to other firms, either suppliers or customers (agglomeration or cluster effects); zoning, for example heavy industrial vs. light industrial, business park or high tech. These locational factors may outweigh or at least mitigate the brownfield vs. greenfield site issues.

Matching the locational needs of different types of industries and the market opportunities of different geographic locations will enhance brownfield redevelopment. It is critical to understand which types of companies can go where. Some industries and development types will be able to take on the brownfield challenges, others will not, and will focus their development decisions on greenfield sites. Each type of land, brownfield and greenfield, has a role to play in a regional economic development strategy.

Focus on the Brownfield Sites that have a Demand in the Market

The old saying of "location, location, location" in real estate is as valid in brownfields as it is in greenfields. As this study shows, different brownfield sites have different remediation cost profiles. However, brownfield sites located in areas of high market demand are better able to remain viable real estate investment opportunities if there is likely to be a high residual land value. The public sector should focus available assistance dollars to those sites that have the highest remediation costs and that are located in an industrial area that has market demand.

The Public Sector's Role in Brownfield Redevelopment

There is a role for public incentives that support the goal of keeping industrial brownfields for industrial uses because the private marketplace will be less likely to do this, due to the lower market value of industrial land.

Risk Reduction

First, the data provided in this study shows clearly that the cost of high risk capital to conduct site study and clean-up is a significant factor. The rate of return required by equity investors and the lack of debt capital are factors to which many states and municipalities have turned their attention. The creation of state revolving loan funds, tax-free bonds, private debt funds and participating grant money are all mechanisms that are being used to reduce the cost of capital.

One of the major issues associated with brownfield sites is the uncertainty created by unknown liability ("inflated risk assumptions"). Environmental insurance is a way to mitigate this risk. The cost and quality of environmental insurance is not only a direct cost factor but also an indirect cost. Comprehensive environmental insurance policies for these projects eliminate or lessen reduction in residual land value associated with stigma (the risk factor). Several states have created pooled, state-subsidized environmental insurance. These programs have reduced the direct cost of insurance policies and provided for broader coverage and longer terms than insurance that is available for individual projects.

#### Site Characterization Assistance

Another potential area for public involvement is in site characterization. The cost for preliminary, investigative studies to characterize contamination conditions at a site are not only a significant project expense, but frequently becomes a barrier to entry. Few private entities are willing to spend thousands, often hundreds of thousands of dollars to characterize a site that may or may not turn out to be suitable for redevelopment. Direct subsidy of characterization costs will create an expanded market of brownfield sites. The sites in this study have been sufficiently characterized for remediation estimating and insurance. However if that were not the case, it is unlikely that a third party developer could have supported those costs. State and municipal brownfield initiatives can provide forgivable loans for characterization. If the investigative results support development, the loan is repayable. If not, the loan becomes a forgivable grant.

#### Study Methodology Limitations

The purpose of this study was to determine the development costs for a specific development use, compared between a specific brownfield site and a specific greenfield site. The methodology used in the study is a case study approach, using a specific development project of a certain size and then preparing a pro forma analysis that is based on a private developer doing a speculative development. The study shows that the approach and the model function, and can be replicated with other uses and on different sites. It is also the case that the output of the model, in terms of costs and therefore residual land value, would change if different assumptions were used.

The actual development characteristics of each of the sites in this study are unique and site specific. Each has a cost structure for either remediation or new infrastructure services that are different from each other and from any other site in the Portland region. And the number of sites, only seven, provides a limited number of case studies from which to draw generalizations. So while the study found that it was more costly to remediate a brownfield site than to provide infrastructure to a greenfield site, the study's analysis should be considered as proposing a general theoretical construct for appropriately evaluating specific sites, as opposed to generating rules of thumb that can be consistently applied across all brownfields and greenfields in the region.

# Attachment F

ě	tland Major.	Projects and	of Portland Major Projects and Citywide Programs List	List				
Type of Project	Number o Projects	ff% of Total Projects	Number of % of Total Total Cost (both Projects Projects Financially Constrained and Non FC)	% of Total Cost	Number of Projects in City FC	% of project category in FC	Cost in FC	Share of FC Dollars
Active Transportation	219	75%	\$ 1,293,097,793 69%	%69	163	740%	3 076 015 666	
Motor vehicle	35	120%	271 002 210	1.40/	2	0/1/	3 3/05/15,000	10%0
	1	2	0 2/1/002,210	0/47	19	24%	\$ 100,461,305 8%	%8
Multi Modal	61	%9	\$ 251,379,529 13%	13%	12	%89	105 869 A76 100	100/
ITS/Other	20	7%	\$ 54.710.717 3%	3%	17	85%	\$ 53,000,470 497	40/
	203	1000%	20001 520 050 1001 3	1000	1	200	07,110,00	470
	423	100/0	1,020/20/0,1 6	100%	7117		S 1256 322 875 110004	1000%

Ordinance 187832, Vol. 1.3.J, page 7170

# Attachment G

# West Coast Ports Tonnage

- 23 million tons moved through Portland Harbor
- 22 million tons moved through other lower Columbia River ports (international only)
- \$13 billion value of tonnage trade in Portland Harbor

21,000,000 23,000,000 Columbia River 22,000,000 23,000,000 19,000,000 58,000,000 84,000,000 2013 toal tonnage

The Portland Harbor tonnage includes both public and private terminals. The Port of Portland terminals represent about half of the total. The loss of container service that occurred in 2015 would reduce the overall tonnage by about 1.8 million tons.

UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION TESTIMONY on COMPREHENSIVE PLAN January 7, 2016

The Board of the University Park Neighborhood and its Land Use Committee requests that you consider the following comments and concerns about the proposed Comprehensive Plan.

1) The Water Bureau property known as the Carey Boulevard property be zoned OPEN SPACE.

The creation of the Mid Peninsula Trail has created a park like setting. The UPNA's comments to the Planning and Sustainability Commission requested that this land be OPEN SPACE. Alternatively, the UPNA requests that the current R5 zoning be maintained and that the one R2 parcel be rezoned to R5.

This request is based on two heritage trees being on the property, its historical use as a park, and the Equity Goals of the Comprehensive Plan. Two hundred years of experience show that Railroads and Residential Housing are not compatable. This is one of the few parcels in the City of Portland where no residences abut railroad lines. In addition, upzoning to allow multi-family housing would create an inequity — the poorest residents in the neighborhood would live adjacent to a rail line, in an area which already has some of the worst air quality in the US.

This set of parcels is used by over 1200 people every day in the summer to walk dogs, run, bike, play ball, or enjoy the birds and fauna (August 2015 activity census performed by UPNA). It is also used by over 20 and as many as 50 houseless individuals each day of the year.

- 2) The UPNA Board strongly urges the City Council to FIX a problem created by the current Comprehensive Plan south of Willamette Boulevard and to the east of the railroad line. Five residences are zoned Commercial. The City does not own the bridge and there is a dangerous blind curve at this location which makes vehicular and pedestrian access very difficult. We request that this be DOWNZONED to R5. The addresses of the subject properties are: 6858, 6946, 6838,6832 and 6822 N. Willamette Blvd.
- 3) The UPNA Board urges the City to rezone the property south of Oberlin and east of Minerva to R5 to be consistent with the rest of the zoning west of Macrum Ave.
- 4) The UPNA Board DOES NOT support the creation of an Institutional Campus Zone, but WEAKLY SUPPORTS the reclassification of the Baxter-McCormick property as proposed by the proposed Comprehensive Plan to a lower than Industrial employment zone. The UPNA preferred option is to Reclassify and ReZone the Baxter-McCormick property to OPEN SPACE.
- 5) The UPNA Board and Land Use and Open Space Committees supports the proposed rezoning and reclassification from Industrial to Open Space of a parcel of land south of Willamette Blvd.

- 6) The UPNA Board supports the proposed replacement of the viaduct on Willamette Blvd, the replacement of a private bridge across the railroad on Willamette Blvd. and rail line improvements. It also supports the proposed watershed infrastructure improvements.
- 7) The Map App did not work properly initially and even in its latest version is difficult to use, loses input and is user unfriendly. It isn't alway clear what map is being examined, the directions were unclear and it wasn't available in any languages other than English. This suggests that it did not adhere to the goals for inclusivity and community input found in the Comprehensive Plan.
- 8) The UPNA Board and Land Use Committee strongly supports the inclusion of a Health Overlay for North Portland as proposed by the North Portland Land Use Group and Neighborhood Association Chairs.

Submitted,
Thomas Karwaki
University Park Neighborhood Association Vice Chair & Land Use Committee Chair
7139 N. Macrum Ave
Portland OR 97203
253-318-2075 cell
karwaki@yahoo.com

## Arevalo, Nora

From:

Jim Owens <jim.owens@coganowens.com>

Sent:

Thursday, January 07, 2016 3:33 PM

To:

BPS Comprehensive Plan Testimony; Engstrom, Eric

Cc:

Duke, Courtney; Igarta, Denver; Philip Selinger; Nettekoven, Linda;

cosmicray@comcast.net

Subject:

TEG Comments on Comprehensive Plan Transportation Element

**Attachments:** 

TEG Comments on Comp Plan 1 6 16.docx

Eric,

Attached are draft comments from PBOT's Transportation Expert Group (TEG) on the Transportation element of the Proposed Comprehensive Plan. These are submitted as draft comments to be formally endorsed by the TEG by January 15. This formal endorsement has not occurred due to the cancellation of the TEG's December and January meetings. The group was scheduled to meet today to take that action but that meeting has been rescheduled by the bureau until late February. It is unlikely that there will be any substantive changes to the comments. We will forward the final document by EOD on January 15.

Thanks for your consideration of these comments.

Jim

JIM OWENS, Principal

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Cogan Owens Greene, LLC

Celebrating 40 years of engaging people to create and sustain great communities.

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January 6, 2015

TO:

**PORTLAND CITY COUNCIL** 

FROM:

TRANSPORTATION SYSTEM PLAN EXPERT GROUP

SUBJECT:

COMMENTS ON RECOMMENDED DRAFT 2035 COMPREHENSIVE PLAN

TRANSPORTATION ELEMENT

## **CONTEXT**

The City of Portland's 23-member Transportation Expert Group (TEG) was jointly convened in January 2014 by the Bureau of Transportation (PBOT) and the Bureau of Planning and Sustainability (BPS) to provide input on revised transportation goals and policies in the Proposed Draft Comprehensive Plan and on implementing elements of the City's 2035 Transportation System Plan (TSP).

The TEG process builds upon the work of an earlier Networks Policy Expert Group (PEG) convened by PBOT and BPS and BPOT to advise on the transportation element of the Comprehensive Plan. The TEG brings together the perspectives of agency partners, community and business associations, mode-specific representatives and at-large representation. Since its inception, the TEG has been advising PBOT and BPS, as well as the Planning and Sustainability Commission, on those aspects of the Comprehensive Plan affecting the City's transportation system, including goals, policies, and significant projects. Contracted facilitation has assisted the group in engaging in open and frank consideration of the TSP. As a group, we have not provided comments on the Comprehensive Plan Map. Areas of TEG input have included TSP public outreach, transportation related goals and policies, project selection criteria and evaluation process, project list priorities and financial plan, street classification map updates, design and implementation of a transportation hierarchy, Citywide parking strategy, and changes to Code to implement the TSP, e.g. street design guidelines. Input has also been provided on PBOT's Two-Year Action Plan and Our Streets initiative.

The TEG is generally complimentary of the process and the outstanding support of staff in TEG presentations, solicitation of input, and response to the TEG's questions and expressed concerns. While bounds have been set as to what is and is not to be addressed in this update of the TSP, a far-ranging set of topics have been considered. Staff is to be commended for the level of research, innovation and thoughtful consideration of diverse community needs in preparing the draft TSP. While the draft is not everything every member of the TEG may have hoped for, it is a major step forward in addressing the urgent needs of our growing city.

The following comments have been prepared to respond to issues and questions raised by City Council members in its November 3, 2015 work session on the Transportation Element of the Recommended Draft 2035 Comprehensive Plan. Additionally, the TEG is reaffirming some of its key comments submitted to the Planning and Sustainability Commission during its deliberations on the Comprehensive Plan. Separately, individual members may be submitting more detailed comments on specific proposed policies and projects on behalf of the organizations or interest groups that they represent.

## PROPOSED COMPREHENSIVE PLAN POLICY DIRECTION

- Overall Policy Direction: The TEG endorses the overall policy direction for the City's transportation system
  represented by the Recommended Draft goals and policies, projects and programs, and specifically policy
  direction that:
  - Recognizes the role of the transportation system in supporting local and regional economic growth.
  - Targets growth and investment to centers and corridors.
  - o Reduces carbon emissions associated with the transportation sector.
  - Promotes equitable transportation investments, but recognizes the need to prioritize such in areas such as East Portland (including Cully and Brentwood) where infrastructure investment has lagged behind other areas
  - Recognizes that one size does not fit all in terms of planning for and use of the transportation system.
  - o Commits to the development of multi-modal performance measures.

We think that it is important to recognize that this is the first time that the City has applied a financially constrained approach to project selection. Further, projects were selected based on a new project selection process that was widely vetted internally and externally, including with the TEG.

- Transportation Hierarchy: While supporting the concept, some concern has been expressed that the proposed transportation hierarchy fails to recognize the continuing role of autos and freight and is absent a strategy to resolve conflicts among modes. As drafted, the weighing of modal transportation needs within a "hierarchy" sends the wrong message by implying that motor vehicles will be shunned, and perhaps not even accommodated on some streets. In practice this will not be how it works. The TSP needs to be realistic in its characterization of this interplay of modes. While the plan correctly promotes alternative modes, motorized vehicles will continue to play a dominant role. There needs to be more guidance on how this hierarchy will be used.
- Accommodating a Changing Demographic and Persons with Disabilities: The plan seems to rely on ADA
   Title III for disability transportation planning. While this may help eliminate contingent liability for the
   city, the ADA law only speaks to minimum requirements which will likely result in minimum and
   unsatisfactory outcomes. The plan needs an infusion of focused creativity to address head-on the needs
   of people with disabilities as well as Portland's aging population. This added focus will certainly move
   Portland toward the goals of a truly "Livable City" for all residents. Examples of an area that needs a new
   creative approach are the group care, assisted living, and transitional facilities that have proliferated in
   former single family residences often located far from transit and many other services."
- City's Role in Transit: The City's approach to transit and streetcar strategies is not clear in the Recommended Plan and it is recommended that the City take a more assertive role regarding transit. Rather than just "punting" that responsibility to TriMet, the City should take a larger role in shaping and funding transit in coordination with TriMet. The TSP further needs to address the role of streetcars and the City's considerable investment in this mode vis a vie TriMet's role in providing other transit services.

- Being Forward Thinking: The Transportation element seems to be stuck in a vision based on status quo modes and technology. As a 20-year plan, it should acknowledge potential changes in technology that may change how streets function (e.g. driverless cars), car ownership (share sharing, ride sharing, jitneys), and how public transit's role might shift as these new approaches to transportation take shape. For example, what about drone deliveries displacing the ever more ubiquitous UPS and FedEx trucks? Are there other big changes out there a subway in the central city for regional light rail or closing down a freeways segment or capping a piece of freeway? Or the effect of emission-free technologies on automobile use? While the TSP cannot predict these things, it needs to consider the City's ability to respond to these changing needs and opportunities.
- Role of Ride-Sharing: The Plan needs to better recognize and support ridesharing and carsharing as a
  growing and increasingly important approach to meeting the City's transportation goals. At the same
  time, the coordination with and effects on transit, environmental considerations (clean air), and
  economic effects need to be addressed.
- Rivers as Part of Transportation Infrastructure: There is concern that while proposed policies recognize
  the role of the Willamette and Columbia rivers as transportation infrastructure for both freight and
  passengers, there are no specific strategies and projects to implement this policy direction. In what
  applications is this an efficient and viable alternative mode of travel?
- Safety as a Priority: Concern that there is inadequate discussion of safety for all modes, but particularly the need to create a safer pedestrian system. Safety is more than connectivity. The City's adoption of a "Vision Zero" goal is a big step in the right direction. One death on our city streets is indeed too many.
- Regional Coordination: Concern that there is inadequate emphasis on regional coordination and
  addressing existing classification conflicts across jurisdictions. The City's transportation system needs to
  be viewed in the larger context of the region. At the very least, coordinated and consistent use of street
  classification names and definitions among jurisdictions is needed. Trips are not bound to the City limits
  and Portland policy will not necessarily align with that of the region's suburban communities. The
  Regional Transportation Plan needs to be clearly referenced as one place where such alignment is
  referenced.
- Partnering with ODOT: the City's partnering with ODOT needs to elevate joint planning efforts for
  "orphan highways" such as Powell, 82nd Avenue, McLoughlin Boulevard, Macadam Avenue, Lombard
  Street and Barbur Boulevard as well as "fixing" the numerous interchange locations that pose a great
  hazard and inconvenience for cyclists and pedestrians.
- Use of Rights-of-Way to Accommodate Multiple Modes: Concern that the list of Significant Projects does not adequately accomplish this goal, especially in terms of freight.

## PLAN IMPLEMENTATION

Collectively, the Plan's goals, policies and projects represent a sea change shift from an auto-oriented transportation system to a multi-modal transportation system. The TEG is concerned, however, about a lack of direction in some areas on how to implement this policy. We urge PBOT to address the following in its development of the Transportation System Plan:

- Lack of Process/Criteria for Resolving Conflicts within the Plan: Perhaps the TEG's most significant
  concern is the absence of a clearly articulated process and criteria for resolving conflicts among policies,
  classifications, modes, etc. The Proposed Draft identifies a multitude of centers, corridors, transit station
  areas, City Greenways, urban habitat corridors, employment areas, pattern areas without any mention of
  how they will be reconciled with and against each other.
- Internal Coordination on Plan Implementation: There is concern that while the Proposed Draft assumes
  coordination among city bureaus to accomplish Plan objectives, in real life the experience is that all too
  often the opposite is true. This has often hampered progress in providing transportation facilities in a
  timely and cost-effective way. It's not clear how this policy direction will be meaningfully
  implemented. The City's recent efforts to coordinate parking policy between PBOT (on-street) and BPS
  (off-street) is a big step in this direction.
- Application of a New Multi-Modal Approach to Level of Service: There is concern that this underpinning
  of a multi-modal system and implementation of the proposed transportation hierarchy remains a lower
  priority for PBOT.
- Lack of Identification of Transportation Improvements Needed to Accommodate Projected Growth: The
  Plan provides sweeping policy direction intended to ensure that planning, design and investment in
  transportation infrastructure accommodates projected growth over the 20-year planning period.
  However, the list of Significant Projects has not, to our knowledge, been assessed to ensure that
  transportation improvements are indeed doing that. The TEG is not convinced that the Significant
  Projects list sufficiently addresses the needs of high-growth areas.
- Making Centers and Corridors Work: Centers and corridors are central to the strategy to accommodate projected growth, yet the Plan development process (including the selection of Significant Projects) has not matched infrastructure investments to the proposed centers and corridors. Pilot projects should be undertaken to demonstrate how specific transportation facilities will be designed to accommodate multimodal needs in corridors and centers. Additionally, an overall street plan for future streets is needed to ensure that we are truly focusing investments in line with planning policy. Transportation Demand Management strategies are essential tools that need to be developed and promoted. They tend, however, to be "soft" often requiring sustained partnerships and voluntary actions and will require bolstering with innovative land use and infrastructure design and development approaches.
- Impacts on Gentrification: There will be a need to know the potential effects on gentrification and
  involuntary displacement resulting from transportation improvements, with streetcar, MAX and bike
  network projects being the oft-cited examples. Transit-oriented development needs to be affordable.
  This is a complex topic that is closely tied to the City's renewed consideration of inclusionary zoning.
- Resiliency: Another area needing to be addressed is the resiliency of the transportation system in the case of significant natural disasters, terrorism, or other disruptions. Many neighborhoods would be isolated with the failure of bridges or tunnels or slippage of roadside hillsides.

#### PROJECTS AND PROGRAMS

The Significant Projects selection process and resultant project list has been a key focus of the TEG. TEG input has helped shape the evaluation criteria and has led to the establishment of a programmatic category to target funds to smaller projects. By design, the TEG has not reviewed individual projects and offers no comments on specific priorities.

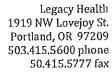
TEG comments on the project evaluation process and criteria, resultant project list and program categories, and Financial Plan include:

- An Experiment to be Tested and Refined: Recognition that the project evaluation and prioritization process developed for the Comprehensive Plan is an experiment that will need to be tested and refined over time. It is a much improved approach to project selection and PBOT should be applauded for its innovation and commitment to integrating the TEG and other parties into its development. At the same time, there is recognition that many parties are confused by the project evaluation process and concerned about the resultant prioritization. It is also clear that many are unaware that smaller projects are being included in Citywide Program categories rather than on the project list and that the project list will be updated, through a public process, approximately every five years. As might be expected with a process that has evolved piecemeal over time, understanding what has been developed by the bureau has been a "catch-up" exercise that has frustrated some. Clear, non-jargon information is needed on how the project evaluation criteria will be used and what other factors will be considered in project and program selection. Details on how the project lists will be updated are also needed.
- Outcome-Based Criteria: There is support for the use of outcome-based criteria to evaluate Major
  Projects and Citywide Programs. In most cases, funding projects that achieve multiple benefits is a wise
  use of limited resources. Using evaluation criteria can also identify projects or programs that score well
  on only a few criteria, but may serve a critical role in achieving key outcomes. The set of criteria
  developed through consultation with the TEG seems to work well in recognizing projects that are likely
  to do the most to improve safety, health, equity, access, and economic benefit.
- Refinements to Project Evaluation Criteria: While the proposed project evaluation criteria represent a
  positive step toward creating a more transparent decision-making and project prioritization process,
  refinements are needed in several areas:
  - Comparing completely different projects with the same criteria: Evaluating totally different projects (e.g., comparing a \$42 million rail bridge project with a modest pedestrian/bike project) while using the same criteria is awkward at best.
  - Clarifying how the evaluation criteria fit into the entire project prioritization process: PBOT staff has indicated the criteria are intended to guide decision-making, to inform final decisions about which projects are placed on the "constrained" list, and to help determine how they are prioritized. However, this evaluation with the criteria has formed the constrained project list with minimal public input, vague project descriptions (regarding the type and level of improvement), and extremely preliminary and inconsistent cost estimates.
  - o Fitting one size to all situations: Certain types of projects and areas of the city will always score poorly, regardless of the true need. Examples include active transportation projects of smaller neighborhood scale, safe routes to school, and gap filling projects, which are at a disadvantage because they will have few categories to score points (e.g., not on a high crash corridor, lower population density, limited economic benefit, no freight benefit,

- etc.). Despite frequent claims from the staff that the unique circumstances of different neighborhoods should be recognized, the one-size-fits-all approach was imposed uniformly in the application of the evaluation criteria. The criteria should be refined to allow a more nuanced approach to enable projects in different areas of the city to be competitive for needed transportation improvements or program assistance. Consistent community advocacy for a project that otherwise does not score well needs special consideration at least after the expressed need for a project is affirmed over time.
- o Enhancing the existing transportation network: The analysis is heavily focused on evaluating individual projects using criteria that primarily consider social, economic, and environmental issues. The criteria don't give sufficient consideration to the strategic transportation value of individual projects for making our pedestrian/bike/motor vehicle/freight system whole. For example, access to transit is dependent on a complete pedestrian infrastructure.
- Citywide Programs: Support for establishment of categories of Citywide Programs to ensure that the
  Bureau effectively prioritizes, funds, and delivers smaller, cost-effective projects. More detail is needed
  on the nine Citywide Programs. Small projects proposed to be moved from the major project list should
  be shown on citywide program reference lists. Small projects proposed through public input should also
  be evaluated for inclusion on future citywide program reference lists.
- Project Pipeline: Support for a five-year "project pipeline." By identifying high priority short-term
  projects, the Bureau can be better prepared for grant applications with more fully developed projects.
   We recommend the project pipeline include both bundles from citywide programs and major projects.
- Equitable Distribution of Active Transportation Projects: The backlog of needs for the outer
  eastside (former unincorporated area) relative to the southwest (topographically challenged)
  has been evident for a long time. Review of the list of active transportation projects shows a
  concentration of projects in the eastern portion of the city, while the west side (including many
  areas of substantial need) has relatively few.
- Regular Assessment/Reporting: The TEG recommends that PBOT develop a program of regularly reporting on the performance of the draft constrained project and program lists, including how projects and programs support the Comprehensive Plan focus on centers and corridors, and job centers. Performance modeling for access/mobility, mode share, vehicle miles travelled, greenhouse gas emissions and other factors should be developed and publicly shared. This is important if community advisors are to play an on-going, meaningful role. The budgeted BPS evaluation program needs to coordinate with PBOT on the evaluation of TSP elements.
- Opportunistic implementation of projects: In spite of all the best intentions built into evaluation criteria
  and policies, projects that are FUNDED tend to advance and some funding programs (Federal or
  otherwise) are mode or project-specific. Certainly this is true of LID and some SDC-funded projects streetcar being one example. Is opportunistic implementation a good thing and how is it accommodated
  in the processes outlined in the TSP?

Thank you for consideration of our comments.

Transportation Expert Group





January 7, 2016

Portland City Council 1221 SW 4th Avenue Portland, OR 97204

# Re: Portland Comprehensive Plan Update

Dear Commissioners:

Planning and Sustainability staff has requested that Legacy Health summarize for the Council's benefit Legacy's current views and response to the City's Comprehensive Plan update process. This letter is provided for the Council's consideration.

In addition to Legacy's lead role in re-purposing its Holladay Park facility as the Unity Center for Behavioral Health, Legacy operates two urban medical care centers (Legacy Good Samaritan Medical Center and Legacy Emanuel Medical Center), over a hundred primary and specialty care clinics and a regional clinical laboratory in Portland. Both Good Samaritan and Emanuel offer comprehensive and specialized health care services to the Portland area and regionally. Those specialized initiatives include the Randall Children's Hospital, a range of organ transplantation services and the only burn center and one of only two Level 1 trauma centers between the Puget Sound area and the Bay Area. Our two health centers are also two of the most accessible and busiest emergency departments in the City and region.

Both Good Samaritan and Emanuel have been a valued part of our community for over a century at their present locations. As Portland has grown, so has the need for the types of care Good Samaritan and Emanuel provide. The Council is aware of the complexities, costs and challenges facing urban health care centers. We believe that no other type of organization carries with it the diversity and significance of what we (and Portland's other major providers) undertake on a daily basis.

In the Comprehensive Plan process, the City's focus is how land and facilities (existing and future) are best utilized, balancing numerous policy objectives. In Legacy's case, our health care centers are essential community resources, which differentiates them from commercial enterprises. We respond to those who have fundamental health and medical needs. Our facilities and the use of our physical assets have this as a central purpose. Both Good Samaritan and Emanuel function in highly urban environments. In effect they both are "land-locked"——in Good Samaritan's case by an eclectic NW Portland neighborhood, in Emanuel's case by freeways and major streets. The land base which we own at both locales is limited and extremely important to us. It allows the flexibility to create new or improved facilities to serve patients and their families, while preserving on a cost-responsible basis both locations' historic cores. We continually evaluate whether we should renovate or retro-fit existing buildings or start facilities anew. We have taken both approaches, dictated by patient care needs and the costs associated with construction to meet those needs. Health care facilities are expensive to build, no matter what format. Patient care standards, medical technology and the highly regulated nature of health care require our attention to making wise and cost-effective choices.

We have shared these perspectives with City Staff as part of the multi-year Campus Institutional (CI) zoning project. This is a sub-set of the larger Comprehensive Plan update. We have appreciated the efforts made

by John Cole and his colleagues as they have proposed CI land use regulations. More work remains, as this is among the most challenging of land use categories. We are currently engaged with Staff in refining this effort and have provided extensive comment to the Planning and Sustainability Commission. Our plans are developed on an integrated, long-term basis. We believe that Staff concurs with this location-wide approach, rather than undertaking a parcel-by-parcel or building-by-building analysis at either Emanuel or Good Samaritan.

Instead of directing our efforts to the broader Comprehensive Plan update process currently under Council review, we have, as encouraged by Staff, focused our discussions for over two years on the CI process. As proposed, that process deals directly with our properties and our uses. As a result, we very much want to conclude the CI process and believe that our comments and interactions with the City best belong in that specific, concentrated forum.

The CI process has led to a variety of responses by those institutions affected by it. What appears to be emerging are two core issues:

a) Should health care centers be included in zoning also designed for higher education institutions?

b) Are the individual health care centers (Providence, Adventist, Legacy) different enough from one another---from the standpoints of location, services and mission---that each should be subject to specific land use treatment, such as has been given to OHSU?

In Legacy's instance, both Good Samaritan and Emanuel have been subject to campus-wide, long-range plans for many years. This has worked well in terms of creating an overall planning horizon but those plans do not now address many issues which have developed as a result of the ever-changing nature of health care facilities' needs and uses. The City is correct that such issues should be considered comprehensively.

We have also been informed that a separate effort, being led by PBOT, concerning Transportation Demand Management (TDM) policies and/or regulations is proceeding independently from the Campus Institutional zoning project. We have encouraged City Staff to merge those two efforts, so that they can be considered concurrently and comprehensively. Transportation and parking issues are a key component to the use of our properties. Legacy has long supported TDM measures. We were an early and significant supporter of the Portland Street car. The proposed CI2 zone leaves open transportation, parking and TDM incentives and standards. It is difficult for us to address overall CI planning issues with transportation matters subject to a separate process. We look forward to cooperative discussions with Planning and Sustainability and PBOT representatives about a coordinated approach to these issues. The first of such discussions is scheduled for later this month.

As we have emphasized to City Staff, Legacy wishes to accomplish good, thoughtful community-based outcomes from these planning processes. Because there are no other uses which truly parallel the operation of health care centers, we welcome the opportunity to educate and discuss these specialized elements with Staff, the Planning and Sustainability Commission and, ultimately, with the Council. We are open at any point to respond to your questions or provide information helpful to achieving our shared objectives. Thank you for engaging us in these efforts.

Our principal objective, like the City's, is to assure that Portland is a healthier place, with caring and professional health care services available on a cost-effective basis to the City's entire population. We thank the City for joining in this effort.

Sincerely,

Everett W. Newcomb III, D.O., FACC, FACP

Chief Operating Officer

Legacy Health

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

January 7, 2016

Mayor Hales and Commissioners:

I am writing to contribute my comments on the Draft 2035 Comprehensive Plan. I am a resident of the Richmond neighborhood; I currently serve on the Richmond Neighborhood Association Board as well as representing Richmond on the Southeast Uplift Neighborhood Coalition Board. I also have been actively engaged with the Division Design Initiative. The views I present here reflect my own views and not those of any organization.

First of all, I wish to endorse enthusiastically the recommendations made by the Division Design Committee and offer my appreciation for all the work done by Heather Flint Chatto. I strongly support the call for more context sensitive development as our city strives to respond to the rising cost of housing. All of the recommendations put forward by Division Design are ones that I support because I feel that too much of the recent construction in my neighborhood has violated our sense of neighborhood community by blocking sunlight, invading privacy of adjacent properties, and simply being an eyesore. Design is an important element that has been overlooked in much of the city, and it is time to correct for this oversight. The policy recommendations of the Division Design group provide concrete guidelines for achieving more desirable outcomes, and should be implemented with haste.

Having said that I would also like to express my view that it is time for commissioners to step back and consider the situation from a city rather than neighborhood perspective. Planning should be done in a uniform manner so that residents are treated consistently and without bias. Design review should be applied citywide. 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. That 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.

To achieve more affordable housing that does not threaten to undermine the strong sense of community that characterizes our neighborhoods, we need consistent and informed oversight from our commissioners and planning bureau. Please step up and meet this challenge before it is too late.

Sincerely,

Denise Hare

## Arevalo, Nora

From: Hunting, Duane <duane.hunting@zgf.com>

**Sent:** Thursday, January 07, 2016 2:46 PM **To:** BPS Comprehensive Plan Testimony

Cc: Don Baack (Baack@q.com); Robert Hamilton (robert@phww.org);

vpimont@spiritone.com; Glenn Bridger (gbridger@teleport.com); Wes Risher

(wrisher@easystreet.net); carolynraz@comcast.net; rickm@meigs.org; Barbara Bowers; Eric Wilhelm; Sheila Fink; lesliepohl@comcast.net; michael.reunert@comcast.net; mikal@windermere.com; 'apanitch@comcast.net'; Rick Seifert (wfseifert@gmail.com); John Gould; Mike Roach; rstein@spiritone.com; Hunting, Duane; Bogert, Sylvia;

Frederiksen, Joan

Subject: "Comprehensive Plan Testimony" - HNA Comments on Wilson High School Zoning

Adjustment

Attachments: 2268\_001.pdf

Portland City Council:

### MAP ZONE CHANGE REQUEST:

The Hillsdale Neighborhood Association (HNA) is requesting that the <u>Comprehensive Plan zoning designation</u> for the Wilson High School campus at 1151 SW Vermont Street, Portland, Oregon 97219 be returned to <u>"conditional use"</u> <u>within an R7 (Residential 7,000 sf) zone designation</u> to be consistent with all other Portland Public School (PPS) property zoning. The Wilson High School campus (Quarter Section Map 3628) is currently zoned IRd (Institutional Residential) as a holdover from the Hillsdale Town Center Plan approved in 1997 by the City of Portland. The adjacent Mary Rieke Grade School (Quarter Section Map 3627) is currently zoned R7. This requested zone change was approved by the HNA Board of Directors at last night's January 6, 2016 monthly meeting. With no time to send a letter to the Council Clerk, 1221 SW 4<sup>th</sup> Avenue, Room 130, Portland, Oregon, I'm emailing our request to the Council as directed by the Bureau of Planning and Sustainability information received to meet the Thursday, January 7, 2016, 6:00 pm deadline.

# **BACKGROUND INFORMATION:**

Originally, HNA was promised a Wilson High School Campus Plan within 2 years of the Hillsdale Town Center Plan adoption by the city in 1997. However, no campus plan has been prepared to date, and the neighborhood has been advised to participate in review and comment upon the many adjustments made over the last 20 years. In developing the Hillsdale Town Center Plan, the Hillsdale neighborhood was too early at embracing the future development of the school campus through an early acceptance of the Institutional Residential (IR) zoning within the Hillsdale Plan District designation. HNA was not advised previously that accepting the IR zoning, in lieu of the "conditional use" designation within the R7 zoning of the adjacent neighborhood and schools, we would not receive the promised campus plan and not be invited to the PPS review and discussion table for improvements such as the Baseball Batting Cage Location, Swimming Pool Upgrades, Major Landscape Improvements, School Signage Pedestal Design, Sports Field Concession Stand and Fence/Gate Relocation, etc.

# **CURRENT ZONING DESIGNATIONS:**

Wilson High School, 1151 SW Vermont Street, Portland, Oregon.

Current Base Zone: IR (Institutional Residential)

Comprehensive Plan: Same as above.

Plan District: HD (Hillsdale Plan District)

Mary Rieke Grade School.

Current Base Zone: R7 (Residential 7,000 sf)

Comprehensive Plan: Same as above.

Park Bureau Property around school property.

Current Base Zone:

OS (Open Space)

Comprehensive Plan: Same as above.

Duane Hunting, HNA President 6703 SW 13th Avenue, Portland, Oregon 97219 duane.hunting@zgf.com

Duane Hunting

ZGF ARCHITECTS LLP

Associate Partner

T 503.863.2454 E duane.hunting@zgf.com

1223 SW Washington Street, Suite 200

Portland, OR 97205

ZGF Email Disclaimer

# 1151 WI/ SW VERMONT ST

# PORTLAND, OR 97219

### **ZONING & DEVELOPMENT**

## Zoning

Base

IR - Institutional Residential

R7 - Residential 7,000

Overlay

d - Design Zone

Comp Plan

IR - Institutional Residential

R7 - Residential 7,000

**Comp Pian Overlay** 

n/a

**Historic District** 

n/a

**Conservation District** 

n/a

**Plan District** 

HD - Hillsdale

**Natural Resource** 

n/a

**Management District** 

**Quarter Section** 

3627

## Historical Resource

n/a

## **Urban Renewal Area**

n/a

# **Storefront Improvement Area**

n/a

#### **Business District**

n/a

# 1151 SW VERMONT ST

## PORTLAND, OR 97219

## PROPERTY

PROPERTY		
Year Built		Assessor
Description	MISC YARD IMPROVEMENTS	Property Values (2015)
Neighborhood	HILLSDALE	Market Value \$2,328,230.00
Jurisdiction	Portland / Multnomah	Assessed Value \$0.00
Zoning	IR - Institutional Resident OS - Open Space	ial Taxes (2015)
Owner	SCHOOL DISTRICT NO 1 (LEASED HILLSDALE	Property Taxes \$0.00
	FARMERS MARKET ATTI	Total Taxes \$0.00
Owner Address	PO BOX 3107 PORTLAND, OR 97208-3	107
Parks		Schools
Nearby		Attendance Area
·		Attendance Angu
Wilson Pool	514ft	District PORTLAND (#1J)
0.52 acres	40000	Elementary School RIEKE, K-5
DeWitt Park 1.09 acres	1288ft	Middle School GRAY MIDDLE, 6-8
George Himes Park	0.42ml	High School WILSON HS
33,35 acres	V. 12	
Stephens Creek Nati	ural Area 0.47mi	Nearby Schools
4.73 acres SW Terwilliger Blvd I	Parkway 0.49mi	Wilson High 973

# Portis

Gray Middle 0.76mi

Public 6-8

Public 9-12

Public K-5

Private P-5

**Rieke Elementary** 

Portland Jewish Academy

Maimonides Jewish Day School

0.82mi

1175ft

0.75mi

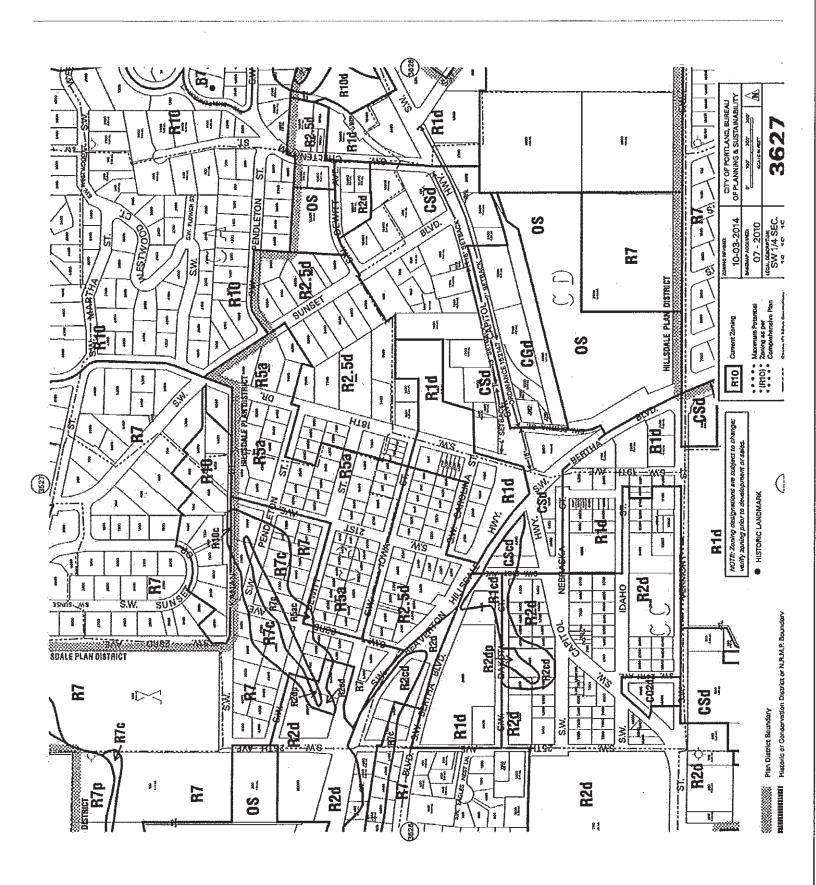
Private P-9

## **Public Safety**

101.09 acres

# Crime Statistics





## Arevalo, Nora

From:

Dave Brook <dbrookportland@gmail.com>

Sent:

Thursday, January 07, 2016 2:40 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Submitted by David Brook 1905 NE Clackamas Street Portland, Oregon 97232

More than 20 years ago the Sullivan's Gulch Neighborhood adopted, and Portland City Council approved, the 1987 SGNA Neighborhood Action Plan, which defined goals for the commercial and residential areas of our neighborhood. Since then this vision has not been superseded, and if anything is more relevant than ever. The general principal in our neighborhood plan (which was embodied in the previous Comp Plan) was to concentrate commercial development along NE Broadway and maintain residential designations in the rest of the neighborhood (minus a few parcels with legacy commercial zoning).

I fully support the goals of increased housing density but am concerned that the Mixed Use Zoning proposed for areas of Sullivan's Gulch in the 2035 Comprehensive Plan will seriously impact the residential character of the neighborhood by expanding the areas of commercial development in these proposed areas:

- NE Multnomah 16th to 21st Ave.
- NE Weidler 17th to 24th Ave.

As any merchant on NE Broadway in our neighborhood will tell you, this area has a long way to go to equal the vibrancy of many other shopping/entertainment areas of the city. And it's not because there aren't already plenty of potential customers living close their shops!

A key aspect of the SGNA Neighborhood Action Plan is to work toward the eventual decoupling of Broadway and Weidler from NE 16th to 24th. Two-way traffic on Broadway would be a boon for the businesses there - giving businesses additional exposure from drivers traveling in either direction. In addition, it would make pedestrian crossing of both Weidler and Broadway far less hazardous than it is now since additional traffic signals would reduce the platoons of cars chasing the stoplights as we have now. However, the proposals in the Comp Plan that call for Mixed Use Zoning along the north side of Weidler seem to continue the vision of one-way traffic on Broadway and Weidler and opens the possibility of commercial-only development along what has been, and I believe, should continue to be, primarily a residential street. Given its proximity to the Broadway corridor, I am very supportive of higher density residential-only development along NE Weidler Street.

## **Mixed Use Zones**

While the Mixed Use Zone concept has the admirable goal to increase housing density and provide neighborhood services, there is no requirement that housing MUST be built - only that it CAN be built. As a result it allows the possibility of commercial-only development in an area intended to encourage residential development and local services.

Similarly, the proposed Mixed Use Zoning along the south side of Multnomah between 16th and 21st Ave. would allow the possibility of completely commercial developments there—essentially continuing the Lloyd District development pattern all the way to 21st. Again, I am supportive of higher density residential-only development along Multnomah.

#### Scale

Further, I am concerned about the scale of what is likely to actually get built under the proposed zoning categories. While the base definitions of the zoning proposed along Multnomah and Weidler are generally in keeping with the adjacent parts of the neighborhood - given the allowable bonuses, and developers' apparent willingness to use these bonuses (as demonstrated in recent projects all over the city) - what will get built, in fact, will be 1 or 2 stories taller than the base zone being "sold" to the residents. While setbacks, massing, step downs and other amenities may mitigate this issue slightly, basically, these buildings will end up being too darn tall for the character of the surrounding homes!

To preserve the character of Sullivan's Gulch neighborhood, while increasing density and commercial vibrancy, I suggest:

- NE Multnomah 16th to 21st Ave (proposed is CM3) should be MultiResidential (or if a MUZ is kept, no greater than CM1)
- NE Weidler 17th to 24th Ave. (proposed is CM2) should be Multi Residential (or if a MUZ is kept, no greater than CM1)

I would like to mention a general concern implicit in the Comp Plan which spans 2 bureaus - BPS and PBOT: While the "centers and corridors" strategy for increasing housing density generally preserves the character of single-family areas, I am concerned that since these new apartments and condos are located on the edges of single-family areas, the impact of parking by employee, apartment/condo residents, and shoppers will significantly impact the houses in the first block or two near these corridors. This puts added importance on carefully developing off-street parking requirements for these buildings, as well as the availability of permits currently being considered by PBOT. We know that access to transit and bike commuting takes cars of the road, but that doesn't mean people don't also own cars.

I mentioned the SGNA Neighborhood Plan previously, and from reading the 1987 plan, it's revealing to compare how neighborhoods were treated 20 years ago during the previous Comp Plan adoption. Planning staff spent extensive time with the neighborhood association helping them develop the plan. Staff apparently facilitated several meetings and worked to be sure that neighborhood goals were consistent with what was in the plan. This seems a far cry from the apparent cherry-picking that resulted from citizen and neighborhood comments during current process. In the current process, I am only aware that city representatives attended several neighborhood association Land Use committee meetings, later in the multi-year process.

# Arevalo, Nora

From:

Sean Baioni <seanbaioni@gmail.com>

Sent:

Thursday, January 07, 2016 2:38 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Our neighborhood (SWHRL) has very limited commercial designated property. It's walkability score is low. Buses are infrequent at best and accessibility for people with disabilities who do not drive is terrible. All the walkable emanates of our community including grocery, drug store, coffee shop, dry cleaner and gift store is currently located at the 2855 SW Patton Rd location.

I believe our neighborhood needs more commercial property designated, to provide servers for the residents, not less. Please keep this location commercial however, I do not believe it should only be used as a grocery store because of the obvious economic challenges that other market forces such as but not limited to: New Seasons, Fred Myer & Amazon present. Without some type of creative funding model, I don't believe that this location can support a full service grocery only. A mixed use designation that provides commercial services including restaurants, coffee and recreational business which includes housing would be the best choice for the entire neighborhood.

If no compromise can be made for a multi use designation perhaps the parks department could use the location for a community center or larger park extension with adequate parking.

Please do not allow this location to become unusable, as I mentioned earlier, our community already struggles with limited commercial designated properties.

Thank you

Sean Baioni seanbaioni@gmail.com (503) 816-7245



January 7, 2016 Portland City Council City Of Portland, Oregon 1221 SW 4th Avenue Portland, OR 97201

Subject: Rezone three blocks between North Williams Avenue and North Vancouver Avenue, Russell Street and Stanton Street from IR to Mixed Use/Residential

Dear Portland City Council Members:

Following are comments and recommendations from the Eliot Neighborhood Association (ENA) regarding rezoning three blocks between North Williams Avenue and North Vancouver Avenue, Russell Street and Stanton Street from IR to Mixed Use/Residential zone as part of the new comprehensive plan similar to the proposal in a letter dated November 19, 2015 by the North Northeast Business Association (NNEBA) to the Portland City Council.

The ENA urges the City to approve the rezoning of this three block area. This proposed rezoning would help reverse an over four decades long set of grievances that have been felt by the predominately African American community and businesses that were displaced by the expansion of Legacy Emmanuel Medical Center during the 1970s. The development of 180 to 300 housing units that would have replaced homes that were demolished by the Legacy Emmanuel expansion never materialized as noted in NNEBA's letter.

The ENA recognizes that the Russel Street and Williams Avenue was once the heart of a thriving business center of our neighborhood and these empty blocks are forming a void in the center of what should be our commercial district. This land, adjacent to 2 parks and very accessible from many parts of the city has been unused for over 40 years. This step will help to erase this void in the city fabric

We believe that corrective measures are long overdue. Taking this action to rezone this three block area and the creation of the proposed development corporation would begin to help meet the goal by NNEBA of the revival of a once thriving African American commercial and residential district of Portland.

The ENA Land Use and Transportation Committee members thank you for your important work for the future of our city, and we appreciate your serious consideration of our comments.

Sincerely,

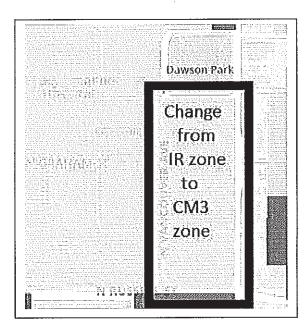
Allan Rudwick

Land Use Chair, Eliot Neighborhood Association

allan Rudwick

228 NE Morris St

Portland, OR 97212



# Arevalo, Nora

From:

Brent Carpenter < brent@full-tilt-boogie.com>

Sent:

Thursday, January 07, 2016 2:30 PM

To:

BPS Comprehensive Plan Testimony Comprehensive Plan Testimony

Subject: Attachments:

1834 SE Ash St. testimony.pdf

Portland City Council Commissioners,

My name is Brent Carpenter, and I'm testifying today about our property at 1834 SE Ash St. My wife and I are residents of SE Portland and have owned this property since 2007.

When the proposed Comprehensive City Plan was released earlier this year, we expected this property to be changed from R 2.5 to Multi- Dwelling 1000 because every other property on our side of Ash St. between SE 18<sup>th</sup> and 20<sup>th</sup> is currently zoned office commercial or is non-conforming R 1.

Our understanding is that the proposed plan would try to match, if possible, what was already on the ground. If that is the case, then our side of the block (the south side from 1822-1932 SE Ash St.) would have been changed to Multi-Dwelling 1000 to reflect what already exists on the ground.

There are three non-conforming R1 multi-family apartments on both sides of our single family home. We are the only single family home on that side of the block. I've attached another document to this to illustrate the current usage. Because the house is land locked between multi-family apartment buildings, the best use for this property would be to eventually convert it to multi-family.

1834 SE Ash fits the designation of Multi-family 1000. It is in an area near a major corridor (SE Burnside) and a secondary corridor (SE 20th) with multiple public services and access to extensive public transportation.

We are asking the council to reconsider the current R 2.5 zoning for the south side of our block from 1822-1932 SE Ash St. and propose changing the designation to Multi-Dwelling 1000 to match what exists on the ground.

Thank you for your time and consideration.

Sincerely, Brent Carpenter PO Box 14336 Portland, OR 97293 January 7, 2016

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Thank you for your time and consideration.

Sincerely,

Brent Carpenter 1834 SE Ash St. Portland, OR 97214

1822-1932 SE Ash St. Land Use

Lot Size: 11,400 sq. ft. 1926-1932 SE Ash St.

Usage: 8 units Built: 1949

Zoned: R 2.5

Actual use: Non-conforming R1 Proposed: no change

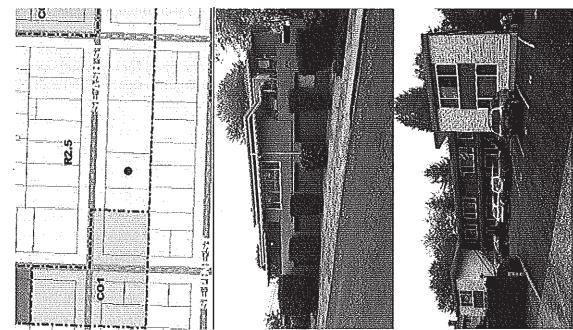
Lot size: 11,619 sq. ft. 1902-1924 SE Ash St.

Usage: 12 units

Built 1965

Zoned: R2.5

Proposed: no change Actual Use: No-conforming R1

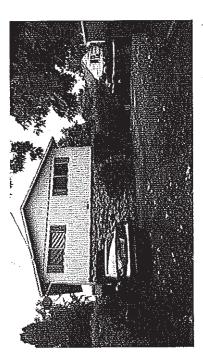


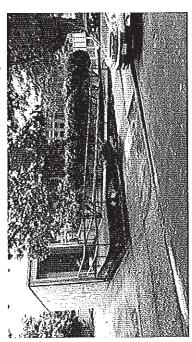
1822-1826 SE Ash St. Lot size: 5000 sq. ft.

Usage: 3-plex **Built 1976** 

Zoned: R2.5 Proposed: no change Actual Use: Non-conforming R1

212 SE 18<sup>th</sup>
Lot size: 10000 sq. ft.
Zoned: CO1
Proposed: CM2







January 7, 2016

Portland Planning and Sustainability Commission Comprehensive Plan Update 1900 SW 4<sup>th</sup> Avenue, Suite 7100 Portland, OR 97201

Re: Proposed Comprehensive Plan Map Change

To whom it may concern:

In the early 1970's, to save the four buildings on the north side of SW Main Street between King and St. Clair Avenue from certain destruction, office use of these buildings was legally permitted. These permits were issued to the owners of the buildings and are still in use today. The office use has become a part of the community, discretely used this way for the past 45 years. These offices contribute to a complete neighborhood by providing well maintained buildings and family wage jobs that are compatible with the neighborhood.

As the representative of two of the buildings located at 2165 and 2153 SW Main Street, the owners of the properties and my concerns with the pending zone changes is that the current use will not be allowed to continue. Revokable permits and nonconforming uses create uncertainty for property owners. This uncertainty may lead to the undesirable effect of less investment in maintenance and a degradation of the character of the buildings.

Zone changes should not become a burden on existing uses. Several options have been discussed to allow the continuation of the existing uses, each with their own concern. I support the current use to be allowed by a permit which runs with the land rather than the owner.

The bottom line is that as part of the pending zone changes, the continued use of the buildings as offices without the cloud of permit revocation or additional requirements needs to be provided for.

Respectfully,

Lisa A Joerin, CPA

Simpson & Company

Representative for Rhododendron House Ltd.

Ofine A Join

2165 SW Main Street

Portland OR 97205



900 S.W. Pith Avenue, Suite 2600 Portland, Oregon 97204 main 503.224.3380 fax 503.220.2480 www.stoel.com

STEVEN W. ABEL Direct (503) 294-9599 steve.abel@stoel.com

January 7, 2016

# VIA E-MAIL CPUTESTIMONY@PORTLANDOREGON.GOV AND U.S. MAIL

Portland City Council c/o Council Clerk 1221 SW Fourth Ave, Room 130 Portland, Oregon 97204

Re: Comprehensive Plan Testimony - King's Hill Historic District Changes

Dear Commissioners:

This office represents Mark Jordan, who owns a home on SW Kings Court in the King's Hill Historic District. As part of the Comprehensive Plan Update, the City of Portland ("City") is proposing to change the Comprehensive Plan designation and rezone several properties in the vicinity of Mr. Jordan's home. These properties, located at 2187 SW Main, 2177 SW Main, 2165 SW Main, and 2153 SW Main ("Properties"), have an existing Comprehensive Plan designation of High Density Single Dwelling with a corresponding Residential 5,000 (R5) zone. The proposed Comprehensive Plan designation is Multi-Dwelling 2,000 with a corresponding Multi-Dwelling Residential 2,000 (R2) zone. For the reasons outlined below, on behalf of Mr. Jordan we strongly object to the proposed change and urge the City to maintain the existing comprehensive plan designation and zone.

The Comprehensive Plan designation and zone proposed for the Properties is inconsistent with a number of City priorities. First, the proposed change is inconsistent with the City's goal of preserving historic resources and historic districts because it would increase the allowable density and height on the Properties, thereby increasing the likelihood that the existing historic homes would be replaced by new multi-family dwellings. The historic homes on the Properties are all listed as contributing resources within the City's King's Hill Historic District and, as such, demolition and alteration is heavily regulated. However, by increasing the allowable height and density on the Properties, the City is unnecessarily placing the retention of historic neighborhoods and buildings in conflict with other, competing City priorities, such as increased density. Having reviewed previous Historic Demolition Review applications, it is entirely possible that, if the City rezones the Properties, the owners could make a case that, on balance, the demolition of the existing homes is supportive of the goals and policies of the



Portland City Council January 7, 2016 Page 2

Comprehensive Plan. We suspect that the City may not have considered this potential consequence of the proposed change.<sup>1</sup>

Second, the proposed change is inconsistent with the designated scenic corridor that covers a portion of the Properties. As noted above, the proposed change would increase the allowable height on the Properties. For the City to propose an increase in allowable height in an area where the preservation and enhancement of scenic character is a priority is confounding. Again, we suspect that the City may not have considered this issue when attempting to rectify the issue with the existing nonconforming situations.

In sum, there are potentially significant negative consequences of the proposed change. For these reasons, we urge the City Council to reconsider the proposed changes and retain the existing comprehensive plan designation and R5 zoning for the Properties. Thank you for this opportunity to comment on the considerable work that has been done on the Comprehensive Plan Update to date, and thank you in advance for your careful consideration of these comments and our recommendation.

Very truly yours,

cc: Mark Jordan

<sup>&</sup>lt;sup>1</sup> Through our conversations with City staff, we understand that the proposed change is driven, in part, by the belief that, if the Properties were zoned R2, the owners could retain the existing offices if the owners secured approval through Historic Preservation Incentive Review. Although we recognize the City's desire reduce the number of non-residential uses operating in residential neighborhoods under revocable permits, requiring the owners to go through a discretionary land use review with the City to recognize the existing office uses does not solve the issue.

# Arevalo, Nora

From:

Kathy Mccann <fabcollector@gmail.com>

Sent:

Thursday, January 07, 2016 1:54 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

comprehensive plan: testimony map change 366

**Attachments:** 

IMG\_20160107\_0001.pdf

Please find attached the signatures of homeowners who have supported the change of zoning to R.2.5, thank you, kathy fletcher mccann

Map Change 366 We the undersigned request that the blocks of SE Hawly 35 Ellis & FE Pleedway between 52 Milwanke Ave JE 1744 be regoned R. 2.5. Econgle family, Hothleen F. McCann 1639 58 Ellis Se Karlem IlmcCani CARL LIESHARZST HORA SE HAROLD GARY SHANK 1618 NE HAMOLD ST Day Shank Dan Palmar 1647 SE Reedwa My / Laura Harris 1647 SE Reedway Jama Hams Peggy MacMillan 1629 3E Ellis St. Pegg MacMill-Tom Mangold 11e29 SE Ellis St. Touthingolf

JESSICA POST-GOLDBLUM 1618 SE ELLIS ST.

1618 SE Ellis St.

Bruco Pederson

# Arevalo, Nora

From:

Nicole Holt <ndholt@gmail.com>

Sent:

Thursday, January 07, 2016 1:52 PM

To:

BPS Comprehensive Plan Testimony

Cc:

Heather FlintChatto; rebecca grace Testimony to support the Division Design Initiative's Top Ten Policy Recommendations

Subject: Attachments:

Testimony for DDI Top Ten Recommendations.pdf

Dear Portland City Council Members,

I am writing on behalf of Architecture for Humanity Portland to express our support of the Top Ten Policy Recommendations for Portland, as proposed by the Division Design Initiative. Through the spirit of collaboration, AFH Portland strives to empower local communities in need by facilitating appropriate design solutions with lasting benefit and a sustainable mindset.

AFH Portland partnered with the DDI in the early stages of their efforts to engage local residents in creative conversations about community design. We worked with local businesses and neighborhood associations to install a series of temporary art installations along Division Street in Fall of 2014. These installations collected input from over 400 community members, reaching a much wider audience than those attending neighborhood association meetings. The key themes we heard from this informal survey were:

- Trees, open space, and nature in general are coveted by local residents in the urban environment.
- · Affordability is a growing concern, both in the residences and the businesses along Division.
- Residents appreciate the variety of small, local businesses along Division and want more services that cater to the needs of the neighborhood
- A sense of identity and character is important so the feel of the neighborhood is not lost in rapid growth.
- The businesses along Division serve as gathering spaces for the community, and the few open areas with access to all are greatly appreciated.
- Most survey respondents live within ¼ mile of Division Street, travel there by foot, and are concerned about pedestrian safety.

See the attached list of data we collected and summary of survey results for more details. We believe the Top Ten Policy Recommendations from the DDI represent the above concerns in a proactive way. The Initiative continues to bridge the gap between technical policy and community education, a role that is critical in empowering individuals to participate in the planning process within their communities.

In partnerships with local non-profit organizations, our volunteers have engaged with a variety of stakeholders to make projects happen that may not otherwise have come to fruition. For example, we worked with Central City Concern to develop a line of bed bug resistant furniture. We collaborated with staff and residents at the Rosewood apartments and the Macdonald Center residence to envision underused courtyards as lively outdoor living rooms. Through feasibility studies for the Willamette West chapter of Habitat for Humanity, we enabled the organization to broaden its portfolio of properties, allowing more residents to transition to home ownership. With the help of Reed College, the collective vision of a group of neighbors in North Portland will become a reality this summer when we bring a sheltered gathering space to their multi-ethnic community garden.

Cross-pollinating efforts between organizations to promote community engagement are exactly the collaborations we support in our effort to strengthen synergic networks within Portland. The Neighborhood Design Guidelines and Toolkit the DDI are working towards are evidence of the solutions-oriented mindset of this initiative and we believe will be a great asset to Portland's future neighborhood development. Architecture For Humanity Portland is happy to endorse the Top Ten Policy recommendations and hopes the city considers the DDI's proposal when finalizing policy within the comprehensive plan.

Sincerely,

Nicole Holt Rebecca Grace

Architecture For Humanity | Portland

1624 SE 54th Ave. Portland, OR 97215 January 06, 2016

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Sincerely, Nicole Holt

Rebecca Grace

Architecture For Humanity | Portland

May l. Ass

1624 SE 54th Ave. Portland, OR 97215

# Sample of Envision Division Mad Libs Card Responses

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# Sample of Envision Division Mad Libs Card Responses

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																141			gas consumption, etc) and harring scopie who five here we folse, dist, car exhaust, etc. it generates anger and disgust. We would like to see sustantable plans that are boneficial to everyone, not just developers an businesses. More green space,
																		i i	businesses. More green space, more walkways, and bving green corridors for people, children, and adults.
06 .		D208/13 1(4) PM		The greenery	Mom & pop establishment	Gal	Drink	Play	U	Minutes		Car .	5	Wook	tieokstore .	It's great and old	Mom & pops	High dates	Lave corporate and high rise
33	uosywood Care	10/24/15 9/33 PM		the green	the history	pet things she friends	eșt		15 60	minutes		ler	3	year	New Seasons	They've been here foreyer	perking for visitor	no parking	Blay the same no more dondos with no parking
31	Mirador	12/22/15/924 PM		orean source/suphinable	local bisinessas	lase illerion	drink	existence	- 6	minutes		ser walking		year	woodsman	H Ph. III and de aller of	outdoor speces	DUNKNICH	e diverse and dynamic cland in Portland
12				transportation				-1,4-14				_	J				orginial low bidge	bulklings	transportation and much john traffic more progressive at least fritmstructure to support it.
12	Mirador	13/22/13 9/44 PM		the houses	the energy	eat	drink	pe weth		minutes	المعارضات المارسا	oot		day	the metal cube housing little T's	it is so monumentally ugly and shows why good stohladture matters	of an "organic" feel	phijopide phijop	a little less intense, and little more neighborhood-oriented.
3 <del>4</del>	Streatteir	02/05/13 1.97 PM		trens & flowers	activity	eat at our lavorite			2	minute	<u> </u>	oot	3	Weak		so much	parking for the new bulknes	tall buildings	more diverse in who lives here and comes here
26.	Division Hardwe	10/24/15 (/24 PM		the charming	the email owner-	ditalyaiest	shop	window shep	1	minutes		/7th	5	wook .	the Tibetan shop at 34th in the old ha	If a old, quality, ensembles		tall new	
	1000	100		neighborhoods	Operated businesses				A S							kind, full of character	of that (old, character) and preservation	tali new buildings	a place preserving the character and charm, no becoming more of a carnon of modern buildings, they will obtain the charm their as attracting now.
Č .	Post Carte	12/23/10 9/44 PM		old neighborhoods	the businesses	shop	ant	walk	1	minute		70th	24/7		Strotmore Guilding?	of the architecture and the macony work	blayoling	auto traffic	emoke-free, "pedestriaria rule" resilty and less roley overall
688	1	15/88/15 5/24 PM		the flora	walking	злор	ent	stroil	2	minutes	1	oot	· · · · · · · · · · · · · · · · · · ·	Week	Sen Yal	They remodeled/restyled if so well	оголимайна	suto traffio - slower	a walking destination and tight knit community
270	Streetfair	02/00/16 1,37 PM	I would like to see Division become greener (more trees & foldage) and more alies friently. It is oursetly very unsafe for opelat lowelf like to see more local blaskesses, including shops, and no more shipt density housing an the street, Nore foed carts, My	•	to bongle	see dege	beards	cirthik beset	4	min	1	erozeppin light	3	work	orange	the designers chose that for Bollywood building	boy bands	Que traffic	a podestrian greenway thereughters with likid terches and inficiable houses (see blo- dome).
	Tublit Food	12/22/15 0/24 PM	the street, Nicro food carts, My Involves are Cibo, Imperial	реорія	feod	oat	drink	wak		minutos			d.						
331	Carty North Bar	1300-2710 (LSq. PAS	<del></del>	the festival strosphere	walking	dat	drink	wak		minutes		oot	multiple	week		favorises	music	gongestion	An amazing place to raise a family
	144.6	İ			<b>-</b>								попира		Hadge House, Landmark Galcon, Ap		walking	driving	a haven for eating, dripking, and milling about with no care/polivition in the way a walking destination and light-
146	ļ	12/22/15 9:24 Pro .	<del></del>	the flora	walking	shop	eat .	siroli	2	minutes	· · · · · · · · · · · · · · · · · · ·	cot	. 7	week	Çen Yai	they remodeled/restyled [1.50 Well	CLOPPANY	NAUD	
300 137	New Geasons	12/22/16 0/24 PM (02/00/16 1,12 PM	we need a large community danter and a popi	people, nature, art	the food	ent	qorte	walk		minutes		.,	many	Week	Roman Candle	Crows play on the roof	tiks lares	parking	bike and pedeatrian only
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	(www.ordscolum	Jack to the			1	est	100	stroil	3	лks	e jaret sasser	sika	Б	week	distribute e erece	olikata tata 1466	greatery and affordable housing	traffic	a bile and pedestrian evenue with a monoral for public transport - why not?
190 190		12/22/15 6:50 PM 12/22/15 9/24 PM		food	treak the coffee shops	ent	uhop	walk	3	Minutes		oot	2	day	Hedge Hause	t is fun for kide to play and eat	loya	trattio	more pedestrian friendly, My 4-hr old wants a toy store that sells Wants at Dolla
	1 - 1	Bridge Control		the front yards	nie cones suchs	go vintege shopping	pet nottee	474.3	15	Minutes	ura Mid	oot		Week	the older ones	they have character/history	safer sidewalks	traffic	more walkable with a mix of affortlable and trandy restaurants
006	Pine State/Ford	10/24/15 produkty	(drawing by 8 yr old)  posture of ealt and straw with a  warning year deligious sign	tridges	ramen	est	bike	walk	15	ភាពមេ		in'	2	толіп	salt and strew	love los creum	loy sloves	traffic	and businesses a web, bike and train only place
38	1	12/22/15 (PV4 PM		palons	on the move	Walk	ыуар	eat	15	minutes		Mile.		wash -	On-the-Maye	I have fun with friends	free hang out apole	traffic	an affordable, pedestrian and bik friendly, multicultural
in in	Bollywood Cate	12/22/15 6:50 PM		the architecture	the revitalization	Oat	stink colles	e shop	10	minutes		ar.	3	month	stumptown	it represents innovation and community	parking	traffic	heighborhood maintain a healthy balance of all income levels to ensure diversity
205		12/22/10 (244 PM 03/11/10 10/10 PM	Family colored	hietory	mom & pop shops biking	greeny shop	eat	shop drink with a friend		min		ar .	2-3 10	week	gone New Gessons	of new ugly development it feeds rise		traffic .	lesa yuppie sõlim
	11017 000 1111	20 117 p 10.12 7 p	Pamily oriented Public transit-friendly gardens along wallowys aco-urben design to engage & inspire	isone .	and it	Bunner's errofs	bat	WINK THE STROTE	•	Hillman	•	)M(18	10	wask	Loon frestricks	em abeel 1	paths	traiffig	a community hub for intergenerational gatherings,
124	North Bar	12/2015 9:50 PM		Ula	living	sleep	164	ivo .	ů.	estunim		10ff16	every day		my home	Ilive here	iove	treffic	more home - facilitative - less tourists?
145		02/08/15 1:12 PM		the trees	the auture	tae	drink	shop	2	min		not	1	day	the old Nature's	it was cook, local, and friendly	deg Mendly	traffic	more localized with neighborhood
130		02/06/10 1/47 PM		landscaping	riding my bike	shop	play	eat	2	estinim		2nd	5107	Week	New Gestions	ta my favorite	Yanyaa Yees	traffic	community solution and vibs more pedestrian, with community
91A 417	Unfold Yoga	13/22/15 (c2/19M 12/21/15 10:00 (-M		Dass	reateurante Walking	eat shop	work	shat	15 to 20	ministes ministes		ar		month	Aza Harriwan	I slao work here	and less	traffic	stay community minded
315	North Bar	TÜZATB DILL PM		Does	the diversity	work	eat	visit hip watering holes	20	minutes		ar he Pearl		wask	Ase Hordware Franklin High dichool	Lineed hardware It's had prohitecture	walking janea	traffic traffic	a bike macca a hiplohill/unique version of Hawthorne/Alberta/Belmont/NW 23(d etc.
115	North Dar	SERVICE CONTRACTOR		trees	the diversity	work	eal	visit hip watering holes	20	minutes				Week	Franklin High School	g,e unit elityljacinie	isios	traffic	a hip/chill/unique version of Hawithome/Alberta/Jelmont/NW 123rd etc.
ю	New Deasons	i		ореп врясе	food	food shop	eat	bika	10 minutes			ike .	2	wask	manyi		parklets	tratfic	a dense ete street with parks allemating with apartments & totals.
x01	OHOU Clinic	TO SALES VICES FOR	li's in a dream wish upon a shooling ster	Unignia	strolling along Division	Boto the Dector	shapping	meeting Tigat	20	minus		X45	3	month.	the sheps	I love one man Junk is often my treasure	Baskins .	traffic :	more medernized
727	Unfold Yopa	122014 054 PM 122114 629 PM	<del></del>	landecaping	food carts	real avenue				minutes		valking	3	week.			efforciable Legithforth	Dario	exactly as it is now. No more condes, please!
34	Food Carts	12/22/16 05/6 PM		plants the energy	the people	eat eat	walk		3	minutes		Powell lock		week	For Peros	a's original	parking, diversity	traffic Umffic	a parking lot I wish that buildings would take
102	OHUU Clinic	19752116 орл РМ		flowers and trees		see my PCP	shapping	coffee	1		18 8	ouis.	3	week	Ologo (OHO) OCO	I like my PCP	parks	Unific	undergebreite parking less traffic, more quiet, more quiet, more flowers More open & less congested
02	Yega	10/34/12/3/14 PM		Trees	yvelking	Work	Eat	Hong with	10	Minutes		Ser	<del></del>	Week	Salt & straw	I heart loe gream	Lanes	Treffic	More open & less congested
141	!	19/21/14 (CS) PM		trons	rature	shop	drive by	eat	10	minian	72nd Mt T	ubor	.4	manth	Franklin HS	Oatry Queen ()	bikas	балю	still small friendly small reighborhood

# Mad Libs - Summary of responses - Vision for Division

Vision for Division		10 years		Combined	
Accessibility	3	Pedestrian Friendly	43	Pedestrian Friendly / Safe	69
Business Diversity	18	Affordability .	39	How it used to be / Simplified / Less Development / Smaller	62
Simplified	1	Other	39	Affordable	52
How it used to be	4	More Green space	33	Family oriented / Community minded	48
Pedestrian Friendly	12	Community Minded	26	Diverse Businesses/ Small Businesses	47
Improved Public Transportation	4	Improved Height/Scale/	20	Less gentrified / Greater sense of place	47
Affordability	13	Bike friendly	19	More Green Space	43
Safe	6	Less Gentrified	19	I like the new direction / I love it as it is	26
Bike friendly	4	Cultural / Character	18	More neighborhood & public services and public space	23
Community Minded	5	Diversity	18	Improved Traffic	25
More Art	4	Improved Traffic	17	More Diverse	25
Diversity	7	I like the new direction	16	Bike Friendly	23
Cultural / Character / Sense of Place	3	Business Diversity	14	More Parking	22
Cleaner Streets	3	Improved Public Transp	14	Improved Public Transit	18
Improved Traffic	8	How it used to be	14	More Art & Music / Creative community	15
Improved Height/Scale/Design	8	More Parking	14	Cleaner streets	7
Family oriented	5	Family oriented	12	Greater accessibility	7
More Green space	10	More Small Business	11	More Density	3
I like the new direction	7	Safe	8	Preserve houses	3
Music	0	Neighborhood Services	7	Ecological mindset	2
More Parking	8	Less Density	6		
More Small Business	4	Simplified	5		
Less Development	4	More Art	5		567
Ecological Mindset	2	Creative community	5 ;		
Gentrification	6	Accessibility	4		
I love it as it is	1	Cleaner	4.	•	
Preserve Housing	3	More Density	3		
Trash cans/benches/ash trays, etc	4	As it is now	2		
Neighborhood Services	6	More Public Space	2		that sound of let obtained schoolfed for on t
More public space	4	Music	1		one pat and health to second and has one has health as a
	!	No Smoking	1	·	

# Mad Libs - Summary of responses - Beauty

I see beauty in	######################################		
Nature/Open Space	105	Nature / Open Space	105
People	38	People / Community	54
Other	28	Neighborhoods / Houses	25
Everything	24	Everything	24
Neighborhoods	24	Past / Old / History	23
Past / Old / History	23	Architecture / Buildings	13
Community	16	Diversity	10
Architecture/Buildings	13	Character / Vibe / Weirdness	10
Diversity	10	Urban / Density	2
Weirdness	6	Food	2
Biking/Walking/Transit	6	Equality / Justice	2
Art	5		
Small businesses	5		
Character/Vibe	4		
urban/density	2		
Food	2		-1471
Equality/Justice	2		# .
Houses	1		CALLEGE TO BE SEE TAX DESCRIPTION OF THE PARTY OF TAXABLE PARTY.
Creativity	1		TO THE OWN THE REAL PROPERTY OF THE PARTY OF
Sustainability	1		

# Mad Libs - Summary of responses - I love

And the state of t		Creall husingsons / Channing / Specific Pusings	50
Walking	35	Small businesses / Shopping / Specific Business	
Food / Eating / Restaurants	31	Walking	35
Nature/Open Space	28	Food / Eating / Restaurants	31
Small businesses	23	Nature/Open Space	28
Past / Old / History	22	Past / Old / History	22
Specific business	20	Character / Energy / Weirdness	20
Living	17	Living	17
Other	17	People	15
		Action	13
People	15	New	12
Action	13	Neighborhood/Community feel	11
New	12	Diversity	10
Neighborhood/Community feel	11	Art / Culture /Music	7
Diversity	10	Not Much	5
Shopping	7	Homes	5
Art / Culture /Music	. 7	Biking	4
Character	6	Everything	4
Not Much	5	Buildings/streetscape	2
Homes	5		
Biking	4		
Everything	4		-pynnyny gypnynyn yn yndfryggy fal fal saklaaidd l falgl
Buildings/streetscape	2		
Weirdness	1		
Public transportation	1		

# Mad Libs - Summary of responses - I come to Division to

Eat	219	Eat / Drink	282
Shop	125	Shop	125
Walk	74	Walk	74
Drink	63	Meet / Visit people	49
Other	60	Play	37
Meet people	44	Work	28
Play	37	Live / Sleep	28
Work	28	Observe	22
Live / Sleep	28	Get coffee	16
Observe	22	Buy groceries	16
Coffee	16	Relax	14
Groceries	16	Work out / yoga	13
Relax	14	Ride the Bus	11
Work Out	13	Bike	10
Bus	11	Go to the doctor	7
Bus	11	Get a haircut	4
Bike	10	Drive	4
Doctor	7;		and the control of th
Visit	5	·	
Haircut	4		
Drive	4		

# Mad Libs - Summary of responses - Distance & mode

I live this far from Division		Distance		Mode	
Less than 5 min walk	143	On Division	26	Walk	196
6-10 min walk	15	1/4 mile	164	Bike	36
20+ walk	. 4	1 mile	42	Drive	53
20+ bike	10	4 miles	36	Bus	11
15 min walk	8	more than 4 miles	28	:	
Less than 10 min bike	21	Out of town	5		
15 min bike	5	manu menan casan menenuk, arrumanyaran cumasa benebut debut benedibukh dalah dalah dalah dalah dalah dalah dal			296
Less than 10 min drive	19	usu aannon monumusus karamas erd eron elem elekelelekelekelekele elekeletelekelesisi. Aarleh iside elekelekele 	301		
20+ drive	16			:	alend I chinale e seminal benedit dense benedities the commission of the seminal dense seminal benedities to be
10-20 min drive	18				
10-30 min bus	9				
Out of town	. 5				
30+ bus	2				
On Division	26			:	
	•				
·	301		1		inconscious de communicación de communic

# Mad Libs - Summary of responses - Frequency

1/day	55	Multiple times per day	54
2-6/week	114	Once per day	55
2-4/month	17	Multiple times per week	114
1-2/week	31	Once per week	31
1/month	7	Multiple times per month	17
5/year or less	13	Once per month	7
multiple times/day	54	Five times per year or less	13
e-samure-a-rager, arcatelyn (*1500-1500-1500-1500-1500-1500-1500-1500	291	очинен түрүүн шигийн ал техни тейни тайш тайш тайш амамамы дайынаны «Сылды» (да разды ойдайын даламаран тай	291

***************************************	
Other	75
Old	22
Ford	15
Oregon Theater	15
New Seasons	11
Salt & Straw	10
Food Cart Pod	9
Bollywood/D Street	8
Hedge House	7
The one I live in	7
Many	7
Village Merchants	6
Division Hardware	5
Pok Pok	5
Mirador	5
St Honore	4
Eugenio's	4
Anders	4
Houses	4
Franklin HS	3
None	3
Unfold	3
St. Philip Neri	3
Plaid Pantry	3
OHSU Clinic	3
LEED/Green buildings	2
Wine Collective	2
Move the House Apts	2
The state of the s	

## Mad Libs - Summary of responses - Reason for favorite building

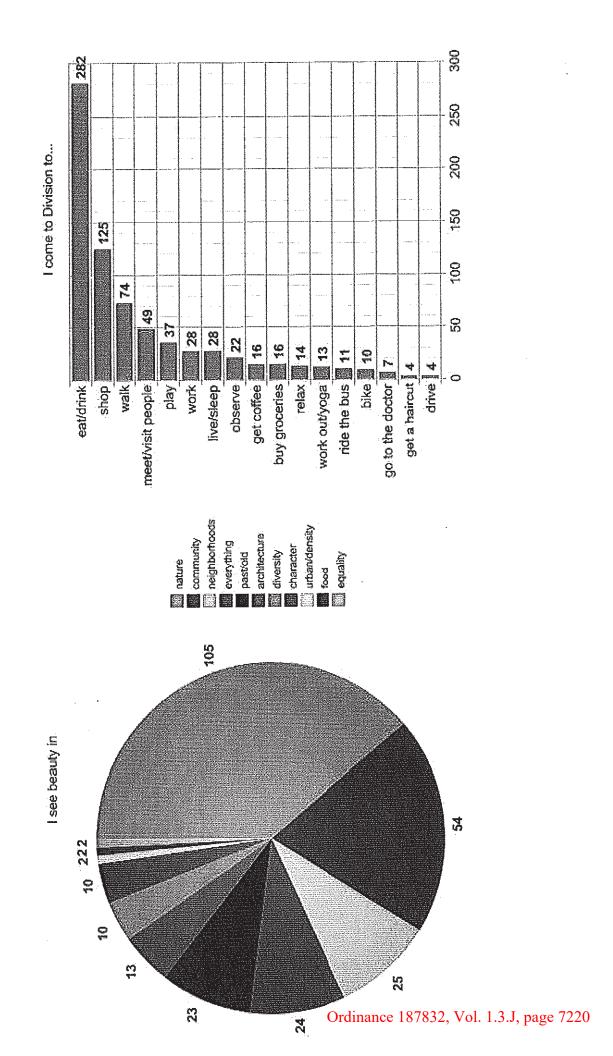
Type of shop/restaurant	66
History	36
Other	36
Character	25
Open Space / Outdoor	14
Community Hub	11
It's mine	9
Inviting	8
Improvement	6
Material or Light quality	6
Variety	6
Beauty	5
Timeless / Lasting	4
Renovation	4
The People	4
I work there	4
Potential	2
Modern	2
Sustainability	1

# Mad Libs - Summary of responses - I wish there were more

Other	43		
Parking	41	Nature / Open Space	49
Nature	33	Parking .	41
Affordability	25	affordability	25
Public Resources	23	Public Resources	23
Bikes	19	Bikes	19
Past / Old / History	. 17	Past / Old / History	17
Open Space	16	Retail	14
Retail	14	Art / Culture / Music	12
Art/Culture/Music	12	Character / Sense of Place / Weirdness	14
Character / Unique quality	12	Small Businesses	12
Small Business	12	Community	8
Community	8	Small Scale	8
Small scale	8	Diversity	6
Diversity	6	People	6
People	6	Restaurants	6
Restaurants	6	Accessibility	5
Accessibility	5	Multi-family housing	2
Mixed Use Development	3		
Weirdness	2		
Multi-family	. 2		
Quiet	1		
Of the Same	1		
Large Scale	1		րութանոններութերինահութարինների ույրդիչերոնութենա
	0		

# Mad Libs - Summary of responses - I wish there were less

Cars	44	Cars / Traffic	87
Traffic	43	Condos / Apartments / Large Scale buildings	46
Other	32	New Development / Construction / Density	31
Condos/Apartments	28	High End / Lack of affordability	21
Height / Scale	18	People / Crowds / Noise	18
New Development	16	Gentrification / Sterility	11
Construction	13	Ugly buildings	9
High End	11	Restaurants / Bars	9
Affordability issue	10	Trash	8
People	9	Negativity	7
Bad/Ugly Buildings	9:	Boxy / Modern Architecture	6
Trash	8	x-rated shops	. 4
Negativity	7	Auto repair shops	3
Gentrification	7	Buses	2
Boxy / Modern Architecture	. 6	Blank walls	2
Crowds	6.	Bikes	2
Bars	5		
X-rated shops	4	,	
Restaurants	4		
Sterile	, <b>4</b>		
auto repair shops	3	,	
Noise	3		
Buses	2		
Blank walls	2		
Bikes	2		O COMMITTE COMMITTED COMMI
Density	2		kalandinad kal andidad and and ang kacang kangangan di kananadan dan an
Low Density	1 .		
Design comment, General	0 :		andrewed to the separate control people to a transfer of transfer of transfer.
handrich der der der eine gester der est behand der fest gegen fest der eine gegen der eine gegen der der eine gegen der der eine gegen der der eine gegen de		http://www.nethricom.com/presentation.co	



From:

Brent Carpenter <br/> <br/>brent@full-tilt-boogie.com>

Sent:

Thursday, January 07, 2016 1:47 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Attachments:

3905 SE Main St. testimony.pdf

This email has my correct mailing address and replaces my testimony that I just sent.

Portland City Council Commissioners,

My name is Brent Carpenter, and I'm testifying today about our property at 3905 SE Main St. My wife and I are residents of SE Portland and have owned this rental property since 2003.

When the proposed Comprehensive City Plan was released earlier this year, we expected this property to be changed from R 2.5 to Commercial/Mixed Use because it sits on the corner of the busy commercial intersection of SE Cesar Chavez and Main St.

The three other properties on this intersection include Fred Meyer, US Bank, and Da Lat Restaurant. Our property is the only one that is not zoned commercial on that intersection. We believe it makes sense to extend the commercial zoning to embrace our property corner, and make the entire intersection Commercial/Mixed Use.

3905 SE Main St. sits on one of the busiest corridors in close-in East Portland and meets all the criteria for Commercial/Mixed Use designation. It is close to the central city with multiple public services available including access to extensive public transportation along SE Cesar Chavez and Hawthorne. The property is pedestrian oriented with robust street level activity because of the existing businesses at the intersection and in the neighborhood.

We are asking the council to reconsider the current R 2.5 zoning for 3905 SE Main St. and propose changing the designation to Commercial/Mixed Use- Urban Center.

I've attached my signed testimony as well. Thank you for your time and consideration.

Sincerely, Brent Carpenter PO Box 14336 Portland, OR 97293 December 10, 2015

Portland City Council Commissioners,

My name is Brent Carpenter, and I'm testifying today about our property at 3905 SE Main St. My wife and I are residents of SE Portland and have owned this rental property since 2003.

When the proposed Comprehensive City Plan was released earlier this year, we expected this property to be changed from R 2.5 to Commercial/Mixed Use because it sits on the corner of the busy commercial intersection of SE Cesar Chavez and Main St.

The three other properties on this intersection include Fred Meyer, US Bank, and Da Lat Restaurant. Our property is the only one that is not zoned commercial on that intersection. We believe it makes sense to extend the commercial zoning to embrace our property corner, and make the entire intersection Commercial/Mixed Use.

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We are asking the council to reconsider the current R 2.5 zoning for 3905 SE Main St. and propose changing the designation to Commercial/Mixed Use- Urban Center.

Thank you for your time and consideration.

Sincerely,

Brent Carpenter 3905 SE Main St.

Portland, OR 97214

From:

Hales, Mayor

Sent:

Wednesday, January 20, 2016 4:30 PM BPS Comprehensive Plan Testimony

To: Subject:

FW: Rezoning: Comprehensive Plan

From: Stephen Adams [mailto:stephen.adams@stephenadams.com]

Sent: Thursday, January 07, 2016 1:26 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Subject: Rezoning: Comprehensive Plan

#### Dear Mayor Hales

It's come to my attention that the council is considering zoning changes, aka the Comprehensive Plan. I'm concerned with one property that will be changed from R5 to CM1. I'm worried that the change will greatly diminish the quality of life of nearby homeowners.

I live across the street from the Irvington Corner, 1517 NE Brazee. To my knowledge there are no current proposals to alter this property; however the rezoning will probably immediately affect the residents that live adjacent to it. In R5 businesses are required to close by 11:00pm. If this property is rezoned, not only will these businesses be able to operate until 2:00am but also our current Good Neighbor Agreement that was negotiated with help from the City will be nullified. One of the businesses is a pub with outdoor seating for 30+ people. Neighbors and business owners, with help from the City, worked long and hard to come to GNA that is more or less working. During the warm months, when windows are open, nearby homeowners with normal workday hours, i.e. to bed well before 2 a.m., will be involuntarily subject to the noise generated by pub customers until 2 a.m. every night. This is not right. This property is the ONLY such property for blocks and blocks in a residential neighborhood, and it should remain R5.

It seems to me that changing the rules by which business operate make no sense when there is not even a proposal to redevelop this property. Please look carefully at rezoning properties from R5 to CM1 and the immediate impact it can have on the quality of life for current residents.

Yours truly, Stephen Adams 2443 NE 15th Ave. Portland, OR 97212

From:

Hales, Mayor

Sent:

Wednesday, January 20, 2016 4:30 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

FW: Written testimony for Council by tonight's deadline

Attachments:

CompPlanCommentsJan2016jshWrittenTestimony.pdf; ATT00001.htm

Follow Up Flag:

Follow up

Flag Status:

Completed

From: Dean P. Gisvold [mailto:deang@mcewengisvold.com]

Sent: Thursday, January 07, 2016 1:24 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Cc: Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner

Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>;

jsheuer@easystreet.net; bing <bings@serapdx.com>

Subject: Fwd: Written testimony for Council by tonight's deadline

Mayor and Commissioners,

I wish to add my support and endorsement for the comments below of Jim Heuer, chair of the Preservation Coalition, a member of the Irvington Land Use Committee, and my neighbor.

If you have time to read only one or two emails today before the hearing tonight, or if your staffs have time, please read this email from Jim. His comments are the comments of neighborhoods across the City. They certainly reflect my experience with the Comp Plan and my high level of frustration with City staff and with the Planning Commission.

Dean Gisvold 2225 NE 15th Ave Portland, OR 97212 503 284 3885

Sent from my iPad

Begin forwarded message:

From: Jim Heuer < <u>isheuer@easystreet.net</u>> **Date:** January 7, 2016 at 2:59:30 PM CST

To: "pdx-chr@googlegroups.com" <pdx-chr@googlegroups.com>

Cc: Rod Merrick < merrick map@yahoo.com >, "Steve Dotterrer (kradot@hevanet.com)" < kradot@hevanet.com >, Holly Chamberlain < HollyC@visitahc.org >, "Dean P. Gisvold" < deang@mcewengisvold.com >

## Subject: Written testimony for Council by tonight's deadline

Reply-To: <i sheuer@easystreet.net>

Attached was sent to Council members and City Clerk as written commentary for tonight's hearing. It elaborates on the brief 2-minute commentary I'll be presenting in oral testimony.

Just FYI.

Jim Heuer

James S. Heuer 1903 NE Hancock Street Portland, OR 97212 (503) 284-8481 (Home) (503) 335-8380 (Work/Cell) (503) 348-8694 (Text)

# Written Testimony on Historic Preservation and the 2035 Comprehensive Plan - Before Portland City Council

By James S. Heuer, Chairperson, Portland Coalition for Historic Resources January 7, 2016

Mayor Hales and Members of the Portland City Council, my name is Jim Heuer, and I write this as Chair of the Portland Coalition for Historic Resources. This volunteer organization represents the largest historic districts in the City, preservation activists, and the two major regional non-profits dedicated to historic preservation: the Bosco-Milligan Foundation and Restore Oregon. I am one of the PCHR representatives from the Irvington Historic District, and we have representatives from the Alphabet District, the proposed Buckman historic district, the Ladd's Addition Historic District and several neighborhoods which are not officially designated but are every bit as important historically at both the State and National level, including Laurelhurst and Eastmoreland.

PCHR representatives will be supplying detailed remarks on neighborhood-specific concerns, but here is the bigger picture:

Portland is an old city. Many people like to think of Portland as a hip and happening place, but much of its appeal to tourists and the influx of the creative classes is our built environment... our picturesque downtown and historic Old Town and Chinatown areas, our vast bungalow neighborhoods dating to the early 20th Century -- providing the same cozy, practical housing for the middle and working classes as they did 100 years ago, and the precious survivors of the halcyon days of the 19th Century when Portland was the richest city per capita west of Chicago. The numbers tell the tale -- if you exclude the areas annexed to Portland in the 1990s, the age of our housing stock is comparable not to that of western cities like Los Angeles, Phoenix or Houston, but instead to Chicago, Philadelphia and Baltimore.

And unlike cities like Cleveland, Buffalo, Philadelphia and others in the east with shrinking populations and a desolate historic core, our historic neighborhoods are vital, popular places to live -- cherished by their residents, appreciated by thousands of heritage tourism visitors, and drawing ever greater numbers of eager buyers – indeed their very popularity threatening the affordability, cultural diversity, and character that has drawn people to Portland in the first place. Moreover, they include some of the highest density areas in the City – many, like the Irvington Historic District, having a population density more than double that of Portland as a whole. But you'd never know this from reading the Comprehensive Plan documents..

Sure, there are some lovely goals and sub-goals that mention these issues, but in the proposed zoning, where the rubber meets the road, the Plan exhibits the same destructive one-size fits all aspirational zoning that has resulted in the current cacaphonous state of development in Portland... Development which has succeeded in disrupting the fabric of our traditional neighborhoods and business streetscapes while achieving minimal overall increases in the concentrated residential density required for meaningful reductions in transportation-based carbon footprint.

The problem is that aspirational zoning applies higher density zone designations wherever the planners hope some-day greater density might happen -- without regard to what is already there. The "hope" is that the real-estate market will produce the density and help the city achieve its carbon footprint reduction goals. Since the planners freely admit that the "realization" of the build-out of those areas will never approach 100%, the only solution is to over zone in hopes of someday getting to the desired density. Sadly, the result is a scattershot of higher density projects -- eroding the character of our neighborhoods -- without ever once achieving the critical mass of density to support 10-minute transit intervals or a major expansion of bicycle corridors crisscrossing the city.

But not only is the already-observed outcome of this scatter-shot approach to increasing density a failure... it is also a direct violation of state law. Portland is a signatory to an agreement with the State of Oregon and is thus designated as a Certified Local Government, which requires Portland to apply its zoning powers to protect and nurture its designated historic districts and to stay current on what parts of the city are or should be historically designated. The Comp Plan's refusal to align zoning with historic resource review guidelines covering thousands of contributing structures in both Historic Districts and Historic Conservation Districts is an affront to this legal commitment.

The Planning and Sustainability Commission and BPS have put increasing density at the forefront of all priorities. This priority has trumped the preservation of Portland's historic character, traditional neighborhoods, and cultural richness -- but un-necessarily so. The fine print of the Comp Plan admits that the Buildable Lands Inventory shows that current zoning designations provide for substantially more residential unit capacity than is called for between now and 2035. Moreover, the vast expanses of Portland that are currently zoned for R10 and R20 densities -- suburban or even rural density levels which have no place in a city aspiring to ever greater population density – encompassing at least 12 square miles of land within the city limits -- seem to have escaped the planners entirely.

The Comp Plan's lack of attention to these issues is not due to a failure of the community to speak up. Neighborhood associations, and citizens' groups, not to mention countless individuals via the Map App, have repeatedly raised these issues over the last several years. Nearly all such appeals have been ignored.

Our goal is to present specific requests to modify the Comp Plan to better protect our precious historic resources and the vital cultural and historic fabric of our traditional neighborhoods. We are asking the Council to take our concerns seriously and act accordingly by setting aside resources and time in the "fine tuning" stage of the Comp Plan to address the identified gaps in protection of historic resources in the current Comp Plan proposals.

From:

John Moody <john.moody@gmail.com>

Sent:

Thursday, January 07, 2016 1:24 PM

To:

BPS Comprehensive Plan Testimony

Cc:

John Moody

Subject:

Comprehensive Plan Testimony Re: 2855 SW Patton Rd

Strohecker's grocery store at 2855 SW Patton Rd. is an important resource for the Portland Heights and West Hills community. On Feb 16, 1984, the City Council passed Ordinance No. 155609 specifying that 2855 SW Patton Rd. should be zoned C3 and that "Use of the site shall be restricted to a grocery store." Our family lives a 7 minute walk from Strohecker's, and we shop there often. Our kids love walking there with us. The importance for our neighborhood of having a local, accessible grocery store was underscored during this week's ice storm. A local store like Strohecker's contributes significantly to the vitality of the neighborhood, and helps make Portland Heights a liveable area. Please don't give in to the profit interests of the California property owner / developer. Please honor the hard-won 1984 Ordinance, and keep this property as a multi-purpose store that serves the vital interests of our neighborhood and the many hundreds of families who reside nearby.

To put things into a geographical perspective, Strohecker's is the only grocery store located strategically in the center of the SW Hills neighborhood. The nearest grocery stores to 2855 SW Patton Rd. outside the hills to the North and East are Zupans (1.7 miles), Stadium Fred Meyer (2.0 miles), Safeway downtown (2.1 miles) and Whole Foods in the Pearl (2.5 miles). The nearest grocery stores to the South and West on the Beaverton Hillsdale Hwy are Safeway (2.7 miles) and New Seasons (3.0 miles). (These are all driving distances from Strohecker's per Google maps.) Strohecker's location truly makes it a neighborhood grocery store, and serves an important need for residents of the SW Hills. It's great to be able to walk or take a short drive to shop, and we often run into neighbors at the store. Permanently losing such a resource at this location would be a huge blow to the livability and vitality of our local community.

Sincerely,

John Moody 2769 SW Buena Vista Dr. Portland, OR 97201

From:

Sue Sue <suesuecorso@yahoo.com>

Sent:

Thursday, January 07, 2016 1:07 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Please see that the 1984 ordinance 155609 is kept in place.

In order to keep our property values as they are is very important that you do so Respectfully Susan Corso 2725 sw old orchard rd

Sent from my iPhone



Housing Land Advocates c/o Jennifer Bragar 121 SW Morrison Street, 11<sup>th</sup> Floor Portland, Oregon 97204

January 7, 2016

#### Via E-Mail

Mayor Hales and City Council Members c/o Council Clerk 1221 SW 4<sup>th</sup> Avenue, Room 130 Portland, Oregon 97204

RE: Housing Land Advocates' Comprehensive Plan Testimony

Dear Mayor Hales and City Council Members,

Housing Land Advocates (HLA) submits this testimony with respect to the Draft 2035 Portland Comprehensive Plan ("Draft Comprehensive Plan"). HLA's mission is to encourage land use policies and practices that will support the development of affordable housing in sustainable communities. We welcome the opportunity to participate in the community's effort to reevaluate its housing needs and to adopt strategies to encourage forms of housing and densities that address both the demand for affordable housing and a fair distribution of affordable housing within the region. These comments are based on the City's obligation to affirmatively further fair housing within the scope of its zoning and land use ordinances, and augment comments previously submitted by HLA.<sup>1</sup>

The Draft Comprehensive Plan provides an opportunity to evaluate and increase fairness in both access to affordable housing and distribution of affordable housing throughout the region. As the community is well aware, Portland's housing market has been segregated by race, class, and income. Wealthier neighborhoods of the City are primarily white have received public investments in transportation, social amenities, and high quality schools. As income disparities and housing prices have increased, these neighborhoods have become unaffordable and inaccessible to most. On the other hand, lower-income neighborhoods, especially those with concentrations of protected class households, have historically received less public investment.

HLA's November 16, 2015 letter addresses the affordable housing bonus in Mixed Use Zones; its July 9, 2015 coalition letter supports affordable housing tools in the plan; its January 13, 2015 letter addresses proposed down-zoning in Eastmoreland; its May 1, 2013 letter discussed policies for consideration in the comprehensive plan; and its August 30, 2012 letter expressed concerns that the comprehensive plan focused on goals and aspirations without specific means to achieve the same. All of these letters should be in the record, but are also available at HLA's website - http://housinglandadvocates.org/what-we-do/advocacy/.

Many of these lower income neighborhoods, especially in north and northeast Portland, are now experiencing economic displacement because their closer proximity to transit and employment is attracting higher income residents. This is forcing many lower income residents to neighborhoods located farther away from transit, jobs, and other amenities. The Draft Comprehensive Plan does not recognize the disparity in opportunity that exists on the ground for protected class households and therefore fails to affirmatively take steps to reduce that disparity.

A significant example is the failure of the Plan to increase the density of residential land near or within wealthier and white neighborhoods. Reducing minimum lot size can reduce the cost of housing and increase its availability to the region's protected class households, who are disproportionately represented within the lower income quartiles. It can also address housing costs by increasing the total supply of housing within the region. Failure to capitalize on this opportunity will eliminate an opportunity to integrate established neighborhoods that are predominately white, and have access to high-quality transportation, services and schools.

It is noteworthy that all of the proposed increase in density in the Draft Comprehensive Plan is located within a few narrow corridors. This plan ignores opportunities to increase housing affordability and create housing affordability within neighborhoods of higher net income, low to little diversity and large lot zoning. HLA recommends the Draft Comprehensive Plan be modified in the following ways, in order to address the City's obligation to affirmatively further fair housing through its zoning and land use plans:

- A. Do not down zone residential land located within or adjacent to higher income neighborhoods. HLA specifically objects to increases in minimum lot size in neighborhoods with good access to transit and other urban amenities.<sup>2</sup>
- B. Identify opportunities to reduce minimum lot sizes, and otherwise increase density citywide (e.g., internal house conversion to create multiple units in an existing house, secondary accessory dwelling units, cottage cluster development, stacked flats, etc.). Zoning for larger lots drives up housing costs and excludes more affordable housing types, especially on land close to the city center. The focus of zone change designations in the plan should not only be on centers and corridors the Draft Comprehensive Plan should also incorporate zone change designations in those areas where additional density can be achieved.

HLA believes the City's zoning and land use plans should reflect not only its obligation under Statewide Planning Goal 10 but also its obligation under the federal Fair Housing Act. By failing to identify strategies to increase the range and number of affordable housing opportunities in all neighborhoods, the City risks violating both.

<sup>&</sup>lt;sup>2</sup> The Portland Planning and Sustainability Commission is recommending that Eastmoreland <u>not</u> be down zoned from R5 to R7. HLA supports this recommendation.

For these reasons, we believe that City Council should direct staff to amend the Draft Comprehensive Plan and to add substantial new density within high income neighborhoods with larger lot zoning. We would be glad to meet with you or your staff to discuss these matters further.

Sincerely,

ennifer Brarar, President

Housing Land Advocates

GSB:7471541.1 [13046.00117]

From: Beverly Bookin <bookin@bookingroup.com>

Sent: Thursday, January 07, 2016 12:17 PM

To: BPS Comprehensive Plan Testimony

Cc: 'Marilynn Considine'

Subject: [User Approved] Letter from South Portland Neighborhood Association in Support of

the National College of Natural Medicine

Attachments: SPDX Neighborhood Association.pdf

I believe that this email address is the portal for submitting testimony on the Portland Comprehensive Plan via the City Clerk for inclusion in the legal record for tonight's City Council hearing on the matter. I represent the National College of Natural Medicine. Earlier today, a representative of the South Portland Neighborhood Association (SPNA) submitted a letter from its board supporting a request by NCNM to extend the proposed new Institutional Campus (IC) Comprehensive Plan designation across its entire approved campus boundary. This copy of the letter contains a signature by Ken Love, president of the board, whereas we believe the earlier copy did not. Thanks.

Beverly Bookin, AICP The Bookin Group LLC 813 SW Alder Street, Suite 320 Portland, OR 97205 503.241.2423 (Office) 503.309.4140 (Cell)

#### WE ARE MOVINGIIII

Effective February 15, 2016 812 SW Washington, Suite 600 Portland, OR 97205

from:

robin skarstad <rskarstad@yahoo.com>

Sent:

Thursday, January 07, 2016 12:09 AM BPS Comprehensive Plan Testimony

To: Cc:

Robin Skarstad

Subject:

Comprehensive Plan Update Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Dear Portland City Council Members,

As a Southwest Hills resident and patron of Strohecker's Market located at 2855 SW Patton Road, I write to express my support for Ordinance 155609. Altering the existing zoning would offend the stated goals of the City of Portland's Comprehensive Plan and the character of a treasured neighborhood.

First, replacing or amending Ordinance 155609 to allow for multi-dwelling use – and particularly the high-density condo development the out-of-state owners likely have in mind – is inconsistent with the evaluation criteria described in the Comprehensive Plan:

- No access to frequent transit: Trimet has slashed bus service, which runs only certain times of the day and not at all on weekends. It is impossible to live in this neighborhood without a car and more residential density means more cars.
- Low-stress bikeways completely absent: The roads in this historic neighborhood are extremely steep, narrow, and windy. Visibility is poor and bike lanes non-existent.
- No facilities or space for carpool lots.
- Greenhouse gas/carbon emissions already heightened: Patton Road serves as a cut through from Highway 26 to downtown and during commuting times, the traffic is already at an absolute standstill. I have witnessed close calls with impatient drivers and school children that walk to nearby Ainsworth Elementary.

Higher residential density means higher traffic volume and this neighborhood cannot support it.

Second, property values and quality of life in this neighborhood would be greatly diminished by a change in the zoning. Ordinance 155609 has allowed for the provision of vital services for an otherwise isolated community for decades. For young parents, non-driving seniors and busy professionals – not to mention those cut off from other services by inclement weather – a shop for essentials within walking distance is a necessity. It increases the neighborhood's appeal, walkability scores and, in turn, property values. More importantly, public space in this location fosters a sense of community, provides a place to meet and greet one's neighbors or grab an ice cream or picnic supplies during the baseball game in adjoining Portland Heights Park. It is nothing less than the heart of this community.

My neighbors lobbied hard and thoughtfully in 1984 and the resulting Ordinance 155609 has served this community well for over 30 years. It should not be undone with the hopes of attracting or appearing an out-of-ate developer.

Regards,

Robin Skarstad 2511 SW Arden Road Portland, Oregon 97201 (503) 243-1124

From:

Erik Lawrence <elawrence@tenbridgepartners.com>

Sent:

Thursday, January 07, 2016 11:47 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Erik Lawrence 3610 SW Grover Street Portland, OR 97221

Re: Re-zoning of property at 2855 SW Patton Road, "Stroheckers"

These comments were also submitted through the www.portlandoregon.gov/bps/mapapp website.

Our family is vehemently opposed to the City bowing to commercial interests in order to enrich a few at the expense of the many. Changes to the Strohecker's property should be in accordance with Ordinance No. 155609 section 8 item c. Any development of multi-family housing in any shape or form would be degradation to the neighborhood as a whole. It would be destructive to driving patterns and standards, property values, livability, and the overall aesthetics of the existing area.

The City needs to avoid another travesty like Forest Heights where developers are allowed to destroy family based neighborhoods for their own personal gain. Don't be mistaken or fooled; developers don't care about the neighborhood, the residents or the City. Their motive is only one.

We live here, this is our neighborhood, and Ordinance 155609 honored that. Changing the zoning or the requirements of the ordinance would be a direct contradiction of the values the City of Portland has strived so hard to maintain and uphold.

Erik Lawrence CFP®
President and Managing Partner



TenBridge Partners, LLC 516 SE Morrison, Suite 1200 Portland, OR 97214

(971) 277-1080 Phone (503) 320-3026 Cell

#### www.tenbridgepartners.com

Advice and financial planning is provided through TenBridge Partners, LLC., an independent Registered Investment Advisory Firm. Brokerage investments and services provided through KMS Financial Services, Inc., Member FINRA/SIPC.

From:

Derek Sandoz < dereksandoz@gmail.com>

Sent:

Thursday, January 07, 2016 11:41 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

These comments address Proposed Change #1128 (formerly #644) regarding the property located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

We are all neighborhood residents/owners with homes in the area near this property, many of us in close proximity.

We value having a neighborhood grocery store near us with its ancillary services (pharmacy, liquor store, postal service), but are strongly opposed to additional commercial development or high density housing that would add more traffic and parking stress to our residential neighborhood. Southwest Patton Road, the only street bordering this property, is routinely gridlocked by commuter traffic that has increased in recent years and safety for drivers and pedestrians is compromised daily.

We ask that the 1984 Ordinance No. 155609 that allowed Strohecker's to expand at that time and restricted use of the property to a grocery store remain intact with the new zoning name changes (relative to any future use of this property) so that we can maintain the livability and safety of our residential neighborhood.

Now that the store has announced its imminent closure and the intentions of the out-of-state developer who recently purchased the property are unknown, these Comments to the Portland City Council endorsed by over 200 near neighbors are particularly timely. Thank you.

Derek Sandoz 2014 SW 17th Ave Portland OR 97201

From:

Washington, Mustafa

Sent:

Thursday, January 07, 2016 11:37 AM

To:

Leonar80msu

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: St. John

Dear Nancy,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Leonar80msu [mailto:leonar80msu@gmail.com]

Sent: Sunday, December 27, 2015 4:23 PM

To: Hales, Mayor < mayorcharliehales@portlandoregon.gov>

Subject: St. John

I do not support the idea of modifying Lombard road in St. John in a manner removing the vegetated divider (ivy island) it adds to the downtown area. We moved here in August after substantially renovating a 1915 house we purchased in April near st johns downtown. I don't believe the diving island is causing a safety concern so doesn't merit removal

Nancy Leonard

- {

Apologies in advance for any interesting autocorrect & typos made while sending from my iPhone

From:

Washington, Mustafa

Sent:

Thursday, January 07, 2016 11:36 AM

To:

Lila Zamani

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: Keep Ivy Island

Dear Lila,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

----Original Message-----

From: Lila Zamani [mailto:lilaincorporated@gmail.com]

Sent: Monday, December 28, 2015 2:57 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Subject: Keep Ivy Island

Hello! Please keep Ivy Island in St Johns. It gives our town character and green areas that are much needed!

Lila Zamani

From:

Washington, Mustafa

Sent:

Thursday, January 07, 2016 11:35 AM

To:

Lynnette Jackson

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: Save Ivy Island

Dear Lynette,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard your concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office.

Sincerely,

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

----Original Message-----

From: Lynnette Jackson [mailto:msnettework@gmail.com]

Sent: Monday, December 28, 2015 4:16 PM

To: Hales, Mayor < mayorcharliehales@portlandoregon.gov>

Subject: Save Ivy Island

This email is my written request to 'Save Ivy Island' and keep the gateway into the St. Johns community and neighborhoods weird.

Thank you.

Ms. Jackson

From:

Washington, Mustafa

Sent:

Thursday, January 07, 2016 11:32 AM

To:

Chloe Frisella Kunst

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: Save Ivy Island

Dear Chloe,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office,

Sincerely

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

From: Chloe Frisella Kunst [mailto:c.soleil.fk@gmail.com]

Sent: Wednesday, December 30, 2015 11:10 PM

To: Hales, Mayor < mayorcharliehales@portlandoregon.gov>

Subject: Save Ivy Island

Mayor Charlie Hales

1221 SW Fourth Ave, Rm 110

Portland, OR 97203

Dear Mayor Hales,

St. Johns is a valuable neighborhood. One of the things that attracts people to this city is its small town feel and its historic neighborhoods, its access to nature and its natural spaces within the city. These are all key elements of St. Johns. On the edge of Forest Park, St. Johns is an historic neighborhood that still maintains a small town feel and a sense of community.

We are living in the age of gentrification and it is more crucial now than ever to maintain and foster our communities. Development and progress is important and necessary, but equally important is developing in a way that supports and enhances the neighborhoods and the people who have made this city what it is.

From the moment a person enters down town St. Johns, whether traveling over the historic St. Johns bridge or ushered in by the welcome sign and the foliage of Ivy island, one feels that they are entering a community and a little piece of history. Ivy Island highlights the small town feel of the St. Johns Business district and provides easy access. Ivy Island is a signature gateway into St. Johns. This new intersection that would go in place of Ivy Island would be getting rid of one of our valued green spaces and it would obstruct the view of and easy access to the St. Johns Business District.

This development would be a detriment to the current feel of St. Johns and has the interest of out-of-town developers in mind more so than that of the people who made this neighborhood what it is. Please save this historic green space for the good of the neighborhood and its people. Developers might provide people with new places to live for the time being, but it is the character and history of this place that brought them here and that is what will make them want to stay. Please save Ivy Island

Sincerely,

Chloe Frisella Kunst

4757 N. Lombard st

Portland, OR 97203

From:

Washington, Mustafa

Sent:

Thursday, January 07, 2016 11:30 AM

To:

Alister Fenix

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE:

#### Dear Alister,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office,

Sincerely

Mustafa Washington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Alister Fenix [mailto:afenix.design@gmail.com]

Sent: Saturday, January 02, 2016 1:53 PM

To: Hales, Mayor < mayorcharliehales@portlandoregon.gov>

Subject:

Please do not allow the needless destruction of one of the key features that makes St. John's so special. A sense of place and belonging is something that everyone needs. St. John's is one of the key places in Portland that excels at defining a true sense of community rooted in place. By destroying one of the key elements that show that sense of place you begin to undermine the very community itself.

Save Ivy Island!!! Keep what makes St. John's so special.

Alister Fenix

From:

Pete Conklin <petermconklin@msn.com>

Sent:

Thursday, January 07, 2016 11:19 AM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

#### Council members,

I am writing to express my concerns regarding a proposed development on NE Halsey St. at NE 53rd. The development is to be five stories tall filled with apartments and have no on-site parking. As a long time resident of Northeast Portland I have witnessed firsthand the negative impacts of developments such as this one.

I have two specific concerns. The first is the lack of on-site parking. All over the city these developments have been a problem for the last few years and I thought we had and finally moved past allowing them. The number of residents living there with cars will flood the neighborhood streets and that is unacceptable. A development of this scale should be required to provide its own parking for each unit.

My second concern is simply the scale of the project. I believe that it is too big and too imposing and completely out of scale and character with the surrounding neighborhood.

I hope that you will take my concerns and the concerns of my fellow residents into consideration and deny a request for this project until it can be reconfigured to provide parking and better suit the scale of the neighborhood.

Pete Conklin 3206 N. E. 43rd Ave. Portland Oregon 97213 503-284-0320

From:

Hales, Mayor

Sent:

Wednesday, January 20, 2016 4:31 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

FW: Rezoning R5 to CM1

From: Robert [mailto:r\_elan@comcast.net]
Sent: Thursday, January 07, 2016 11:13 AM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Subject: Rezoning R5 to CM1

Dear Mayor Hales,

I am writing to convey my concerns about the implementation of the Comprehensive Plan that is being considered by the council. In particular, I'll address one property though my concerns are relevant to all properties that are "upzoned" from **R5 to CM1**. It seems there is at least one very important unintended consequence that should be considered, one that will greatly diminish the quality of life of nearby homeowners.

I live across the street from the Irvington Corner, 1517 NE Brazee. Though there are not any current proposals to alter this property the rezoning may still immediately impact the residents that live all around it. In R5 businesses are required to close by 11:00pm. If this property is rezoned, not only will these businesses be able to operate until 2:00am but also our current Good Neighbor Agreement that was negotiated with help from the City will be nullified. Why is this a big deal? One of the businesses is a pub with outdoor seating for 30+ people. Neighbors and business owners worked long and hard to come to an agreement that is more or less working. During the warm months, when windows are open, nearby homeowners who have to get up and work for a living will be involuntarily subject to the noise generated by pub customers until 2 a.m. every night. This is not right. This property is the ONLY such property for blocks and blocks in Irvington and it should remain R5. Sometimes it is disturbing enough with the current agreement, but the businesses have generally been very good about living up to the GNA.

It seems to me that changing the rules by which business operate make no sense when there is not even a proposal to redevelop this property. Please look carefully at rezoning properties from R5 to CM1 and the immediate impact it can have on the quality of life for current residents.

Sincerely, Robert Hodgson 2443 NE 15th Ave

rom:

Subject:

Suzanne Starr < suzannestarr@me.com>

Sent:

Thursday, January 07, 2016 10:36 AM

To:

BPS Comprehensive Plan Testimony Comprehensive plan testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Suzanne Starr, 1415 NE 52 Street. Please do not allow the rezoning of the property at 53 street and Halsey from R5 to CMI as it would threaten the integrity of the historic neighborhood surrounding that intersection. The possibility of large, tall condo buildings looming over the yards and houses next to them in this intact community of carefully tended homes seems reckless and unnecessary. Let the large and tall buildings be placed in the areas that are properly zoned for them, not squeezed into places where they will cause pain and degradation to the surrounding neighborhood.

rom:

Chris Yeargers < cyeargers@yahoo.com>

Sent:

Thursday, January 07, 2016 10:24 AM

To:

BPS Comprehensive Plan Testimony

Subject:

Proposed change to designations and zoning in Comprehensive plan

Follow Up Flag: Flag Status:

Follow up Flagged

Hello.

I am writing with concerns regarding the proposed changes to the Comprehensive plan.

In my opinion, no changes should be made to the Comprehensive Plan without a full understanding of the ramifications of those changes.

As you are aware, the Multnomah county Assessor's office recently started assessing properties with detached ADU's in a new manner, after years of assessing them in a different fashion. The change appeared to be arbitrary and was done without discussion or public input. This kind of action tells me that the City of Portland and Multnomah County aren't acting in good faith with each other. If these two government entities aren't communicating, then we, as residents, can have no faith in nat one group says as compared to the other.

Now we are looking at a potential huge designation and zoning change without any written guarantees from Multnomah county as to what those changes would trigger.

Me and my neighbors understand the intent of the zoning change, to keep neighborhood character. However, if the proposed fix hurts us more than doing nothing, then why bother with it?

Again, in my opinion, no changes should be made to the Comprehensive Plan without a full understanding of the ramifications of those changes. The City should get Multnomah County Assessors on board with any changes. That would include written assurances from Multnomah County as to their reaction to wholesale designation and zoning changes.

Regards,

Chris Yeargers 19 NE Monroe St. Portland, OR 97212 503 847 9463

აm:

Vailey Oehlke <vaileyo@multcolib.org>

Sent:

Thursday, January 07, 2016 10:21 AM

To:

BPS Comprehensive Plan Testimony

Subject:

Support for zoning changes in 2035 Comprehensive Plan draft

Follow Up Flag:

Follow up

Flag Status:

Flagged

Greetings.

Multnomah County Library District supports the City of Portland's 2035 Comprehensive Plan draft map designation that changes properties in proximity to adjacent library-owned properties at 216 NE Knott St. and 205 NE Russell St. currently zoned High Density Residential to Mixed Use zones.

The goal as described in Chapter 3: Urban Form of the Comprehensive Plan is to: "Foster an equitable system of compact mixed use and commercial centers across the city to increase access to community services and businesses and create more low carbon complete healthy connected neighborhoods."

The library hereby submits this formal request for our properties located at 216 NE Knott Street and 205 NE Russell Street to be rezoned from RH to Commercial Mixed Use (CM2) which is in alignment with the 2035 Comprehensive Plan. This zoning change is also consistent with the City's proposed CM2 zoning change for altiple properties in proximity.

Please contact me if you have any questions about the library's comments or considerations in this matter.

Sincerely, Vailey Oehlke

Vailey Oehlke | Director | Multnomah County Library 919 NE 19th Ave, Portland, OR 97232 | 503.988.5403 www.facebook.com/multcolib | @MultCoLib\_Dir

2015-16 President, Public Library Association

Why let a computer tell you what to read? Get personalized reading recommendations at <a href="My Librarian">My Librarian</a>

iley Oehlke | Director | Multnomah County Library

9 NE 19th Ave, Portland, OR 97232 | 503.988.5403

www.facebook.com/multcolib | @MultCoLib\_Dir

2015-16 President, Public Library Association

Why let a computer tell you what to read? Get personalized reading recommendations at <a href="My Librarian">My Librarian</a>

. rom:

James MacLowry <ermjdm@icloud.com>

Sent:

Thursday, January 07, 2016 9:49 AM

To:

BPS Comprehensive Plan Testimony

Subject:

"Comprehensive Plan Testimony"

Follow Up Flag:

Follow up

Flag Status:

Flagged

I sincerely hope that the city will continue to honor the 1984 ordinance No 1155609 to maintain neighborhood livability. The grocery store creates neighborhood for us —It is and has been a part of the community for as long as we have lived here for 20 years

Eva MacLowry 2246 SW Humphrey Park Rd Portland OR 97221

.rom:

george pfundheller <arizonasonny@gmail.com>

Sent:

Thursday, January 07, 2016 9:07 AM

To:

**BPS Comprehensive Plan Testimony** 

Follow Up Flag:

Follow up

Flag Status:

Flagged

I just heard the City Of Portland will be voting on allowing a five story apartment complex on Halsey near my house on 52nd Ave.

This is already a congested area with little parking and I believe will lead to anxiety and confrontations between homeowners here and the apartment tenants. I think the comples is too big for the area. Please consider a no vote.

George Pfundheller 1415 NE 52nd Ave, Portland.

rom:

Jim Rosenbaum <rosenbaj@ohsu.edu>

Sent:

Thursday, January 07, 2016 8:57 AM

To:

Edward Neuwelt; jill neuwelt; BPS Comprehensive Plan Testimony

Subject:

RE: Comprehensive plan testimony

Follow Up Flag: Flag Status:

Follow up Flagged

Jill

Thanks for taking the time to write and to express your feelings so articulately.

Jim

----Original Message-----From: Edward Neuwelt

Sent: Thursday, January 07, 2016 7:57 AM

To: jill neuwelt; cputestimony@portlandoregon.gov

Cc: Jim Rosenbaum

Subject: RE: Comprehensive plan testimony

Great letter!! Ed

---Original Message-----

rom: jill neuwelt [mailto:jneuwelt@hotmail.com]

Sent: Thursday, January 07, 2016 4:59 AM To: cputestimony@portlandoregon.gov

Cc: Edward Neuwelt

Subject: Comprehensive plan testimony

Strohecker Grocery Store

2855 SW Patton

I have lived on 4246 SW McDonnel since 1981 and have shopped at Strohecker's since then. 2 of my children worked there during highschool.

Unfortunately The neighborhood, especially the neighbors on SW Old Orchard Street, have a history of being hostile to customers and to employees. When the Stohecker family remodeled, they petitioned the city to have the A/C unit removed from the roof which added hundreds of thousands of dollars to the cost of the remodel; some neighbors seem to have nothing better to do than to make sure nobody parks on their street while shopping, even when the lot is full. As I was bidding good-bye and thanked the employees yesterday, they said that only few, maybe 20, customers came to the store to do their regular grocery shopping. Most customers may get a quart of milk or a loaf of bread, but they do their regular "big" shopping at other stores. Obviously the neighborhood does not think it is necessary to support a local business.

losure of Stroheckers is a big loss for me. Since I live off Council, Crest drive i will now always have to drive down the hill for my groceries, quite a distance away. Apart from that, i enjoyed going to the store. The employees were friendly, the store was clean, and they always had what I needed. I appreciated their yearly picnics with the free hotdogs and hamburgers. They certainly did not fail due to lack of trying to please. And the post office was also a big convenience.

Of course I think we need a grocery store in the neighborhood. However, if it is not possible to run a profitable business, I cannot blame a developer for building condominiums. I think we get what we deserve.

Elizabeth Neuwelt 4246 SW McDonnel Terrace Portland, Oreogon 97239

Sent from my iPad

from:

Jim Braun <james.e.braun@gmail.com>

Sent:

Thursday, January 07, 2016 8:50 AM BPS Comprehensive Plan Testimony

To:

blytheolson@gmail.com

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

FROM: Jim Braun

4211 SW Patrick Place Portland, OR 97239

REGARDING: Strohecker's Neighborhood Grocery

2855 SW Patton Rd Portland, OR 97201

Hello,

I'm writing to express my opposition to ideas for changing or modifying Ordinance No. 155609 that was signed no law in 1984 regarding the property at 2855 SW Patton Rd in SW Portland. Neighbors and residence owners in this Southwest Portland community collaborated closely and worked diligently with the city of Portland to establish specific zoning for this property leading to the 1984 ordinance.

Making changes to this ordinance that would permit new home construction or various high density dwelling types would not only underserve the community work from prior years that led to the law and ordinance, but it would also permanently alter one of Portland's most unique neighborhoods that is valued by all who live in it and recognized widely across Portland as a wonderful and livable neighborhood. Having the existing neighborhood grocery is a big part of our neighborhood's identity and it peaks its livability.

Please uphold the ordinance as it stands today.

Thank you, Jim Braun

Jim Braun

james.e.braun@gmail.com

Cell: 503-367-4311

From:

Hales, Mayor

Sent:

Wednesday, January 20, 2016 4:31 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

FW: Comp Plan Testimony Irvington Hist District 15th and Brazee

From: Dean P. Gisvold [mailto:deang@mcewengisvold.com]

Sent: Thursday, January 07, 2016 8:04 AM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

**Cc:** Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Patty A. Richardson cpattyr@mcewengisvold.com>; jsheuer@easystreet.net; holberg

Subject: Comp Plan Testimony Irvington Hist District 15th and Brazee

#### Mayor and Commissioners,

One of the proposed Comp Plan changes is to up zone the commercial node at 15th and Brazee from R5 to CM1. As I noted in my email to each of you, this is not acceptable. One of the neighbors, Barbara, sent me an email regarding her personal experience and her concerns, which I have copied below. She is unable to attend the hearing. I ask that this email be entered into the record on her behalf or as a separate email from me.

"Thank you Dean for letting us know. Unfortunately, due to family emergency, I'm not able to respond to the city in such a short time frame. Also unfortunately we are probably one of the households who are the most impacted by any change as we live directly across Brazee from the Hophouse. I'm not at all knowledgeable about land use planning, zoning changes etc, but I do remember when Hophouse was first applying for the OLCC license one of the big sticking points for them was that as a residential zoned property they could not stay open until 2am as they desired. The residential zoning required they be closed by 11pm. I'm really concerned that this protection for the neighborhood might go away. Believe me on a summer night it's loud enough at 11pm to sometimes be a problem.

If anyone else is going to give comments to the city I would greatly appreciate it if you could mention that issue. Oh, also parking is always a problem - between Roots, Foster and Dobbs and Hophouse the street is pretty well packed with non-residents all day.

Thanks,

Barbara"

Thank you for your consideration.

Dean Gisvold 2225 NE 15th Ave Portland, OR 97212 503 284 3885

Sent from my iPad

rrom:

Edward Neuwelt < neuwelte@ohsu.edu>

Sent:

Thursday, January 07, 2016 7:57 AM

To:

jill neuwelt; BPS Comprehensive Plan Testimony

Cc:

Jim Rosenbaum

Subject: -

RE: Comprehensive plan testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Great letter!! Ed

----Original Message----

From: jill neuwelt [mailto:jneuwelt@hotmail.com]

Sent: Thursday, January 07, 2016 4:59 AM To: cputestimony@portlandoregon.gov

Cc: Edward Neuwelt

Subject: Comprehensive plan testimony

Strohecker Grocery Store

2855 SW Patton

have lived on 4246 SW McDonnel since 1981 and have shopped at Strohecker's since then. 2 of my children worked there during highschool.

Unfortunately The neighborhood, especially the neighbors on SW Old Orchard Street, have a history of being hostile to customers and to employees. When the Stohecker family remodeled, they petitioned the city to have the A/C unit removed from the roof which added hundreds of thousands of dollars to the cost of the remodel; some neighbors seem to have nothing better to do than to make sure nobody parks on their street while shopping, even when the lot is full. As I was bidding good-bye and thanked the employees yesterday, they said that only few, maybe 20, customers came to the store to do their regular grocery shopping. Most customers may get a quart of milk or a loaf of bread, but they do their regular "big" shopping at other stores. Obviously the neighborhood does not think it is necessary to support a local business.

Closure of Stroheckers is a big loss for me. Since I live off Council, Crest drive i will now always have to drive down the hill for my groceries, quite a distance away. Apart from that, i enjoyed going to the store. The employees were friendly, the store was clean, and they always had what I needed. I appreciated their yearly picnics with the free hotdogs and hamburgers. They certainly did not fail due to lack of trying to please. And the post office was also a big convenience.

Of course I think we need a grocery store in the neighborhood. However, if it is not possible to run a profitable business, I cannot blame a developer for building condominiums. I think we get what we deserve.

Elizabeth Neuwelt 4246 SW McDonnel Terrace ortland, Oreogon 97239 Sent from my iPad

crom:

John Hickox <johnhickox@yahoo.com>

Sent:

Thursday, January 07, 2016 7:44 AM BPS Comprehensive Plan Testimony

To: Subject:

Comprehensive Plan Testmony

Follow Up Flag: Flag Status:

Follow up

Flagged

#### Dear Commissioner,

I am writing regarding the Portland 2015 Comprehensive Plan to consider Riverside Golf and Country Club

as future Industrial Sanctuary.

I am sending a photo that shows what our golf club looked like 90 years ago when it was first developed. It

looked like Eastern Oregon with just a few trees. Today we have over two thousand old growth trees in

the overall inventory. That makes 85 acres of golf course and trees. If we want to remove a tree we just

get permission from our local government. To remove an old growth forest of two thousand plus trees to

become industrial land seems to be in direct conflict with tree cutting restrictions placed on the citizens of

Portland. I am sure brown land will come available in future years to offset the idea of using a community

resource such as our golf club.

Riverside has about 410 golfing members, which is just shy of being full, and about 85 families that are

pool/social members which is very busy all season. We are serving the North and Northeast communities

of Portland. As a family oriented club, Riverside has developed one of the best Junior Golf Programs

in the State. We have 100 to 110 kids, age 7 to 17 in our program every year. We also allow Portland State,

St. Mary's, Central Catholic, and Lincoln golf teams to use our course free of charge to develop their golf program.

Riverside hosts the P.N.G.A., O.G.A., and Senior U.S.G.A., tournaments. These organizations use

club as a vehicle to grow their membership and their organization. We also host the Eddie Hogan Cup

tournament every year which has twelve College Teams from all over the U.S. to compete. Tiger Woods

won in the year he was in competition at our club. These tournaments bring revenue to the airport and

surrounding resturants and hotels.

Riverside Golf and Country Club is a very active club. Our mwmbership is within 5% of being full and last

year we increased revenues by about 25%. We are a very active asset to the surrounding neighbors. I

am asking you to remove Riverside Golf and Country Club from any consideration for Industrial Sanctuary

Space.

Respectfully John E. Hickox



# Our Links: Past to Present



Harold Speer was head golf pro the first summer the course was opened, followed by Chet Beers and Grev Sloan. The clubbouse was bost to many parties and Saturday night dances. Sunday afternoons featured mixed two-ball foursomes. Soon Christmas Day open houses, New Year's Eve celebrations and annual club election dinners became Riverside traditions. After the fire, the new clubhouse was built running east=west, on the north end of the current parking lot and was dedicated in October 1980.

The Depression and recession soon affected Riverside Golf Club, throwing the Club into foreclosure in 1939. It was reopened as Pacific Golf Club, a semi-private club. In 1935 several former members gathered,

determined to reclaim their Club. Their successful efforts resulted in the "re-epening" of Riverside Golf & Country Club in the fall of 1986.

Eddie Hegan joined RGCC as head pro November 1, 1989. At the age of 36, Eddie was already a well-known and respected golfer through the Western US. He served in this capacity for 29 years.

During World War II, Eddie served as both Head Pro and Club Manager. Because of gasoline rationing, the Club had a "transportation directory" to inform and encourage ride sharing among members. A portion of the club grounds was used for vegetable gardens, which members planted and tended. With golf balls being searce, Eddie encouraged members to turn in "10 old balls for one new ball."

In 1945, Riverside hosted the Pacific Northwest Pro Am. Riverside also hosted the Oregon State Best Ball in the 1940s. This event soon became the Riverside Best Ball Invitational and is known as one of the premier golf events for amateurs and professionals alike in the northwest to this day

In June of 1948, the Columbia River broke a dike near Vanport - roughly where Delta Park and Portland International Raceway are today - flooding the clubhouse and golf course under 18 feet of water. The high water plaque remains today on the big tree to the right of #5 green.

Members stepped forward to support a threeyear rebuilding, reconstruction and tree replanting program.

Upon returning from playing in = by invitation - the Bing Crosby Tournament at Pebble Beach in 1958, Eddie wrote in the club newsletter. The Tattler, "I really had a very enjoyable trip and met many wonderful persons, but as I always say, there's no place like Portland and dear old Riverside Golf and Country Club."

From the Riverside Golf & Country Club Archives. Watch for "Our Links: Past to Present" in your monthly Leaderboard!



Eddie Hogan

Ordinance 187832, Vol. 1.3.J, page 7260





### Contents

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- 12 Leadership Connections
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- 15 January 2016
- 16 Ladies Talk



## Our Links: Past to Present

In 1925, a group of twenty-five golfers filed Articles of Incorporation to purchase sixty-four acres of land called Sunderland Acres. The private club was called Riverside Golf Club. Nine holes were opened for play on July 16, 1926. As we celebrate our 90th year, please enjoy a glimpse into our history over the next year!





The first clubhouse opened on September 11, 1926. On August 19, 1929, the clubhouse burned to the ground. Only the fireplace & chimney remained.

The first nine holes were seeded in the fall of 1925 and officially opened for play on July 16, 1926. According to legend, nine prominent golfers were each asked to design their "perfect" golf hole. Par was 37, since the original #9 (now #18, the hole located under the present drive-up front entry) was a par 5.

The second nine holes were designed by Chandler Egan and constructed by William Scully. The original nine holes became the back nine holes. The new 18-hole course was dedicated on June 30, 1929.

January 7, 2016

Re: City of Portland 2035 Comprehensive Plan Comments
Updated from previous submission and with additional signatures

Dear Portland City Council Members,

As neighbors of the historic "Strohecker's Market" in Portland's West Hills, we ask to have our voices heard with respect to any zoning changes/variances/language changes for this property in the midst of our residential neighborhood.

Our attached comments with over 200 neighbors' endorsements are submitted for your review and consideration.

Sincerely,

Blythe Olson Cell 503-849-9616

Attach: Comments with endorsements (10 pages)

#### Comments for the City of Portland 2035 Comprehensive Plan

Hearing scheduled for January 7, 2016

Supplement to comments submitted Nov. 19, 2015 with additional signers

For Portland City Council consideration

These comments address Proposed Change #1128 (formerly #644) regarding the property located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

We are all neighborhood residents/owners with homes in the area near this property, many of us in close proximity.

We value having a neighborhood grocery store near us with its ancillary services (pharmacy, liquor store, postal service), but are strongly opposed to additional commercial development or high density housing that would add more traffic and parking stress to our residential neighborhood. Southwest Patton Road, the only street bordering this property, is routinely gridlocked by commuter traffic that has increased in recent years and safety for drivers and pedestrians is compromised daily.

We ask that the 1984 Ordinance No. 155609 that allowed Strohecker's to expand at that time and restricted use of the property to a grocery store remain intact with the new zoning name changes (relative to any future use of this property) so that we can maintain the livability and safety of our residential neighborhood.

Now that the store has announced its imminent closure and the intentions of the out-of-state developer who recently purchased the property are unknown, these Comments to the Portland City Council endorsed by over 200 near neighbors are particularly timely.

Thank you. The following neighbors endorse these comments:

**Blythe Olson** 

2719 SW Old Orchard Rd

J. Mary Taylor

2718 SW Old Orchard Rd

Anne Rogness 2740 SW Talbot Rd

Jeannie Santos 2681 SW Vista Ave

Leonard Santos 2681 SW Vista Ave

Sandra Joos 4259 SW Patrick Place

Valerie Hill 2624 SW Talbot Rd

Warren Hill 2624 SW Talbot Rd

Brook Howard 4243 SW McDonnell Terrace

Ann Howard 4243 SW McDonnell Terrace

Rachel Young 2493 SW Arden Rd

Chapin Titcomb 2846 SW Labbe Ave

Minah Titcomb 2846 SW Labbe Ave

Alison Friday 1703 SW Myrtle St

Sara Matarazzo 1909 SW Laurel Place

Elizabeth B. Brown	5031 SW Humphrey Park Rd

4 SW Talbot Rd
,

Dishaud Candaus	2002 CW Talkat Dd
Richard Senders	2682 SW Talbot Rd

Mabel Harris	5042 SW Hilltop Ln
Linda Blaskowsky	2815 SW Patton Ln
Daniel Herzig	2612 SW Talbot Rd
Sallie Herzig	2612 SW Talbot Rd
Bill Headley	2669 SW Montgomery Dr
Julie Headley	2669 SW Montgomery Dr
Lynn Pratt	2501 SW Ravensview Dr
Steve Pratt	2501 SW Ravensview Dr
Betsy McCormick	1535 SW Elizabeth St
Charles McCormick	1535 SW Elizabeth St
Michael Fennerty	3902 SW Hewett Blvd
Maureen Fennerty	3902 SW Hewett Blvd
Chris Dolle	2791 SW Montgomery Dr
Anne Dolle	2791 SW Montgomery Dr
Mary Reed	3431 SW Brentwood Dr
Casey Carl	2804 SW Montgomery Dr
Everett Carl-Schooler	2804 SW Montgomery Dr
Adam LaMotte	4068 SW Hewett Blvd
Janet Coleman	4068 SW Hewett Blvd
Stacy Parker	4558 SW Ormandy Way
Jeff Parker	4558 SW Ormandy Way
Deb White	2464 SW Sherwood Dr
Kristin Morgan	1640 SW Davenport St
Rhys Morgan	1640 SW Davenport St

Lisa Smith

3941 SW Mt Adams Dr.

Gretchen Richter	2529 SW Vista Ave
------------------	-------------------

Arden	Rd
ŀ	Arden.

Michele Bowler	2649 SW Georgian Place

Erez Russo 2662 SW Grenwolde Pl

Claudia Brown 2926 SW Periander St

Camille Hunt 2656 SW Upper Dr Pl

Harry Groth 1010 SW Myrtle St

Bryan Thurston 1525 SW Myrtle St

Diane Thurston 1525 SW Myrtle St

Cindy Easton 4344 SW Hewett Blvd

Michael Easton 4344 SW Hewett Blvd

Alan Jewett 2681 SW Montgomery Dr

Tami Jewett 2681 SW Montgomery Dr

Melinda O'Scannlain 4530 SW Humphrey Ct

Brendan O'Scannlain 4530 SW Humphrey Ct

Leanne Marinace 2818 SW Patton Rd

Anne-Marie Lamb 2865 SW Upper Dr

Robert Linifield 2865 SW Upper Dr

Greg Epkes 4560 SW Hillside Dr

Attilia Sawyer 4560 SW Hillside Dr

Marlene Braun 4211 SW Patrick Pl

James Braun 4211 SW Patrick Pl

Trish Greene 3640 SW Dosch Rd

Rich Greene 3640 SW Dosch Rd

Mary Welle 3836 SW Hewett Blvd

Beth Healde 4015 SW Council Crest Dr

Demian Healde 4015 SW Council Crest Dr

	_
Joe Laqueur	2741 SW Old Orchard Rd
Elaine Tanzer	4405 SW Warrens Way
Jake Tanzer	4405 SW Warrens Way
Nancy Lee	2833 SW Periander St
Steve Ascher	2833 SW Periander St
Susan Kirschner	2444 SW Broadway Drive
Aubrey Russell	4921 SW Hewett Blvd
Molly Spencer	4232 SW Greenhills Way
George Spencer	4232 SW Greenhills Way
Mark von Bergen	4200 SW Greenhills Way
Marilyn von Bergen	4200 SW Greenhills Way
Jim Ruyle	2714 SW Sherwood Dr
Joanne Ruyle	2714 SW Sherwood Dr
Angela Clark	2793 SW Old Orchard Rd
Khashayar Farsad	4622 SW Greenhills Way
Denielle Edlund	4622 SW Greenhills Way
Kathleen Brookfield	2738 SW Old Orchard Rd
Jason Gifford	2738 SW Old Orchard Rd
Robeson Kitchin	2799 SW Montgomery Dr
Leigh Kitchin	2799 SW Montgomery Dr
Bennett Goldstein	2925 SW Montgomery Dr
Patricia Clark	2925 SW Montgomery Dr
Terry Wirkkala	2798 SW Old Orchard Rd
Kester Wise	2751 SW Old Orchard Rd
Cat Wise	2751 SW Old Orchard Rd

Kathryn Scribner	2707 SW Homar Ave
Dan Scribner	2707 SW Homar Ave
Doug Coates	3040 SW Periander St
Marcia Hille	3040 SW Periander St
Jordan Lubahn	2907 SW Periander St
Jessica Lubahn	2907 SW Periander St
Barbara Wagner	2720 SW Montgomery Dr
Susan Dierauf	2783 SW Roswell Ave
Tim Dierauf	2783 SW Roswell Ave
Luis (Ed) Valencia	2738 SW Old Orchard Rd
John McPhee	2930 SW Periander St
Cindy McPhee	2930 SW Periander St
Jerome Schiller	2742 SW Old Orchard Rd
Juliet Ching	2742 SW Old Orchard Rd
Eric Butler	2851 SW Montgomery Dr
Alice Rogan	2724 SW Old Orchard Rd
Lauren Jacobs	2933 SW Periander St
Zach Fruchtengarten	2933 SW Periander St
Joan L. Kirsch	4610 SW Greenhills Way
Jill Mitchell	4404 SW Warrens Way
Darren Mitchell	4404 SW Warrens Way
Michael Gann	2906 SW Periander St
Susan Gann	2906 SW Periander St
Christopher Gann	2906 SW Periander St

**Louise Brix** 

2741 SW Old Orchard Rd

•	
Faith Emerson	2730 SW Old Orchard Rd
Dan Rogers	2730 SW Old Orchard Rd
Sarah Anderson	2770 SW Old Orchard Rd
Steve Anderson	2770 SW Old Orchard Rd
Joanne Klebba	2766 SW Old Orchard Rd
Betsy Rickles	2754 SW Old Orchard Rd
Norm Rickles	2754 SW Old Orchard Rd
Christine Colasurdo	2776 SW Old Orchard Rd
Thomas Scanlan	2776 SW Old Orchard Rd
Maryann Mackinnon	2792 SW Old Orchard Rd
Frances Barnes	2731 SW Old Orchard Rd
Susan Corso	2721 SW Old Orchard Rd
Brian McDonagh	2710 SW Old Orchard Rd
Megan McDonagh	2710 SW Old Orchard Rd
Kent Weaver	2736 SW Montgomery Dr
Peter Miller	2775 SW Montgomery Dr
Sally Miller	2775 SW Montgomery Dr
Anthony Mantione	2842 SW Patton Rd
Kelly Mantione	2842 SW Patton Rd
Elisa deCastro Hornecker	2959 SW Montgomery Dr
Jeanne Windham	2753 SW Roswell Ave
Wilmer Windham	2753 SW Roswell Ave
Janet Conklin	2635 SW Montgomery Dr
Bob Conklin	2635 SW Montgomery Dr

From:

Hales, Mayor

Sent:

Wednesday, January 20, 2016 4:31 PM BPS Comprehensive Plan Testimony

To: Subject:

FW: Comp Plan Testimony Irvington Historic District

Follow Up Flag:

Follow up

Flag Status:

Completed

From: Dean P. Gisvold [mailto:deang@mcewengisvold.com]

Sent: Thursday, January 07, 2016 7:41 AM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Cc: Patty A. Richardson <pattyr@mcewengisvold.com>; jsheuer@easystreet.net; Barb Christopher

<barbfc@comcast.net>; Steven Cole <stevencole86@gmail.com>; Nathan.Corser@ch2m.com; Nikki Johnston

<ndiz@yahoo.com>

Subject: Comp Plan Testimony Irvington Historic District

Mayor Hales,

I am unable to be present for the hearing tonight. Thus, I submit my written testimony via this email. Thanks for your consideration of same.

Based on my long experience with Portland city planning, and five years of working with the Irvington Historic District and the City to implement the largest historic district in Oregon, I offer the following comments and proposed amendments.

Over the five year period, we have dealt with numerous significant remodels and several new infill construction projects. In doing so we have used the 10 criteria set forth in the City Code in 33.846.060 G. For large remodels and new construction, the key criteria require compatible massing, scale, size, and architectural features, (see criterion no. 8), and an overall compatibility with the existing resource, then secondarily with adjacent properties, and finally with the rest of the historic district. See criterion no. 10.

We have learned over the five year period that the zoning in many cases is inconsistent or not compatible with the applicable criteria, that the historic district criteria trump and take precedent over the applicable zoning, and that all facades matter, including the rear facade. The myth that anything goes on the rear facade is just that, a myth, not grounded in the criteria or in the interpretation of same by the Landmarks Commission.

I also know from my experience on the N/NE Quadrant Committee, that there is enough density in the present zoning code and its application (before any up zoning contemplated by the Comp Plan) for the next 30 or 40 years, perhaps 50 years, which means that there is no need for additional density generally, and certainly not in the Irvington historic district.

Based on the above, a reduction in zoning density, height, and FAR in certain areas in the Irvington Historic District is consistent with the current amount of zoning and density, and with the goals of the Comp Plan and the City as a whole. The City has an obligation to preserve its existing historic districts, and I would argue, its inventory of older neighborhoods.

I offer the following proposed amendments to the zoning code and to the Comp Plan

- 1. The RH zoning in the Irvington Historic District with its FAR of 4.0 is incompatible with the fabric of the district. Thus, the RH zoning where currently found in Irvington should be restricted to FAR of 2.0 or, if north of Schuyler Ave, the RH should be reduced to R1 to achieve compatibility with the transition to a predominantly residential neighborhood.
- 2. The maximum height of 75 feet along Broadway on the north side between 7th and 16th is not justified either by market needs nor by consistency with the compatibility with the historic development pattern and should be adjust downward in that stretch to match the 45 foot height currently established along the north side of Broadway between 16th and 27th.
- 3. The CX zoning along the north side of Broadway between 7th and 16th is also not compatible with an historic district, and should be changed to CM 2, but without the benefit of bonuses. The bonuses are too much for an historic district.
- 3. The specific changes affecting the Irvington Historic District on the Comp Plan map are:
  - a. 24th and Fremont commercial node-change from CN 2 to CM1-this is acceptable.
  - b. 7th and Knott commercial node-change to from CN1 to CM1-this is acceptable.
  - c. Half block east of 7th, between Schuyler and Tillamook, and the full block between 7 and 8, Schuyler and Hancock-change from EX to CM3. This is NOT acceptable. The proposed CM3 designation should be change to CM1
  - d. Half block north of Broadway between 16 and 27th, change CS to CM2. This is acceptable if bonuses are not allowed; the bonuses would push the height and FAR above levels compatible with an historic district.
  - e. 15th and Brazee commercial node-change from R5 to CM1. This area is in the middle of the residential heart of Irvington, and one block from Irvington School. The original commercial building on this site was allowed only if it looked like a library building which it did. This commercial node is surrounded on all sides by residential dwellings. Yes, the current uses are non conforming, but they knew this when they relocated. If the staff is trying to rectify non conforming uses, this is not the way to do it. This change is not acceptable and should be deleted from the Comp Plan. If adopted, it would be the first commercial zoning on NE 15th except for the small area on Broadway. Indeed, the Irvington Community Association was formed (1964) in part to fight a proposed commercial project on NE 15th and Knott, a proposed gasoline station, three years before my wife and I moved into the neighborhood.

I ask that you enter this email in the official record and initiate amendments to accomplish the foregoing. Further, I have additional comments about the Comp Plan process and would be happy to share same with you or your office staff should there be any interest in hearing or reading same.

I am sending copies of this email to the Commissioners as well.

Dean Gisvold 2225 NE 15th Ave Portland, OR 97212 503 284 3885

Sent from my iPad

January 7, 2016

To: Mayor Hales, City Council Members

From: Linda Robinson

Re: Comprehensive Plan Update

As a lifelong resident of the Portland Metro Area (including nearly 50 years in the City of Portland), I am pleased to have this opportunity to comment on the proposed Comp Plan Update.

I'll start by telling you that I have found this whole process to be very confusing. It's been very hard to tell what I should be commenting on as part of the Comp Plan itself versus what is related to it but not part of it and, therefore, should be addressed at a different time.

I've summarized a number of concerns below:

- An issue of great concern to me, at this time, is the conversion of natural areas for industrial uses. I
  support the approach taken in the Comp Plan, as forwarded to City Council by the Planning &
  Sustainability Commission which puts the focus on cleaning up contaminated sites rather than
  converting critical natural areas to meet industrial demand, i.e., more intense use of the existing land
  base.
- I also feel very strongly that industrial landowners should NOT be exempt from environmental regulations, especially lands along our rivers. Nor should existing environmental regulations be curtailed or rolled back.
- West Hayden Island should NOT be included in the industrial land inventory!
  - Project #30018 "Implement street plan for Hayden Island to improve circulation and access for all modes" is titled "West Hayden, N; Street Network Improvements". West Hayden Island is not in the City at this time and has been, I'm told, removed from the industrial lands inventory, so I'm questioning why the title refers to <u>West</u> Hayden Island, not just Hayden Island.
  - Project #30062 "Extend rail from BNSF mainline to West Hayden Island and construct rail loop to serve future marine terminal." This should be removed from the Priority Project List.
- It's extremely important that infrastructure precede additional density of development in East Portland. Infill that occurred without infrastructure since annexation, has been very problematic.
- I applaud the down-zoning of some residential properties:
  - To avoid over-loading the David Douglas School District even more;
  - To avoid potential landslide risks in the East Buttes area of East Portland, and in some of the hillier areas on the west side.
- The existing transportation system in East Portland has too much focus on east-west travel, and not enough on north-south travel. This forces vehicles to use one of only four streets that cross over/under I-84 (NE 102nd, NE 122nd, NE 148th, NE 162nd). I know it would be difficult, if not impossible, to add another crossing of I-84, so the existing streets need to be upgraded to handle the larger volume of traffic generated by infill development and jobs creation (Columbia Corridor).
  - North-south transit service is especially deficient in East Portland.

City Council Agenda Item 52, Riverview Natural Area Management Plan, CVNA testimony

Dear Mayor Hales and Commissioners,

The Collins View Neighborhood Association (CVNA) has supported the process through which City of Portland Parks & Recreations has developed a management plan for Riverview Natural Area (RVNA) that is consistent with Metro's conservation easement and the goals and principles stated in the proposed plan for RVNA. It is our opinion that the language in this conservation easement is extremely important in assessing any management plan for Riverview Natural Area.

As noted in the proposed management plan summary for City Council, our neighborhood will probably experience an increase in traffic once access to the natural area is established; this will require future expenditures on improvements that will mitigate this traffic impact.

In our opinion, that process has been transparent, inclusive and well-managed. Our neighborhood, including members of the biking community, participated in the Project Advisory Committee within the planning process; the advisory committee included soil and water scientists as well as an expert from the Audubon Society and mountain bikers from across the city, not just Collins View.

We in Collins View give kudos to the City of Portland for acquiring this natural area and the plans to rescue and preserve it. The natural area was private property before its acquisition by the city, and those who hiked or biked there were trespassing, causing considerable damage, despite the efforts of the previous owners to discourage such activities.

The plan is consistent with Council-approved policies and strategy related to protection of the Westside Wildlife Corridor<sup>1</sup>, environmental protections<sup>2</sup>, conservations efforts<sup>3</sup>, and climate change.

https://www.portlandoregon.gov/parks/article/204516

https://www.portlandoregon.gov/bes/article/474043

Total Maximum Daily Load (TMDL) Implementation Plan,

https://www.portlandoregon.gov/bes/article/509613

Excerpt. TMDL parameter, Temperature. General Strategies/Best Management Practices(BMPs)

Collins View Neighborhood Association letter of support

for Riverview Natural Area management plan

Page 1

<sup>&</sup>lt;sup>1</sup> City of Portland, Parks and Recreation, The Westside Wildlife Corridor,

<sup>&</sup>quot;The Westside Wildlife Corridor is the forested spine of the west hills that provides the green backdrop to downtown Portland. This local target area will help protect remaining natural habitat, protect headwater streams, and create a continuous wildlife migration corridor from Forest Park south along the west hills."

<sup>&</sup>lt;sup>2</sup> City of Portland Bureau of Environmental Services,

<sup>2014</sup> Stormwater Management Manual, page two.

<sup>&</sup>quot;Stormwater management is critical to maintaining and enhancing the City's livability and improving watershed health. The Stormwater Management Manual allows the City of Portland to protect both watershed resources and infrastructure investments with every land improvement. As each development and redevelopment project meets the requirements of this manual, it will contribute to achieving these important citywide goals."

<sup>&</sup>lt;sup>3</sup> City of Portland Bureau of Environmental Services,

The plan supports the goals and Policies in the Comprehensive Plan Update. Here are some specific instances:

#### 1. Chapter 7, Environment and Watershed Health

- a. Policy 7.22, Land acquisition priorities and coordination. Maintain a land acquisition program as a tool to protect and support natural resources and their functions. Coordinate land acquisition with the programs of City Bureaus and other agencies and organizations.
- b. Policy 7,51, Riparian and habitat corridors. Protect and enhance riparian habitat quality and connectivity along Tryon and Fanno creeks and their tributaries. Enhance connections between riparian areas, parks, anchor habitats, and areas with significant tree canopy. Enhance in-stream and upland habitat connections between Tryon Creek State Natural Area and the Willamette River.
- c. Policy 7.52, Reduced hazard risks. Reduce the risks of landslides and streambank erosion by protecting trees and vegetation that absorb stormwater, especially in areas with steep slopes or limited access to stormwater infrastructure.

#### 2. Chapter 8: Public Facilities and Services

a. Policy 8.94, Natural Resources. Preserve, enhance and manage city-owned natural areas and resources to protect and improve their ecological health, in accordance with both natural area acquisition and restoration strategies, and to provide compatible public access.

We also approve of the current restrictions on activities in order for the natural area to recover, given the environmentally sensitive nature of much of its terrain. We hope that such protections will be extended.

Collins View Neighborhood Association strongly supports sustainable uses of RVNA that are consistent with the conservation values stated in the conservation easement signed by City of Portland July 22, 2011, which says in part 3(b) "Grantor's permitted uses shall therefore include public access for nature based recreation, such as hiking and nature watching, environmental education and research (emphasis by CVNA)."

It is also our view that language used in the conservation easement clearly prevents activities that are inconsistent with the conservation values stated in the agreement:

Specific Purposes; Conservation Values. The more specific purpose of this Easement is to prevent any use of, or activity

https://www.portlandoregon.gov/bps/article/531994

Collins View Neighborhood Association letter of support

for Riverview Natural Area management plan

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<sup>&</sup>quot;Increase effective shade through restoration and protections; Restore natural stream hydrology and cool water refuges and wetlands; increase natural stream flow."

<sup>&</sup>lt;sup>4</sup> 2015 Climate Action Plan Summary, page 14,

<sup>&</sup>quot;Building resilience and improving the health of our natural systems, including urban trees, open spaces, rivers, streams and wetlands, and the fish and wildlife that rely on them."

on, the Easement Area that will impair or interfere with the Conservation Values, (emphasis by CVNA) as such term is defined herein. Grantor and Holder have identified that the Easement Area provides protection for important wildlife habitat and water quality, connects riverfront natural areas that function as important corridors for wildlife and people, and is an important refuge and rearing habitat for salmonids along the Willamette River's main stem. These characteristics of the Easement Area (the "Conservation Values") shall be preserved, protected, and enhanced under this Easement. (emphasis by CVNA) The Conservation Values include:

- At 145 acres, the Property contains the largest remaining unprotected and undeveloped habitat patch in the West Hills Wildlife Corridor. The large habitat patch size provides critical interior habitat particularly for species that demonstrate patch-size preference. Additionally, native species diversity and wildlife population stability increase with increasing habitat patch size.
- The Property supports mature Douglas fir and western red cedar forest including large trees, vertical diversity and canopy gaps. The higher level of structural diversity in mature forest structure tends to host more native wildlife.
- The protection of seven intermittent and perennial streams and the associated riparian forest provides benefits to water quality and wildlife, including stream shade for favorable water temperatures, stream bank protection, runoff filtration, large wood recruitment, wildlife breeding habitat and travel corridors.
- 4. The Property's location, due north of Tryon Creek State Park, helps to create and maintain a key connection within the West Willamette Wildlife Corridor.
- Cold water flowing from the perennial streams located on the Property creates much needed temperature refuge for salmonids in the main-stem Willamette River.

It is our view that the proposed management plan for RVNA is sensible, consistent with those

Collins View Neighborhood Association letter of support for Riverview Natural Area management plan

same values provided that permitted activities are also consistent with the conservation easement, and will well serve the needs of the community. We applaud Parks & Recreation for their efforts on the proposed management plan.

On behalf of the officers and members of the Collins View Neighborhood Association,

Jim Diamond

Chair, CVNA

9519 SW 2<sup>nd</sup> Ave., Portland OR 97219

To: City Of Portland, Mayor Charlie Hales Commissioner Nick Fish Commissioner Amanda Fritz Commissioner Steve Novick Commissioner Dan Saltzman

CC: Council Clerk

Metro Council President Tom Hughes Metro Councilor Carlotta Collette

City of Portland
Bureau of Environmental Services Director Michael Jordan
Portland Parks & Recreation Director Mike Abbaté
Portland Parks & Recreation Project Manager RVNA Emily Roth

Executive Director, Southwest Neighborhoods, Inc. Sylvia Bogert Secretary, CVNA, Maryellen Read

Jim Diamond 9519 SW 2nd Ave. Portland, OR 97219 503-984-2775 From: Robert McCullough

To: BPS Comprehensive Plan Testimony
Subject: Comprehensive Plan Testimony
Date: Thursday, January 07, 2016 3:39:43 PM
Attachments: 20151207 Letter to the Commissioners 3 RM.docx

20150510 PORTLAND PLANNING and SUSTAINABILITY COMMISSION.pdf

Neigh Coal Dir & Chairs-- Comp Plan discussion -- summary of major points -- 12 10 2015.docx

Please see attached material for submission to the Comprehensive Plan official record.

--

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December 7, 2015

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

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

Thank you for the opportunity to comment on the proposed comprehensive plan. I am sorry that the first speaker in the testimony on the new comprehensive plan would have had the job of bringing negative news to your attention. Believe me, this was not a job I expected or wanted. However, the process to date has violated the citizen involvement requirements of Policy and Objective 9.3 of the Comprehensive Plan, which remains in effect.

The special target of this violation has been the Eastmoreland Neighborhood Association (ENA). On the specific topic of neighborhood-wide zoning, ENA has contributed far more detailed, factual evidence and information into the record, and produced more thoughtful comments by more neighbors, than any other neighborhood. Nonetheless, as detailed below, both the process and the outcome up to this point have favored other neighborhoods making similar requests (or even not having made a request at all), while Eastmoreland has been subjected to malign neglect at the best of times and misrepresentation and punishment for the rest. We are not unique victims of the current process. I have attached the Portland Neighborhood Coalition Directors and Chairs Group's comments on community engagement in the current Comprehensive Plan process.<sup>1</sup>

As a young intern at Legislative Research in the early 1970s, I worked on Senate Bill 100. I can remember writing a report at the time recommending its many excellent features. One important facet of Senate Bill 100 – now our comprehensive planning law – is the focus on public involvement.

Although I was not active in the 1980 plan, it represented a high point in public involvement

<sup>&</sup>lt;sup>1</sup> Portland Neighborhood Coalition Directors and Chairs Group's Comments Regarding Community Engagement, Neighborhood Coalition Leaders and Staff, December 10, 2015.

with the mayor and senior planners visiting the neighborhoods and responding -- directly -- to issues raised in the plan; unlike the current process, a point by point record exists on issues as far down the ladder of importance.

This has not been the case in the proposed plan. As a replacement for public involvement, we have seen a great deal of public "process." However, public involvement is a two way street. Public involvement does not involve either ignoring or disparaging valid planning efforts by neighborhoods and coalitions. Sadly, this has been the case across the city -- and especially now in Eastmoreland.

Eastmoreland is an older neighborhood with older homes. By design, the majority of lots west of 36th are larger than the current standards for R7. Eastmoreland, for many years, has also included the homes between SE 36th and SE 39th. Different portions have different characters. For example, 65% of the lots north of SE Bybee and east of 36<sup>th</sup> are larger than R7. South of Berkeley Park that proportion falls to 21%.

Eastmoreland is currently zoned R7 and R5.2 Changes in the city zoning rules have changed the vast majority of the area to R2.5 in practice, since the original marketing divisions (aka "lot lines") have been redefined as buildable lots and our many corners in this neighborhood have also been in effect rezoned. This recent change was undertaken without adequate notice or adequate public debate. It has created a situation where Eastmoreland's homes are being picked off one by one, demolished and replaced by larger homes on significantly smaller lots. And this is just the start.

It should be understood that this is not "affordable housing". In fact, it is the exact opposite as many affordable older homes are disappearing in favor of million dollar McMansions with minimal yards and minimal trees. This is not hyperbole. It is a fact of life in our neighborhood. Anyone who claims that current practices in Eastmoreland are producing affordable housing is either disingenuous or dreaming.

Two years ago, I submitted a letter asking for the area to be downzoned to R7. This would

<sup>&</sup>lt;sup>2</sup> One two lot corner is zoned R2.5.

bring the minimum lot size back into balance with the existing use.<sup>3</sup> The letter was accepted and placed in the comprehensive plan process.

The staff review indicated support of a portion of the proposal. We subsequently researched and developed a full blown analysis to justify all aspects of our request.

The testimony and studies to support this were prepared by our land use committee with extensive planning experience and qualifications. The proposal had been developed through public involvement -- true public involvement -- and was supported by the vast majority of the residents of Eastmoreland and adopted by the ENA Board of Directors.

At this point, our experience turned bitterly disappointing. A summary of the neighborhood's comments which thoroughly mischaracterized ENA's proposal was distributed by city staff to the Planning and Sustainability Commission before the closing date for testimony and before they considered our testimony and studies. The explanation, made to you last week, was that there was a scheduling problem. The explanation is facile and fails to address the very real problems that ENA has been discussing with BPS staff for three years. It appears that Eastmoreland has been singled out for punishment. The whys and wherefores are difficult to understand. We have submitted an Oregon Public Records request to the Bureau of Planning and Sustainability in order to discover what happened; we will pursue that request to the full extent of the law. Weeks have now passed, but we have not received a substantive response.

Even more incomprehensible is the derisive treatment the neighborhood received, not only in the staff summary of ENA's issues, but in the nature of the presentation of those issues to the PSC. The great number of comments addressing the change was noted in the planning staff's preemptive report, but the overwhelming support of ENA's proposal was dismissed by staff. Instead, staff engaged in an exercise in false equivalency by giving equal emphasis to the negative comments (some irrelevant) received in opposition to ENA's proposal from 10 percent of the respondents. Proponent comments were also dismissed on the basis that "Eastmoreland residents submitted testimony supporting the proposal on the assumption that it would slow

<sup>&</sup>lt;sup>3</sup> Request for Land Use Zone Change from R5 to R7 for areas within the Eastmoreland Neighborhood Association Boundary, Robert McCullough, December 20, 2013.

<sup>&</sup>lt;sup>4</sup> Re: Request for Comprehensive Plan Map and Zoning Map Changes in Eastmoreland, Eric Enstrom, April 28, 2014.

the rate of neighborhood change,"<sup>5</sup> Given the expertise of the participants, the professional quality of the materials submitted, and the offhand level disrespect, this comment was viewed as insulting. Not surprisingly, we objected at that time, provided further rebuttal testimony, and posed a number of material questions that we hoped would be presented to the PSC for the purposes of discussion and to address the concerns we raised.

The discussion of Eastmoreland was carried over to a second work session. In that session, staff spent most of the time talking about other, selected parts of the city that they felt should be downzoned for a variety of reasons. At the same time, they isolated Eastmoreland as a special case on the basis that there was supposedly a mix of lot sizes that supposedly disqualified it from being a pure R7. However, there is nothing in the code that talks about pure or mixed communities, but rather about the prevailing lot pattern, density, and lot standards. Staff muddled this information by basing its analysis on lot size by block to highlight certain variations, while failing to address the criteria in the code. Despite the extensive discussion of the criteria and detailed analysis provided by Eastmoreland, staff chose to ignore ENA's arguments entirely. It failed to present, highlight, or refer to ENA's testimony. In an apparent state of confusion, staff was unable to answer the questions of impacts or to justify its efforts at segmentation of the neighborhood. Then, staff claimed that the change advocated by ENA would have little impact on the neighborhood and no significant impact on density.<sup>6</sup> A central theme was that Eastmoreland's concerns might best be handled in an as yet unannounced process that would be "half done" this fall, whatever--if anything--that means.<sup>7</sup>

The meeting of the Planning and Sustainability Commission was well attended by interested parties from the neighborhood. By the rules of the Commission, we were not allowed to participate, but had been assured that the staff would present our testimony and studies in a positive fashion. This commitment was not honored by any stretch of the imagination.

<sup>&</sup>lt;sup>5</sup> Memo to the Planning and Sustainability Commission, Deborah Stein, February 25, 2014, page 19.

<sup>&</sup>lt;sup>6</sup> "Eastmoreland and Portsmouth changes have no projected impact on development capacity because there is very little vacant and underutilized land within these two areas." Memo to the Planning and Sustainability Commission from Deborah Stein, February 25, 2014, page 19.

<sup>&</sup>lt;sup>7</sup> PORTLAND PLANNING and SUSTAINABILITY COMMISSION FOR THE COUNTY OF MULTNOMAH, Portland, Oregon Tuesday, May 12, 2015 at 12:30 p.m., RE: COOMPREHENSIVE PLAN UPDATE, page 28.

I have attached a transcript of the meeting in question. At page 5, you will see that Ms. Stein commenced lobbying against the change in zoning.<sup>8</sup> A central theme was that while other parts of the city should be rezoned, Eastmoreland should be treated differently. On page 17, Ms. Stein finally concludes: "And with respect to Eastmoreland, we would recommend that you consider these options. One would be to retain the R5 and address the issues through code, or we would recommend that you would look at down designating the area within the existing Eastmoreland plan district from R5 to R7." The PSC members were either left confused or convinced that there was no basis for the ENA request as summarized in the staff report discussed above.

It was clear from the dialog during the session that no one had read the testimony and studies submitted. When staff were asked about the facts, they were not able to answer. Moreover, they did not even ask for leave to get the answer from the authors of the studies, who were in attendance. The meeting was so chaotic and so disrespectful to the neighborhood that I have included a transcript of the hearing. For example, when asked the impact the zoning change might have, the staff simply answered that they did not know -- even though the materials had been in their possession for weeks and had been discussed extensively with the planning liaison.<sup>10</sup>

While the violation of the commitment to present the facts was serious, it was far less serious than the chief planner's decision to take up much of the session lobbying the Planning and Sustainability Commission to reject ENA's proposal. The dialog between the chief planner and the chair appears at pages 24 through 40 of the transcript. While the chair repeatedly asked if there was a way to solve the problem, the chief planner argued that it should not be addressed since it was to be solved in some other process. 11

In the end, other neighborhoods, which had not demonstrated or provided the factual or public support evidenced by Eastmoreland, were granted R7 status. In our case, a bizarrely confused dialog ended with the R7 application being rejected and the entire neighborhood proposed to be rezoned R5, presumably including even the areas currently zoned R2.5 and R7!

<sup>&</sup>lt;sup>8</sup> Ibid., page 5.

<sup>&</sup>lt;sup>9</sup> Ibid., page 17.

<sup>&</sup>lt;sup>10</sup> Ibid., page 37.

<sup>&</sup>lt;sup>11</sup> Ibid., page 24.

Why was Eastmoreland singled out for special treatment? We do not know. Why was the significant work put into our effort ignored? Again, we do not know. This material has been provided to the PSC and you, our City Council. Rod Merrick, our land use co-chair and a respected architect, has testified to bring your attention to these issues at the City Council hearings on the comprehensive plan. Mr. Merrick's submission goes to the merits, and I pray you will judge it on its merits—not the biases of the planning staff.

As you know, I have a long professional career with extensive participation in and before decision making bodies at the local, state, and federal levels. I was shocked by the miscarriage of due process in this instance, and I have worked extensively in Louisiana and Illinois--states where the democratic practice has been known to have its rough edges.

This letter explains why one community within Portland remains disappointed and angered by the dismissive treatment and perversion of the decision making process before the PSC. Drive down our streets, especially in the southeast quarter, and witness the replacement of modest viable housing with large and far more expensive housing. That is the result of misguided planning decisions. We ask you to reconsider the record testimony, and grant the designation to R7 from R5 for all of our neighborhood.

Yours on behalf of the Eastmoreland Neighborhood Association,

Robert McCullough

President
Eastmoreland Neighborhood Association
6123 SE Reed College Place
Portland, Oregon 97202

Attachments:

# Eastmoreland Neighborhood Association

Portland Neighborhood Coalition Directors and Chairs Group Transcript of May 10, 2015 Planning Commission Meeting

# Portland Neighborhood Coalition Directors and Chairs Group

#### Portland Comp Plan Update

#### COMMENTS REGARDING COMMUNITY ENGAGEMENT

12/10/15

TO: Portland City Council

FROM: Neighborhood Coalition Leaders and Staff

#### RE: COMMUNITY ENGAGEMENT IN THE COMP PLAN

Neighborhood coalition leaders and staff, from all seven of Portland's neighborhood coalitions, want to share with you some important concerns about the community engagement in the update of Portland's Comprehensive Plan (Comp Plan).

Our group held a special three-hour meeting on November 12, 2015 to discuss community concerns about how BPS engaged the community in the update of the Comp Plan.

We recognize that lots of process took place, but we also are hearing strong concerns in the community about the quality of these processes, who was heard, and what impact community member input has had on the development of the recommended draft.

A key message is that both planning staff and community members need more time, and that the process needs to have enough resources and realistic timelines to ensure that the community effectively is involved in shaping the final products.

As leaders and staff for Portland's seven neighborhood coalitions, we want to share with you below what we are hearing and what we believe to be accurate.

#### **SUMMARY OF KEY THEMES**

# Process did not follow Proposed "Chapter 2—Community Engagement" goals and policies

 We recognize that the recommended "Chapter 2: Community Engagement" language includes goals and policies that set strong expectations for good community engagement. We find it ironic and disturbing that the process used to engage the community in the Comp Plan Update did not follow these recommended goals and policies.

#### Community input appears to have had little effect

 We found many instances in which community members and neighborhood and community organizations provided extensive and detailed input but did not see that their input had any effect on the final product.

- Neighborhood and community groups and community members often did not receive a
  formal acknowledgement that their input was received, and often received no feedback
  on what was done with their input.
- In some cases, more savvy neighborhood and community activists who really
  understood the system and had good inside relationships were able to move some of
  their priorities forward. However, community members, in general, appear to have had
  little effect on the outcomes.

#### Decision making processes were not transparent

- Rather than a transparent, "additive," process by which community members could see
  how different products and documents evolved, community input seemed to go into a
  BPS "black box" in which decisions were made without any explanation of how
  community input was or was not used and why. Community members complain that
  they are not able to "reverse engineer" BPS decisions to understand how these
  decisions were made.
- Community members want to know: What was the decision making logic? Were
  decisions just made by senior planners? What criteria did they use and what level of
  understanding of the prior community input and existing plans did they bring to their
  decisions?
- Recommendations in this process often appear to have gone forward without support
  of the groups that had been involved in helping develop the recommendations.

# Lack of Community Access to Planning Commission

Many community members feel that the Planning and Sustainability Commission (PSC)
was not accessible to the community during the process. Community input to the PSC
was filtered through the staff. Community members do not feel confident that PSC
members adequately were aware of and understood community concerns and
recommendations.

#### Disconnect with prior, existing plans and earlier products

- The Comp Plan Recommended Draft proposals and recommendations do not appear to reflect earlier aspirational goal and policy language—e.g. visionPDX, Portland Plan, earlier Comp Plan aspirations, goals for specific zoning, Zoning Code density standards, existing plan districts, etc. For instance, the Comp Plan map and zoning updates and changes being proposed do not seem to correlate with the aspirational language in the Comp Plan goals and policies.
- The Comp Plan Recommended Draft does not appear to incorporate and reflect other existing plans that often were developed with significant community input: e.g. District Plans, Parks Vision 2020, Climate Action Plan, Age-Friendly City Plan, etc.

#### Community engagement processes were not designed to be appropriate to different audiences

- Community engagement should focus on helping community members understand how a project or proposed policies will affect them and their community and how they can have an effect on the issues that are most relevant to them.
- Many community members and organizations did not have the capacity to get themselves up to the level at which planning staff were working.
- Much of the community outreach and engagement was done in language and formats
  that many community people could not understand. Outreach and engagement also
  was not designed to be accessible to many different groups of people in our community
  and often was not tailored adequately to the needs and context and communication
  styles of different cultural communities.
- Outreach also was not tailored adequately to different areas of the city. Too many
  presentations had a general city-wide focus and were not relevant or useful to
  community members—community members could not see how the issues and
  processes would affect them and what they could do to affect outcomes that mattered
  to them.
- Outreach also needed to be staged and tailored to audiences with different levels of
  interest and expertise. Too much of the information came all at once. Processes needed
  to make sure that the right people were in the room for the content being presented—
  e.g. "101" sessions for people who are very new to planning, and more advanced
  sessions for more experienced people.

#### Multiple Projects were underway in parallel without being clearly integrated

- Too many different planning projects were underway at the same time. It was not clear
  to most community members how they all fit together. Even the most savvy and
  experienced neighborhood and community activists had trouble following and
  understanding what was happening.
- BPS staff also often were overwhelmed and said they did not understand how all the pieces fit together. This made it difficult for them to help the community engage effectively.
- The Comp Plan is about much more than just land use, including transportation, bikes, parks, etc. This process affects so many different areas important to the community that is was easy for community members to lose track. Many felt that the whole picture was not being looked at.

# <u>Projects were not pursued in a logical sequence with adequate time</u>

 Projects at different levels of the planning process were happening all at the same time, rather than a logical progression from the most broad to the most specific.
 Implementation projects were started before goals and policies were finished, and often shared the same deadlines.

- The process also was marked by a feeling that BPS staff were rushing to get everything
  done to meet what appeared to be artificial deadlines. This appeared to sacrifice the
  goals of producing a quality product and ensuring that the community understood and
  was able to provide meaningful input and have an effect on the outcomes.
- In some cases, staff reports were released to the community with only a week for the community to review and respond. This was completely inadequate given the complexity and importance of many of these products.
- Many community members feel overwhelmed and exhausted trying to follow, understand, and participate in all the different processes that were happening at the same time.
- Both planning staff and community members need more time.

# <u>Inadequate Resources</u>

- BPS staff were overwhelmed by the scope and complexity of the processes and products they needed to deliver. While some planning staff tried hard to engage the community, BPS did not have enough people and resources to adequately involve the community in all the different projects.
- BPS staff did not have the resources to acknowledge, consider, and respond adequately and effectively to all the community input. This resulted in many community members and organizations feeling that their input was not heard or considered.

# "One-size fits all policies" do not work for many parts of Portland

- The Mixed Use Zoning project proposes a one-size fits all approach at the general level that amplifies the drive toward greater density and other effects that often contradict the goals of existing plan districts and disregard existing plans and public input. The more fine grain levels and impacts of these proposed policies are not clear.
- The "five Portlands" approach does not describe the Portland community members see. We need zoning and planning that reflects the neighborhoods in question.
- No mechanisms exist for neighborhood associations to have a say in design and development in their neighborhoods.
- Neighborhood livability is being sacrificed for regulatory simplicity.

# <u>Lack of adequate analysis and modeling—identification of unintended consequences</u>

- BPS generally has not analyzed adequately the different proposed policies to identify their likely, real-world outcomes in the community.
- Analysis has been limited primarily to static studies. Finer grained studies of the likely impacts on local areas have not been done. Analysis tools have not been responsive to the questions that the community is asking.
- BPS also does not track the actual impact of adopted policies on different neighborhoods in Portland.

• Community members already are seeing unintended consequences of this process. It's important to daylight these consequences earlier rather than later. Some additional mechanism is needed to identify and respond to these unintended consequences as the many elements of the Comp Plan are implemented.

		Page 1
1	PORTLAND PLANNING and SUSTAINABILITY COMMISSION	
2	FOR THE COUNTY OF MULTNOMAH	
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4	Portland, Oregon	
5	Tuesday, May 12, 2015 at 12:30 p.m.	
6		
7	RE: COOMPREHENSIVE PLAN UPDATE	
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10	TRANSCRIPT OF PROCEEDINGS	
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22	DEBORAH COOK, RPR, CSR	
23	COOK COURT REPORTING, INC. 1102 N. Springbrook Road	
24	Suite 136 Newberg, Oregon 97132	
25	(503) 537-0339 deb@cookcourtreporting.com	
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#### **PROCEEDINGS**

Tuesday May 12, 2015, at 12:30 p.m.

MR. ZEHNDER: Just a couple items on the Director's Reports. Two reports we're going to send you links to that have been released recently that are relative to the comprehensive plan and just the work of the Commission. The first is the State of Black Oregon Report. There's actually a city club sort of presentation and discussion of it, I think, this Friday, but we will send the link to all the Commissioners.

And within that report it covers a full range of topics, but there's a consideration of development and gentrification in that report, as well. And then the second one is the State of Housing in Portland, which is a recent report prepared by the Portland Housing Bureau, just sort of a snapshot of housing conditions and affordability across the city that is very informative to our work. So I wanted to let you know about those, and we will send you the link so you can take a look at your convenience.

COMMISSIONER TALLMADGE: So this Wednesday, actually tomorrow, is Multnomah County Budget Forum being held at IRCO. And it will -- there's a number of individuals testifying on their budget priorities,

Page 3 including planning and development. So that will be at 1 2 IRCO, and you can find that information -- actually, I 3 have some postcards I can pass around, but that may be 4 of interest. 5 Thank you. Other items? CHAIR BAUGH: 6 have two Consent Agenda items, and we will take them 7 separately. Consideration of minutes from 4/28/15 8 9 meeting. Will they be accepted or approved? 10 CHAIR BAUGH: Aye. 11 COMMISSIONER GRAY: Aye. 12 COMMISSIONER HOUCK: Aye. 13 COMMISSIONER OXMAN: Aye. 14 COMMISSIONER RUDD: Aye. 15 COMMISSIONER SHAPIRO: Aye. 16 COMMISSIONER SMITH: Aye. 17 COMMISSIONER ST. MARTIN: 18 COMMISSIONER TALLMADGE: Aye. 19 CHAIR BAUGH: That passes. 20 Right-of-way No. 7880 for buttress 21 prevacation North Terminal Road east of North Lombard 22 Street. 23 UNIDENTIFIED COMMISSIONER: Second. 24 CHAIR BAUGH: That's been moved and

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seconded. All in favor?

1 CHAIR BAUGH: Aye. 2 COMMISSIONER GRAY: Aye. 3 COMMISSIONER HOUCK: Aye. 4 COMMISSIONER OXMAN: Aye. 5 COMMISSIONER RUDD: Aye. 6 COMMISSIONER SHAPIRO: Aye. 7 COMMISSIONER SMITH: Aye. 8 COMMISSIONER ST. MARTIN: Aye. 9 COMMISSIONER TALLMADGE: Aye. 10 CHAIR BAUGH: That passes. 11 Introductions. 12 MR. ENGSTROM: Thank you, Chair Baugh. 13 This is one of a number of Comprehensive Plan work 14 sessions, as you know. I think this is No. 6. We have 15 two primary subjects today, as you already indicated. The first piece, Deborah and I will go over a number of 16 17 issues related to residential densities. She'll start out, and then I have a follow-up related to Concordia. 18 19 And then the second half -- or second major 20 component of today is the economic follow-up as you 21 noted, which has a number of sub issues that you already identified. 22 And then we will wrap up with a brief 23 24 discussion of where we are in your review of the consent

list that we sent you, and then we will go over and do Q

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and A on the next steps. As Chair Baugh indicated, we're working towards Commission recommendation by July 14th at this stage, so I will go over what the agendas are for the next few meetings just to make sure everybody is clear on that.

MS. STEIN: Good afternoon. So I will be talking about residential densities. I think this is part 4 of the set of discussions about residential densities. And today I will be talking specifically about some changes from R5 to R7.

So you will recall that the July 2014 map proposal included a set of down designations that we labeled as distance from centers in corridors, and prevalent lot patterns. And the objective of that set of proposals was to adjust residential densities to better align the Comprehensive Plan designation with the lot patterns. And we were looking at areas with two features. One was that they were relatively distant from centers and corridors, and areas where the existing development pattern is predominantly at a lower density than what the Comprehensive Plan currently allows.

The proposals that we presented to you back in July, 2014, originated with a request by the Reed Neighborhood back in 2011. And that was followed by a similar request by Eastmoreland Neighborhood

Association.

And so like other things we have done through this process, we wanted to make sure that we were looking at like situations and treating them in like ways. So Staff scanned the city at the time to identify any additional areas in the city, again, outside of centers and corridors, and where there's a general pattern of lots that are approaching or exceeding R7. We wanted to consider all of those together.

So you might recall the map on the left shows, I think, nine areas, and then there's another map on the right. These are the sets of areas that had those characteristics I just described. Again, R5 areas that are distant from centers and corridors, and areas where either the zoning currently is R7, but the Comprehensive Plan doesn't match. We have several where we have R7, slash, R5. So we looked at those areas, and then we also looked at those areas that have the zoning and Comprehensive Plan designation of R5 but seemed to meet more of an R7 density pattern, and you can see the names of the neighborhoods listed to the right.

So we did have a couple of initial conversations with you about this already, so you might recall them. And these were the takeaways that Staff

heard from your discussion. And the three takeaways were, first, be clear about what problem we're trying to solve. Second is, let's make sure we're consistent across the city. And third we heard a message that was, keep it simple. Don't make this too complicated. So we have used these takeaways as guideposts for our follow-up analysis that we're going to be describing to you today.

So Staff pored through a great deal of testimony, and from that testimony we derived a set of issues or problems that were identified by neighbors that were in support of their request to do the down designation. And we reviewed these issues or problems in order to ascertain two things. One is, which of these are most appropriately addressed by changing the map from R5 to R7. And secondly, which are, instead, most appropriately addressed through a zoning code change, as opposed to a map change.

So Staff would assert that of this list -and again, this is not a full list, but I think these
are some of the major things that came out in the
testimony. Of this list, we would say that the down
designation, a map change, could address the first two
items that are listed there. We would say that large
and small lots can be reestablished based on historic

underlying lot lines where they exist. And that's something we talked to you about at one of your earlier work sessions.

And so as I had mentioned then, there is a difference between the minimum lot size, depending on whether the base zone in the Comprehensive Plan designation, is R5 or R7. So that does, in fact, make a difference. And while a map change will not erase or negate the underlying lot lines, it would increase the minimum lot size of any new lot that can legally be required -- or legally be created.

So there could be a net decrease in the number of skinnier, smaller lots in a neighborhood, depending on what that zone is. Now, larger lots can currently be divided, based on allowable lot size in R5. But larger lots still would be able to be divided, even if it were changed to R7. So it's going to depend on the size to determine which lots would still be dividable, even if we were to make the change.

But again, there may be a slight decrease in the number of new lots created through land divisions if we were to change to R7 because fewer lots will be large enough to allow that division. So that makes sense.

Now, the next set of issues while we have

heard quite a bit of testimony about these, and we know that these are important, we would assert that these are better addressed through code changes, rather than through map changes. So demolition of homes in good condition -- and similarly, we heard some of the issues about landscape, mature landscaping, tree canopy. Those are all things that would be better addressed through code changes, rather than map changes.

The concern about new development being out of scale with existing homes, again, we think that that is something better addressed through a code change rather than a map change. We did hear some concern about duplexes on corner lots, and that is something that could be addressed through some code changes to address scale, or development standards, but still allowing for duplexes on corner lots. That could be something that could be addressed.

And then another really key issue that we have heard from testimony is the loss of economic and/or generational diversity within a neighborhood when smaller homes are replaced by larger and more expensive homes. Very important issue, but not really most appropriately addressed by a map change. We think that could be a code change.

So let me describe to you what our

analytical approach was very briefly. We went back and reexamined all the study areas that I showed on that earlier map where we had originally proposed the R7, back in the July 2014 proposal.

And we looked at concentrations of lots within each of these study areas, where the concentration of lots meet or exceed 6,370 square feet. And why that number is because that represents R7 density. So basically we're looking at an area where there were great concentrations of lots that were at or above that size to determine whether those had what we would call a predominant R7 character or quality already existing.

In addition to doing this analysis, which I will show you some examples of it in a minute, we looked at a number of additional maps for Eastmoreland that the testimony that Eastmoreland Neighborhood Association provided. As you remember, they provided very well documented testimony with a number of maps, and they did their own analysis. So we did consider that, as well.

And we also looked at a constraints analysis to determine what environmental and/or infrastructure constraints exist in each of those study areas, based on our buildable lands inventory.

Showing you this map again, rather than

show you the analyses for all ten areas that we looked at, I am going to zero in on three of them to give you a sense of what this analysis looked like, what these maps looked like, to see where we were looking for concentrations of lots that were at or exceeded the R7 densities.

So I have circled the areas that I am going to show you. One is Eastmoreland, one is an area in the southern part of Lents, and one is one that straddles Portsmouth and Kenton.

So starting with Kenton Portsmouth, this is an example of this analysis map. And because I know it's hard to read the legend, I will give you a quick tour here. The dark red indicates blocks that have concentration of 75 to 100 percent of the lots, within each block, that are at or above R7 density. Pink represents 50 to 74 percent of the lots within that block that are at the R7 densities. Light blue is 24 to 49 percent, and then the dark blue on these maps is zero to 23 percent.

Although, on this particular map, that's a bit of an anomaly because the area that is shown in dark blue, they are actually very large lots owned by Union Pacific. And they were sort of averaged out, so the blue is an anomaly, and those lots are currently zoned

for R7, and they have a designation of R5.

So here you can see that predominantly, the area that is shown in color is at that R7 density.

There are a few -- few of the outlying areas are slightly less printouts, but the red indicates that 75 percent or more are the R7 density areas.

The next area I have to show you is in South Lents. This is well outside of the Lents Town Center. And again, strong R7 character for most of the area. You will see a couple of little pockets with the blue, meaning those are less concentrated, and the pink is somewhere in between. But fairly strong R7 density that exists today, based on the lot size.

Now, this map shows Eastmoreland; same blue, red, pink categorization. The yellow circle we have added since the last map. That's the quarter mile from the light rail station. So as you heard from the neighborhood, they don't feel like there's -- that most of the neighborhood is within walking distance of that light rail station. So you can see that yellow circle, that represents the quarter mile.

You will remember there's been quite a bit of testimony from Eastmoreland, and they did submit a request for the entire neighborhood, which is the full colored area on this map to be down designated from R5

to R7. And the eastern boundary that you see here is Caesar Chavez. That's the eastern edge of the neighborhood.

The neighborhood's reasons for proposing R7 were based on the historic development pattern as a lack of access to transit and services. And you also heard a concern about loss of the architectural quality, landscape quality, and there were a number of other issues that they raised in their testimony.

In comparison with the other maps that I just showed you, there's much more of a mix of lot sizes within Eastmoreland. Again, the red shows blocks that have 75 percent or more at the R7 density. And then the dark blue is 25 or less. And then it's different percentages in between.

The -- let's see. Oh, the other thing that I would highlight here, it's not shown on the map, but the nearest retail node is at Woodstock -- right about here, Woodstock or -- right about here is where the Woodstock commercial district starts. So as the neighbors attested, they don't have easy walking distance to the commercial node there.

Now, South Burlingame hadn't been included in the original July 24, 2014, for a down designation. But through testimony, we heard a number of neighbors

asking to be also considered for a down designation from R5 to R7. We hadn't selected this originally, because it didn't pass the initial screen based on the proximity of this particular neighborhood to commercial nodes.

And there is a commercial node down here, and this is Barbur Boulevard, which is a major corridor, and there's a commercial -- let's see, it's hard for me to see. But anyway, here. There's a Fred Meyer, and then there's another commercial area here.

So we did find that this area did have better pedestrian access, much of the neighborhood has much better pedestrian access to commercial nodes, and to a major corridor. But again, I wanted to bring this to you, because there was quite a bit of testimony asking for this to be down designated in a similar way.

Among the issues that South Burlingame neighbors raised were some unimproved streets here, which is true. They are most notably, however, in the areas with the greatest concentration of the R5 lots, rather than the larger lots. And substandard streets are not a unique issue here, as you know. There's quite a few places in Southwest.

But for the most part we found that the proximity to the commercial nodes would not support the down designation. The concerns, though, from the

neighborhood did express very similar frustration about the size and scale of in-fill development. Similar to what we have been hearing in Eastmoreland, and other neighborhoods, as well, and the demolition of older homes. And some of the smaller homes being replaced by larger homes. So there's definitely a consistent theme here in some of the concerns that prompted the request in the first place.

So I would like to just outline our findings from this analysis. First, we found that of the study areas we looked at, nine of them do have fairly uniform lotting patterns based on that red, blue, red, pink, blue model that I showed you. Eastmoreland and South Burlingame had more of a mix. The other study areas had much more uniform concentrations of R7 density lots.

The second important find is that the underlying lot lines, and the kind of development that results as a -- as a result of those lot lines would best be addressed through code changes, rather than map changes. And changing from R5 to R7, we do find it would reduce the overall number of smaller lots that can be reestablished, but we think a lot of the issues could be better addressed through code.

In Eastmoreland the largest concentration

of underlying lots is located east of Southeast 36th where the lots predominantly match the R5 density. And the pattern of underlying lots continues eastward well past 36th, and well beyond the edges of Eastmoreland Neighborhood, which ends at Caesar Chavez.

So to really look at that as a prompting for consideration, we would say, where would we end. I think that the pattern of underlying lots is not confined to the boundaries of Eastmoreland. So we would say that that is something we really ought to be addressing through a citywide approach, rather than looking simply at a redesignation of Eastmoreland itself.

So I would like to conclude with some recommendations for you today. And the first would be that we recommend that you affirm the July 2014 proposals for R5 to R7. However, I am going to show you in a moment some options for Eastmoreland. And then we would also recommend that you retain the R5 in South Burlingame, because of the proximity to services and amenities.

But in addition, I want to say that we would recommend that we would address the underlying lot and scale issues on a citywide basis through code changes, rather than map. And with respect to

Eastmoreland, we would recommend that you consider these options. One would be to retain the R5 and address the issues through code, or we would recommend that you would look at down designating the area within the existing Eastmoreland plan district from R5 to R7.

Now, this is a slight modification to what we originally proposed in July 2014 where we had confined the down designation proposals to the area west of 36th. In this new revised proposal, we would recommend going one set of lots east of 36th, because that takes in the lots that comprise the plan district boundaries, and the original boundaries of the subdivision.

CHAIR BAUGH: Do you have a visual of that, Deborah? It would be easier to contemplate.

MS. STEIN: Yes, I can go back. So this map, again, shows the whole Eastmoreland neighborhood.

CHAIR BAUGH: Where is 36th?

MS. STEIN: This line is 36th here. So you can see -- and this ties back to some of the things we heard you say in your earlier discussion. Commissioner Hanson had brought up the idea that there really is a break in the neighborhood between the older curvilinear pattern of streets, and then the grid pattern which really that break occurs at 36th.

1 UNIDENTIFIED COMMISSIONER: There's even a 2 change in the name. I think it's Berkeley.

Eastmoreland and then there's Berkeley.

UNIDENTIFIED COMMISSIONER: Sounds like California.

MS. STEIN: So again, thinking about your direction, Commissioner Hanson, about looking at the physical characteristics that change at this line, as well as your admonitions to keep it simple, we thought that the Plan District Boundary would be the appropriate boundary to apply the down designation.

Now, I will note the neighborhood has asked, actually, to expand their Plan District to encompass the full neighborhood boundary, but the plan district boundaries aren't on the table right now.

We're really looking at the Comprehensive Plan designation, not the plan district.

COMMISSIONER TALLMADGE: So one of the options is east of 36th would retain the R5 designation, and everything to the west would be R7?

MS. STEIN: Correct. And as I mentioned, if you look at this line, the lot pattern, with the exception of this block that is -- is that where the church is? I believe that might be a church. But the lotting pattern does change at that line to some degree.

There's more of a concentration of 5,000-square foot lots. There's also the area where there's the largest concentration of those underlying lots. But that concentration continues out east. It doesn't stop at the line, at Caesar Chavez.

And so with that, I will put it up for questions and discussion.

CHAIR BAUGH: Questions? Discussion?

Comments? Michelle.

COMMISSIONER RUDD: So how many potential housing units would we lose in Eastmoreland? And also, what are the -- can you identify all the green spaces on the map? Looks like there were parks and golf courses and things.

COMMISSIONER TALLMADGE: Can we keep it on the map?

MS. STEIN: Yeah, that's a good idea. I am going to look for the answer, because I have that right here. I have it right here.

(Inaudible indistinguishable discussions away from mic.)

MS. STEIN: So when we did the original growth allocation, we had included some numbers in our -- in a February report to you that showed that Eastmoreland, there actually is not a very significant

difference in the number of units. And based on the 1 2 growth allocation, there's actually an increase, only 3 because we changed our assumptions about accessory dwelling units. But the capacity check, it looks like 4 5 there was -- let's see, two acres of vacant and underutilized land in the analysis, capacity for five 6 new units on the existing plan; five with the proposed 8 plan. So really not a material difference in the number of units. 9

But I should note that's not taking into account the narrower lots. That's based on the R5 density, if you were doing land divisions.

CHAIR BAUGH: Teresa.

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COMMISSIONER ST. MARTIN: So what happens to the places that are already in an R5 or a different lot configuration when you change it to R7?

MR. ENGSTROM: They become nonconforming density, essentially, which in a single dwelling zone doesn't have a lot of meaning, because it's the -- the development standards for lot -- for house development on R5 and R7 are the same. So there's not much effect on the existing property owners.

The primary effect would be if you had a bigger lot that was dividable under R5 that is no longer dividable under 07, and Deborah said there's not much of

that in this neighborhood anyway, the main capacity for the development in Eastmoreland is accessory dwelling units, and/or the skinny lot, or the substandard lot provisions in the zoning code, not the basic R5 versus R7.

It's hard to quantify, because you have to document the lots, and we can't -- we don't have the capacity to do a deed history on all the lots and estimate that. But you can get a sense of it from where do those underlying plats exist.

COMMISSIONER ST. MARTIN: And would that then change in the density opportunity, also preclude then further investment in transit and other things, because you are basing those things off of density, as well.

MR. ENGSTROM: Because the neighborhood's mostly already developed, the two zones are not going to have a big impact on how the city plans transit, I don't think, in this case. It would if this was a vacant piece of land and we were debating whether it was R5 or R7. R7 is less likely to receive frequent transit.

But in this case, you have an already developed neighborhood that is, as the blue indicates, is partly already developed in R5. So the transit planners are going to look at the actual density, more

1 than the zone.

CHAIR BAUGH: So I just -- so I just want to walk kind of through some logic here for me. If you do the lot line adjustment, zoning code process, that's going to solve some of these problems, correct?

MS. STEIN: I think what it would solve -well, depends on the outcomes of that project. Because
the scope is still being developed. But I think
certainly being able to address the scale of new
development, for example, if there are issues about
compatibility of what is built new that is bigger, and
less -- smaller setbacks, or scale is different than the
existing development, that's something that could be
addressed through code refinement.

There could be different minimum lot sizes that could be imposed. There are a number of things that could be changed through code changes that would get at what happens with these underlying lots, and what is developed based on that kind of density.

CHAIR BAUGH: And that's a process we already have scoped and we're heading down the path with, correct?

MS. STEIN: We have that in -- in the mayor's recommended budget. That is a project that we would be undertaking.

CHAIR BAUGH: And then we have the pass five (phonetic) around doing easements and scale, correct? Or am I -- is that the same thing?

MS. STEIN: I think that's the same

process.

CHAIR BAUGH: So if we attack that problem, and if you could go back up to your recommendations and then address from that standpoint, we kind of solve the -- then we leave the East side alone. And does that address more of the items you had listed in the first page?

MS. STEIN: Over where I had the checklist, do you want me to go back to that?

CHAIR BAUGH: So I am trying to see what is going to address more of those issues, because it looks like we're only maybe solving one versus three or four.

So demolition of homes is a separate process. The scale of new development through the lot line --

MS. STEIN: Scale of new development, certainly. I don't know whether we would want to address the duplexes. That would be up to the scope of that project. If we change just the dimensions of a duplex, or the design of the duplex to be more compatible. We're not considering removing the ability

to do duplexes on corner lots, but instead maybe looking at how they are developed, and what the design is.

CHAIR BAUGH: So I am just trying to get to, we can solve more problems with that than doing an R5 to R7?

MS. STEIN: More of the issues listed on here, certainly.

CHAIR BAUGH: And that still does not prevent coming back and looking at R5 to R7 at a later date.

MS. STEIN: Sure.

MR. ZEHNDER: The single family house project, you will be able to see the results and see which of these issues it resolves. Our intention is to adjust the size of an infill house you can build, and where that's maybe most acute, from where we have seen in the neighborhoods, is in these situations where you are putting two on what used to be one lot. And it's adjusting through the skinny lot things. To have two where there used to be one, and have both of them be larger than expected seems to be part of the heart of what is concerning people.

So that project will definitely address that, both the dimensions of the house, and going to come up with some sort of proposals about how to treat

those underlying lots, the skinny lots.

MS. STEIN: But I think the minimum lot width and minimum lot size, I think what we have heard is truth in zoning. That is a really resonant term, because I think one expects R5 is going to look a certain way, based on 5,000 square feet. And one expects that R7 is going to look a certain way, based on 7,000 square feet. But if you look at our code today it allows different lots sizes that are significantly smaller than those numbers.

So there's this sort of hidden density that I think people are asking for more transparency about what a zone really means. And having those numbers be clear. And it could mean just widening the minimum lot width, or enlarging the minimum lot size based on different circumstances. And having that be more clear, because I think the development of some of these skinny lots has been quite a surprise to neighbors when they fully expect they live in an R5 neighborhood, and that should mean something, and then they see something much smaller.

So getting at that truth in zoning issue is really what people are asking for, and I think that would be a fundamental concept built into the scope of this new project.

CHAIR BAUGH: And the ability to accelerate that would be maybe us requesting from Council to push it a little faster so that it gets some relief to the neighborhood quicker? I mean, I don't know how quick we can get it done, but --

MR. ZEHNDER: You know, there's no -- I think we're moving expeditiously, so I don't know that the process to go through that is -- can be sped up. The City Council could conceivably ask us to take a look at changing a minimum lot size in a way that could almost -- that could stop skinny lot development for a period of time while the single-family lot project was completed.

But that would be a separate sort of ordinance and undertaking, and you would have to bring it back through here. But it would -- and it would be a way to put a pause on this, if you really wanted to.

We need to talk with the city attorney. There is sort of legal issues that are raised with creating lots where you could be perceived to be making them undevelopable, so we would want to research it first. But really the single-family house project is going to address this, and is supposed to be done with recommendations in 12 months. And then we're here for however long the hearings take.

There's 155,000 single family properties in the city, so that's part of why we can say we can speed it up, we can speed up the analysis, but that's a lot of folks to -- who are going to be affected by this. So that's part of why we're anticipating the timeline.

CHAIR BAUGH: But I hear a potential kind of solution of maybe we can, as PSC, request Staff, and if we need to write a letter or something, have Council create an ordinance that would, based on the legal -- what you find out about legally, if we could pass something as an interim step to then get to the broader issue under the lot line adjustment, I guess, and come back. So we have a two-step process.

And that -- if the first one is legal and we can get through those legal issues and get Council's agreement to then move forward on a separate path, but also have the proposal that is currently in front of Council move forward so we get -- I don't want to say a moratorium, but a pause. And then come back with a -- a zoning change around design.

MR. ZEHNDER: The Commission could clearly express that point of view and recommendation to the City Council as something separate from what we're talking about. This change would not get to City Council until later this year, right?

1 Eric, what is the timing on that?

MR. ENGSTROM: The map changes we're talking about are part of the overall comp plan package,

4 so that goes to Council in the fall.

MR. ZEHNDER: So we will be half done with the single-family house project by that time, too.

CHAIR BAUGH: But we could get to Council before that around an ordinance --

COMMISSIONER SHAPIRO: Absolutely you could. Absolutely you could.

CHAIR BAUGH: And I am kind of back to the first item of using the right tools here, and it seems if we can do that, maybe we get a better solution versus doing a lot of zoning that's not going to -- actually have an impact into the community.

I don't know thoughts, but it seems a reasonable approach. I am just talking about Eastmoreland, specifically.

COMMISSIONER SHAPIRO. I think we should have some clarity about what we're talking about. It seems like you are urging the Commission to move forward independently on Eastmoreland, and request the City Council to that issue. Is it timing? Is that what you are suggesting? I want to understand if we go this way, none of this will be impacted until the comp plan is

adopted and moved on.

What I hear you say is an urgency to move on the Eastmoreland-specific project. Which I don't have a problem with, but I want to understand, what is the urgency?

CHAIR BAUGH: Well, the urgency would be giving the communities some temporary relief from the issues they are facing in the community, and then coming back, if I am understanding it, coming back with the broader zoning package in a year, to 18 months, assuming Council approves the comp plan, and those things.

MR. ZEHNDER: Just to clarify I believe that discussion was around not just the skinny lots or underlying lots that are part of that Eastmoreland proposal. This would apply citywide, is what I thought. It's sort of -- it's not a moratorium, because technically it doesn't qualify as that, but it's a change that would put a great pause on the development of those lots until new rules were in place, or -- but, once again, I don't know exactly how to do that, or the legalities of it. But it seems like that could be a possibility.

And the tradeoffs are this: The pace of development and infill would put a chill on that for a period of time. And, you know, one of the tenents of

housing affordability is just to build housing to
increase the supply of housing. However, I don't
know -- I don't want to misrepresent that I even have a
sense of the scale of impact of that, but you know,
these things -- these things all have implications like

that. All of those do.

MS. STEIN: There's something I had forgotten to mention to you. The map, I know you can't see it, but this map -- can't see it close up. The map I put up shows the underlying lots citywide. So you can see where they are located, and the extent to which

those areas are distributed across the city.

I couldn't make it into a slide, because it's so tiny. So you really have to stand right up to the map to see. But to get a sense of how widespread these concentrations are, and how distributed across the city, this is not an Eastmoreland problem. This is a -- so it's an interesting map, and you might want to take a look at that at the break.

COMMISSIONER SHAPIRO: And just to clarify, could I understand the problems that the community is facing that they need this acceleration?

CHAIR BAUGH: It's up here. So all I'm saying is can we have, I guess, Staff come back on the 26th with an opportunity whether or not we can do that

first part? If it's feasible.

Do you think, Joe, you can get back to us, before we tell you, yes, go ahead and do that? I don't want to --

MR. ZEHNDER: It would be -- I think, what I would recommend, as you all just debate the interest and merits in that. If there is a way to do that we would develop some alternatives. I don't think I can get you an answer by the 26th. From what I know the backlog is in the city attorney's office right now on a variety of things.

COMMISSIONER TALLMADGE: (No microphone, partially inaudible.) I am not sure what the conversation around this is, but I don't feel the urgency putting out an ordinance to stop development right now. So that's my own opinion. I don't know how the rest of the commissioners feel about that. I don't feel the need to get an ordinance to stop the development.

CHAIR BAUGH: So back to the recommendation, are you comfortable with changing -- my problem is changing R5 to R7 doesn't do anything, in my view. I mean, you are mitigating, but you are not solving the problem. And so I am not really in favor of moving the zoning R5 to R7.

1 Teresa.

COMMISSIONER RUDD: Just to clarify, we're only talking about Eastmoreland, and then we're going to have recommendations on the other areas, or we're not talking about the other areas?

MS. STEIN: My recommendation would be to affirm the down designation for the other areas where there was a very consistent pattern of R7. Where it really is simply matching the designation to the lot pattern without the variation. I think the variation shows up -- variation among lot sizes shows up more in South Burlingame and in Eastmoreland.

And our recommendation to you is not to down designate South Burlingame. But if you choose to down designate in Eastmoreland, I would say contain it to the area covered by the plan district, which is just to 36th, including the lots fronting on 36th, east.

COMMISSIONER RUDD: And then what about Lents and Kenton Portsmouth?

MS. STEIN: We would recommend there, because the down designation simply matches what is already on the ground. It isn't really changing any development capacity, doesn't remove or reduce any development capacity.

CHAIR BAUGH: Karen.

COMMISSIONER GRAY: So to Andre's point, if he's saying he doesn't get the point of why we're doing this, and I feel like I have been pretty tuned in for the last half an hour of your conversation, can you summarize again for us why you think this is important for the Commission to follow your recommendation? Make it very plain and very clear. Why is it that you are looking at down zoning from R5 to R7 in these areas.

No. No. No. The whole megillah, this whole thing here. I am not pulling out Eastmoreland from this conversation. You have made a recommendation. I think I get the point. I am not knowing that everybody is getting the point. Maybe you can make the point one more time as to why this is important in the redesign of the comp plan for us to do this.

MR. ENGSTROM: Stepping back to the real beginning of this conversation, we were looking at areas that are located farther from centers and corridors, and looking for opportunities to reduce infill pressures there, and align the zoning with the lot pattern that prevails in those areas. So that, as Deborah said, our approach was fairly consistent in many of those other areas she showed on the map. And we didn't run into very much ambiguity.

Where we ran into ambiguity was in South

Burlingame and East Moreland. So we have come to a position of several options that we have put on the table, either changing the map for the plan district, or not changing it and relying more on the code changes, or both.

But again, the big picture is these are places away from centers and corridors where there's some amount of infill that causes community friction that isn't key to our achieving our growth objectives in the city, because they are farther away from where we need the growth to occur.

CHAIR BAUGH: Are people comfortable with the recommendation except for -- I'm going to pull out Eastmoreland. But is everybody else comfortable with the other places in terms of the recommendation?

MULTIPLE VOICES: Yes.

CHAIR BAUGH: So Eastmoreland, Burlingame, that's where I am most uncomfortable with the zone change. But Don?

COMMISSIONER HANSON: The one thing about Eastmoreland that I like is the certainty of the time frame. I am glad Staff is mentioning code changes and other projects that could get at these kind of conflicts of character in neighborhoods.

But we know we can do the zone change

before the end of the year. Am I accurate when I say before the end of year, or comp plan change?

MR. ENGSTROM: No, because the comp goes through a process of being acknowledged at the State. So the design map -- it's likely that the code project that Joe described will be in effect before the zoning map changes would be because the comp plan is on a slower train, if you will because of State acknowledgment --

COMMISSIONER HANSON: Because of State endorsement. That's what I needed to understand.

But, Eric, it would be through the city process?

MR. ENGSTROM: Correct. If you all finish your work by July, we believe we could have the City Council finish by the end of the calendar year.

COMMISSIONER HANSON: So that clarifies the timing for me. Thanks.

And the other part of the question is if we go R5 to R7 because of the lack of proximity to corridors and center, and the characteristics of the neighborhood today, how does that address the inherent conflicts that people are seeing in Eastmoreland in terms of infill housing, and it doesn't fit with what's there? Does it get at that, if we go from R5 to R7? Is

there more restriction that solves and addresses some of these issues?

MR. ENGSTROM: The development standards are the same. So you are not going to affect the size of houses. The only thing you are affecting is the number of lots that are dividable through the standard process.

COMMISSIONER HANSON: Which is a lot. That's a big change.

MR. ENGSTROM: No, it's not a big change, because there's not very many lots that are dividable either way. The biggest issue -- the biggest opportunity for infill in Eastmoreland is either through ADUs or through these preexisting small lots, the 25 by 100, the teardown and replacement, because of the preexisting plat.

And that would be affected by change from R5 to R7. But for the issue that -- the problem is most of those lots are east of 36th, which has more of an R5 density. So it's a little bit of a Catch 22.

COMMISSIONER HANSON: Okay. That helps a little bit. Thanks.

COMMISSIONER RUDD: So the ones that make the most sense to me are the ones where you are making it consistent with the underlying zoning. I do have

discomfort with the ones where -- I guess, Burlingame and Eastmoreland where there's not such a concentration of the 7,000-square-foot lots already.

So my tendency would be to pull the Eastmoreland and South Burlingame out of it, and deal with those issues through the code amendment process, and stick with what I believe is the July 2014 recommendation.

CHAIR BAUGH: Chris.

COMMISSIONER SMITH: I want to ask the question not asked in a slightly different way and make sure I understand the answer. If we did go from R5 to R7 in Eastmoreland within the plan district as you suggested, how many opportunities for these skinny lot subdivisions go away because of that transition?

MS. STEIN: Again, it's very hard to quantify, because we see where some of those underlying lots are, but we don't know how many of those could be documented in a way that would allow those lots to be created or reestablished. So it's a little bit tricky to give you a number. I think the key --

COMMISSIONER SMITH: -- is there a boundary condition on that? Is there a worst case?

MS. STEIN: I don't know, but I wanted to just answer in a different way. The real difference

between R5 and R7 for the lots is the minimum lot size allowed. And that's because there's a difference for the lots of record between -- 3,000 square feet is the minimum lot size if it's R5 and 4,200 if it's R7.

So it would take some tricky math to figure out what that would look like with different -- lots of variation in our estimates based on our lack of understanding of where those lots can be documented or not. I am sorry that's not a clearer answer.

MR. ENGSTROM: Maybe another way to phrase it is the concentration of those historic lot lines is much more intense east of 36th than it is west of 36th. So if your objective is to use the zoning to reduce that from happening, you are sort of missing the target. But if you were to extend the zoning tool and down zone the area east of 36th, there's not a logical stopping point. You might as well go all the way to Lents then, because it's all that --

CHAIR BAUGH: Michelle.

COMMISSIONER RUDD: Isn't there a risk of driving more conversions as people try to get ahead of the zoning map change? So you may be actually driving what we don't want. I mean, I would want to vest my rights.

MR. ENGSTROM: Usually there is a little

Page 39 blip in development activity trying to beat the clock. 1 2 COMMISSIONER SHAPIRO: That's why -- asking 3 for an ordinance. 4 CHAIR BAUGH: So what I hear is there's 5 general acceptance, again, for No. 1, and I -- can I say hesitancy for Eastmoreland and Burlingame, or --6 7 COMMISSIONER HANSON: I would say 8 (inaudible). 9 CHAIR BAUGH: For a zone change? 10 COMMISSIONER HANSON: Yeah, I'd like to see -- (inaudible). 11 12 COMMISSIONER RUDD: To retain the R5 --CHAIR BAUGH: To retain the R5. Retain the 13 14 R5 for South Burlingame. 15 MS. STEIN: So our recommendation was to 16 not down designate Burlingame. 17 CHAIR BAUGH: So everybody is okay with 18 that? 19 COMMISSIONER SHAPIRO: The language gets 20 triple not double. 21 CHAIR BAUGH: And then for Eastmoreland, 22 are we hesitant to down zone it? 23 (Inaudible statement, no 24 microphone.) 25 MS. STEIN: No. 1 here meant for the other

Page 40 study areas. And I was separating out Eastmoreland with 1 2 the options of -- our recommendation was that if you are 3 down designating, you would go to 36th. That's one line 4 of homes, the planned district boundary. 5 (Inaudible statement.) MS. STEIN: Right. And I can show you the 6 7 map again so you can see the area of Eastmoreland. 8 know this is confusing. (Inaudible statement.) 9 CHAIR BAUGH: So do we need to vote? Or is 10 11 there --12 MR. ZEHNDER: It would be best if we got a 13 motion and a vote on this today for clarity. CHAIR BAUGH: Who's in favor of east of 14 15 36th, staying current zoning? East of 36th -- we're --16 COMMISSIONER TALLMADGE: So do not down 17 zone? 18 MS. STEIN: And again --19 MR. ZEHNDER: Can we get a motion and a 20 I think that would be best. Thank you. vote? 21 (Inaudible). 22 CHAIR BAUGH: I am going. 23 COMMISSIONER SMITH: I am going to ask my question again. No. 1, the July 2014 recommendations 24

did not include any parts of Eastmoreland?

25

1 MS. STEIN: Did not include any parts of

2 Eastmoreland or South Burlingame. It's the other areas,

3 Lents, et cetera.

4 CHAIR BAUGH: Is there a motion to amend

5 | the current recommendation around Eastmoreland?

COMMISSIONER SHAPIRO: There is.

7 Oh, you want me to state it? I move we

retain the zoning east of 36th Street in -- east of 36th

Street, retain the zoning.

10 COMMISSIONER HANSON: I second.

11 (Inaudible statements.)

12 | COMMISSIONER SHAPIRO: I am saying retain

13 | the zoning east of 36th Street.

14 CHAIR BAUGH: And west of 36th would be, to

15 | clarify, to be down zoned?

16 COMMISSIONER SHAPIRO: That is correct.

17 | That's correct. The motion is specifically east of

18 36th.

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19 CHAIR BAUGH: Is there a second?

COMMISSIONER HANSON: I will second.

21 MR. ZEHNDER: And clarification, just to be

22 | clear, so the west side is R7, the east side the

23 | proposal is R5. The line that Deborah recommended

24 | included -- it's both sides of 36th. So a very small

25 | sort of technical thing, but I wanted to be clear.

MR. ENGSTROM: So another clarifying
question, but some of you are talking as if this motion
is just dispensing with the area east of 36th, and you
are going to have another discussion west. And some of

5 you are assuming that you are motioning about the whole

6 thing. And I want to clarify that.

7 CHAIR BAUGH: I think we're motioning --

8 | Howard, is your motion on the whole part of

9 | Eastmoreland?

10 COMMISSIONER SHAPIRO: No, it is not.

CHAIR BAUGH: Just on east? On the west

12 | part --

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13 (Multiple Inaudible Voices.)

CHAIR BAUGH: We're going to do it -- so on the west part of Eastmoreland -- we have to vote on this

16 first.

MR. ZEHNDER: You need a second of that

18 motion.

19 CHAIR BAUGH: Don seconded.

Julie, let's do a vote. Julie a vote.

21 We're voting on the amendment to east of 36th as to it

22 will retain its current zoning, R7.

23 COMMISSIONER TALLMADGE: Just that --

24 CHAIR BAUGH: R5. I am sorry, R5. R5,

25 | it's just on -- we're going to come back and vote on

1 just the west side.

COMMISSIONER ST. MARTIN: Sorry, to sound so obtuse, but we're going to come back and vote on the west side, and what about, (inaudible, no microphone).

5 (AYE: Baugh, Gray, Hanson, Houck, Oxman

6 Rudd, Shapiro, Smith, St. Martin, Tallmadge.)

CHAIR BAUGH: The west side motion.

COMMISSIONER HANSON: I move that we change the designation east of 36th -- west -- west of 36th, from R5 to R7 -- (Inaudible Statements, Multiple Voices) -- the plan district which includes the lots

13 COMMISSIONER HOUCK: Second.

that front on the east side of 36th.

14 CHAIR BAUGH: Discussion?

MR. ZEHNDER: No, we need a separate motion

16 on 1 and 3.

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17 (Inaudible Statements, Multiple Voices)

CHAIR BAUGH: So a clarifying question on this, would this include properties within the

20 quarter-mile radius of the transit center?

MS. STEIN: Yes. Yes --

MR. ENGSTROM: Small number --

MS. STEIN: It's small, and they tend to be

24 the largest lots.

CHAIR BAUGH: They tend to be the largest

1 lots, of course.

COMMISSIONER SMITH: That forces me to make
the point that a quarter mile for walking to transit is
conservative, and people will walk farther for higher
quality transit, so people will walk a lot more than a
quarter mile to this Maxx Station, I'm sure. So where
that radius is, is not a big influence on my vote on

MR. ZEHNDER: So, Commissioners, I believe you have a motion and a second on the table.

11 CHAIR BAUGH: Julie, vote.

12 (AYE: Gray, Hanson, Houck, Oxman,

13 | Shapiro.)

this.

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14 (NAY: Baugh, Rudd, Smith, St. Martin,

15 | Tallmadge.)

16 CHAIR BAUGH: It fails. So it retains the

17 current zoning.

So need a motion on the overall

19 recommendation.

20 ROBERT McCULLOUGH: I want to make a

21 comment here --

22 CHAIR BAUGH: There's no public comment,

23 | sir --

24 ROBERT McCULLOUGH: -- you are leading up

25 to litigation. You have one standard for one part of

Page 45 1 the city, and another --2 CHAIR BAUGH: -- sir, there's no public 3 comment. 4 ROBERT McCULLOUGH: There will be legal 5 comment. 6 CHAIR BAUGH: A motion on the current 7 recommendation, as amended. 8 UNIDENTIFIED COMMISSIONER: So I move we 9 accept recommendation 1 and 3. UNIDENTIFIED COMMISSIONER: 10 Second. 11 CHAIR BAUGH: And it would include the 12 motion that was passed earlier -- the amendment passed earlier, correct? Okay. 13 14 (Multiple Voices.) 15 CHAIR BAUGH: Julie. 16 (AYE: Gray, Hanson -- ) 17 (Inaudible, multiple Voices.) CHAIR BAUGH: Is there a discussion? 18 I 19 thought we had already discussed it. Do you want to --20 is there a discussion? (Inaudible.) 21 Gary? 22 COMMISSIONER OXMAN: So what we 23 are doing -- are we leaving unresolved the question what 24 happens on the west side of 36th? 25 CHAIR BAUGH: No.

COMMISSIONER OXMAN: So it stays as is?

2 CHAIR BAUGH: It stays as is --

MR. ZEHNDER: So if I could clarify, I
think it's going to be helpful. So we're going to
affirm all of the proposals, other than the Eastmoreland
and Burlingame? And Eastmoreland we're leaving -- you
are leaving the current designation, the R5 designation
in place for the whole area, east and west? And for
South Burlingame, you are also keeping the R5

CHAIR BAUGH: We're essentially just leaving things as you recommended in July.

MS. STEIN: No --

designation in effect.

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MR. ENGSTROM: So you departed from the July recommendation with the Eastmoreland discussion, which you already voted on. But No. 1 there is everything else.

COMMISSIONER SMITH: So I am confused, because I asked the question did the July recommendation include any part of Eastmoreland and you said no.

MR. ENGSTROM: No. 1, does not -- No. 1, as we worded the recommendation, what we meant with No. 1 is those other areas stick with the July; then No. 2 was for Eastmoreland we have two choices.

COMMISSIONER SMITH: What was the July

1 recommendation for Eastmoreland?

2 MR. ENGSTROM: R7.

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MS. STEIN: No, up to 36th, but stopping in the center line of 36th. So we modified that a little bit by saying move one lot farther east.

COMMISSIONER SMITH: So if we applied the same analytic criteria to Eastmoreland west of 36th that we are to the rest of the July recommendation, we would go to R7 there?

MR. ENGSTROM: No. That's why we brought this to you, is because the map is much more ambiguous in Eastmoreland. And those red and blue colors, the idea was that red are blocks that are predominantly R7, and the blue are blocks that are predominantly R5. And in all those other areas it was much more clearcut. In Eastmoreland, there was a mix of both of those patterns.

COMMISSIONER SMITH: I am back with the program. Thank you.

CHAIR BAUGH: Other discussion?

(No response.)

CHAIR BAUGH: Julie.

22 (AYE: Baugh, Gray, Hanson, Houck, Oxman,

23 Rudd, Shapiro, Smith, St. Martin, Tallmadge.

CHAIR BAUGH: Yes. The motion passes.

Next item, Economic Elements.

MR. ENGSTROM: Actually, we have one other residential density, and this one I hope will be clearcut, and we will get through it quickly. But there was a request in Concordia that we want to quickly go through. And I will move as fast as I can, so we can get to a recommendation.

So you heard testimony from Concordia that was a little bit analogous to the Eastmoreland testimony, except for in Concordia you have zoning of R5 and R2.5, and you have a larger extent of these preplatted 25-by-100-foot lots. So in this case the neighborhood didn't take a position, but some residents requested either R5 or R7, and less R2.5. It's in response to narrow houses being built.

And I am just going to show you a couple slides of houses on 25-by-100 lots, essentially, in Concordia. And the house on the right in this example is more of a typical house in Concordia. There's a lot of small bungalows. Another example, this one has an alley, so it doesn't have a front garage. Another quick example. Again, the house on the left is more typical to is in Concordia. A variety of architectural approaches, as you can see.

This is a map showing the area, and we're located between two neighborhood centers. The

neighborhood center on the right is 142nd Avenue at Killingsworth, and the center on the left is the Alberta Center there. And what you have here in blue are the R5 lots that are platted at 25-by-100-foot plats, and the orange, which is a little harder to see on this map, but it's between Killingsworth and Alberta, is 25-by-100 platted, also. But it's zoned R2.5.

And then I have shown you the X in the middle is the grocery store at New Seasons there, and the purple dotted line is the frequent transit line that cuts through the area. So this area, just for background, was zoned R2.5 in the Albina Community Plan between Killingsworth and Alberta. And generally, R2.5 is a buffer between the neighborhood, and the more intensive mixed-use zones. And that's a typical pattern found throughout the city.

This map shows you where the R2.5 zoning is located throughout the city, and you can see it straddles a lot of the corridors, or is between corridors where they are close together. So Sunnyside, for example, between Hawthorne and Belmont is a similar situation as Concordia, which is between Alberta and Killingsworth. It's a situation where there's two corridors closer to where that R2.5 essentially comes together. I outlined Concordia in the dotted line at

the top of the screen, so you know where it's located.

Service analysis in this situation, it's important to note that there are very few service deficiencies here. This is -- it's not in an environmentally sensitive area or flood plane. It has sewer and water service. It does not have significant traffic issues, at least from a capacity point of view.

There's a few unimproved streets, but not to the extent you would see in outer Southeast or Southeast, and a very high percentage of the neighborhood has access to frequent transit.

Housing supply context, this chart was in our Housing Background Report, and it's also in a number of other Staff reports. But it's our way of explaining and connecting the dots between the different household types in the city, and the different housing types we have.

And the thing to remember about this is that different housing types serve different household types, depending on their size and affordability. And this diagram shows what is affordable to different groups. So to give you an example, the only housing type, housing type G, that is affordable to anyone in the city is the SRO, small studio apartment style.

In contrast, like the high-rise towers or

the large lot detached homes are only affordable to the highest income groups without any kind of cost burden. So we use this kind of matrix to assess whether our comp plan is providing enough housing of the right type for the different income groups, and family size groups.

One of the things to note when we look at this is that we have talked a lot about affordable housing, and we're not -- our current comp plan is not yet providing an easy path for those lower income groups, or for entry level homeownership. And, in fact, with our down designations in East Portland and some of the ones you just talked about, even though they might be in the right places for down designations, they are not necessarily high amenity areas.

But they are reducing the supply of affordable single family and more affordable apartment buildings where we have reduced the R2 zoning in East Portland. And that may be okay, because we don't want that development in East Portland, but citywide we have reduced that supply.

So it's really important to pay attention to this R2 and 2.5 zoning, because that's the zoning that provides the housing types that are most accessible to those household groups and income groups. So with that in mind, what we're talking about is --

COMMISSIONER SMITH: Are there numbers attached to these groups? Is Group 1 millionaire, and Group -- I don't quite get it.

MR. ENGSTROM: We have that in the Housing Background Report. Group 1 is essentially very low income. Group 8 is -- I forget the exact cutoff, but it's over 100,000 a year for household income. So there's -- you can kind of figure it out. Group 5 or 6 is median income.

So for R2.5 and R2 groups, you are talking about plexes or small lot detached or attached. And those are the lowest -- the least costly homeownership opportunities we have in the city. Because if you move to the larger lots, you got get more expensive, larger lots you are buying. And if you go to higher density, you are into a different construction type.

So just to use household Group 6, for example, they make \$60,000 to \$75,000 of annual income. And a typical Group 6 might be two adults with school-age children, one working full time and one part-time. These small lot, single-family houses or attached houses are really the only option, if they want to own a home, if they want to have some ground for a yard, and if they want to avoid being cost burdened. So that's why we're looking carefully at the supply of R2

and R2.5 zoning.

So I think our argument here is it's very important for this scale of zoning to exist for affordability, but there are a variety of forms it could take. So the form we saw pictures of was this detached skinny houses. But you can have, at the same density, a whole variety of other housing types. And we heard testimony from Concordia that they weren't necessarily against density. What they were concerned about was the form of the skinny houses.

So for example, these are at the same density, they just happen to be pairs attached to each other, rather than detached. Or you can also do cottage-type housing, which we have seen in Concordia, as well, or accessory dwelling units, as another option.

So our recommendation in Concordia is to not down zone the R2.5 or R5 areas. But like Eastmoreland, we believe there is a code solution that would look at what are the appropriate forms in the R2.5 zone, through this single-family project. And that's the Staff recommendation to this particular request.

COMMISSIONER SMITH: So this is not an issue with underlying old plats. This is the actual zoning, and that people are having problems with the

CHAIR BAUGH: Discussion. Chris?

	Page 54
1	zone design type?
2	MR. ENGSTROM: In R2.5 it's both. There's
3	underlying plats, and it's zoned for 2500-square-foot
4	lots. So it's both.
5	CHAIR BAUGH: Other discussion?
6	Are we okay with the recommendation? I
7	think we're good.
8	COMMISSIONER TALLMADGE: I did have a
9	question, sorry, about just as a point of reference,
10	why didn't you discuss infrastructure in relation to
11	Eastmoreland, or did we discuss that at our July 2014 in
12	terms of access to
13	MR. ENGSTROM: We did provide the same
14	infrastructure on that in our Staff Report. And
15	Concordia has better fewer constraints than
16	Eastmoreland.
17	COMMISSIONER TALLMADGE: Okay.
18	MR. ENGSTROM: But not a huge difference.
19	CHAIR BAUGH: Okay. We're okay with it.
20	Thanks.
21	(Proceedings concluded at 1:15 p.m.)
22	
23	
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STATE OF OREGON )ss

COUNTY OF YAMHILL)

I, Deborah L. Cook, RPR, Certified Shorthand Reporter in and for the State of Oregon, hereby certify that at said time and place I reported in stenotype all testimony adduced and other oral proceedings had in the foregoing hearing; that thereafter my notes were transcribed by computer-aided transcription by me personally; and that the foregoing transcript contains a full, true and correct record of such testimony adduced and other oral proceedings had, and of the whole thereof.

Witness my hand and seal at Dundee, Oregon, this 25th day of November, 2015.

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DEBORAH L. COOK, RPR Certified Shorthand Reporter OREGON CSR #04-0389 CALIFORNIA CSR #12886 WASHINGTON CSR #2992

	<b>affirm</b> 16:16 32:7	anyway 14:8 21:1	attested 13:21	45:6,11,15,18,25
A	46:5	apartment 50:24	attorney 26:18	46:2,11 47:19,21
ability 23:25 26:1	affordability 2:18	51:16	attorney's 31:10	47:22,24 53:22
able 8:16 22:9	30:1 50:20 53:4	applied 47:6	<b>Avenue</b> 49:1	54:5,19
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January 7, 2015 Council Clerk 1221 SW 4<sup>th</sup> Avenue, Room 130 Portland, OR 97204 By email to: cputestimony@portlandoregon.gov

RE: Comprehensive Plan Testimony

6134 NE Davis Portland, OR 97213

## Zoning Proposal for 6134 NE Davis

The adjacent property to the west of 6134 NE Davis is in a Zoning Review area. These two properties (6134 and 6124 NE Davis) are in the middle of the block and are similarly situated. We request that our property be included in the same Comprehensive Plan Designation as the neighboring property to the west (either R1 or R2 depending upon the outcome of Zoning Review). This is a logical zoning Designation change and supports Comprehensive Plan policies that seek gradual and reasonable transitions between areas of higher and lower density.

As a practical matter the current structure on the subject site is likely to be replaced. It is a small, turn of the century farm house with an outside entry dirt floor basement. Changed zoning would allow for increased density at the site and provide an opportunity to construct a more energy efficient and resilient structure. We believe moving the current zone transition location to include our property in the higher density zone is an appropriate change for the reasons described below.

## Zoning Request Description & Supporting Information

The purpose of our comments is to request a change in the Comprehensive Plan Designation for 6134 NE Davis, a property we have owned since 1993, to be the same as the R2 (or possibly R1) zone of the neighboring property to the west at 6124 NE Davis. The zoning transition occurs in the middle of the block at our property line. Our property has an R5 designation, while the property next door has an existing R2 designation (R1 in the existing Comprehensive Plan), as shown in Figure 1 below.

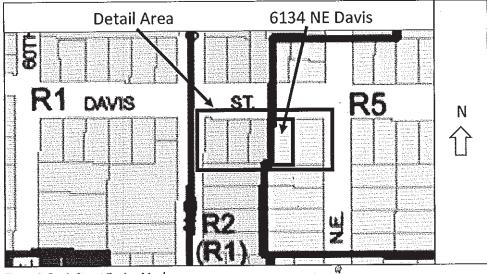


Figure 1: Davis Street Zoning Map<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> **Source:** screenshot from Eastside Max Station Community Project Document: http://efiles.portlandoregon.gov/Record/4214856/File/Document/

Moving this zoning transition so that 6134 NE Davis matches the higher density designation of properties to our west will result in an improved boundary location between these two areas of different densities. The following reasons support this request:

- If all properties in the detailed area outlined in Figure 1 were to be developed to maximum density, 6134 NE Davis would be the only lot on the block where a multifamily building is not permitted. To avoid this inconsistency, the boundary between zones should be moved one lot to the east such that it touches a corner lot and does not fall between two interior (non-corner) lots. We believe this strategy significantly improves the land use transition at this location and should be approved.
- Lot sizes on the subject block present an opportunity to ensure a more gradual building scale transition between R1 and R5 zones. The size of the adjacent corner lot is larger than other lots on the block, resulting in a natural buffer area that is not present at the current transition location. Figure 2 below depicts lot dimensions and existing land use. Because there is significantly more space between both the existing structures and the potential developable footprint along the east edge of 6134 NE Davis, locating the zoning boundary there will soften the transition between higher and lower density.

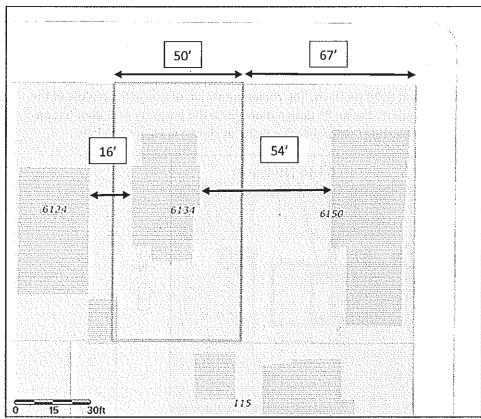


Figure 2: 6134 NE Davis existing structure & Lot dimension detail<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> Source: Screenshot from PortlandMaps Beta. Distance between structures estimated using Google Earth.

Alignment with 2035 Comprehensive Plan Recommended Draft Policies
Our requested zoning designation is consistent with Policies **4.29** and **4.30** that "address transitions between areas of differing types of activity and scale of development." Policy **4.29** seeks to "soften transitions in scale and limit light and privacy impacts on adjacent residents."

For the following reasons, we believe our requested zoning change will bring our property and the surrounding area into closer alignment with these policy goals.

### • Transitions in scale

- Transitioning at a corner lot softens the density transition.
- Lot dimensions and existing building scale indicate our requested change is a more logical transition location.

### Light and privacy impacts

 Moving the transition to a location where there is more distance between developable footprints lessens these impacts.

This concludes our comments. We appreciate the opportunity to provide input to the City and are fully supportive of the robust public involvement process and plan development procedures.

Property Owners of 6134 NE Davis: James and Marsha Henry 1323 SW Curry St. Portland, OR 97239 503.789.8030



January 7, 2016

The Hon. Charlie Hales, Mayor Portland City Hall 1221 SW Fourth Avenue Portland, OR 97204

Re: Comprehensive Plan Update

Dear Mayor Hales and Commissioners:

On behalf of the Home Builders Association of Metro Portland (HBA), the association hereby submits the following written comments regarding the draft 2035 Comprehensive Plan.

In particular, there are a series of fundamental assumptions that are problematic when looking at the long-term growth projections for the City, as well as for the region as a whole. A primary concern centers around the Comprehensive Plan's assumptions for redevelopment expected to occur within Portland over the next 20 years – the future, projected redevelopment and underlying zoned densities are unprecedented in nature and far exceed historical experience and evidence.

Moreover, the Comprehensive Plan discounts the demand and preferences for single-family housing within Portland. The assumptions relied upon in the draft Comprehensive Plan fail to provide a balance of housing options for current and future residents of the City.

Lastly, there are outstanding issues with the proposed redevelopment and zoning designations that highlight uncertainties around their financial feasibility over the 20-year period, as well as the underlying risks to housing affordability and equity for those vulnerable populations impacted by the acceleration of redevelopment in geographic regions of Portland.

The HBA values our relationship with the City and looks forward to working together on these important issues for Portland. We appreciate your attention to the above-noted concerns.

Respectfully,

Paul Grove

**Director of Government Relations** 

Home Builders Association of Metro Portland

Home Builders Association of Metro Portland 15555 SW Bangy Rd., Ste. 301 Lake Oswego, OR97035 503-684-1880 • Fax 503-684-0588



January 7, 2016

Mayor Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
1221 SW 4th Avenue
Portland, Oregon 97204

Dear Mayor Hales and Commissioners:

Thank you for the opportunity to comment on the 2035 Comprehensive Plan Recommended Draft (August 2015). The Port of Portland (Port) has been an active participant in this process, providing written testimony on earlier versions of this document and supporting materials in May and December 2013, May and June 2015 as well as additional oral testimony before the Planning and Sustainability Commission (PSC). We propose the following changes in the current draft:

- The Economic Opportunity Analysis should utilize the medium forecast to support equitable job growth.
- Brownfield redevelopment should be funded to support efficient use of Portland's industrial land base.
- Freight transportation investment should be prioritized to support Portland's growing service sector economy.
- West Hayden Island should be treated consistent with City Council direction and with Metro's planning policy direction. Meaning, it should be available for annexation for a combination of open space and deep-water marine industrial uses at some time in the future.
- The need for consistency and balance should be reinforced to avoid conflict between countervailing policy objectives.

We commend staff for inclusion of several significant policies that, if fully implemented, would go a long way towards ensuring Portland's economic prosperity over the next 20+ years.

For example, Policy 6.34 Industrial Land, encourages Portland's growth as a trade and freight hub and center for manufacturing. This should serve to provide a widely accessible base of living wage jobs that will assist in implementing other policies in the plan (6.28 Income self-sufficiency, 6.29 East Portland job growth. Policies 6.14, 6.39 and 6.40 all relate to brownfield or Harbor Superfund clean-up, including the ambitious goal of cleanup of 60% of brownfield acres in the City by 2035.

Mission: To enhance the region's economy and quality of life 7200 NE Airpx
by providing efficient cargo and air passenger access 8x 3529 Por
to national and global markets, and by promoting industrial development. 503 415 6000

7200 NE Arport Way Portland OR 97218
Box 3529 Portland OR 97208
503 415 5000

Manufacturing jobs, as noted on page 33 of the City-wide systems plan, offer opportunities for living-wage careers for residents, often without requiring a four-year college degree. These policies support middle income jobs, often with low barriers to entry. Manufacturing jobs also have a high "employment multiplier" effect – one manufacturing job supports 3.69 total jobs in the region.

Beyond jobs, all forms of industrial development tend to result in high levels of capital investment, resulting in an ongoing revenue stream of property taxes and other fees used to fund schools, public safety and other essential City and County services.

However, in order for these policies to be successfully implemented, there are a number of key issues requiring resolution, as outlined below:

### ISSUES FOR RESOLUTON

### 1. Economic Opportunities Analysis (EOA)

The Economic Opportunity Analysis is a critical input to the Comprehensive Plan. In particular, without an accurate and consistent marine cargo forecast and supportive land inventory, the Comprehensive Plan will fail to foster growth and reinvestment in Portland's industrial harbor lands. The outcome will be disinvestment in the harbor with a deleterious effect on Willamette Superfund cleanup, brownfield redevelopment, natural resource recovery and middle-wage jobs.

As mentioned in our letter and testimony to Council on November 18, 2015, the Planning and Sustainability Commission's (PSC) recommended EOA changed the forecast of the Portland Harbor's economic activity from medium, as originally recommended by staff, to a low-growth future. The recommendation is not only a change from the 2012 City Council adopted EOA; it is contrary to historical trend data, recent investment activity and projections reflected in Metro's urban growth report.

The change proposed by the PSC from a medium forecast to a low forecast for the Portland Harbor is neither objective nor reflective of the data on trends and investment in the harbor. Additionally, it is inconsistent with the typical approach used by the PSC of selecting the mid-range of a low and high forecast. We believe that staff and the PSC did not consider the amount of marine cargo handling capacity created by private investment in the Portland Harbor since 2010 through the current date. Specific investments and capacity gains are detailed in a memo attached as Exhibit A.

In this case, we believe substantial private investment in Portland Harbor facilities has been triggered by investment in public infrastructure, in particular the Columbia River Channel Deepening project, as well as critical road and rail bottlenecks serving the marine facilities in the harbor. At the same time, capacity gains on existing facilities cannot continue Indefinitely. However, we believe that if our proposals related to brownfields, freight transportation and consistency and balance are adopted, the data supports a conclusion that the current supply of marine industrial land is likely adequate to accommodate a mid-range cargo forecast over the planning period.

However, future demand for harbor industrial land must include development ready sites and not rely solely, or even primarily, on only the intensification of existing sites. We also believe it is appropriate for staff to revisit the underlying cargo demand forecasts within the next five years, in light of the dynamic global marketplace and demand for harbor ready land.

### 2. Brownfields

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

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

In addition to the challenges of cost and lack of focus, there is also the challenge of unintended regulatory hurdles. For brownfields such as Time Oil, the second largest identified site in the Portland Harbor, new regulatory burdens described below would make the proposed City goal of 60% brownfield redevelopment virtually impossible in the marketplace. City and community support of Policies 6.14, 6.39 and 6.40 land re-use policies are critical to the success of industrial and harbor economic development. The Port's on-going support of adoption of this Recommended Comprehensive Plan assumes the City shows measurable financial and policy support of a brownfield development initiative in the budget process.

### 3. Freight Investment

As noted in our comments on the significance of transportation investment to realize land intensification opportunities at the marine terminals, funding for freight system needs is integral to gaining more through-put through existing facilities. The City Transportation System Plan (TSP), an implementing document for the Comprehensive Plan, has few City resources focused on freight improvements. The intensification of Portland Harbor depends upon the transportation system limitations being addressed through investments. We understand the limitations with existing transportation resources and, therefore, urge the City Council to focus new transportation resources, including grants, toward improved freight infrastructure.

### 4. West Hayden Island (WHI)

Because the Comprehensive Plan sets the 20-year direction for the City of Portland (and the region), the Port believes it is prudent to have a policy calling for the future annexation of West Hayden Island "for a combination of open space and deep-water marine industrial uses" through a process that "ensures mitigation of impacts and provision of public benefits." This is consistent with City Council Resolution, 36805 and action taken by the PSC in the fall of 2013. This does not mean that WHI should be counted in the current land supply or is expected to be necessary to accommodate the mid-range cargo forecast over the planning horizon. Instead, it is a reflection of the most recently adopted policy direction on WHI, and acknowledges that future annexation is not foreclosed.

In addition, policy language in the Comprehensive Plan as suggested above would also be consistent with Metro's designations and requirements for WHI. Metro's current 2040 Growth Concept Map designates WHI as Employment land and as a Regionally Significant Industrial Area (RSIA) on the current Title 4 map. In addition, Section 3.07.1330(B)(4)(b) of Metro's Urban Growth Management Functional Plan requires that "The City of Portland shall develop a District Plan that complies with Metro Code Section 3.07.1330(B)(4)(a), in cooperation with the Port of Portland, that applies to West Hayden Island."

As required by Statewide Planning Goal 2 and noted on page HTU-9 of the August 2015 Comprehensive Plan Update Recommended Draft, "Portland's Comprehensive Plan must be consistent with three regional plans and implementing regulations established by Metro." These plans and regulations include the Urban Growth Management Functional Plan, the Metro Regional Framework Plan and 2040 Urban Growth Concept.

### 5. Consistency, Conflicting Policies & Balance

We urge Council to address policy conflicts and lack of consistency found in the August 2015 Comprehensive Plan Update Recommended Draft in part by adding back Policy 1.3 from the Summer 2014 Comprehensive Plan Update Discussion Draft, which stated "Internal consistency: Ensure that the components of the Comprehensive Plan are internally consistent." We also understand that the City intends to provide itself the discretion to balance Comprehensive Plan policies in the future, on a case-by-case basis.

Without internal consistency, the Comprehensive Plan will be difficult, if not impossible, to implement and many of the positive attributes of the document will likely be negated. In particular, many beneficial policies contained in Chapter 6: Economic Development could be contradicted and/or undone by countervailing policies contained in Chapter 7: Environment and Watershed Health.

As an example, Policy 7.38 suggests that grasslands and floodplains must be protected and enhanced within the Willamette River watershed. "Grasslands" as shown on the current City NRI map includes many fallow areas consisting of barren weedy fill not currently regulated. Floodplains are currently regulated from a flood hazard perspective, but not as a habitat feature in and of themselves.

Since the definition of "protect" is defined to include "regulations to prohibit or limit an action," redevelopment of brownfields in the Willamette River watershed, such as the Time Oil site, would become even more difficult, if not impossible, in direct contradiction of several Chapter 6 policies including 6.14 Brownfield redevelopment; 6.13 Land supply and 6.46 Industrial brownfield redevelopment; in addition to policies in Chapter 7, including 7.15 Brownfield remediation.

On a similar note, there is great disparity in the verb choice between Chapters 6 and 7, particularly those that are mandatory (such as "protect") vs. those that are aspirational (such as "encourage"). Specifically, "protect" or "protecting" is used 15 times in Chapter 7 policies while only being used 8 times in Chapter 6 policies. In contrast, "encourage" is used only 8 times in Chapter 7 policies, while being used 29 times in Chapter 6 policies. These verb choices matter because terms such as "prohibit" or "protect" cannot be balanced, which means the City is depriving itself of the ability to exercise discretion and make policy choices in the future.

In addition to these broader issues, we have a number of specific recommendations related to policies, attached as Exhibit B. In addition, Port written testimony on previous drafts of the Comprehensive Plan and supporting documents dating back to 2013 are submitted to the record and are attached as Exhibit C.

Thank you again for the opportunity to comment. We commit to working with staff to help address resolution of these issues over the next several months.

Curtis Robinhold

Deputy Executive Director

Attachments:

Exhibit A (Memo on Private Investment in the Portland Harbor)

Exhibit B (Comments on Specific Policies)

Exhibit C (Previous Written Testimony on the Comprehensive Plan)

- May 1, 2013 Letter to BPS staff
- December 31, 2013 Letter to BPS staff
- March 13, 2015 Letter to PSC
- June 22, 2015 Letter to PSC

Exhibit A (Memo on Private Investment in the Portland Harbor)



7200 NE Airport Way, Portland, Oregon 97218 (503) 415-6522

### **MEMORANDUM** from Policy and Planning

Date:

January 5, 2016

To:

Susan Anderson, Director, Bureau of Planning and Sustainability

From:

Greg Theisen, Senior Planner, Port of Portland

Re:

Portland Harbor Capacity Improvements: analysis in support of a mid-

range forecast in the Economic Opportunity Analysis

This memo addresses the issue of capacity improvements achieved in the Portland Harbor as they relate to the more efficient use of existing harbor industrial lands and the demand for additional lands based on the City's Economic Opportunity Analysis and the EcoNorthwest harbor forecast.

The Port has participated in discussions with Planning Bureau staff to assess recent investments in marine facilities and found that an increase in volume handled per facility has occurred since the forecast was completed in 2012. These volume increases have occurred in two cargo types, bulks and automobile handling. They are the result of private and public investment in existing facilities, sparked by Columbia River channel deepening and road and rail infrastructure improvements. The volume increases are illustrated in Table 1. For bulk terminals the increase is in the range of 4 - 6.5 million metric tons per year in handling capacity. The additional annual volume capacity for autos is 90,000 units per year.

Research completed by EcoNorthwest in 2015 identified an additional \$1.3 billion in investment completed on the Columbia River marine transportation system since 2010, \$370 million of which occurred in the Portland Harbor. This investment reinforces the critical connection between Portland, Oregon, and the world economy. Our role as an international transportation hub at the confluence of the Columbia, Willamette and Pacific Ocean continues to grow, with billions of additional dollars planned to be invested in Columbia River marine facilities.

#### **GRAIN**

In the case of two sizable investments, \$44m at Columbia Grain and \$21m at LD Commodities, we estimate that the handling equipment improvements, storage changes and cleaning methods that improve efficiency, and rail capacity improvements increase the capabilities of the two terminals. The investments at Columbia Grain and LD Commodities position these facilities to be competitive in current and future markets by responding to the demand for cleaner product and demand for a greater diversity of grain products.

While these investments better position Columbia Grain and LD Commodities to compete on a product basis with new hyper-efficient and high volume EGT facility in Longview, and are on par with recent investments made at grain terminals in Kalama and Vancouver, WA, CG

#### Attachment A

and LD Commodities cannot compete with the volumetric efficiency at the heart of EGT's modern layout and ability to handle four unit trains on site. The demand for additional EGT type terminals remains and the Port of Portland is committed to providing internationally competitive marine facilities.

### **DRY BULKS**

The greatest gains in volume capacity came about through investments at the Kinder Morgan soda ash facility at Terminal 4 (1m metric tons) and the Portland Bulk Terminals/Canpotex potash facility at Terminal 5 (3m metric tons). These gains were supported by private and public investments made in adjacent rail yards.

### **AUTOMOBILES**

With the additional use of 28 acres of non-harbor industrial land, the Port of Portland is increasing its capacity for automobile handling by an additional 90,000 vehicles per year. Unlike our traditional import activities with Toyota, Honda and Hyundai, this new capacity is for export of Ford vehicles. Increasing throughput at automobile facilities like Terminal 6 or Terminal 4 is highly dependent on local market conditions, land values, rail service, ship calls, manufacturer's inventory management and distribution patterns, and other variables.

While we have increased handling capacity at Terminal 6 Berth 601 by at least 90,000 vehicles, we hesitate to make additional assumptions about Portland's potential for more intense land use for auto terminals without understanding how known variables, such as those mentioned above, respond to Portland market characteristics. We believe additional shovel ready industrial land will be necessary in order to meet the demand for marine auto imports and exports.

#### SUMMARY

The commodity handling port investments in the Portland Harbor and the lower Columbia river reinforce the continuing demand for bulk and RO/RO (automobile) port lands in Portland and the region. The 2012 forecast range still applies to the Portland Harbor, with the very high level of demand being distributes across a greater geography. Updated information (a new forecast and market review) will be needed within the next 2-4 years to understand how the constraints of the EOA correlate with market conditions.

The marine commodities market is dynamic in the short term, a fact apparent in the 50 year trend graph from the EcoNorthwest forecast and EOA. More importantly the volume trend continues on an upward trajectory. This is reinforced by investments made and increased import/export volumes in Portland Harbor and lower Columbia marine facilities. Type, size and location matter greatly in the marine marketplace so while investment in existing facilities has occurred and will continue, it is only a partial substitute for newly built and fully modern marine terminals.

Table 1. Portland Harbor Capacity Improvements

Terminal/Year	Operator	Commodity	Cost	Tons/hour	Prior Capacity (annual)	Current Capacity (annual)
T-4/2013	Kinder Morgan	Soda Ash	\$9.5m	3000	2.5m MT	3.5m MT
T-5/2015	Canpotex	Potash	\$140m facility enhancem ent, \$25m loader	6000	3-3.5m MT	5-6m MT
T-5/2014	Columbia Grain	Grains (wheat, corn, soy)	\$44m	Unknown. Probably 2000mt	4.5m MT	6m MT*
Louis Dreyfus  - Steel Bridge/2015	LD Commodities	Wheat	\$21m	Unknown	1m MT**	1.5 - 2m MT**

Terminal/Year	Operator	Commodity	Cost	Additional acreage	Prior Capacity (annual)	Current Capacity (annual)
T6, AWC -	Auto	Automobiles	\$2.8m	9	0	90,000 units per
Ford	Warehousing		\$6.7m	19 (marine		year
2014, 2016	Corporation			reserve)		

<sup>\*</sup>Recent improvements are for cleaning and storage systems. The improvements expand the type of products that can be handled and thus the market for terminal products.

January 2016

<sup>\*\*</sup>Estimate based on internal Port assessment completed in 2010 (Jim Daly) and personal conversations with sources at Louis Dreyfus; Sebastian Degens, Port of Portland; Dick van Sickle, grain facility consultant.

Exhibit B (Comments on Specific Policies)

City	Recommended Draft August 2015	Port Comments
Figure 1-1. Comprehensive Plan Package	While not cited in a policy, Figure 1-1 illustrates the Comprehensive Plan Package.	Modal plans, such as the Freight Mobility Plan, will not be adopted as a part of the Comprehensive Plan. How much weight then is given to those plans that are not a part of the Comp Plan?
1.19.c Area-specific plans.	Community, area, neighborhood, and other area-specific plans that were adopted by ordinance prior to [effective date of this 2035 Comp Plan] are still in effect. However, the elements of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that are inconsistent with this Plan. See Figure 1-2—Area-Specific Plans Adopted by Ordinance Prior to [effective date of this 2035 Comp Plan], and Figure 7-2—Adopted Environmental Plans.	It is unclear which, if any, elements of the area-specific plans (e.g., Airport Futures City Land Use Plan, Guild's Lake Industrial Sanctuary Plan and Amendments to the Cascade Station/Portland International Center Plan District) will be superseded by the Comp Plan. This seems to reverse the current order wherein a specific plan supersedes a more general plan and is therefore of considerable concern.
General comment	2.32 Inclusive participation in Central City planning. Design public processes for the Central City that recognizes its unique role as the region's center. Engage a wide range of stakeholders from the Central City and throughout the region including employees, employers, social service providers, students, and visitors, as well as regional tourism, institutional, recreation, transportation, and local/regional government representatives, as appropriate.	Very little is said about the role of agencies and employers in the community involvement chapter. A policy similar to 2.32 should apply to other areas of the City as well (e.g., industrial districts), not only for the Central City.
3.10 Rural, urbanizable, and urban land.	Preserve the rural character of rural land outside the Regional Urban Growth Boundary. Limit urban development of urbanizable land beyond the City Limits until it is annexed and full urban services are extended.	It's unclear how the City would implement the first part of this policy as it appears to be solely within the County's jurisdiction.
3.52 Freight. (formerly Policy 5.24 Civic Corridors)	Maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets.	Current draft includes a policy that recognizes the overlap between civic corridors and freight routes.  A similar policy should also apply to City Greenways.
3.65 Urban habitat corridors	Establish a system of connected, well-functioning,	WHI is designated as an Urban Habitat Corridor on Figure3-6. As land not currently

	Recommended Draft August 2015	Port Comments
	and diverse habitat corridors that link habitats in Portland and the region, facilitate safe fish and wildlife access and movement through and between habitat areas, enhance the quality and	within the City of Portland, either delete this reference or change additional maps (such as Figure 3-7) to reflect Metro and City Council designation for employment and habitat.
	connectivity of existing habitat corridors, and establish new habitat corridors in developed areas.	
Employment Areas	Narrative	Revise to say "Existing industrial districts" in
(formerly Policy 5.16	Industrial Districts: Industrial districts	recognition that future industrial districts
Industrial and River)	are in the low, flat areas along Portland	could be located in other parts of the city.
	Harbor and the Columbia Corridor,	
	Oregon's freight infrastructure hub.	
	Manufacturing and distribution sectors	
	concentrate here. They typically need	
	one-story buildings, medium to large	
	sites, and locations buffered from	
	housing. There is also an industrial	
	district in the Central Eastside and	
	smaller industrial areas scattered	
	around the city, mostly adjacent to	
·	major transportation hubs.	
	Regional Truck Corridors: Maintaining	
r	the primary truck routes into and	
	through the city supports Portland's role	
	as an important West Coast hub and a	
	gateway for international and domestic	
	trade. These streets are integral to the	
·	growth of traded sector businesses such	
	as manufacturing, warehousing and	
0.00	distribution industries.	
3.69	Enhance designated streets to	Current draft policy appears to do a better
Regional Truck	accommodate forecast freight growth	job of recognizing the importance of freight
Corridors.	and support intensified industrial use in	routes.
(formerly Policy 5.23	nearby freight districts. See Figure 3-7 —	
Corridors and	Employment Areas. Designated regional	
connections.)	truckways and priority truck streets	
	(Transportation System Plan classifications are shown to illustrate	
	this network).	
3.73 Industry and port	Enhance the regionally significant	Revised policy does a better job of
facilities	economic infrastructure that includes	recognizing the investment in infrastructure.
· · · · · · · · · · · · · · · · · · ·	Oregon's largest seaport and largest	<u> </u>
(formerly Policy 5.19	airport, unique multimodal freight, rail,	
Focused investments)	and harbor access; the region's critical	

City	Recommended Draft August 2015	Port Comments
	energy hub; and proximity to anchor manufacturing and distribution facilities.	
Figure 3-1 Policy 5.26 Greenways	Figure 3-1 Hayden Island is still shown as "Habitat Corridor" on Figure 3-1 and as "Existing/Enhanced Habitat Corridor" on Figure 3-6. WHI is not identified as an "Employment Area" on Figure 3-7.	The issues raised in the attached May 1, 2013 letter have not been addressed.
Figure 3-5 City Greenways (formerly Policy 5.16.c. (Enhance and complete the area's system of riverside trails and strengthen active transportation connections to Portland's neighborhoods))	A trail along the river adjacent to the Albina Yard is shown on Figure 3-5.	While the trail continues to show up on maps and in planning documents hasn't the UP pursued an alternative that the city is also interested in pursuing?
4.21 Street environment.	Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.	Policy 3.52 recognizes the need to maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets. However, this issue is not carried forward into Chapter 4.
4.31 Industrial edge (Formerly Policies 5.33.c and 5.33.d.)	Protect non-industrially zoned parcels from the adverse impacts of facilities and uses on industrially zoned parcels through the use of a variety of tools, including but not limited to vegetation, physical separation, land acquisition, and insulation to establish buffers between industrial sanctuaries and adjacent residential or mixed use areas to protect both the viability of long-term industrial operations and the livability of adjacent areas.	Former 5.33.d. (Ensure that new residential and high-density development adjacent to industrial sanctuaries incorporates design elements that soften the transition in land use and protects the viability of long-term industrial operations) was more balanced. The revised policy seems to imply that all of the protective measures should be provided by the industrial uses to protect non-industrially zoned land. Need to clarify that adverse impacts can be addressed on non-industrial zoned property.
4.73 Natural hazards and climate change risks and impacts.  (formerly Policy 5.42 Hydrologic function and Policy 5.47.a.)	Limit development in or near areas prone to natural hazards, using the most current hazard and climate change-related information and maps.	Policy formerly read: Limit development in or near areas prone to natural hazards, where practicable, using the most current hazard information and maps available. The current version, which does not say "where practicable" is even more restrictive regarding development in floodplains.

City	Recommended Draft August 2015	Port Comments
3 7	August 2013	
5.11 Impact analysis.	Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts.	What is the meaning of "significant" in this context? Ensure that this policy is applied consistently for all types of development. Specifically, clarify that new housing development will have the same impact analysis applied to mitigate for impacts from locating in proximity to preexisting non-residential uses.
6.39.e. Prime industrial land retention	<b>6.39.e.</b> Protect prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.	Policy has been rewritten; however, "for" should now be changed to "from".
6.41 West Hayden Island	There is no policy regarding West Hayden Island; however policy 6.15 Annexation addresses some related Issues. Facilitate a predictable, equitable process for annexation of employment lands within the urban services area as needed to meet the City's forecasted land needs.	See letter to Council regarding inclusion of WHI policy that is in conformance with Metro policy and planning guidance.
6.54 Neighborhood buffers. (formerly Policy 3.43)	Maintain and enhance major natural areas, open spaces, and constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas.	Issue remains the same as in the attached May 1, 2013 letter.
7.15 Brownfield remediation.	Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.	Brownfield remediation by its very nature improves environmental quality and watershed health. Additional requirements will only add to cost and complexity, making brownfield remediation less likely to occur.
7.19 Natural resource protection.	Policy 7.19 Natural resource protection.  Protect the quantity, quality, and function of significant natural resources identified in the City's natural resource	A number of the significant natural resources listed in this policy (including grassland habitat) are not well defined.
(formerly Policy 4.5 Atrisk habitats and Policy 4.15 Efficient use of land)	inventory, including: grassland habitat	If this policy is meant to apply only to significant Goal 5 resources, then it should clearly say so. The decision to protect significant resources identified in a Goal 5 inventory is the result of an ESEE analysis or safe harbor. The policy assumes protection is a forgone conclusion for all inventoried

City	Recommended Draft	Port Comments
	August 2015	resources. This is more clearly stated in Policy 7.21.
7.23 – 7.26 Protecting natural resources in development situations	The following policies provide guidance for land use regulations that address significant natural resources where new development is proposed. They will help ensure that the potential adverse impacts of development are well understood, and avoided where practicable. These policies also call for an evaluation of design alternatives to minimize negative impacts, and the use	The policies in this section treat the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors. This conflicts with the OAR and with Policy 7.21.  It should clarify that these policies apply only to those significant Goal 5 resources for which an ESEE analysis resulted in a determination to "limit" or "prohibit"
	of mitigation approaches that fully mitigate unavoidable impacts	conflicting uses
7.25 Mitigation effectiveness. (Formerly Policy 4.12 Impact mitigation.)	Require that mitigation approaches compensate fully for adverse impacts on locally and regionally significant natural resources and functions. Require mitigation to be located as close to the impact as possible. Mitigation must also take place within the same watershed or portion of the watershed that is within the Portland Urban Services Boundary, unless mitigating outside of these areas will provide a greater local ecological benefit. Mitigation will be subject to the following preference hierarchy:  1. On the site of the resource subject to impact with the same kind of resource; if that is not possible, then  2. Off-site with the same kind of resource; if that is not possible, then  3. On-site with a different kind of resource; if that is not possible, then  4. Off-site with a different kind of resource.	The current draft policy is too focused on the local impact when assessing for functionality and potential mitigation. The proposed mitigation hierarchy gives more weight to an on-site location rather than greater environmental function elsewhere in the same watershed.
7.38 Sensitive Habitat - Willamette River Watershed.	Policy 7.38 Sensitive habitats. Protect and enhance grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors.
Policy 4.24.f. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including	other key habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific Flyway and the Willamette River corridor.	Sensitive habitat will only be protected if resources are or have been deemed significant and the conclusions of the ESEE find that conflicting uses must be limited or prohibited. Add reference to consistent with

City	Recommended Draft August 2015	Port Comments
species that migrate along the Pacific flyway and Columbia River corridor.)		Goal 5 inventory and ESEE analysis.
7.39 Riparian Corridors- Willamette River Watershed. (Formerly 4.24.e. (Promote rehabilitation	Policy 7.39 Riparian corridors. Increase the width and quality of vegetated riparian buffers along the Willamette River.	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource or expansion of the riparian area regardless of the other factors.
of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.))		Riparian corridors cannot be increased in width without going through a Goal 5 process.
7.45 Riparian corridors.	Increase the width, quality, and native plant diversity of vegetated riparian buffers along Columbia Slough channels and other drainageways within the watershed, while also managing the slough for flood control.	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource or expansion of the riparian area regardless of the other factors.  Riparian corridors cannot be increased in width without going through a Goal 5
7.46 Sensitive habitats- Columbia Slough Watershed.	No change	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors.
(Formerly Policy 4.25 Columbia Slough Watershed Policy 4.25.d. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for		Sensitive habitat will only be protected if resources are or have been deemed significant and the conclusions of the ESEE find that conflicting uses must be limited or prohibited. Add reference to consistent with Goal 5 inventory and ESEE analysis.
shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.))		
7.49 Portland International	Protect, restore, and enhance natural resources and functions in the Portland	Are all natural resources identified in the Portland International Airport/Middle

City	Recommended Draft August 2015	Port Comments
Airport - Columbia Slough Watershed.	International Airport plan district, as identified in Portland International Airport/Middle Columbia Slough Natural	Columbia Slough Natural Resources Inventory intended to be protected, restored and enhanced as implied by this policy?
	Resources Inventory. Accomplish this through regulations, voluntary strategies, and the implementation of special development standards.	It would be less confusing if the policy simply stated that natural resource protection within the plan district is subject to the
		environmental policies, regulations and strategies outlined in the plan district, consistent with Policy 9.41.
7.31 Sensitive habitats - Columbia River Watershed	Enhance grassland, beach, riverbanks, wetlands, bottomland forests, shallow water habitats, and other key habitats for wildlife traveling along the Columbia	This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors.
(Formerly 4.26.b. (Enhance grassland, beach, and wetland habitats and improve	River migratory corridor, while continuing to manage the levees and floodplain for flood control.	Sensitive habitat will only be protected if resources are or have been deemed significant and the conclusions of the ESEE find that conflicting uses must be limited or
other ecological functions, while continuing to provide flood control.)	•	prohibited. Add reference to consistent with Goal 5 inventory and ESEE analysis.  The reference to "floodplain" habitat has
7.32	Maintain plans and regulations that	been resolved in the current policy. This is a relatively helpful policy. A similar
River- dependent and river- related uses.	recognize the needs of river-dependent and river-related uses while also supporting ecologically-sensitive site design and practices.	policy in the section on the Willamette River and Columbia Slough would be beneficial.
8.73 and 8.74 Flood management. Floodplain management. (Formerly 6.20.a. Prevent or limit further impacts from	Policy 8.73 Flood management. Improve and maintain the functions of natural and managed drainageways, wetlands, and floodplains to protect health, safety, and property, provide water conveyance and storage, improve water quality, and maintain and enhance fish and wildlife	By their very nature, Port and other river- dependent facilities must be located in the floodplain. Special recognition of this requirement should be factored into policy regarding floodplain management and function.
infrastructure on natural hydrologic cycles, especially in areas with poorly infiltrating soils and limited public stormwater discharge points.)	habitat. Policy 8.74 Floodplain management. Manage floodplains to protect and restore associated natural resources and functions and to minimize the risks to life and property from flooding.	
Policy 10.1 Land use designations.	This designation is intended for lands that serve a recreational, public open	This is an expansion of the definition of Open Space to include areas along freeway

- in City	Recommended Draft August 2015	Port Comments
1. Open Space	space, or ecological function, or provide visual relief. Lands in this designation are primarily publicly-owned but can be in private ownership. Lands intended for the Open Space designation include parks, public plazas, natural areas, scenic lands, golf courses, cemeteries, open space buffers along freeway margins, railroads or abutting industrial areas, and large water bodies. The corresponding zone is OS.	margins, railroads, abutting industrial areas, or large water bodies such as the Willamette and Columbia Rivers. This seems to be an over reach and will result in additional complexity when developing, maintaining or managing these areas. The stated intent, "for lands that serve a recreational, public open space, or ecological function or, provide visual relief" is not consistent with the expanded definition.

### Exhibit C (Previous Written Testimony on the Comprehensive Plan)

- May 1, 2013 Letter to BPS staff
- December 31, 2013 Letter to BPS staff
- March 13, 2015 Letter to PSC
- June 22, 2015 Letter to PSC
- June 23, 2015 Letter to PSC

Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and diobal markets.



May 1, 2013

Eric Engstrom, Principal Planner City of Portland Bureau of Planning & Sustainability 1900 SW 4<sup>th</sup> Avenue, Suite 7100 Portland, Oregon 97201

Re: City of Portland Comprehensive Plan Update Working Draft - Part 1

#### Dear Eric:

Thank you for the opportunity to comment on the City of Portland Comprehensive Plan Update Working Draft - Part 1, dated January 2013 (Draft Comprehensive Plan). The Port of Portland (Port) has been a partner in this process with the Bureau of Planning and Sustainability and appreciates the challenge of creating focus around the diverse interests in our city.

As reflected in our written testimony to the Planning & Sustainability Commission in November 2011, the primary area of focus in the Portland Plan for the Port was centered on the Economic Prosperity and Affordability strategy. This strategy addresses the lack of jobs, relative decline in personal income, decline in tax and other public revenue and the lack of business investment in Portland. Unless these issues are addressed, the City's aspirations cannot be successfully implemented.

With that same focus in mind applied to the Draft Comprehensive Plan, we describe five key issues, followed by a table with section-specific comments.

### KEY ISSUES

Trade and Freight Hub. As noted in the Introduction, the Comprehensive Plan is intended to codify the priorities outlined in the Portland Plan. However, the Portland Plan's recognition of the importance of Portland as a trade and freight hub and its competitive market access could be more specifically identified in the Draft Comprehensive Plan policies. As an example, the City of Portland, the Brookings Institution and other local partners developed the Greater Portland Export Plan to double the Portland region's exports in five years, adding \$21 billion in foreign sales and potentially 100,000 jobs. This also dovetails with the current U.S. National Export Initiative goal to double national exports between 2009 and 2014.

Economic Development Integration. The Port is very supportive of the inclusion of an Economic Development Element which recognizes the importance of job growth for the health of the City; however, to be consistent with the Portland Plan, there should be better integration of these economic policies in the other elements of the Comprehensive Plan as well.

Industrial Smart Growth. The Port supports "Industrial Smart Growth", which emphasizes the importance of focusing Industrial development in proximity to essential infrastructure. This approach relies on maintaining facilities for freight movement and ensuring sufficient industrial land adjacent to critical infrastructure investments. The Draft Urban Design Framework does not identify a "freight" or "industrial" corridor type. The Port is concerned that the Civic Corridors and Greenways designations will conflict with the modal designations for freight Identified in the City of Portland Transportation System Plan and Freight Master Plan.

Transportation Hierarchy. The new policies in support of a green and active transportation hierarchy in Chapter 7 of the Working Draft were borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people are combined in a single hierarchy in the Working Draft. This has the effect of relegating freight to a lower level than walking, cycling and transit. It also fails to acknowledge the value of the efficient movement of goods to the city's economy and quality of life. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". Vancouver's overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan.

Previously Adopted Plans. While the commentary notes that some plans are being updated as a part of the Comprehensive Plan (e.g., the Transportation System Plan), the status of a number of other adopted plans, including Airport Futures and the Freight Master Plan, is unclear. The Port recommends the Working Draft be amended to reflect the policies adopted from Airport Futures with broad community support two years ago. Specific adopted policies from Airport Futures are described in the subsequent table.

The Port looks forward to continuing to work with the City to resolve these issues and the issues outlined in the attached table prior to adoption of Comprehensive Plan Update.

Sincerely,

Susie Lahsene,

Regional Transportation & Land Use Policy Manager

c: Tom Armstrong, Portland Bureau of Planning and Sustainability
Tom Bouillion
Lise Glancy

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## AL DRAFT ECONOMIC DEVELOPMENT GOALS AND POLICIES (CHAPTER 3)

Draft Goals and Policies	Comments
Goal 3.A Prosperity	The Port recognizes the importance of this goal and appreciates the acknowledgement of the region and the state as part of the diverse population served by the City. The commentary to this goal states that "in addition, Goal 3.A creates a multidisciplinary framework for economic development that incorporates land use and infrastructure with business development, workforce development, seaport and airport services, affordable housing, and social services." This important concept should be better reflected in the goals themselves.
Policy 3.3 Economic center.	The Port appreciates the recognition of the important role of the multimodal transportation infrastructure in the economic health of the City.
Policy 3.5 Economic role of livability and ecosystem services.	While ecosystem services do have an economic value, this policy would be more appropriately located in Chapter 4.
Policy 3.9 Land efficiency.	The linkage between industrial land efficiency and viable multi-modal freight infrastructure is key to economic development. The suggested modification below is intended to address that concern.  Modify the draft policy language to state (w/new language underlined): "Encourage infill, redevelopment, and intensification and throughput of on scarce urban land."
Policy 3.10 Brownfield redevelopment.	The Port strongly supports this policy and the City's goals for brownfield redevelopment.
Policy 3.18 Trade and freight hub.	Given the importance of Portland's role as a trade and freight hub, and the emphasis put on this role in the Portland Plan, the proposed "maintain and plan" language should be further strengthened as suggested below.  Modify the draft policy language to state (w/new language underlined): "Maintain and plan for Improve transportation systems and services that will retain and expand Portland's competitive market access as a West Coast trade gateway and freight distribution hub and realize the Greater Portland Export Plan to double the Portland region's exports in five years.

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Draft Goals and Policies	Comments
Policy 3.28 Freight-oriented development.	As noted above, given the importance of Portland's role as a trade and freight hub and the emphasis put on this role in the Portland Plan, there is a need to prioritize investments in industrial areas. This policy should be modified as suggested below.
	Modify the draft policy language to state (w/new language underlined): "Coordinate land use planning and <u>prioritize</u> transportation investments in industrial districts to encourage freight mobility and industrial development."
Policy 3.29 Marine, rail, and airport facilities.	The Port strongly supports this policy which reflects the Portland Plan's emphasis on maintaining and expanding Portland's role as a West Coast trade gateway and freight distribution hub.
Policy 3.34 Prime industrial land and freight hub.	While the Port supports this policy, freight hubs by definition cannot function without viable freight infrastructure serving the hubs. This policy should be modified as suggested below to better acknowledge that relationship.
	Modify the draft policy language to state (w/new language underlined): "Protect the multimodal freight-hub industrial districts, as well as the freight infrastructure to serve the freight hubs, at Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land."
Policy 3.35 Industrial land retention.	The Port strongly supports this policy and the City's goals for the retention of industrial land. However, it is unclear under this policy what (if any) protection "non-prime" industrial land would receive.
Policy 3.36 Harbor access.	The Port strongly supports this policy and the City's intention to prioritize river-dependent and river- related uses on harbor access lands. However, some clarification may be needed with regard to the definition of "harbor access lands". Presumably this is meant to refer to those lands with direct access to marine facilities.
Policy 3.39 Dispersed industrial areas. Provide for small, dispersed industrial areas.	The purpose of this policy is unclear. Large, concentrated industrial areas tend to have fewer neighbors (and therefore fewer conflicts) and more efficiently provide transportation and other infrastructure. Are "dispersed industrial areas" intended to be an alternative to the "prime industrial lands" cited earlier?
Policy 3.40 Brownfield	As noted in Policy 3.10, there is a need to prioritize investments in these areas. The proposed

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Draft Goals and Policies	Comments
redevelopment.	modification below is intended to clarify this point.
	Modify the draft policy language to state (w/new language underlined): "Prioritize <u>investment in</u> brownfield <u>sites</u> redevelopment resources and approaches to encourage remediation and redevelopment for industrial use and accommodate industrial growth."
Policy 3.41 Industrial land intensification.	As noted previously, the linkage between industrial land efficiency and viable freight infrastructure is key to economic development. Intensification should therefore include greater "throughput" and should be tied to transportation infrastructure investments referred to in Chapter 7.
	Modify the draft policy language to state (w/new language underlined): "Promote public investments and business climate enhancements that encourage industrial reinvestment and increase land efficiency for industrial output and throughput.
Policy 3.42 District expansion.	While the Port supports the expansion of industrial areas where appropriate, this policy might benefit from some further clarification of when and where this expansion should occur.
	Modify the draft policy language to state (w/new language underlined): "Provide opportunities for expansion of industrial areas through voluntary conversion of underutilized non-industrial land."
Policy 3.43 Neighborhood buffers.	While the Port recognizes the benefits of using major natural areas and open spaces as buffers, this policy should clarify that these are not within the industrial areas themselves, but are typically designated as Open Space.
	Modify the draft policy language to state (w/new language underlined): "Maintain and enhance major natural areas, or open spaces <u>outside of prime industrial areas</u> , or constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas."

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## B. Draft watershed health and the environment goals and policies (chapter 4)

Draft Goals and Policies	Comments
Policies 4.1 through 4.6	These policies use the phrase, "protect, enhance and restore" While this may reflect a desired outcome, within an urban setting, these policies should address the need to balance environmental protection with conflicting land uses and policies.
Policy 4.5 At-risk habitats.	In addition to the broader comment above, because "grassland" is not well defined habitat type (e.g., grassland could include a golf course, play field, or barren weedy fill), categorizing it as an "at-risk habitat" that presumably would become a regulated feature is problematic. The addition of the word "native" grassland would help address this concern.
Policy 4.6 Biodiversity.	In addition to the broader comment above, as written, this policy suggests protecting bridges, manmade detention pond or other similar feature as a habitat for wildlife. This would be problematic and could compromise the primary function of the structure (for transportation, stormwater retention, etc.). Some clarification is needed regarding the intent of this policy as it relates to manmade structures.
Policy 4.7 Habitat corridors.	The Conceptual map of potential habitat corridors appears to identify West Hayden Island as a Habitat Corridor. While a portion of West Hayden Island functions as a habitat patch, in this location the Columbia River functions as the primary corridor for wildlife movement. In addition, the definition of Habitat Corridor is so broad that it could potentially apply to the entire City, but appears to have been applied selectively based on other criteria that are not explicit in the definition. For example, a portion of the narrative suggests corridors could be established by "incorporating naturescaping into yards and landscaped areas". Further clarification of this designation is needed.
Policy 4.11a (Consider the condition of, and potential cumulative impacts on, natural resources when creating land use and infrastructure plans.)	This policy suggests considering cumulative impacts when creating land use and infrastructure plans. However, the term "cumulative impacts" is not defined and it's unclear how this would work in the context of balancing statewide planning goals.

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Draft Goals and Policies	Comments
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Policy 4.11.b. (Strive to sustain the carrying capacity of air, land, and water resources by enhancing natural resource quality and function.)	The term "carrying capacity" is not defined, so it is unclear how this policy would be implemented. It would be helpful to provide additional guidance as to the intent.
Policy 4.12 Impact mitigation.	The commentary associated with this policy notes that the City "allows for different approaches where appropriate." However, this concept is not made clear in the policy itself. The proposed modification is intended to clarify this point. Further, the Port would recommend putting the emphasis on the quality of the mitigation rather than its location. If better mitigation can be accomplished off-site then that should be encouraged over lower quality opportunities available onsite.
	Modify the draft policy language to state (w/new language underlined): "Require that negative impacts from development impacts that cannot be avoided be minimized and fully mitigated. Generally, prioritize onsite mitigation or mitigation in the same watershed within the city over mitigation in another watershed or outside of the city, but encourage alternative approaches which will provide better mitigation opportunities."
Policy 4.15 Efficient use of land.	The term "natural resources" is not defined and is not listed in the "Special Habitat" designation protocol used in the City natural resource inventory. Given this, as written, this policy would appear to suggest that any location could be considered a regulated "natural resource" requiring review, alternatives analysis, mitigation, etc. Further, the portion of the policy which states "when doing so does not negatively affect historically underserved communities" is unclear. For example, what is the intention if historically underserved communities are negatively impacted? Is it then appropriate to disturb "natural resources"? Finally, this policy should be better aligned with other policies in Chapter 3 related to land efficiency (policy 3.9 for example).
Policy 4.24 Willamette River Watershed.	The relationship between this policy and those in Chapter 3 should be better defined. The proposed modification below is intended to address that issue.

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Draft Goals and Policies	Comments
	Modify the draft policy language to state (w/new language underlined): "Manage the riverfront and uplands areas to enhance the corridor's habitat quality and connectivity for migratory species and integrate nature and natural hydrologic function into urban environments consistent with draft policy 3.36 which prioritizes river-dependent and river-related industrial use over other land uses on harbor access lands".
4.24.e. (Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.)	While more a natural river bank condition is desirable, it may not be consistent with high intensity urban development (e.g., the Central City) or some marine industrial activities. The proposed modification below is intended to address that issue.  Modify the draft policy language to state (w/new language underlined): "Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions where appropriate given adjacent land uses.
Policy 4.24.f. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.)	As noted above, while the phrase, "protect and enhance" may reflect a desired outcome, within an urban setting, environmental policies should address the need to balance environmental protection with conflicting land uses and policies.  Also, as noted previously, the Port is concerned about the use of the term "grasslands". This should be clarified as "native grasslands".
Policy 4.25 Columbia Slough Watershed  Policy 4.25.d. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including species that migrate along the Pacific flyway and Columbia River corridor.)	As noted above, while the phrase, "protect, enhance and restore" may reflect a desired outcome within an urban setting, environmental policies should address the need to balance environmental protection with conflicting land uses and policies.  Also, as noted previously, the Port is concerned about the use of the term "grasslands". This should be clarified as "native grasslands".
Comment: Policy 4.25.f. (Protect and maintain the functions of remaining open	As written, this policy could be understood to limit development on all remaining vacant (i.e, "open") parcels. Presumably, the intention is to protect designated significant Goal 5 resources rather than all

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Draft Goals and Policies	Comments
spaces and anchor upland habitats).	remaining open spaces. The suggested modifications are intended to clarify this point.
	Modify the draft policy language to state (w/new language underlined): "Protect and maintain the functions of remaining designated open spaces and anchor upland habitats outside of prime industrial areas."
4.26 Columbia River Watershed	The commentary for this section states that "However, West Hayden Island and the northern portion of Portland Harbor provide some of the best shoreline, shallow-water, wetland, and floodplain habitat in Portland's urban services boundary." The Port is concerned about the scientific basis for this claim especially given the hydrologic controls (dams) on the Columbia River. Also, the term "floodplain habitat" appears to be used inappropriately since floodplain is a river function across a range of habitat types. "Floodplain" is not a habitat in and of itself.
4.26.b. (Enhance grassland, beach, and wetland habitats and improve other ecological functions, while continuing to provide flood control.)	It is unclear what is intended by "improve other ecological functions". Some further clarification should be provided.
provide fiood control.)	Also as noted previously, the Port is concerned about the use of the term "grasslands". This should be clarified as "native grasslands".

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### C. DRAFT URBAN DESIGN AND DEVELOPMENT GOALS AND POLICIES (CHAPTER 5)

Draft Goals and Policies	Comments
Commentary (p. 5-3)	The Portland Plan recognizes the importance of a strong economy and job creation to a healthy city and individual well-being. While this is acknowledged in Chapter 3, the linkage is not made in the other chapters. The commentary addresses wildlife habitat connections and environmental health, but does not address the economy or industry. Metro 2040 Design types such as employment and RSIA are not mentioned. While the identification of the Industrial and River area as a discrete geography is helpful, more should be done to recognize the importance of those areas outside of centers.
GOAL 5.A. A city designed for people	This goal should include a reference to a built environment that promotes economic development and job creation as well as health, resilience and equity. In addition, the importance of the City as a regional and statewide hub is not addressed. Alternatively, a new goal named "A City designed to work", as well as a corresponding policy emphasizing Industrial Smart Growth, could be added to address these concerns.
Goal 5.B. Context-sensitive design and development	The Port supports identification of the Industrial and River area as a discrete geography.
GOAL 5.C. Portland's system of centers	As noted above, while the identification of the Industrial and River area as a discrete geography is helpful, more should be done to recognize the importance of those areas outside of centers.
Policy 5.16 Industrial and River	While combining the industrial and river areas together results in a rather inconsistent set of policies, there are several issues which could be addressed by additional sub policies:
	The need to design and construct new residential to be compatible with existing industrial uses and freight infrastructure (such as found in proposed Policy 5.33 d).
	The need to prioritize public investment in freight infrastructure in this geography, consistent with Policy 5.16a.
5.16.a. (Maintain and enhance the area's	The Port supports this policy which recognizes the importance of the air port and marine facilities and

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Draft Goals and Policies	Comments
regionally significant nexus of Oregon's largest seaport and largest airport; unique multimodal freight, rail, and harbor access; and proximity to anchor manufacturing and distribution facilities.)	related uses.
Policy 5.16.c. (Enhance and complete the area's system of riverside trails and strengthen active transportation connections to Portland's neighborhoods)	This policy appears to be contradictory to the broader policy contained in Policy 5.16 to support the area's prime industrial lands. As an example, completing a trail along the river through Albina Yard would likely diminish the ability of that key freight hub to operate.
5.16.d. (Enhance the strong river orientation of the area's residential areas.)	Because river frontage should be reserved for river-related and dependent uses, this policy should be modified to limit enhancement to existing residential areas only.  Modify the draft policy language to state (w/new language underlined): "Enhance the strong river orientation of the area's existing residential areas."
Policy 5.19 Focused investments	The Portland Plan recognizes that Portland's advantages as a trade and freight hub warrant strategic investments to maintain and grow our competitive position. This policy prioritizes investment in centers, but fails to consider other "pattern areas", in particular Policy 5.16 Industrial and River.
Policy 5.23 Corridors and connections.	The City's Transportation System Plan and Freight Master Plan designate freight routes. These routes are critical for Portland to retain its competitive market access as a West Coast trade gateway as outlined in the Portland Plan. Freight routes, which are not mentioned in the discussion of corridors and connections, should be explicitly mentioned as a key organizing element in the design and structure of the city.
Policy 5.24 Civic Corridors	The conceptual map of potential Civic Corridors coincides with several designated priority freight routes (such as I-5 and US Highway 30, both not owned by the City of Portland). The description of Civic Corridors under this policy does not seem to be compatible with freight or other modal designations.

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Draft Goals and Policies	Comments
Policy 5.26 Greenways	The conceptual map of potential Greenways coincides with several designated priority freight routes. The description of Greenways under this policy does not seem to be compatible with freight or other modal designations. In addition, West Hayden Island is shown as designated as Habitat Corridor. As mentioned previously, West Hayden Island functions as a habitat patch within the larger context of the Columbia River corridor. Also, West Hayden Island should be shown as unincorporated Multnomah County.
	Finally, the term "Greenways", although adopted in the Portland Plan, is confusing since it sounds similar to the "Willamette River Greenway" identified in Statewide Planning Goal 15 and in some cases is identified in the same physical location as the Willamette River Greenway Trail alignment
Policy 5.27.b. (Consider both the place and transportation functions when designing and programming each street)	The Port supports the policy approach of considering both the place and transportation functions when designing and programming each street.
5.29.b. Encourage development to be designed to enhance the pedestrian experience, with windows, entrances, pathways, and other features that provide connections to the street environment.	In some circumstances, such as industrial campuses, privacy and security may be of critical importance. This policy should recognize that connections to the street may not be appropriate in all situations.
Proposed Policy 5.33.c. (Protect non- industrial lands from the potential adverse impacts of industrial activities and development)	This policy should be modified in order to be more consistent with Policy 5.33 d.  Modify the draft policy language to state (w/new language underlined): "Protect existing non-industrial lands development from potential demonstrated adverse impacts of new industrial activities and development"
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5.33.d. (Ensure that new residential and high-density development adjacent to industrial sanctuaries incorporates design elements that soften the transition in land	The Port supports this policy which is intended to protect the viability of industrial operations from new adjacent development.

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Draft Goals and Policies	Comments
use and protects the viability of long-term industrial operations.)	
Policy 5.37 Resource-efficient development.	This policy should be further expanded to include sub policies that relate to brownfield clean-up and that encourage access to industrial sites with energy efficient transportation modes including rail, barge and ship.
Policy 5.42 Hydrologic function.	As worded this policy would appear to prevent or limit development within the floodplain. While impacts can be mitigated, most water dependent uses must be located within the floodplain.
Policy 5.47.a. (Limit development in or near areas prone to natural hazards, where practicable, using the most current hazard information and maps available.)	This policy suggests limiting development in areas subject to natural hazards, including the floodplain. This is inconsistent with the current policy approach provided by Metro's Title 3 which calls in part for hazard minimization in the floodplain through techniques such as balanced cut and fill, but not limiting development per se.  As an example, this policy could limit development on one of the largest brownfield sites in the City of Portland, the Time Oil site, contrary to other policies encouraging redevelopment of brownfields.
Policy 5.51 Offsite impacts.	As written, this policy primarily addresses impacts to residential areas; however, similar to proposed policy 5.33.d, new residential and high-density development adjacent to industrial areas should incorporates design elements that soften the transition in land use and protects the viability of long-term industrial operations. A good example of this are proposed changes to the St. Johns/Lombard Plan contained in the River Plan North Reach.
Policy 5.51.a - Aircraft noise impacts [NEW]	A new section is appropriate to reflect the policy adopted as a part of Airport Futures to creatively address aircraft noise impacts.  Add language as follows: "Require compatible land use designations and development within the noise-affected area of Portland International Airport while providing public notice of the level of aircraft noise and mitigating the potential Impact of that noise within the area. Partner with the Port of Portland to explore creative new ways to address noise impacts."

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## D. DRAFT PUBLIC FACILITIES AND SURVICES GOALS AND POLICIES (CHAPTER 6)

Draft Goals and Policies	Comments
Commentary (p. 6-12)	There are several factual errors in the commentary section:
	(2nd bullet) it seems likely that the Port of Portland should be included under the list of local "transportation facilities and services" providers.
	<ul> <li>(4<sup>th</sup> bullet) This item suggests that rail facilities are provided by "the Burlington Northern Railroad".         The official name for this company is BNSF Railway. In addition, there are several other railroads operating in Portland including the Union Pacific Railroad, Portland and Western Railroad, Portland Terminal Railroad and Peninsula Terminal Railroad.     </li> </ul>
	<ul> <li>(10<sup>th</sup> bullet) As noted later in this chapter, the Port of Portland provides both police and fire services, in addition to other non-City of Portland agencies.</li> </ul>
	<ul> <li>(12<sup>th</sup> bullet) Qwest has not existed since 2011 and is now called Century Link. Also, the last sentence seems to suggest that "various small fuel companies" provide gas and electricity. This sentence should be reworded for clarity.</li> </ul>
Policy 6.3 Interagency coordination.	While the Port fully supports the need for interagency coordination, this policy describes a list of services as "public facilities and services". Later in this chapter the terms "urban services", "urban public services", "community services", "City services", "capital improvements" and "infrastructure" are used. Only the term "infrastructure" appears to be defined in the Glossary. Some clarity and consistency in the use of terms would be helpful in order to better understand which policies apply, especially in cases where the public facilities and services or infrastructure are not provided by the City.
Policy 6.4 Orderly service extension	In order to support Policy 3.7 (Land development) which emphasizes the need for an adequate supply of land, this proposed policy should be amended (or possibly a new policy created) to address the City's interest in annexation. The proposed language below is intended to address this issue.
	Add draft policy language to state (w/new language underlined): "The City should encourage annexation of lands within its urban services boundary in order to meet an identified need in the City

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Draft Goals and Policies	Comments		
	buildable lands inventory and other adopted documents."		
6.4.b. Coordinate provision of urban public services so that provision of services does not significantly precede the City's ability to provide other urban services.	It is unclear what is meant by "other urban services" in this policy.		
Policy 6.20 Environmental carrying capacity.	"Carrying Capacity' is not defined: In addition, if non-City owned facilities are defined as "public facilities and services", then it is unclear (and potentially concerning) what requirements might result from this policy which requires that the carrying capacity of air, land, and water resources be considered when developing plans.		
6.20.a. Prevent or limit further impacts from infrastructure on natural hydrologic cycles, especially in areas with poorly infiltrating soils and limited public stormwater discharge points.	The phrase "natural hydrologic cycles" is broad. As written, this policy could be interpreted as limiting infrastructure in the floodplain. Port infrastructure by necessity must be located within the floodplain as do bridges and other essential infrastructure. If the intent of this policy is to address stormwater management, it should be revised to be more specific.		
Policy 6.26 Civic corridors and Greenways	As also noted in the Chapter 5 comments above, proposed Civic Corridors and Greenways have not considered modal designations such as priority freight routes. This policy should explicitly note that modal designations should dictate the infrastructure for those rights of way.		
Policy 6.39 Rates.	As written, this policy would appear to allow for rate increases without consideration of the cost to users. The proposed modification below is intended to address this concern.  Modify the draft policy language to state (w/new language underlined): "Establish and collect rates and charges for sewer service to recover the cost of developing and maintaining the system while limiting the rates and charges to the minimum necessary to meet permit requirements, to minimize impact to cost burdened households, small businesses and other users."		
Policy 6.48 Rates.	As written, this policy would appear to allow for rate increases without consideration of the cost to		

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Draft Goals and Policies	Comments		
	users. The proposed modification below is intended to address this concern.		
•	Modify the draft policy language to state (w/new language underlined): "Establish and collect rates and charges for stormwater services to recover the cost of developing and maintaining the system while limiting the rates and charges to the minimum necessary to meet permit requirements, to minimize impact to cost burdened households, small businesses and other users."		
Policy 6.66 Natural areas	The term "natural areas" is not defined. As written, this policy could be understood to apply to a wide range of land within the City. The proposed modification is intended to clarify that this policy only applies to City-owned natural areas.		
·	Modify the draft policy language to state (w/new language underlined): "Preserve and manage <u>City owned</u> natural areas to protect their ecological health and provide appropriate public access, in accordance with the natural area acquisition and restoration strategies."		
Policies 6.71 through 6.83 Public safety and emergency response	The Port of Portland provides both police and fire services within the City of Portland as do other agencies. An acknowledgement of these agencies within the commentary and an additional policy under Policy 5.82 Coordination, which addresses partnerships and coordination with other police and fire agencies within the City, as well as existing mutual aid agreements allowing fire departments from adjoining jurisdictions to respond to emergencies in the City of Portland in certain cases, should be added.		
Policies 6.99 through 6.102 PDX Airport Futures [NEW]	New sections are appropriate to reflect the policies agreed to by the City, Port and community and adopted as a part of Airport Futures:		
	Portland International Airport		
	6.99 Promote a sustainable airport (PDX) by meeting the region's air transportation needs without compromising livability and quality of life for future generations.		
	6.100 Regulations Implement the Airport Futures Plan through the implementation of the Portland International Airport Plan District and by including the Airport Futures Plan as part of this Comprehensive Plan.		

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Draft Goals and Policies	Comments		
	A. Prohibit the development of a potential third parallel runway at PDX. Ensure a transparent, thorough, and regional planning process if the Port of Portland demonstrates a need for its construction.		
	B. Support implementation of the Aircraft Landing Zone to provide safer operating conditions for aircraft in the vicinity of Portland International Airport by limiting the height of structures, vegetation, and construction equipment.		
	C. Support the Port of Portland's Wildlife Hazard Management Plan by implementing airport specific landscaping requirements in the Portland International Airport Plan District to reduce conflicts between wildlife and aircraft.		
	6.101 Partnerships  Partner with the Port of Portland and the regional community to address the critical interconnection between economic development, environmental stewardship, and social responsibility.		
	A. Support an ongoing public advisory committee for Portland International Airport (PDX) to:		
	Support meaningful and collaborative public dialogue and engagement on airport related planning and development;		
	2. Provide an opportunity for the community to inform the decision-making related to the airport of the Port, the City of Portland and other jurisdictions/organizations in the region; and		
	3. Raise public knowledge about the airport and impacted communities.		
	6.102 Investments Ensure that new development and redevelopment of airport facilities supports the City's		

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Draft Goals and Policies	Comments	
	and the Port's sustainability goals and policies and is in accordance with Map 11.64.1.	
	A. Allow the Port flexibility in configuring airport facilities to preserve future development options, minimize environmental impacts, use land resources	
	efficiently, maximize operational efficiency, ensure development can be effectively	
	phased, and address Federal Aviation Administration's airport design criteria.	

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# E. DRAFT TRAMSPORTATION GOALS AND POLICIES (CHAPTER J)

Draft Goals and Policies	Comments			
Commentary (p. 7-3)	The relationship of this element of the Comprehensive Plan to other existing Plan documents such as the Airport Futures and Freight Master Plan would be helpful. In addition, as noted earlier, the Comprehensive Plan was amended only two years ago to reflect Airport Futures. These goals and policies, which were the result of a significant planning effort, are included in Airport Futures as proposed amendments to the Comprehensive Plan. If they are no longer included in the Comprehensive Plan itself it is unclear what their status would be in terms of adopted policy.			
GOAL 7.B	The Portland Plan recognizes the importance of Portland's advantages as a trade and freight hub and West Coast trade gateway. While Goal 7.A does refer to "economic prosperity" as a benefit of the transportation system, Goal 7.B does not include prosperity as an important factor in "quality of life". This seems to be inconsistent with the Portland Plan.			
GOAL 7.E	As noted above, while the Portland Plan recognizes the importance of freight movement to Portland's economy, this is the only overall transportation goal that acknowledges freight. However, the current wording ("by providing efficient multimodal access to employment areas, educational institutions, and enhanced freight access to industrial areas.") is too limited in scope. Freight mobility should address Portland's role as a West Coast trade gateway and should recognize need for robust multi-modal freight (air, marine, rail) as well as the role that the transportation system plays in supporting prosperity.			
Policy 7.1 Street design	The Port supports the overall policy which states that street design will be based on street classification (e.g., freight). However, the sub-policies could conflict with the general policy. For example, sub-policy 7.1.a. implies that all streets be made comfortable for all users; however, it may not be possible to design a major freight route to be a "comfortable" bicycle route for all cyclists			
Policy 7.4 Classifications for Civic Corridors and Greenways.	As noted in the comments on Chapter 5, the conceptual maps of potential Civic Corridors and Greenways coincide with several designated priority freight routes. The description of Civic Corridors and Greenways do not seem to be compatible with freight or other modal designations. These freight routes are critical for Portland to retain its competitive market access as a West Coast trade gateway as outlined in the Portland Plan.			

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Draft Goals and Policies	Comments		
Policy 7.6 Green and active transportation hierarchy	This policy was excerpted from the City of Vancouver, B.C. Transportation 2040 Plan and then modified. However, proposed modifications are problematic because they require a trade-off between the movement of goods and the movement of people. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". The overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port supports the approach taken in the City of Vancouver's Transportation 2040 Plan. However, as currently written, policy 7.6 would appear to conflict with the need to preserve freight mobility.		
Policy 7.10 Public transportation.	The use of the term "public transportation" may be overly broad as it can include air travel. These policies are clearly intended for bus, street car and light rail, so some clarification or use of a different term may be appropriate. In addition, there is no mention of services for visitors and the benefits to the tourist sector of Portland's economy. In addition, rather than simply emphasizing the current policy of enhancing access to the Central City, consider enhancing access to employment areas as well.		
Policy 7.11 Multimodal passenger service.	The Portland Plan notes that "only 12 U.S. cities have direct air service to both Europe and Asia, and Portland is the smallest among them. The region must continue to support these direct services or risk seeing them disappear" However, these policies do not mention air travel as a mode.		
Policy 7.13 Multimodal freight system.	While the Port supports this policy which addresses the freight system; overall, these policies should be stronger and more consistent with policies and actions in Portland Plan which speak to "strengthening our freight transportation network, which connects us to global markets"  The Port supports Portland's Sustainable Freight Strategy; however, it is also unclear what is intended by "sustainable global and regional freight movement" in this context. Portland Plan Objective #13 does not use this modifier when describing the importance of maintaining Portland as a hub. Finally, there is no mention of air freight which is essential to important traded sectors.		
7.34.a. Truck Mobility	Numbering appears to be mislabeled, in keeping w/ the sequence, should be labeled "7.13.a".		

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Draft Goals and Policies	Comments			
7.13.b. Truck Accessibility.	The Port supports improving truck access to and from intermodal freight facilities, industrial and commercial districts, and the regional freight system.			
7.13.c. Freight Rail	The proposed language is too passive and does not ask the City to take any action beyond coordination. By comparison, Vancouver BC focuses on protecting rail corridors and prioritizing grade separation projects. The proposed language is intended to address this issue.			
	Modify the draft policy language to state (w/new language underlined): "Coordinate with private stakeholders and regional partners to support continued reinvestment in and modernization of the freight rail network. Prioritize public investment in grade separation and whistle free zone projects to promote freight rail throughput, public safety and neighborhood livability."			
7.13.d. Marine Terminals.	While the Port supports this policy, as worded, marine facilities on the Columbia River are not included. The proposed modification is intended to address this concern.			
	Modify the draft policy language to state (w/new language underlined): "Coordinate with the Port of Portland, private stakeholders, and regional partners to support continued reinvestment in and modernization of marine terminals in Portland Harbor and the Columbia River. Ensure access to marine terminals and related river-dependent uses in Portland Harbor and the Columbia River.			
7.13.e Shipping Channels.	The Port supports coordination and continued maintenance of the shipping channels in Portland Harbor and the Columbia River. However, the title be changed to "Navigation Channels" to reflect the federal designation and to acknowledge the variety of watercraft that use the river. In addition, as proposed, the language is too passive and does not ask the City to take any action beyond coordination. The proposed language is intended to address this issue.			
	Modify the draft policy language to state (w/new language underlined): "Shipping-Navigation Channels. Coordinate with the Port of Portland, private stakeholders, and regional partners to facilitate continued maintenance of the navigation channels in Portland Harbor and the Columbia River. Facilitate the establishment of upland dredge material management sites and encourage the in-water placement of clean dredge material in sediment -starved rivers including the Willamette and Columbia. Encourage maintenance of ship berths to match the			

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Draft Goals and Policies	Comments		
	approved depth of the navigation channels."		
7.13.f.Air Cargo [NEW]	A new section is appropriate given the importance of high value air cargo to the local and regional economy.		
	Add the new policy language to state (w/new language underlined): "Coordinate with the Port of Portland, private stakeholders, and regional partners to support expanded domestic and international air cargo service at Portland International Airport (PDX). Prioritize local road access to air cargo facilities and provide adequate land suitable for projected air cargo need in and around PDX."		
Policy 7.15 Performance measures/level of service.	The Portland Plan Guiding Policy P-13 states "Prioritize freight movement over single-occupancy vehicle travel on truck routes. Increase the freight movement share of our limited transportation system capacity." While multimodal levels of service may be appropriate in the Central City and other Centers, the resulting increase in vehicle congestion would impact freight mobility as well as private automobiles. Ensuring a reasonable level of service on freight routes is important to the economy and consistent with the Portland Plan.		
Policy 7.21 System management.	This policy suggests giving preference to transportation improvements that use existing roadway capacity efficiently and improve the safety of the system. However, not all "transportation improvements" will use "roadway capacity". Comprehensive Plan policies should be more consistent with the Portland Plan, which emphasizes the importance of Portland role as a trade and freight hub.		
Policy 7.24 Project prioritization.	As written, freight system improvements would not be prioritized in the capital improvement program. This is inconsistent with the guidance provided in the Portland Plan which recognizes the need for investments in Portland's multi-modal freight hub infrastructure. It is unclear why all priority projects must reduce vehicle miles traveled per capita or increase active transportation mode share versus other metrics stemming from the Portland Plan such as increasing exports or providing access to employment.		
Policy 7.30 Portland International Airport.	This is the only policy addressing Portland International Airport. There is no mention of the economic benefits of the airport. For example, to air freight (especially to the traded sectors) or to tourism. As the Portland Plan notes "Only 12 U.S. cities have direct air service to both Europe and Asia, and Portland is the smallest among them. The region must continue to support these direct services or risk		

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"" Overall, this policy should be strengthened and sub-policies addressing the ort should be included. Also, as noted earlier, the Comprehensive Plan was are ago to reflect Airport Futures. These policies need to be included.
)

Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets

December 31, 2013



Susan Anderson, Director
City of Portland Bureau of Planning and Sustainability
1900 SW 4<sup>th</sup> Avenue, Suite 7100
Portland, Oregon 97201

Re: City of Portland Comprehensive Plan Update Working Draft - Part 2

Dear Susan:

Thank you for the opportunity to comment on the City of Portland Comprehensive Plan Update Working Draft - Part 2, posted on-line in October 2013. The Port of Portland (Port) has been a partner in this process with the Bureau of Planning and Sustainability and appreciates the challenge of creating focus around the diverse interests in our city.

Building from our written comments on the Working Draft – Part 1 dated May 1, 2013, there are three themes we would like to emphasize in our comments on the Working Draft – Part 2: The role of freight in the transportation hierarchy; conformity with previously adopted plans and the importance of trade and jobs, including the linkage to equity. In addition, given that the Working Draft – Part 2 is focused on Maps and Infrastructure, specific comments from the Port refer to both the "Map App", as well as the Citywide Systems Plan.

Role of Freight in the Transportation Hierarchy. The Working Draft – Phase 1 proposed a green and active transportation hierarchy, borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people are combined in a single hierarchy in the Working Draft. This has the effect of relegating freight to a lower level than walking, cycling and transit. It also fails to acknowledge the value of the efficient movement of goods to the city's economy and quality of life. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". Vancouver's overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan.

In the context of the Working Draft – Phase 2, while Corridor designations from the "Map App" have been removed within proposed prime industrial areas, many key freight routes are still proposed as Civic Corridors, including the St. Johns Bridge, Sandy Boulevard, Powell Boulevard and 82nd Avenue, to name a few. It is unclear how these arterial streets will continue to perform a freight function efficiently if the Civic Corridor concept is adopted in the same location.

7200 NE Airport Way Portland OR 97218 Box 3529 Portland OR 97208 503,415 6000 Susan Anderson December 31, 2013 Page 2

Previously Adopted Plans. While we understand that some plans are being updated as a part of the Comprehensive Plan (e.g., the Transportation System Plan), the status of a number of other adopted plans, including Airport Futures and the Freight Master Plan, is unclear. As mentioned in our previous comments on the Working Draft – Part 1, the Port requests that the Working Draft – Part 2 also be amended to reflect the maps and policies adopted from Airport Futures with broad community support two years ago.

Importance of Trade and Jobs. As mentioned in our Working Draft – Phase 1, the Greater Portland Export Initiative, led by the Office of the Mayor of Portland and the Portland Development Commission, with a broad regional task force and the Brookings Institution, proposed to double the Portland region's exports in five years, adding \$21 billion in foreign sales and potentially 100,000 jobs.

In the context of the Working Draft – Phase 2, acknowledging and facilitating the growth of these jobs, particularly in the manufacturing and distribution sectors, provides a living wage career path for the majority of Portland residents without a four year college degree.

The Port looks forward to continuing to work with the City to resolve these issues and the issues outlined in the subsequent pages prior to adoption of Comprehensive Plan Update.

Sincerely.

Susie Lansene,

Senior Manager Transportation and Land Use Policy

c: Josh Alpert, Office of the Mayor
Tom Armstrong, Portland Bureau of Planning and Sustainability
Eric Engstrom, Portland Bureau of Planning and Sustainability
Deborah Stein, Portland Bureau of Planning and Sustainability
Andre Baugh, Portland Planning and Sustainability Commission
Leah Treat, Portland Bureau of Transportation
Patrick Quinton, Portland Development Commission
Tom Bouillion, Port of Portland
Lise Glancy, Port of Portland

#### **DISCUSSION LAYERS**

#### City Greenways: Key Questions

What do you think of this proposal?

Consistent with the approach taken for Corridors, the Port recommends that no Greenways be located within proposed prime industrial areas. Greenways are not well defined and it is not clear how compatible they would be with existing freight routes. In particular, the designation of NE 33<sup>rd</sup> Avenue north of Columbia Boulevard as a Greenway seems inconsistent with the current freight function. In addition, NE 33<sup>rd</sup> serves existing industrial uses, as well as future industrial uses identified at the SW Quad and NE 33<sup>rd</sup>/Marine Drive sites as a part of the adopted Airport Plan District.

#### Corridors: Key Questions

- Are the Civic and Neighborhood Corridors in the right places? Would you add or remove any?
- In the next 20 years, it is possible that only a few centers and corridors will see major change. Do
  you think the City should mainly invest in areas with both high population growth and high levels
  of need? Which ones do you think should develop first?

While Corridor designations have been removed within proposed prime industrial areas, many key freight routes are still proposed as Civic Corridors, including the St. Johns Bridge, Sandy Boulevard, Powell Boulevard and 82<sup>nd</sup> Avenue, to name a few. It is unclear how these arterial streets will continue to perform a freight function if the Civic Corridor concept is adopted in the same location. In evaluating treatments for particular road segments, the Port recommends the approach taken in the City of Vancouver's Transportation 2040 Plan, with a separate set of policies for "Moving Goods and Delivering Services" distinct from a hierarchy for "Moving People". We believe this approach will protect critical freight routes throughout the city rather than allowing them to be cannibalized with overlapping and sometimes contradictory policies.

#### **Employment:** Key Questions

- Of the strategles presented to increase industrial capacity, which would you support most strongly? Least strongly? Why?
  - a. Create additional industrial land by converting private golf courses to a mix of industrial development, natural areas and open space.
  - b. Support Intensification and expansion of existing businesses by prioritizing freight infrastructure projects
  - c. Create public incentives to clean-up brownfields
  - d. Convert vacant and underutilized commercial or residential land to employment uses in East Portland
- Are there other strategies or implementation approaches (legislation, incentives, funding, partnerships) the City should explore?
- Are there specific equity issues the City should consider in addressing these challenges

Two strategies strongly supported by the Port not specifically mentioned include City annexation and zonling of 300 acres on West Hayden Island for industrial use at a reasonable cost and a final clean up remedy for the Portland Harbor Superfund at reasonable cost for harbor businesses and City rate payers while still being protective of human health and the environment.

Other strategies mentioned above strongly supported by the Port include creation of public incentives to clean up brownfield sites, as well as prioritization of freight infrastructure projects to support intensification and expansion of existing businesses.

While the Port is supportive of changes to City policy that would allow owners of golf courses in the vicinity of PDX to voluntarily convert to industrial use, there is a great deal of uncertainty if any conversion would occur in the next 20 years and if so, the net amount of resulting industrial acreage vs. natural resource or open space acreage.

#### Specific Comments

• While it is positive that 300 acres are shown as potential prime industrial land on West Hayden Island, the area shown for three of the golf courses around PDX (Edgewater, Riverside and Broadmoor) are unlikely to be realized due to lack of dimensional suitability for industrial uses, as well as various environmental constraints. In addition, these same golf courses either need to be shown as potential industrial land or potential habitat corridors, but not both. Colwood golf course should be shown with the northern third industrial and the southern two thirds open space based on the recent City Council decision.

#### **Public Transit:** Key Questions

- Are frequent service lines missing in areas that would provide access to large numbers of people?
   Or in areas that would improve access to jobs, schools and other opportunities?
- The City's limited financial resources mean only a few street car corridors can be developed in the next 25 years. With this limitation in mind, which corridors should be prioritized? Why?

The Port believes transit service providing workforce access to industrial areas in the Portland Harbor and the Columbia Corridor should be prioritized. New street car corridors are unlikely to provide this needed access. A key public transit service question not asked above relates to the substantial funding of TriMet's operational budget through the regional payroll tax. In order to improve transit access generally and workforce access specifically, the City should focus on providing industrial land and freight access to industrial land in order to grow jobs and support TriMet at the same time.

#### **Specific Comments**

• Portland International Airport Station Area: The informational tab suggests station is within a half mile of one bus line, when there are actually none. The informational tab also indicates "Considerations include signage to the transit station and increased hours for transit service for employees." The Port continues to work with TriMet to maximize service hours for employees and passengers as well as to optimize signage for LRT including departure times on flight information displays within the PDX Terminal. Finally, the informational tab suggests that in 2010 this area was home to 5,504 jobs, while in 2035 this area may grow to 5,504 jobs. Instead of zero growth over 25 years, the Port forecasts passenger volumes to increase to 26.8 million annual passengers from the current volume of approximately 14 million annual passengers, with a corresponding increase in employment.

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Mt. Hood Avenue Station Area: The informational tab suggests station is within a half mile of
one bus line, when there are actually none. The informational tab also indicates that this area
was home to 1,890 households in 2010 and may grow to 1,890 households by 2035. Note that
although Cascade Station has a substantial number of hotel rooms, households are not
permitted under the Cascade Station/PIC Plan District.

#### **Transportation:** Key Questions

- With limited transportation funding, what criteria should be used to prioritize projects?
- How should investments be balanced to accommodate expected growth, support growth in centers and corridors, and address existing deficiencies?

The Port believes that transportation criteria should be focused on economic return on investment; promotion of the economic development, in particular advancing freight mobility and the Greater Portland Export initiative; improving safety and providing work force access. In an income tax dependent state and a city with a need for family wage jobs, a keen focus on transportation investments that either support job growth or result in a tangible financial return for Portland citizens should be a priority.

#### **Specific Comments**

Under the Potential Transportation Projects layer, add the South Rivergate Overcrossing Project at South Rivergate Boulevard. This project would provide critical relief for a number of South Rivergate businesses suffering from regular train blockage.

The freight network should be added to this layer rather than the employment layer and should be "clickable" to provide the viewer with additional information.

#### Urban Habitat (Habitat Corridors): Key Questions

- Are the Habitat Corridors and Areas in the right places? Which would you move, add or remove and where?
- What are your ideas for how to preserve enhance or create habitat areas and corridors?
- How do you suggest increasing nature in developed areas, like industrial districts, while also supporting job growth?

Expanded corridors should be limited to willing seller or voluntary enhancements like tree planting, invasive removal and native plantings. Habitat corridors should acknowledge previously adopted plans, such as Airport Futures. Finally, Habitat corridors as proposed don't seem to be compatible with the proposal to convert golf courses around PDX to industrial land. Golf courses can serve one purpose or the other, but not both at the same time.

Several habitat corridors are not compatible with prime industrial land at facilities including Terminal 6, PDX and portions of Rivergate. More broadly, this designation doesn't seem to acknowledge the current built environment. Any "expanded" corridors should be limited to willing seller or voluntary enhancements like tree planting, invasive removal and native plantings. Like other land uses constrained within the Urban Growth Boundary, we should be striving to get more habitat value out of a smaller footprint rather than expanding the footprint to the detriment of other uses.

#### **BACKGROUND LAYERS**

Flood Hazard: This layer appears to map areas permanently covered by water, such as slips at Terminal 4, Swan Island Lagoon and Ross Island Lagoon, and as a result should be corrected.

Parks: This layer needs to distinguish between "park" vs. "natural park" vs. "natural area". In the latter case, portions of Smith & Bybee Lakes owned by the Port and Vanport Wetlands are not accessible to the public due to their status as mitigation sites.

Natural Resources: This layer does not accurately reflect the adopted City of Portland Natural Resource Inventory (NRI) in the vicinity of Rivergate, Terminal 5 and Terminal 6. Specifically, this layer shows these areas as having a "high" ranking when for the most part they have a "low" ranking in the NRI. In addition, this layer needs to be consistent with the Airport Futures planning process in the vicinity of PDX.

Employment Areas: All of Terminal 6 (Including berth 607) should be shown in blue as harbor access subarea. Colwood Golf Course should be updated to reflect current zoning. Cascade Station is shown as a "Neighborhood Commercial" designation when in reality it functions more as a regional shopping destination.

Economic Development: This layer should also show State of Oregon E-Zones (Enterprise Zones).

#### CITYWIDE SYSTEMS PLAN

#### Chapter 1-Infrastructure Planning and Coordination

- On page 3, note that in addition to City of Portland anticipated growth by approximately 280,000 people, the region is expected to grow by approximately one million people according to Metro's most recent forecast. This is important context, as Portland still functions as the center for the region.
- On page 3, the list of City priorities does not include any priorities related to the economy or prosperity, even though there are several examples that could be cited. Specifically, Resolution 36918 adopting the Portland Plan in April 2012 acknowledges one of the three integrated strategies as "Economic Prosperity and Affordability". Another example includes the Greater Portland Export Initiative. The Office of the Mayor of Portland and the Portland Development Commission led the process, with a broad regional task force. As a result, Export Initiatives appears as a priority in the adopted City of Portland 2013 Federal Legislative Agenda.
- On pages 6-7, Under Regional Plans and Requirements, add regional plans beyond those
  developed by Metro. While some Metro plans are requirements, others such as the Community
  investment Strategy are advisory. As a result, it is appropriate to include other regional strategy
  plans not developed by Metro such as the Greater Portland Export Initiative.

#### **Chapter 2-Asset Management**

On page 12, under the heading Accommodating growth, the problem is defined as "The ability
of the City's infrastructure to accommodate current growth depends primarily on the City's
ability to resolve current deficiencies-to serve underserved areas and to maintain the condition
of existing infrastructure." However, a key strategy missing from this discussion relates to

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- brownfields. If the City can focus new development on brownfield sites, existing infrastructure can be used to its full capacity without having to extend infrastructure to new areas. Brownfield redevelopment is mentioned as a priority in the adopted City of Portland 2013 Federal Legislative Agenda, as well as draft Policy 3.40 in the Comprehensive Plan Working Draft-Part 1.
- On page 13, under heading Growth forecasts and locations, as previously mentioned note that in
  addition to City of Portland anticipated growth by approximately 280,000 people, the region is
  expected to grow by approximately one million people according to Metro's most recent
  forecast. This is important context, as Portland still functions as the center for the region.
- On page 14, under the heading Growth scenarios, there is a lack of discussion under
  performance goals about economic development and the importance of freight mobility (goods
  movement). In addition, there is no discussion about the critical role that brownfield
  redevelopment can play in providing development capacity. Without a focus on these elements,
  the Portland Plan performance measure "by 2035, Portland has 27 percent of the region's new
  jobs, more of which provide a living wage, and contributes to serve as the largest job center in
  Oregon" is unlikely to be realized.
- On page 16, under the *Transportation* heading, there is only a discussion of the challenges of providing "complete, safe, and accessible pedestrian, bicycle and transit systems." There is no discussion about the importance and challenges to Freight Mobility (Goods movement), despite draft Policy 3.18 (Trade and freight hub) in the Comprehensive Plan Working Draft-Part 1 as well as the City prioritization of the Greater Portland Export Initiative.

#### **Chapter 3-Integrated Goals**

- On page 19, under the Investing to reduce disparities heading, there is no discussion about work force access in the PBOT paragraph. Under the BES paragraph, there is no discussion about the importance of bringing brownfields back into productive reuse, nor any thing about the need to expedite clean-up of the Portland Harbor Superfund in a cost effective manner while still being protective of human health and the environment. Finally, there is no discussion about the escalating cost of City water, sewer and stormwater utility fees and the disproportional financial impact to medium and low income households.
- On page 20, under the Using an equity lens heading, there is no "lens" that focuses on the
  importance of employment to Portland residents. Equity is defined on page 17 as "Portlanders
  of all cultures, ethnicities, abilities and economic backgrounds have access to opportunities
  necessary to satisfy their essential needs, advance their wellbeing and achieve their full
  potential." Acknowledging and facilitating the growth of industrial jobs, in particular
  manufacturing and distribution, provides a living wage career path for the majority of Portland
  residents without a four year college degree.
- On page 21, under the Economic Shifts and Employment Forecasts heading, there is a good
  description of manufacturing jobs "...with above average wages and high employment multiplier
  effects-one manufacturing jobs supports 3.69 total jobs in the region. It is also worth noting
  that manufacturing provides a living wage career path for the majority of Portland residents
  without a four year college degree.
- On page 22, under the Competitiveness heading, there is the suggestion that "In the coming decades, the City may see a continued shift in primary industries, as the importance of high-tech and creative industries grows." None of the terms in this sentence, such as "primary industries" or "high tech" are defined and the conclusion is contrary to the Portland Economic Development Strategy which identifies the Advanced Manufacturing sector as one of Portland's strengths and areas of economic focus.

- On page 22, also under the Competitiveness heading, is a statement that the City "strives" to
  provide adequate industrial and employment lands. In addition to the requirement to comply
  with Statewide Planning Goal 9 20 year employment land need, the City must actually provide
  adequate industrial and employment lands to be competitive, not simply strive to do so.
- On page 23, under the Transportation and Freight Movement heading, the Greater Portland
  Export Initiative, led by the Office of the Mayor of Portland and the Portland Development
  Commission, with a broad regional task force, should also be cited as a source document for this
  section. One of the policy recommendations is to "Develop a shared state, regional, and city
  freight policy: a) Prioritize arterial roads for getting freight to market, b) Support the region's
  gateway role with International air and marine links and c) Help prevent leakage to other ports
  and promote growth and value add opportunities for agriculture/forestry exports".
- On page 25, under the Connecting people and places heading, there is no discussion about
  workforce access or about the need to provide adequate employment land within the City of
  Portland to provide a jobs/housing balance for the approximate 280,000 new residents forecast
  for Portland by 2035, as well as to minimize the increase in vehicle miles traveled.

#### Chapter 4-Infrastructure and Service Delivery

On page 33, there appears to be a typo in Table 4.1 under Environmental Services, sixth bullet:
 "1,6701,900 green stormwater facilities".

#### Chapter 6-Bureau of Environmental Services

- On page 46, note that the City is a co-permittee with the Port of Portland on the MS4 NPDES Discharge Permit.
- On page 51, under the Sanitary Sewer and Stormwater Rates heading, there is no discussion about the Portland Harbor Superfund Charge as a portion of current residents' and businesses' sewer rates, which has been assessed since 2001. While this current charge as a portion of the overall sewer rate is relatively small, the bill for the final clean up remedy may pose a crushing ongoing cost for low to moderate income households as well as small businesses. Given the equity focus of the Portland Plan, the City should seek a final clean up remedy that is a reasonable cost for rate payers while still being protective of human health and the environment.
- On page 55, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA-Superfund) and Portland Harbor Cleanup section, there is no specific reference to the fact that the City of Portland is a potentially responsible party (PRP) which may result in substantial costs to Portland sewer rate payers depending on the final clean up remedy selected. Given the equity focus of the Portland Plan, the City should seek a final clean up remedy that is a reasonable cost for rate payers while still being protective of human health and the environment. This section also implies that City involvement in the Portland Harbor Cleanup is limited to City operated outfalls and combined sewer overflow outfalls. The City is also involved based on current and historic property ownership abutting the north reach of the Willamette River.
- On page 62, the last paragraph under the Columbia Slough and Columbia River Watersheds heading suggests that "While development on Hayden Island is concentrated on the eastern side, the western portion is outside the City's service area and remains undeveloped." In fact, West Hayden Island is developed with many different uses, including a 104 acre federally designated dredge material disposal site consisting of levees and weirs; BPA and PGE high voltage electric lines and towers; a PGE substation; access roads; a BES dechlorination facility.

Page | 6, December 31, 2013

City of Portland Comprehensive Plan Update Working Draft - Part 2
Port of Portland Remarks

pump station and two outfalls. These two outfalls handle almost all of the treated sewage for the City of Portland from the Columbia Boulevard Wastewater Treatment Plant, with a designed capacity of 100 million gallons per day for secondary treatment.

#### Chapter 8-Bureau of Transportation

- On page 161, under the Service Agreements & Partnerships heading, the Union Pacific Railroad bullet mentions "the Union Pacific Railroad Bridge". It is unclear which bridge is being described, since the only bridge owned by the Union Pacific Railroad in Portland is the Steel Bridge. The rail lift span bridge over the Willamette River near Wacker Siltronic is owned by the BNSF Railway. The BNSF Railway also owns the Hayden Island Rail Bridge connecting Oregon and Washington, as well as Lake Yard in northwest Portland.
- On page 169-170, there should be discussion of the integrated freight network supporting the city's role as a gateway to national and international markets for business and passenger in Portland as well as the rest of the state.
- On page 171, the last bullet under the Multi-Modal Transportation heading, mentions the lack of modal preference in the TSP as a problem. As mentioned in the Port's comments from the Portland Comprehensive Plan Working Draft-Part 1, the concept of a green and active transportation hierarchy were borrowed in part from the City of Vancouver, B.C. Transportation 2040 Plan. However, unlike the Vancouver Plan, the movement of goods and the movement of people were combined in a single hierarchy in the Working Draft-Part 1. This would have the effect of relegating freight to a lower level than walking, cycling and transit. It also falls to acknowledge the value of the efficient movement of goods to the city's economy and quality of life. The Vancouver Plan establishes a hierarchy for "Moving People", but provides a separate set of policies for "Moving Goods and Delivering Services". Vancouver's overall goal for Moving Goods and Delivering Services states that "The efficient movement of goods and services is critical to city, regional, and national well-being." This goal is followed by policies related to Long-Distance Goods Movement, Local Goods and Services and Emergency Services. The Port recommends the Working Draft-Part 1 be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan.
- On page 207, under the Growth and Congestion in the Freight System heading correctly notes that "Not surprisingly, arterials that serve Portland's industrial areas have the highest volume of medium and heavy truck trips today and in the future." However, many of these same corridors outside of employment areas such as Sandy Boulevard, Powell Boulevard and 82<sup>nd</sup> Avenue, to name a few, are also proposed as Civic Corridors in the Map App. It is unclear how these arterial streets will continue to perform this freight function If the Civic Corridor concept is adopted in the same location. Related to the previous discussion about the green and active transportation hierarchy, the Port recommends that the green and active transportation hierarchy be amended to reflect the approach taken in the City of Vancouver's Transportation 2040 Plan, with a separate set of policies for "Moving Goods and Delivering Services" distinct from a hierarchy for "Moving People".
- On page 209, under the Lift and Swing Spans over the Columbia River heading, the discussion is only about the challenges presented to river traffic. There should also be a discussion of the impact of bridge lifts to freight carried by trucks using I-5. Specifically, the Columbia River I-5 bridge crossing is the only lift span bridge on the entire I-5 system between the Canadian and Mexican borders and has been identified as a key bottleneck to the regional freight network. The proposed I-5 replacement bridge would eliminate delay for truck traffic by eliminating the lift span design.

#### **Appendix A-Investment Strategy**

 The City should develop an integrated Five Year Capital Improvement Plan spanning across all bureaus, accessible to the public and updated every 2 years. This approach would help ensure that strategy directions proposed in the Comprehensive Plan are aligned Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets

PORT OF PORTLAND Possibility in every linection

March 13, 2015

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

Dear Chair Baugh and Planning and Sustainability Commissioners:

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

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

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

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

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

#### ADEQUACY OF ECONOMIC POLICY

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

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

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

Trade and transportation is of critical importance to the Portland-Vancouver region. While Investment in harbor businesses has continued to be robust following the deepening of the Columbia River shipping channel, the Comprehensive Plan and Economic Opportunity Analysis (EOA) downplay and may even impact the viability of this investment. The level of investment in new, expanded or more efficient facilities in the Portland-Vancouver Harbor and on the entire Columbia suggests that there is a much greater demand for Harbor Access Lands than is being accounted for or planned for. While the City's initial draft EOA used a medium forecast based land demand, the January 2015 Proposed Draft EOA assumes a low forecast based land demand. We believe this is not supported by the facts of actual harbor demand and will leave the City and state behind the curve of economic upturns restricting opportunities for growth and greater job diversity.

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

A supportive West Hayden Island annexation policy also has a direct connection to other policies contained in the Comprehensive Plan, including land supply, traded sector competitiveness, equitable household prosperity, industrial and employment districts, preservation of open space, and enhancement of various habitat types critical to listed species.

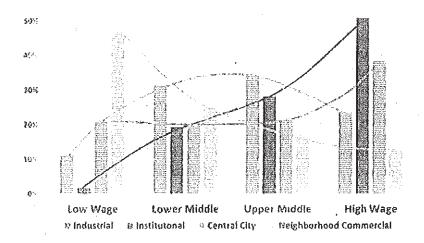
The provision for additional industrial lands, especially harbor access lands, is critical to the future of Portland. We commend staff for inclusion of several significant policies that, if properly implemented, would go a long way toward ensuring Portland's economic prosperity through greater equity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

#### **EQUITY AND GROWTH**

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

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

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



#### **BROWNFIELD REDEVELOPMENT**

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

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

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

#### **TRANSPORTATION**

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

As reinforced by statewide shippers' reaction to the recent departure of Hanjin container service to Asia, the Portland freight hub is critical to the state and local economy. Distillers depend on glass bottles shipped by low-carbon methods from factories in Asia, while blueberry growers depend on the same mode to export perishable products to Japan. Having direct-calling service (both ocean and air) for moving cargo adds to the quality of life in our region. Local exporters have reduced shipping costs and are more competitive the marketplace, creating jobs for Portland residents. Lower costs are also enjoyed by importers such as Fred Meyer and Les Schwab. In turn, they are able to reduce prices to their customers, affording greater access to consumer goods to a wider range of Portland residents. Decisions in Portland have implications for other counties in the region and state that rely on the Portland freight hub. This rural-urban economic linkage should be acknowledged in the Comprehensive Plan.

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

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

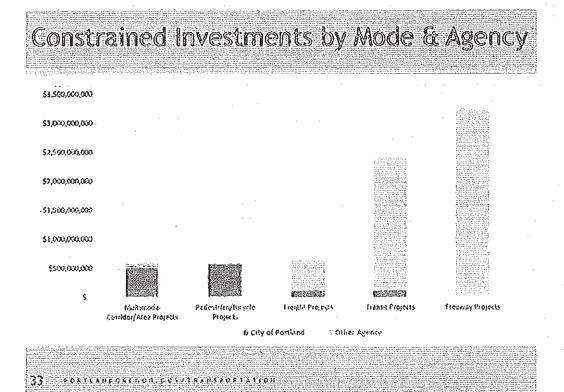
Efficient freight movement is also a key element to providing an adequate industrial land supply (as described in Policy 6.12), in part by increasing throughput on existing industrial sites (as described in Policy 6.38).

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

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

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

From February 24 PBOT presentation at PSC:



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

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

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

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

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

Please see attached TSP list changes.

#### BALANCE

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

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

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

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

Sincerely,

Senior Manager, Transportation and Land Use Policy

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

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

#### TSP ID 40032: Columbia/Alderwood/Cully Intersection improvements

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

#### TSP ID 40009: NE 47<sup>th</sup> Ave Corridor Improvements

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

#### TSP ID 110190: Killingsworth/I-205 Interchange Improvements

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

#### TSP ID 40102: Columbia Bivd. Street Widening

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

#### TSP ID 30055: North Portland Junction: Undoing the X

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

#### TSP ID 40001: 11th/13th Ave. Rall Overcrossing

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

#### TSP ID 40025: 82<sup>nd</sup> and Airport Way Grade Separation

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

#### TSP ID 40085: Kenton Rail Line Upgrade

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

#### TSP ID 103750: Cathedral Park Quiet Zone

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

#### TSP ID 113090: Cully Blvd. Rail Overcrossing

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

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

#### Bonneville Rail Yard Build Out

Construct two interior yard tracks and complete the double track lead from the wye at the east end of the yard to Barnes Yard. Add rail staging capacity for South Rivergate.

Cost: \$3,600,000

Attachment - Port of Portland Recommendation for the TSP project list: Page 2

#### Widen Airport Way Outbound east of 82nd

Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$3,335,000

#### Deplaning Curbside Roadway Lanes

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

#### Airport Way Westbound Approaching Return Road

Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$1,080,000

#### Terminal Exit Roadway at Post Office Curves

Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$1,500,000

#### **Terminal Exit Roadway at Parking Plaza**

Add new lane to provide additional capacity for anticipated growth in passenger traffic. Cost: \$1,104,000

#### PDX Light Rail Station/Track Realignment

RTP# 10364 Realign light rail track into terminal building.

Cost: \$16,330,700

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

#### Willamette River Channel Deepening

Deepen the portions of the Willamette River with deep draft infrastructure to -43' where appropriate. Allow Willamette River terminals to also benefit from the Columbia River's new controlling depth.

Cost: \$200,000,000

Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.

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June 22, 2015

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

Dear Chairman Baugh and Commission Members:

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

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

Andre Baugh, Chair June 23, 2015 Page 2

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

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

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

Sincerely,

Susie Lahsene, Senior Manager

Transportation and Land Use Policy

**Attachments** 



June 23, 2015



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

Chair Baugh and Commissioners,

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

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

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

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

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

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

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503.415 6000

Andre Baugh, Chair June 23, 2015 Page 2

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

#### TAKE ACTION

Add EOA Economic Measures: The Port's conversation with 8PS staff has led us to believe that 8PS feels economic-related metrics are not necessary in the GSR because they are already captured in the Draft Economic Opportunity Analysis (EOA). However, this argument is not compelling for several reasons:

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

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

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

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

Andre Baugh, Chair June 23, 2015 Page 3

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

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

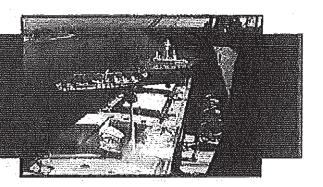
- Foreign direct investment
- Export growth
- New business creation
- Portland Harbor cargo volumes
- Job distribution and growth by wage and location

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

Sincerely,

Transportation and Land Use Policy

# Investment Growth and the Continued Economic Impact of the Portland Harbor



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

# \$370 Million

Total Investment at the Portland Harbor Since 2010

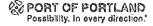
# \$4.5 Million

Estimated Increased Annual Tax Revenue from Investments at the Portland Harbor

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

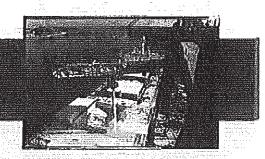
Recent and Proposed Investments	\$870 million	<del>_</del>
Pembina (2018) (Proposed)	\$500 million	Propane export terminal
Capital Investments to Date	\$370 million	
Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Canpotex - Portland Bulk Terminal (2013)	\$140 million	Increase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







# Impacts of Channel Deepening on the Columbia River



#### IMPORTANCE OF THE SHIPPING CHANNEL

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

#### IMPORTANCE OF CHANNEL MAINTENANCE

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

# \$370 Million

#### Total Investment in the Portland Harbor

#### \$1 Billion

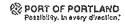
Total Investment on the Columbia River Since 2010

### \$5.15 Billion

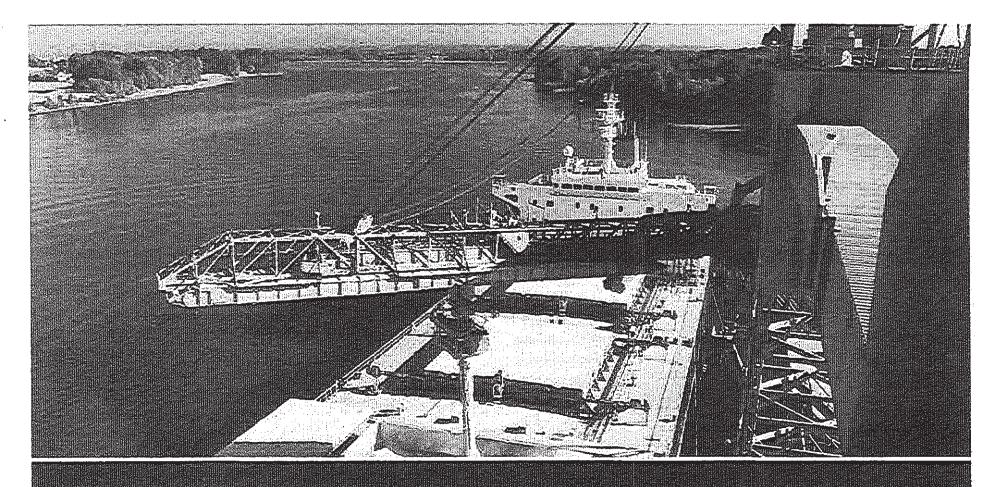
Additional Investments Planned for the Columbia River

Port	Project	Investment Amount	Description
Longview	Export Grain Terminal (2012)	\$230 million	New grain terminal
Kalama	Temco LLC (2015)	\$100 milion	Increase capacity (grain)
	Port of Kalema (2014-15)	\$7 milion	Reil upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
Vancouver	United Grain Corporation (2012)	\$80 million	Enlarge storage and handling capacity
	Wast Vancouver Freight Red Access (2015)	\$228 million	Rail expansion, new loop track, and road improvement
	Tidewater Berge Lines (2015)	\$30 million	Three new tugboots
Portland	Columbia Grain (2015)	\$44 million	Upgraded grain storage and handling
•	Kinder Morgan Bulk Terminal (2013)	\$10 milion	New ship loading facilities
	International Raw Materials (2014)	\$2 milion	improvements to roil and storage tanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving facilities
	Vigor Industrial (2014)	\$50 million	Largest drydock in the US
	Rivergate Road and Rail Improvements (2012)	\$82 million	Improve road and red access and capacity
	Canpotex - Portland Bulk Terminal (2013)	\$140 milion	Increase efficiency of shiploading
	Shover Transportation (2014)	\$21 million	New barge, new tug and new engines
Sub Total Proposed investments		\$1.08 Billion	
Longview	Millennium Bulk Terminal (2018)	\$600 million	New coal terminal
	Millennium Bulk Terminel (2018)	\$25 million	Smaller removel and environmental cleanup for new bulk terminal
Kelama	NW Works (2017-18)	\$1.8 billion	New methanol plant
St Holens Port Westword	Global - Columbia Pacific Bio-Relinery (2018)	മാത്തെ 082	Increased storage and real improvements
	NW Works (2017-18)	\$1.8 billion	New mathenol plant
	Ambre Energy (2018)	\$242 million	Coal transport
Vancouver	Vencouver Energy (2018)	\$100 milion	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propone export lerminal
Total Proposed		\$5,16 Billion	





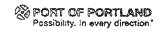




Impacts of Channel Deepening on the Columbia River

June 2015







#### **CONTACT INFORMATION**

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

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## **ACKNOWLEDGMENTS**

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

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

Export Grain Terminal

Temco LLC

Kalama Export Grain

Global - Columbia Pacific Bio-Refinery

United Grain Corporation

West Vancouver Freight Rail Access

Vancouver Energy

Tidewater Barge Lines

Columbia Grain

Kinder Morgan Bulk Terminal

International Raw Material

**LD** Commodities

Vigor Industrial

Rivergate Road and Rail Improvements

Canpotex - Portland Bulk Terminal

Shaver Transportation Company

Millennium Bulk Terminal

**NW Innovations Works** 

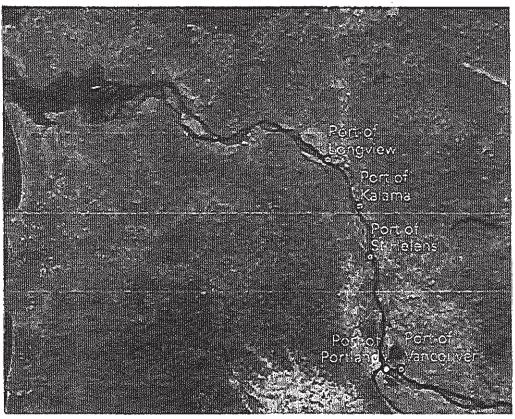
Pembina

#### **SUMMARY**

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

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

Figure 1: Columbia River Ports



Source: Esn, DigitalGlobe, GeoEye, r-cubed, Earthster Geographics, CNES/Airbus DS, USDA, USGS. AEX, Getmapping, Aerogrid. IGN, IGP, swisstopo, and the GIS User Community

Ryan, Timothy P. The Economic Impact of Deepening the Mississippi River to S0 Feet. Big River Coalition, August 22, 2013. Panama Canal Authority, 2006. Proposal for the Expansion of the Panama Canal. Third Set of Locks Project. April 24. (Ryan, 2013).

finternew with Katy Brooks. Port of Vancouver, March S. 2015.

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

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

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

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

Longview	Export Grain Terminal (2012)	\$230 million	New grain terminat
Kalama	Temco LLC (2015)	\$100 million	Increase capacity (grain)
	Port of Kalama (2014-15)	\$7 million	Rail upgrades at the Port
	Kalama Export Grain (2011)	\$36 million	Increase storage capacity
Vancouver	United Grain Corporation (2012)	\$80 million	Enlarge storage and handling capacity
			Rail expansion, new loop track, and
	West Vancouver Freight Rail Access (2015)	\$228 million	road improvement
	Tidewater Barge Lines (2015)	\$30 million	Three new tugboats
Portland	Columbia Grain (2015)	\$44 million	
	Kinder Morgan Bulk Terminal (2013)	\$10 million	Upgraded grain storage and handling
	International Raw Materials (2014)	\$2 million	New ship loading facilities
		<b>DE THINGIT</b>	Improvements to rail and storage lanks
	LD Commodities (2014)	\$21 million	Expanded grain storage and moving
	Vigor Industrial (2014)	\$50 million	fecilities
		330 million	Largest drydock in the US
	Rivergate Road and Rail Improvements (2012)	\$82 milkon	Improve road and rait access and
	Canpotex Portland Bulk Terminal (2013)		сарасну
		\$140 million	Increase efficiency of shiploading
z i zitwo korowskie.	Shaver Transportation (2014)	\$21 million	New barge, new tug and new engines
Sub Total		\$1.08 Billion	
Proposed Investments			
Longview	Millennium Bulk Terminal (2018)	\$600 million	New coal terminal
	Millennium Bulk Terminal (2018)	\$25 million	Smelter removal and environmental
		\$25 timaon	cleanup for new bulk terminal
Kalama	NW Works (2017-18)	\$1.8 billion	New methanol plant
St. Helens Port Westward	Global - Columbia Pacific Bio-Refinery (2018)	640 -: 111	Increased storage and rail
	and a control of a	\$80 million	improvements
	NW Works (2017-18)	\$1.8 billion	New methanol plant
	Ambre Energy (2018)	\$242 million	Coal transport
Vancouver	Vancouver Energy (2018)	\$100 million	Rail improvements and loading facilities
Portland	Pembina (2018)	\$500 million	Propane export terminal

#### INVESTMENT DETAILS

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

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

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

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

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

The deepening of the Columbia River shipping channel, and the investments in port, terminal and transportation infrastructure that followed, provides shipping and commodity firms with the

certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that competing in today's global economy requires. Firms have confidence that shipments won't face backlogs at ports due to capacity constraints. Shipments move efficiently, Firms also spend less time monitoring, planning, and developing contingency shipping plans.

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

#### PORT OF LONGVIEW

#### **Export Grain Terminal**

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

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

#### Millennium Bulk Terminal

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

Internew with Ashley Relenberg. Port of Longview. March 18, 2015; Port of Longview New Release, Part of Longview Inks Property Lease for Export Grain Terminal, June 1, 2009; Export Grain Terminal New Release, July 9, 2012, http://www.extgraim.com/news/release/leachity-creates-new-export-opportunities-for-american-farmers/.
\*\*Internew with Peter Bennett, Millennium Bulk Terminal, March 14, 2015, Information on Millennium Bulk Terminal's website, www.millenniumbulk.com.

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

#### PORT OF KALAMA

#### Temco (CHS/Cargill)

The \$100 million expansion of the Temco LLC grain terminal tripled the terminal's capacity. The project included a new vessel dock and loading equipment, new rail and barge receiving machinery, and upgraded grain cleaners. The terminal can now process up to 200 million bushels of grain per year, comparable to the Temco terminal in Tacoma. As a result of the expansion, employment during grain-shipping season will double to 120.4

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

#### Kalama Export Company

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

#### **NW Innovation Works**

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

## PORT OF ST. HELENS AND PORT WESTWARD

#### Global Partners-Columbia Pacific Bio-Refinery

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

#### **NW Innovation Works**

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

#### Ambre Energy

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

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

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

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

Interview with Paul Butters, Temco LLC, March 2, 2015; Luck, M. 2014. "Temco grain terminal expansion nearly complete." TDN.com. November 24; Pittman, J. 2014. "Temco grain terminal expansion on track for fall completion officials say." TDN com. July 21; Comments from Pacific Northwest Waterways Association staff, May, 2015.
"The Columbian." Port of Kalama to double Temco site's real capacity." December 13, 2013.

<sup>&</sup>quot;Interview with Steve Oakes, Kalama Export Company, March 19, 2015; Olson, E. 2010. "Kalama port officials say grain export expansion will create 180 jobs." TDN.com. February 17; Siemers, E. 2011. "Vencouver port lands \$72M deal." The Portland Business Journal, http://www.bizjournals.com/portland/print-edition/2011/01/14/vancouver-port-lands-72m-deal.html?s=pnnt; ADM. 2014. News Refease: Metabeni and ADM Bolster Export Joint Venture in U.S. Pacific Northwest, September 30 plants-oregon/, "China-funded methanol plants in Oregon," KOINS, http://koin.com/2014/01/22/china-funded-methanol-plants in Oregon," KOINS, http://koin.com/2014/01/22/china-funded-methanol-plants-oregon/,

Interview with Tony Flagg, United Grein Corporation, March 16, 2015.

<sup>&</sup>quot;Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Toledanes, L. 2013. "Port of St. Helens commissioners approve increase to train traffic." TDN.com. November 13.
"Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Northwest Innovation Works, http://www.norts.com/; Castano, C. 2014. "China-funded methanol plants in Oregon," KOIN6. http://kon.com/2014/01/22/china-funded methanol plants-oregon/; Miller, M. 2014. "Port of St. Helens give OK to methanol plant lease option." Pamplin Media, http://www.pamplinmedia.com; The Ostskanie Chief, 2014. "Port commission signs lease option with methanol company." The Classkanie Chief Pebruary 20, http://www.thechiefarchive.com/author/classkaniechief/page/147/; Godiey, V. 2014. Letter to the Port of St. Helens Community. NW Innovation Works. October.

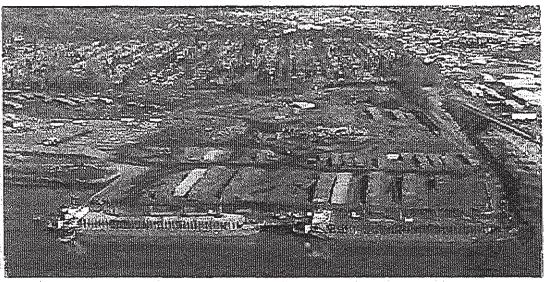
# BECAUSE OF THE DEEPENING, COLUMBIA RIVER PORTS AND TERMINALS ARE WELL POSITIONED TO RESPOND TO GROWING DEMAND FROM THE PACIFIC RIM

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

#### VANCOUVER

#### United Grain Corporation

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



By Sam Beebe (CC BY 2.0 (http://orestvecominons.org/licenses/by/2.0)), via Wikimedir Commons

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

#### West Vancouver Freight Rail Access

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

#### **Vancouver Energy**

Vancouver Energy is investing approximately \$100 million in a "crude-by-rail" terminal. The project is projected to start in 2016. The investment includes new rail lines and storage facilities to move crude oil through the terminal. This terminal will be one of those serviced by the new West Vancouver Freight Rail Access investments.<sup>16</sup>

<sup>&</sup>quot;Interview with Pat Trapp, Port of St. Helens, March 9, 2014; Northwest Innovation Works, http://twinnovationworks.com/; Castano, C. 2014, "China-funded methanol plants in Oragon." KOIN6 http://koin.com/2014/01/22/china-funded-mothanol-plants-oragon/; Miller, M. 2014. "Port of St. Helens give OK to methanol plant lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief, 2014. "Port commission signs lease option with methanol company." The Classianie Chief,

<sup>&</sup>quot;Interview with Tony Flagg, United Grain Corporation, March 16, 2015, United Grain Corporation, http://www.bipourials.com/portland/print-edition/2011/01/14/vancouver-port lands-72m deal html?s=print; Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Mitsul & Co. "Harvesting opportunities in agriculture 1 https://www.mitsul.com/joinn/business/challenge/1201987\_1855 html;

Interview with Katy Brooks, Port of Vancouver, March 5, 2015; Port of Vancouver USA Press Release. Port begins final phase of West Vancouver Freight Access rail projects. November 12, 2014; Port of Vancouver USA: West Vancouver Islanches key component of multimillion-dollar rail expansion project. The Oreganish December. December Commissioners Workshop Tesoro-Savage Joint Venture Lease Overview. July 22, 2013; Savage. Teroro and Savage announce joint venture to construct and operate crude-by-rail unloading and mannetosiding lacity at Port of Vencouver USA, http://www.cfsac.org/prassroom/. Energy Facility Site Evaluation Council, http://www.cfsac.wago.armounce.point.com/prassroom/. Energy Facility Site Evaluation Council, http://www.cfsac.wago.armounce.point.com/prassroom/.

#### DEEPENING-RELATED INVESTMENTS STRETCH BACK TO THE MIDWEST

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

#### **Tidewater Barge Lines**

With the channel deepening came larger ships, with deeper drafts, carrying increased amounts of cargo. Much of this cargo moves up and downriver via tugs and barges. In response to this demand, Tidewater Barge Lines is investing an estimated \$30 million in three new and environmentally friendly tugs, with reduced air emissions and improved fuel efficiency. Vigor Industrial in Portland is fabricating the tugs, which will be delivered by the end of 2015. Fabricating the tugs in the Portland area helps keep more investment dollars in the local economy.16

#### **PORTLAND**

#### Columbia Grain

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

#### Kinder Morgan Bulk Terminal

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

#### International Raw Materials

International Raw Materials switched their loading operations from loading shallow-water barges to a deep water berth that can service larger ships that use the added depth of the shipping channel. They invested \$1.5 million in the switch. International Raw Materials now has one of the deepest berths on the West Coast of the U.S. Ships carrying liquid fertilizer frequently dock at their facility to offload fertilizer and then head south to terminals with shallower berths that could not accommodate fully-loaded vessels.20

#### **LD Commodities**

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

#### Vigor Industrial

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

#### Rivergate Road and Rail Improvements

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

Pinterview with Jennifer Riddle, Tidewater Barge Lines. March 31, 2015; estimates by ECONorthwest, Interview with Tony Flagg, United Grein Corporation, March 16, 2015.

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

<sup>21</sup> Interview with Tim Mahoney, International Raw Materials, March 11, 2015, International Raw Materials LTD, http://www.irmteam.com/our-company/;

<sup>&</sup>lt;sup>21</sup>Culverwell, W. 2012. "Louis Dreylus plans \$21 M update to Rose Querter grain elevator, The Portland Business Journal, December 27.

Interview with Alan Sprott, Vigor Industrial, March 19, 2015, Vigor industrial, "The Vigorous; investing in the future," "Country's larges floating drydock coming to Portland," Vigorindustrial.com/vigorous; Graves, M. 2014, "North America's largest drydock floats first ship at Swan Island's Vigor Industrial," The Oregonian, Nivember 23, http://blog.oregonlive.com/business\_impact/print.htm?/antry=/2014/11/north\_americas\_largest\_drydock\_1.html. Ontown with Phil Healy, Port of Portland. February 17, 2015; Linstrom, A., 2012. "South Rivergate Rail Yard Expansion boosts flow of export." PortDispatch, Port of Portland. August, 7, http://www.portofportland.com/publications/PortDispatch/

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

#### Canpotex - Portland Bulk Terminal

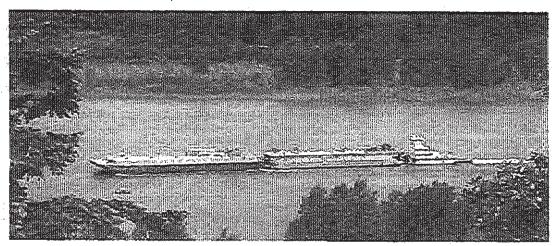
Canpotex is investing \$140 million in new facilities and equipment to increase the efficiency of their potash shiploading facility. The investment includes a new shiploader, improved operations and management capabilities, and an upgraded conveyance system. The increased efficiency will shorten turnaround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

#### Shaver Transportation Company

Shaver Transportation Company has been on a steady program of upgrade and construction since the channel deepening. The company responded to the increased demands from larger vessels with a repowering and new construction program kicked off in 2011. Shaver invested \$9.5 million in a new tug, the SUMMER S, which is being fabricated in Portland at Diversified Marine. They also invested \$4.9 million in new engines and repowering some of their existing tugs. They also invested \$7 million in two new grain barges, the first new grain barges on the Columbia River since 2011.<sup>28</sup>

#### Pembina.

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



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

proposal now goes to the Portland City Council for a vote. If the Council approves the project, it may come online by 2018.<sup>29</sup>

#### CONCLUSION

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

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

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

<sup>&</sup>quot;Port of Portland, 2014, Press Release "Canpotex to Invest at Port of Portland Terminal" October 8. http://www.portofportland.com/NewsRelease" Canpotex, Logistics, http://www.canpotex.com/what.we-do/logistics; Siemers, E. 2013. "Canpotex planning new potash storage facility at Port of Portland." The Portland Business Journal February 20, http://www.bizjournals.com/portland/news/2013/02/20/canpotex-planning-new-potash-storage.html?s=print, George-Cosh, D. 2014. "Canpotex expanding Portland, Ore, manne torminal: The Wall Street Journal October 8. http://www.wsj.com/articles/canpotex-expanding-portland-ore-manne-terminal-1412796970." Interview with Rob Rich, Shaver Transportation Company, March 31, 2015.

<sup>\*</sup>Interview with Teress Carr, Port of Portand, April 3. 2015; Notmistrom, C. 2018. Propane pipeline one step closer to Portland." KOING. April 7. http://koin.com/2015/04/07/pembina-propane-plan-draws-port-protestees

#### Attachment 1

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

6.39.d.	Strive to offset the reduction of development capacity as needed,	Support
Prime industrial land	with additional prime industrial capacity that includes consideration	
retention	of comparable site characteristics. Offsets may include but are not	
	limited to additional brownfield remediation, industrial use	
	intensification, strategic investments, and other innovative tools and	i i
	partnerships that increase industrial utilization of industrial land.	
6.39.e.	Limit the use of prime industrial land for siting of parks, schools,	Change to read:
Prime industrial land	large-format places of assembly, and large-format retail sales.	STRICTLY limit the use of prime industrial
retention		land
6.39.f.	Promote efficient use of freight hub infrastructure and prime	Support
Prime industrial land retention	industrial land by limiting non-industrial uses that do not need to be located in the prime industrial area.	
6.41	Entire section 6.41 stricken from comp plan i.e. not included	Retain first section of 6.41:
West Hayden Island		Provide for the future annexation of WHI
,		for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan
		district or implementation agreement that ensures mitigation of impacts and provision of public benefits. Policy is retained based
		on City Council action and Metro designation.
6.43 Columbia East	Provide a mix of industrial and limited business park development in	Support
	Columbia East (east of 82 <sup>nd</sup> Avenue) that expand employment opportunities	
	supported by proximity to Portland International Airport and multimodal access.	
7.46	Enhance grasslands and wetland habitats in the Columbia Slough, such as	Support with clarification that grasslands
Sensitive habitats	those found in the Smith and Bybee Lakes and at the St. John landfill site, to	do not include areas where dredge
•	provide habitat for sensitive species, and for wildlife traveling along the	material deposition has occurred.
	Columbia and Willamette river migratory corridors.	
Chapter 7	Culture, cultural has been introduced into this chapter: bullet 1, p7-1;	Remove "cultural" and "cultural values"
	paragraph 1, p7-3; Goal 7.8, p 7-9	from this section. It lacks definition and context.

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

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

# **PERKINSCOIE**

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January 7, 2016

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VIA EMAIL CPUTESTIMONY@PORTLANDOREGON.GOV

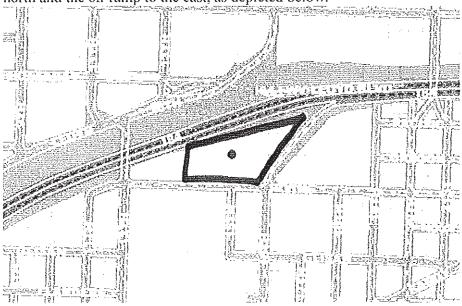
City of Portland, City Council 1900 SW Fourth Avenue, Suite 7100 Portland, OR 97201-5380

Re: Comp Plan Map Designation for 1425 NE Irving Street

Dear Mayor Hales and Commissioners:

We represent Washington Holdings<sup>1</sup> and WREH Lloyd Plaza LLC, the owners of 1425 NE Irving Street (the "Property"). As detailed below, the purpose of this testimony is to notify the City that once we are able to compare the development opportunities available under the Mixed Use Zoning Project and the forthcoming code amendments associated with the CC 2035 Project, we may request that the Central City Plan District ("CCPD") boundary be amended to include the Property, and that the current Central Commercial comp plan designation be retained.

The Property is approximately 5.2 acres, is roughly triangular in shape, bordered by I-84 to the north and the on-ramp to the east, as depicted below.



<sup>&</sup>lt;sup>1</sup> Washington Holdings acquires, develops, manages and invests in real estate in the western United States. Western Holdings currently owns approximately 1.5 million square feet of real estate in the Portland metropolitan area. http://www.waholdings.com/

129301905.1

Mayor Hales and Commissioners City of Portland January 7, 2016 Page 2

The Property is located outside of the Central City Plan District, is zoned Central Commercial with a design review overlay (CXd) and has a comp plan designation of Central Commercial. The Comprehensive Plan Update proposes to amend the comp plan designation to Mixed Use -- Urban Center, and the Mixed Use Zoning Project currently recommends that the Property be rezoned Commercial Mixed Use 3 (CM3).

The SE Quadrant Planning process included the Property in the "Banfield Portal Study Area," and considered whether it was appropriate to amend the CCPD boundary to include that Area. While we tracked the SE Quadrant Planning process, at that time we did not advocate for inclusion in the CCPD because the details of the alternative future regulatory schemes -- the Mixed Use Zoning Project and CC 2035 -- were not yet known.

The Property consists of four one-story buildings on approximately 5.2 acres. All of the buildings were built in 1963-64 for the Bonneville Power Administration.

The proposed comp plan and zoning amendments have led the owners of the Property to consider what may be the best development potential for the Property. The owner has no immediate redevelopment plans for the Property, but acknowledges that the Property's size, access to transit and proximity to the Lloyd District, Central Eastside, Willamette River and Downtown presents a terrific future mixed use redevelopment opportunity. However, the combination of the larger size of the site, the FAR and relatively low height allowance of the proposed zoning encourage development of relatively low, very large floor plate buildings. Large floor plate development also negates urban form objectives, such as providing open space, green space, and light. Mixed use, and particularly residential development, would be very difficult to develop economically under the proposed zoning. To encourage a mixed use development which would include open green spaces and proper floor plate sizes for this size of site, a height limit of 120' or higher would be appropriate (8-stories which could include 6 stories of wood or light gauge steel construction on top of a 2-story concrete podium).

Through this lens, we have begun to evaluate the draft Mixed Use Zoning Project materials, and appreciate BPS staff's guidance. We look forward to analyzing the Discussion Draft of the CC 2035 Project when it is released on February 1. Once we can compare these two regulatory schemes, we will have a better sense of which will better facilitate desirable and feasible development at the Property. It may be that we conclude that it is appropriate to seek having the CCPD boundary modified to include the Property, and the Central Commercial comp plan designation retained.

Mayor Hales and Commissioners City of Portland January 7, 2016 Page 3

We will remain in contact with BPS staff, and provide additional testimony once we are able to analyze the details of the proposed amendments to the potential zoning designations.

Very truly yours,

Dana L. Krawczuk

DLK:dlk

ce: Brent Lower and Josh Keene, Washington Holdings (via email)

Council Clerk (via email)

Barry Manning and Rachel Hoy, BPS (via email)



RIGHT TO ROAM

January 7, 2016

Mayor Hales and Commissioners City of Portland 1221 SW Fourth Ave. Portland OR 97204

SUBJECT: Oregon Walks testimony for Comprehensive Plan and TSP

Mayor Hales and Commissioners:

Oregon Walks is the Portland Metro region and state of Oregon pedestrian advocacy organization, promoting walking conditions that are safe, convenient and attractive for everyone. A key component of walkability is building cities where residents are able to reach most of their daily needs within a 20-minute walk from their home. Planning for walkable neighborhoods will result in people walking or biking for shorter trips, such as to the grocery store, the drug store and to access other services. It also improves access to transit as on option for longer trips.

Oregon Walks supports the 2035 Comprehensive Plan Recommended Draft, and the Recommended Plan Map that accompanies it, as well as the Transportation System Plan (TSP) elements that are now before you.

The "Centers and Corridors" approach embodied in the Comprehensive Plan will help achieve 20-minute neighborhoods by allowing a greater number of residents to live close to shops and services, and with access to frequent service transit lines. We support the greater intensity of development envisioned in the Mixed Use Centers and along the Corridors to help achieve the goal of 80 percent of Portlanders living in a "complete neighborhood".

Oregon Walks supports the goals of reducing Vehicle Miles Traveled per person and reducing transportation-related carbon emissions. Allowing and encouraging four- to six-story buildings and a mix of uses in Centers and Corridors, and greater density in the Central City, supports these goals by making it possible to walk, bike, or take transit to nearby destinations and by supporting greater transit frequency.

We support the incentives to encourage provision of Affordable Housing units, including bonus height provisions, as well as the city's legislative efforts to allow more comprehensive efforts on that front.

Another key component of walkability is the design of a complete, safe, and attractive pedestrian transportation network. Oregon Walks strongly supports the Transportation Goals and Policies in Chapter 9 of the Comprehensive Plan, especially Goal 9A, Safety, which is consistent with the Vision Zero policy we have successfully advocated for and which the City



PROTECTING YOUR RIGHT TO ROAM

has embraced, Goal 9E, Equitable Transportation, and Goal 9F, Positive Health Outcomes. We applaud and strongly support Policy 9.6, the so-called "transportation hierarchy", which prioritizes walking over all other modes, and which provides clear direction to City staff to design the transportation system to safely accommodate the most vulnerable road users, including the disabled, pedestrians, and bicyclists.

Policy 9.16 calls for the City to "encourage walking as the most attractive mode of transportation for most short trips, within and to centers, corridors, and major destinations". Policy 9.17 calls for the creation of more complete pedestrian networks and a higher quality pedestrian environment, and Policy 9.18 calls for improved pedestrian safety, accessibility, and convenience for people of all ages and abilities. Together these policies reflect all the characteristics we have been advocating for over the last 20+ years. Moreover, the criteria used to evaluate the projects in the TSP were consistent with Oregon Walks priorities, and have resulted in a project list we can support.

Oregon Walks urges you to approve the proposed Comprehensive Plan and TSP.

Sincerely,

Noel Mickelberry Executive Director

#### Arevalo, Nora

From:

PDX Comp Plan

Sent:

Thursday, January 07, 2016 2:16 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

FW: [Approved Sender] Comments on August 2015 Comp Plan Draft

Attachments:

2016 1 7 Comments on 2015 Comp Plan Draft.xls

Sara Wright

p: (503) 823-7728

----Original Message----

From: Grumm, Matt

Sent: Thursday, January 07, 2016 2:04 PM

To: PDX Comp Plan <pdxcompplan@portlandoregon.gov>

Subject: FW: [Approved Sender] Comments on August 2015 Comp Plan Draft

Matthew Grumm
Senior Policy Manager
Office of Commissioner Dan Saltzman
1221 SW 4th Ave. # 230
Portland, OR 97204
503-823-4151
Matt.Grumm@portlandoregon.gov

Visit us online or follow Dan Saltzman on Facebook and Twitter

----Original Message----

From: Don Baack [mailto:baack@q.com] Sent: Thursday, January 07, 2016 1:03 PM

To: Saltzman, Dan <Dan.Saltzman@portlandoregon.gov>; Grumm, Matt <Matt.Grumm@portlandoregon.gov>

Subject: [Approved Sender] Comments on August 2015 Comp Plan Draft

See attached XL file with page by page comments on the draft Plan.

It is clear there has been a great deal of thought and work put into assembling reviewing and approving the draft comp plan by many knowledgeable people. My comments are from a SW citizen who has been involved in planning in our part of the city for 20 years.

Attached is a spreadsheet with about 25 suggested changes in the wording of the Comp Plan. The majority of the comments focus on two issues: 1.

Attention to the details of preventing wildfire which I believe has gotten lost in the effort to emphasize a "green city". and 2. Trails

and Transportation where we seek to have our SW Urban Trail network classified as a Neighborhood Greenway and mapped as such.

Thanks for taking the time to address these suggested changes.

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

Page	Policy	Comments
GP3-27	3.1	pedestrian and bicycle connections, greenways as well as off-street trail connections to, through, and from residential neighborhoods.
		Explanation: It is important that the SW Urban Trails be classified as greenways where people are walking in streets with no sidewalks. We seek to have traffic calming and 20 mph speed limits as provided by the greenway designation for these routes. The through addition refers to the need for pedestrian connections between neighbors to avoid long drives where a short walk would suffice if safe, walkable connections existed.
	3.103	Develop Pedestrian Oriented Greenways and enhance the Western Neighborhoods distinctive system of trails to increase safety, expand mobility
GP4-6	4.4	Integrate natural and green infrastructure such as trees, green spaces, ecoroofs, gardens, green walls, and vegetated stormwater management systems, into the urbanenvironment in a manner that does not increase the risk of wildfire.
	4.6	Promote building and site designs that enhance the pedestrian experience with windows, entrances, pathways, and other features that provide connections to and between the street environment.  Explanation: In SW Portland, it is important to provide connections through the neighborhoods, not just to the activity centers. Such connections foster neighbor to neighbor access that are missing in a typical wheel and spoke approach of connecting to activity centers.
	4.8	Encourage the continued use of alleys for parking access while preserving pedestrian access. Expand the number of alley-facing accessory dwelling units.
GP4-13	Dsn w/ Nature	reduction of landslide, wildfire and flooding risks, protection or enhancement of fish and wildlife habitat, and opportunities for Portlanders to enjoy naturein their daily lives.
GP5-9	5.25	MFI is not defined in the text, explain it.
GP5-13	5.54	This draft does not add provisions to allow more intense use of our existing housing stock by suggesting removing limits on numbers of families or unrelated persons that can live in a house. I think this should be examined as a way of significantly increasing our housing stock.
GP7-9	7.11.h	In my view and experience, the risk of wildfire extends well beyond the urban forest. This plan does not focus sufficient attention to the prevention of wildfire in urban neighborhoods. Too much emphasis on the green infrastructure without balancing that with wild fire prevention in terms of vegetation near structures, building materials, etc. Policy makers should review the 1951 Forest Park Fire, the 1991 Berkley-Oakland Ca fire that destroyed 3000 + structures to see what wildfire can do if proper prevention measures are not taken. With the advent of global warming, we face a

GP8-7	8.H	The City manages its natural areas and urban forest to protect unique urban habitats, prevent wildfire and offer Portlanders an opportunity to connect with nature.
GP8-16	8.51	Plan, improve, and maintain the citywide trail system so that it connects and improves access to and <b>through</b> Portland's neighborhoods, commercial areas, employment centers, schools, parks, natural areas, recreational facilities, regional destinations, the regional trail system, and other key places that Portlanders access in their daily lives.  Explanation: In SW Portland, it is important to provide connections through the neighborhoods, not just to the activity centers. Such connections foster neighbor to neighbor access that are missing in a typical <b>wheel and spoke</b> approach of connecting to activity centers.
GP8-17	8.55	Coordinate the planning and improvement of <b>pedestrian and bicycle</b> trails as part of the City Greenways system Explanation: It is important that the SW Urban Trails be classified as greenways where people are walking in streets with no sidewalks. We seek to have traffic calming and 20 mph speed limits as provided by the greenway designation for these routes.
GP8-22	8.93	Add: Recognize that pedestrian and bicylcle trails are also key components of the transportation network.
GP8-24	8.111 <b>A</b>	Add Policy to state: Ensure that public schools allow public pedestrian and bicycle access across school property due to the super block size of the facilities.
GP8-24	8.116	Encourage collaboration with private schools and educational institutions to support community, transportation and recreational use of their facilities.  Explanation: Using Lewis & Clark as an example, the pedestrian trail through their campus is a key link between the Willamette River and the rest of the SW community.
GP8-24	8.117	Maintain and enhance the City's technology and communication facilities to ensure public safety, facilitate access to information, state of the arrt communication systems and maintain City operations.
GP9-1		Guide the location and design of new street, pedestrian, bicycle and trail infrastructure.

GP9-10	9.14	Encourage repurposing street segments that are not critical for transportation connectivity to other <b>public</b> community purposes.
	9.15	Promote street and trail alignments and designs that respond to topography and natural features, when feasible, and protect streams, wildlife habitat, and native trees.
	9.16	Encourage walking as the most attractive mode of transportation for most short trips, within neighborhoods and to centers, corridors, and major destinations, and as a means for accessing transit.
	9.17	Create, sign, and document more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment.
GP9-14	Sys Mgt	Portland's transportation system is an integrated network of roads, rails, trails, sidewalks, bicycle paths, and other facilities within and through the city.  Add: Make the pedestrian and bicycle networks easily followed and well mapped.  Explanation: The SW Urban Trails System has not been visible to planners and therefore has often been neglected when new development has been authorized. We seek a clear overlay of the entire Urban Trail System, and identified as neighborhood greenways. Same applies to bicycle oriented neighborhood greenways.

LP-5	SM-10	Fanno/Tryon Drainage Shoulder Improvements. It is imperative that both of these projects and any similar subsequent project include a provision that an extended (didened) shoulder be provided for pedestrian, mobility defices and bicycle safety. Federal studies show such low cost improvements (15% of full sidewalks) result in 80% of the safety results of full sidewalks. This is a way of making our limited transportation dollars yeild much greater returns to a much larger segment of the populatin.
LP-6	SM-13	Stephens Creek Stormwater System Improvements. Add: Coordinate all actions with PBOT to assure the street, trail and other transportation needs are met concurrently.
Wilson F	HS Zoning	Of particular concern is the current IR zoning for Wilson HS. It was put in place in 1997 as part of the Hillsdale Town Center Plan. It came with the assurance by the Planning Bureau that a detail plan for the campus would be jointly developed by the Hillsdale Neighborhood and PPS. After almost 20 years no such plan has been accomplished amd no such plan is on the horizon. Meanwhile, the campus has had a number of significant changes that we have had no opportunity to comment on or influence in any manner. We request the Wilson HS zoning be reset as residential 7 as it was before 1997 until after the successful completion of a campus plan we can support.

January 7, 2015

#### **MEMORANDUM**

TO: Portland City Council

cputestimony@portlandoregon.gov

CC: Mauricio Leclerc 503 823-7808

mauricio.leclerc@portlandoregon.gov

Grant Morehead 503 823-9707

grant.morehead@portaldnoregon.gov

Portland Bureau of Transportation 1120 SW Fifth Avenue, Suite 900

Portland, Oregon 97204

FROM: Peter Finley Fry

Joseph Angel Katie Durant

RE: Portland Comprehensive Plan Periodic Review

Portland Comprehensive Plan Policy

Parking Management

Adequate provision of off and on-street parking is critical for the health of Portland's small retail, restaurant, and service businesses. These businesses' economic survival depends on the ability of customers to access them. Customers require direct, frequent, and temporary access; often parking for only a short time. Parking required for these businesses is unlike long term parking where cars are parked for a day, night, or several days.

A major issue facing small businesses is the many new apartments without parking. Often residents will store cars on neighborhood streets for days while they use the transit system during the week and then their car to recreate during the weekend.

A reduction of parking supply for these small businesses will put them out of business.

We call for a shift of focus from limiting supply to that of managing demand; including enforcement of the City's laws that make it illegal to store cars on the street.

We request the following amendments. Deletions in red striken and additions in red underlined.

Peter Finley Fry
Joseph Angel
Katie Durant
Portland Comprehensive Plan Periodic Review
Parking Management

### Portland Comprehensive Plan: Chapter 9: Transportation

#### Design and planning

9.2.d. <u>Designate district classification that give priority to on-street parking where a high density and synergy of retail businesses exist or are planned especially including Downtown and commercially zoned streets.</u>

#### Streets as public spaces

Streets, including sidewalks <u>on-street parking</u> and planting strips, provide critical transportation and utility functions. In Portland, streets are the most abundant type of public space, occupying nearly 20 percent of land area in the city. The following policies support community desire to expand the use of streets beyond their transportation functions. See Chapter 8: Public Facilities and Services and Chapter 4: Design and Development for further use and streetscape policies.

Policy 9.13 Streets for transportation and public spaces. Integrate both <u>parking</u>, placemaking and transportation functions when designing and managing streets by encouraging design (particularly for on-street parking to provide access to retail stores and protect pedestrians from the flow of vehicles), development, and operation of streets to enhance opportunities for them to serve as places for community interaction, environmental function, open space, tree canopy, recreation, and other community purposes.

#### Parking management

Vibrant urban places link people and activities. As Portland grows, we must manage both the demand and supply of parking to achieve climate, health, livability, and prosperity goals. Providing too much and/or underpriced parking can lead to an underutilization of land and more driving and less walking, cycling, and transit use; inefficient land use patterns; and sprawl. Poorly designed parking restrictions will damage the economic and retail vitality of an area driving people away and contributing to sprawl. Insufficient parking can negatively affect neighborhood livability and economic vitality. Prioritize short term parking for Portland's restaurants and retail business. These policies provide guidance to manage parking demand and supply to meet a variety of public objectives, including achieving compact walkable communities, reducing private vehicle ownership and overall vehicle use, enhancing livability, reducing pollution, and expanding economic opportunity.

Policy 9.56 On-street parking. Manage parking and loading demand, supply, and operations in the public right of way to achieve mode share objectives, and to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand. Strongly

Peter Finley Fry
Joseph Angel
Katie Durant
Portland Comprehensive Plan Periodic Review
Parking Management

encourage rapid turnover of on-street parking discourage, the storage of cars in onstreet parking spaces and minimize street swale systems that displace on street parking..

Policy 9.57 Off-street parking. Limit the development of demand for new off-street parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.



Jan. 7, 2016 (Transmitted this day to the e-mails cited)

City of Portland
City Council <cctestimony@portlandoregon.gov>
1221 SW 4th
Portland, OR 97204

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

Subject: Recommended Provisional Map Amendments to the Recommended Comprehensive Plan Update for 60<sup>th</sup> Ave. Station Area and Euclid Heights Subdivision subject to public involvement to be completed by March 15, 2015.

Honorable Mayor Hales and City Commissioners:

Thank you for the opportunity to testify on the Recommended Comprehensive Plan Map. On Wed. January 6th the Rose City Park Neighborhood Association (RCPNA) the Land Use and Transportation Committee (LU & TC) held an emergency meeting to review the Provisional Map Amendments for the 60th Ave. Station Area and Euclid Heights Subdivision. The reason for the emergency meeting was Chairman DeRidder had discovered we had the opportunity to recommend approval of a Provisional Map Amendment if it were sponsored by one of the City Commissioners or the Mayor. A Provisional Amendment would enable us the needed time for public involvement for these two areas after the final public hearing on the Comprehensive Plan Update scheduled for Jan. 7th and prior to the City Council's final hearing in April, 2016.

Mayor Charlie Hales has graciously offered his sponsorship for these two RCPNA Provisional Map Amendments that are to be presented at the Jan. 7th City Council hearing thereby making the delayed public involvement for these two areas possible <Thank You!!>

At the January 6th, 2016, the LU & TC recommended approval of the following:

"Provisional Map Amendments for two areas within the RCPNA with the understanding that there has not been adequate time for public involvement to be conducted. The

RCPNA pledges to work with BPS and PBOT to provide extensive public involvement between now and March 15, 2015 for these areas with the understanding that a final version of these map amendments will be provided to the City Council at least one week prior to their final hearing on the Recommended Comprehensive Plan Update in April, 2016. The two Provisional Map Amendments are as follows:

- 1. Down-zoning of Euclid Heights, with the exception of 2 lots, from R2.5 to R5, as illustrated in Exhibit A; and
- 2. Redesign of 60th Ave. Station Area to shift high density residential away from I-84's poor air quality and add Mixed Use Commercial, as illustrated in Exhibit B."

Reasoning for the proposed amendments:

- Euclid Heights Subdivision has remained zoned R5 over the past 35-years and contains homes built on 5,000+ sq. ft. lots. The plan designation should match the current R5 zoning of the site. This will encourage stabilization of property values.
- 2. The 60<sup>th</sup> Ave. Station Area land use designations had been established when the Max Light Rail station was completed. At that time planning did not consider the health consequences of clustering high density residential next to Interstate I-84. In addition, this part of the neighborhood has remained a hodge-podge of development as very few of the properties have up-zoned to the comprehensive plan densities. It is our goal to work with the residents and property owners in this area to design a 'red carpet' of uses leading to the access at the 60<sup>th</sup> Ave. Max Station while supporting the working class home owners that populate the majority of this area.

The RCPNA LU & TC has made the final decision for RCPNA on this matter as our By-Laws allow this authority when the decision is time sensitive, as it was here.

Thank you again for the opportunity to provide input on the Recommended Comprehensive Plan Map and allowing us the critical time needed to conduct public outreach with our residents and business owners by supporting the two Provisional Map Amendments.

My best, Journalist De Eddl

Tamara DeRidder, AICP Chair, RCPNA

1707 NE 52<sup>nd</sup> Ave. Portland, OR 97213

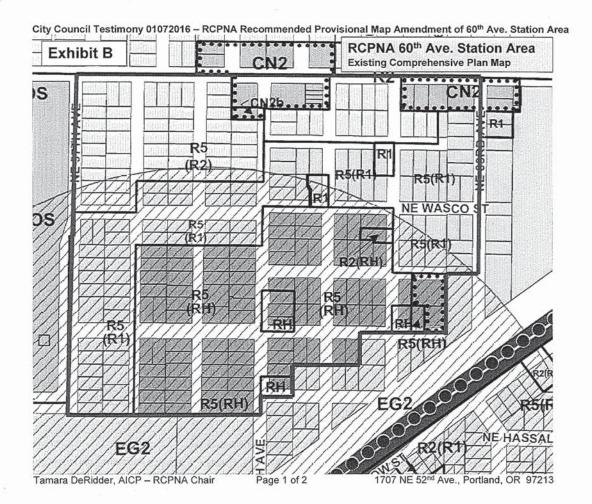
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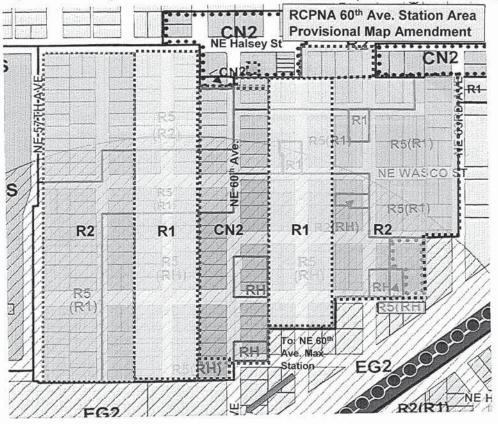
A. Tentative Map Amendment down-zoning Euclid Heights Subdivision from R2.5 to R5, except for two lots zoned R2.

B. Tentative Map Amendment for the Re-Design of the 60th Ave. Station Area.

RCPNA Testimony Page 2 of 2 Jan. 7th, 2016

Recommended Comp. Plan Map Ordinance 187832, Vol. 1.3.J, page 7459





Tamara DeRidder, AICP - RCPNA Chair

Page 2 of 2

1707 NE 52<sup>nd</sup> Ave., Portland, OR 97213

Recommended Comprehensive Plan Testimony Jan.7, 2016, Portland City Council RCPNA Provisional Map Amendment Rezoning of Euclid Estates from R2.5 to R5



On Jan. 6, 2016 the RCPNA LU & TC conducted an emergency meeting and unanimously approved the Proposed Provisional Map Amendment of Euclid Heights Subdivision, outlined in red above and excluding 2 properties that are zoned R2. This is to be a Provisional Map Amendment as it has not yet had notified public involvement. This public involvement is to be completed by mid-March 2016. Thank you for your consideration.

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

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I am a resident of the NE 53<sup>rd</sup>/Halsey neighborhood, which stands to be most impacted by the

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I am opposed to this CM1 zoning pro	oposal for the reasons stated
clearly by the RCPNA above.	
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Address 5334 NE Clackamas S	
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Address 1405 NE 49th Ave	
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I am a resident of the NE 53<sup>rd</sup>/Halsey neighborhood, which stands to be most impacted by the

City of Portland Recommended Comprehensive Plan.

Signature	Janet	nun	W			Date 1-7-16
Address	1385	NE	49th			l+
Comments	no	high	rises.	We	have	enough.
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	$\mathcal{A}_{i}$	1/2/10
Signature Se Di	/mm	Date 1/7/16
Address 1385 NE	49th	
Comments We need	to Keep Halsey	a community
not high rise	of Sstories sui	-rounded by homes
U		$\iota$ .

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Signature Reta C Coleman	Date 1/7/14
Address 1395 NE 49Th Ave	2
Comments This sort of dever	
residential character	olour neighborhood
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	Ledie Hillman		Date ga 5, 2016
Address	3520 NE Habey St	Portland OR	97213
Comment	S		

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Signature Caryl S. Behrend	Date 01-03-16
Simeric Many - 21 Harrand	Date 01-00-10
Address 5225 N.E. Olackamas St	97213
Comments NOL NOL NOL	
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Signature James d. Coleman	Date forwary 3, 2016
Address 1395 NE 49th Avenue	
Comments	
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Signature Jony Casasada	Date @2/3//6
Address 1440 NE 53rd Ave.	
Comments	
Comments	

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Signature MAMMil	Date 1/3/16
Address 1405 No 53nd 97213	
Comments the Jogged corner of 53rd	across Holsey,
with existing pedestrian troppic of the	bike way clesignation
already miduses a dancerous confluence	2. U large retail of
Condental smome would be a custo	e) to this arrang
Shessed corner/completely residential Son	Ingelformer .  unce 187832, Vol. 1.3.J, page 748

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Signature	Curry	MC	où ·	Date	1/3/16
Address ·	5324	NE	Clachamas	St.	
Comments	<b>S</b>				· <del>-</del>
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Signature Z	Date 1-3-16
Address 1406 NE Sznd Portland, OR.	9.7213
Comments We, the neighboors do NOT was	
Petermely disroptive to the neighboring reside	nts .

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Signature WAA	- O'LLAM -MISTELL	Date Jan	3, 2016
Address 242 S	N.E. 47th W	97212	
Comments			· · ·

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Signature Com methos	Date 6 10 2016
Address 1415 NE 53 The Pa	
Comments haffic is bear on SI th	at is disignated
hike unilor - the Theet is no mor	i - The fun
Il Halsgis a blish turn on to	0 31

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Signature Salant Markins	Date 1/1/16
Address 317 NESISTAVE PDX 972	13
Comments	

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Signature Revalt Lerman	Date Jan 7, 2016
Address 5024 NE Waser 5+ P+, 0	r,
Comments This is a well established	, high functioning
neighborhood. The Coffee Shop is and	malous. We
do not want it to become a tre	nd, + lestroy
a lovely neighborhood.	

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Signature	Carolyn	E Ryan	Date 1/7/2012
Address	5024	n. E. Wares St	
Comments	Please	do not you this to	happen.
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Signature A	Date 01/07/16
Address 1405 NE 52nd AV	, Portland.
Comments	

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Signature	Matte	de		<u>[</u>	Date (/ ) (( 6
Address		514 Are	$0 \times$	op	97213
Comments	S				

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Signature		1	Date 1/1/17	-
Address	1328	K JOAN	POX 17213.	
Comments	· · · · · · · · · · · · · · · · · · ·			_

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Signature Milisa Famin fon	Date /-7-//
Address 5025 NE Clarkamas St.	PDX 97213
Comments	

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Signature Zuchowy V. Zuch	Date   - 7-16
Address 5014 NE Clackamas Streets	
Comments	,

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Signature	47	4.5	Eynn	ψ.	Date 1-7-14
Address	1411	NE	49th Ave.	, ,	
Comment	S				

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Signature ann Sheridan	Date 1-7-14
Address 1411 NE 49th Ave.	
Comments Not good for the ne	ighborhood

#### 1/7/2015

My name is Chris Fountain, and I reside in a floating home on Marine Drive, just West of the railroad bridge to Hayden Island. My home looks out over the undeveloped part of the island. I've been a taxpaying resident of Portland for over 10 years, and one of the reasons that I love living in Portland is that places like my home exist in our city. I live just minutes from the city center, yet my neighborhood remains a refuge for fish, birds, animals, and last (but not least) me.

My 23 neighbors and I have been riding the West Hayden Island development roller coaster for many years. Yes, we are financially invested in seeing this land removed from the City's Industrial Lands Inventory - our property values would take a beating if this land were to be developed. But we are also heavily invested in the preservation of this critical natural area.

As has been clearly presented by City Planner Tom Armstrong, the Comp Plan provides for an amount of developable acreage that is above and beyond the demand that is forecasted for the next 20 years, while also accommodating tens of thousands of jobs. A portion of this inventory will come from the accelerated cleanup and redevelopment of polluted industrial brownfields.

This underutilized, contaminated land needs to be repurposed and put back into productive use. Reclamation of this land will not get less expensive with time. The economic, environmental, and social benefits to be derived from brownfield redevelopment compare favorably with greenfield development. Benefits include significant job creation, tax revenue potential, greenhouse gas emission reduction, and savings in public infrastructure investment. Perhaps brownfield reclamation doesn't "pencil out" to industry's satisfaction, but for the sake of future generations, we are morally obligated to care for and protect our land and natural resources. Please remove this land from the City's Industrial Lands Inventory - permanently.

Thank you,

Christine Fountain 3939 N Marine Drive #5 Portland, OR 97217

Phone 503-285-4322 Email <u>cfount@earthlink.net</u>

Re: West thy den Island

T. Helzer Testimony before Portland City Council on Draft Comprehensive Plan, 1.7.16 First of three points this evening: In last month's CP hearing, Working Waterfront Coalition said City Planning Staff's analysis of Industrial Land Inventory "was not based on any data." The Planning and Sustainability Commission received several reports from Tom Armstrong in 2014-15 on this subject, extensively documenting staff's recommendation for far less inventory than previously lobbied for by the Port, Working Waterfront, Portland Business Alliance, Columbia Corridor Association and others. Bottom line: none of West Hayden Island is needed as industrial land to support the City's economic development for at least the next twenty years. Second, in the 30-month combined study by the PSC of West Hayden Island as an industrial park and as a contributor to economic development in the Comprehensive Plan, the PSC attached many basic but vital mitigations for any development of WHI to be included in this Plan. As both an unfeasible and unsustainable development site, and as a high-value regional urban natural wildlife habitat, now is the time in the Comprehensive Plan to a) permanently exclude WHI from the Industrial Lands Inventory, and b) memorialize the very sound research the PSC has done in recommending essential mitigation to be required for any future industrial development on West Hayden Island. Third, from that combined study by PSC, it is now abundantly clear that a) any industrial development of the proposed 300 acres on WHI will be very threatening to the environmental health of the entire 837 acres there, b) Multnomah County studies confirm serious negative impacts will occur on the human health of the entire Hayden Island community, and some of North Portland, and c) for these and many other reasons, we

residents, business owners, and recreationists do not want any development at that site.

# Eastmoreland Neighborhood Association

January 07, 2016, December 03, 2015

Subject: Proposed Comprehensive Plan Eastmoreland Neighborhood Association Supplementary Testimony.

Mayor Hales and Commissioners:

This letter highlights two aspects of the Comprehensive Plan adoption that require modification prior to adoption: the zoning map and residential zoning code inclusion. As background and discussion of other issues, I point to written testimony provided by the Eastmoreland Neigborhood Association in both endorsing and especially in offering constructive criticism of the proposed Comprehensive Plan Document. Our testimony was submitted for the PSC deliberations and again submitted to each of your offices in preparation for your consideration and deliberation.

The written testimony provided by the ENA represents hundreds of hours of work from numerous folks participating in the process, attending meetings and work sessions, examining the policy and technical issues, and finally preparing and documenting our testimony. I urge you to read and consider the issues raised for the benefit of our growing and evolving city.

In addition to ENA Board approved testimony, many of our neighbors provided individual testimony in letters and using the MapAp specifically supporting the comp plan map change for the neighborhood from R5 to R7 that is of urgent concern today.

# R5 to R7 Zoning Map Designation

Based on objective criteria including existing density and lot patterns, access to services and in the interest of preserving viable, more affordable, and in many cases historically important housing stock, tree canopy, and neighborhood character, our request to be designated R7 in the Comprehensive Plan map as proposed in testimony and exhibits is the correct decision. The zoning map as proposed is not. We need Council action to make that change.

In what can best be described as two very confusing PSC work sessions, (I urge you to view the video of the proceedings or read a transcript that the ENA commissioned), our arguments were misrepresented and the PSC was presented with misleading and inaccurate information. I suggest that this was not so much intentional as the fact that the code is inexplicable except for the .001%.

The PSC was assured by staff that ENA concerns around the requested zone designation change would best be resolved in an upcoming project and pressed for a decision against the ENA request. As staff indicated that project was not yet scoped and the outcome uncertain. And as Page | 1

Eastmoreland Neighborhood Association · PO Box 82520 · Portland, OR 97282-0520 · www.eastmoreland.org

structured the outcome of that project could make our neighborhood and others even more a target for inappropriate demolition and redevelopment.

Chapter 10. Remove Inclusion of Alternative Development Options in the Single Dwelling Code from the Comprehensive Plan

We wish to make a strong plea alongside other neighborhoods that the single dwelling residential zoning code not be adopted as part of the comprehensive plan. This would lock in many of the worst aspects in that code as policy. It is a one size fits all legal tangle of confusing code language that does not have a place in an aspirational Comprehensive Plan.

Chapter 3. Clarify or remove the "5 Portlands" theme from the Comprehensive Plan

There is widespread agreement that "5 Portlands" is completely inadequate to address the distinctive characteristics of Portland's neighborhoods and to address the comprehensive plan goals to support neighborhood context or to rework the one size fits all approach of the current zoning code.

Chapter 2. Recommit to "complete neighborhood" based planning and confirm the integral role of neighborhood and business associations in the process.

The Community Engagement processes are not being respected. Neighborhood Associations, all but ignored in the Plan, are the building blocks of public engagement and should be confirmed in the Plan as vital to the role of planning for change and preservation.

ou for your consideration.

trick AIA, Clark Nelson Land Use Co-Chairs

Eastmoreland Neighborhood Association

FORTHERKK COLT SECONDER PORTUND, OR 97700

Robert McCullough, President

01/07/2016

# **Needs Fixing**

Chapter 3 "Pattern Areas" Clarify "5 Portlands" language.

Why? This notion undermines and is completely inadequate to address the context specific themes advocated in the plan.

Chapter 10 Land Use Designations, paragraph referring to "alternative development options" should be removed from the Comprehensive Plan.

Why? Locks in many of the worst aspects of the code as policy, drives demolitions vs preservation in this aspirational plan document. Additional zoning designations may be needed.

Chapter 2. Recommit to "complete neighborhood" based planning and confirm the integral role of neighborhood and business associations in the process.

Why? Community Engagement processes are not being respected. Neighborhood Associations, all but ignored in the Plan, are the building blocks of public engagement and should be confirmed in the Plan as vital to the role of planning for change and preservation.

Overall PreservationTheme missing: Preserve what we love and improve what is neglected and unloved.

THANKS FOR YOUR CONSIDERATION

Rec. Comprehensive Plan Summary Testimony

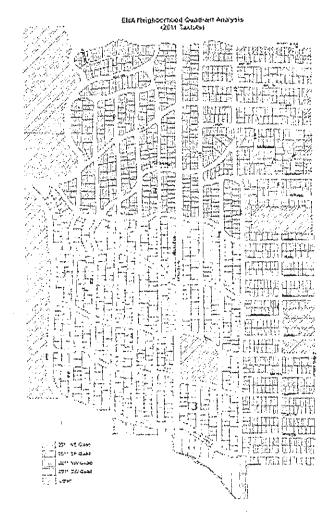
Ral Herral 3727 SECONOR BRILDO, OR 97200

# R7- allowed lot sizes: 4,200 to 12,000 SQ FT

Comp Plan zoning map for Eastmoreland to be R7

# ENA Average Lot Sizes by Quadrant in 2011

- NW Quadrant = 8,086 sq. ft.
- NE Quadrant = 7,062 sq. ft.
- SW Quadrant = 6.764 sq. ft.
- SE Quadrant = 5,592 sq. ft.



Rec. Comprehensive Plan Summary Testimony

PLANTANDOR TROX

Public Testimony for PCC Comprehensive Plan Hearing January 7, 6-9pm The industrial development of WHI has been revisited many times over the past 20 years. Each time the Port of Portland (POP) and many of Portland's major business interests have failed to bring forward a viable proposal for this site. Indeed, in Jan 2014, the POP famously walked away from four years of WHI development planning, which included a very reasonable mitigation requirement from the City (POP said it was too expensive). Since then the POP also found Terminal 6 to be too expensive to continue in operation. The sky did not fall!

Let's take a quick look at some attributes of WHI's 825 acres:

- WHI provides vital web-of-life wetland area for the Columbia river.
- The POP has told us that WHI is too expensive to develop.
- WHI is not suitable for the "new" white-collar software & tech industries.
- WHI is in the highest seismic liquefaction risk bracket for our region.
- WHI includes 300 acres of brownfield due to dumping of toxic spoils.
- WHI is poorly connected by rail & road (Vancouver land is better placed).

Yet, the POP refuses to <u>clean up useful and already available and well-connected brownfields</u> that it currently holds, for future industrial development. Worse still, despite the less than suitable attributes of WHI for industrial development, the POP preferred plan is apparently still to pave it over, and turn it into something as mundane and useless as a new car parking lot!

Portland cannot allow WHI, it's last major untouched urban natural wildlife habitat and wetlands area, to be forever destroyed. WHI is already working hard for our city by helping protect the health of our river environment. We should not deter it from that mission by further interference and disruption to its present state.

Therefore, we ask that the City's Comprehensive Plan permanently omit WHI from the Industrial Lands Inventory as not needed to achieve Portland's economic development goals over the next 30 years.

Alastair Roxburgh, 1503 N Hayden Island Dr, Portland, OR 97217. aroxburgh@ieee.org

# Public Testimony for PCC Comprehensive Plan Hearing January 7, 6-9pm

Dear Mayor Hales and Commissioners Amanda Fritz, Nick Fish, Steve Novick, and Dan Satzman, and also the PSC Commissioners,

I sincerely thank you for recognizing the importance of protecting West Hayden Island from further industrial development, for the next 20 years. It means such a lot to residents on the island like me, and to so many others who care about retaining what remains of our precious and endangered natural areas in the Portland area.

I would like to suggest that having extra protections in place would be a good idea, such as giving a qualified organization, such as Audubon of Portland, the authority and responsibility of systematically monitoring the condition of the land and wildlife at regular intervals. This organization could be required to write a report on their findings which they then submitted to the Portland City Council. I suggest this because of my concerns of how West Hayden Island is already carrying a burden of huge piles of toxic river dredgings that have been placed by the Port of Portland, and according to SB412, the Port intends to continue to dump dredgings there. I am also concerned that activity by the Port of Portland and others may have disrupted the nesting of Bald Eagles so that they left last year.

Thank you for your time and consideration.

Sincerely, Jan Roxburgh 1503 N. Hayden Island Drive, Portland, OR 97217

Submitted by Dana Denny 1/7/16



(HTTP://WWW.CALIPORNIATINTHOUSC.COM)

Tiny is the next big thing

# New Zoning/Development Code

The City of Fresno enacted a new Development Code in November 2015 which is very favorable to tiny homes and tiny homes on wheels on single family residential lots of 6000 sq ft or more (5000 sq ft if corner lot) as secondary dwelling units.

Specifically, Code Section 15-2754 Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters, sets forth regulations for siting such units and further adds a definition in the code to include "tiny homes on wheels" as an acceptable "backyard cottage."

This new ordinance, which goes in affect January 3, 2016, becomes a template that can be used by other cities and counties for permitting tiny homes and tiny homes on wheels.

We must give a great deal of thanks to Fresno Council Member Esmeralda Soria for carrying forward such progressive legislation in the Development Code update. We at California Tiny Homes are proud that Member Soria represents our business in her Council district. We were pleased that Fresno Mayor Ashley Swearengin is a supporter of the tiny home movement and, with assistance from the City's Development Department, moved forward to make the code changes a reality. The Fresno City Council unanimously accepted these amendments for tiny homes on wheels.

Below is a complete copy of the relevant sections of the City of Fresno Development code:

Ordinance 187832, Vol. 1.3.J, page 7513

Recently enacted City of Fresno Development Code Requirements for Second Dwelling Units, Backyard Cottages (including Tiny Homes on Wheels), and Accessory Living Quarters (Effective January 3, 2016)

15-2754 Second Dwelling Units, Backyard Cottages, and Accessory Living Quarters

- A. Purpose. The purpose of this section is to:
- 1. Maintain the character of single-family neighborhoods;
- 2. Ensure that new units are in harmony with developed neighborhoods; and
- 3. Allow Second Dwelling Units as an accessory use to Single-Unit Dwellings, consistent with the Government Code (Section 65852.2).
- B. Architectural Compatibility. If visible from a public street or park, the architectural design, roofing material, exterior materials and colors, roof pitch and style, type of windows, and trim details of the Second Dwelling Unit, Backyard Cottage, or Accessory Living Quarters shall be substantially the same as and visually compatible with the primary dwelling.
- C. District Standards. Second Dwelling Units, Backyard Cottages and Accessory Living Quarters may be established on any lot in any residential district where single-unit dwellings are permitted. Only one Second Unit, Backyard Cottage or Accessory Living Quarters may be permitted on any one lot. Minor Deviations and/or Variances to meet the minimum lot sizes are not permitted.
- D. Minimum Lot Sizes.
- 1. Second Dwelling Unit. 6,200 square feet.
- 2. Backyard Cottage.
- a. Interior Lot Size: 6,000 square feet.
- b. Corner Lot Size: 5,000 square feet.
- 3. Accessory Living Quarters. 5,000 square feet.
- E. Type of Unit.
- 1. Second Dwelling Unit. May provide separate, independent living quarters for one household. Units may be attached, detached, or located within the living areas of the primary dwelling unit on the lot, subject to the standards of this subsection. Kitchens, including cooking devices are permitted.
- 2. Backyard Cottage. May provide separate, independent living quarters for one household. Units may be attached, detached, or located within the living areas of the primary dwelling unit on the lot, subject to the standards of this subsection. Kitchens, including cooking devices are permitted. Backyard Cottages shall be located behind the primary dwelling unit, unless attached and integral to the primary dwelling unit.
- a. A Tiny House may be considered a Backyard Cottage if it meets all the requirements of this section.
- b. The Director shall review the design of the Tiny House to insure that the structure is compatible with the main home and the neighborhood.
- 3. Accessory Living Quarters. Accessory Living Quarters provide dependent living quarters. They may be attached, or located within the living areas of the primary dwelling unit on the lot, subject to the standards of this subsection. Accessory Living Quarters may not provide kitchen facilities, however a bar sink and an undercounter refrigerator are allowed, but no cooking devices or other food storage facilities are permitted. Accessory Living Quarters shall not be located in front of the primary single-family dwelling.
- F. Maximum Floor Area. The following are the maximum square footages of habitable area. The following calculations only include habitable floor space. Minor Deviations and/or Variances are not permitted to

increase the maximum floor areas.

- 1 Second Dwelling Units. 1,250 square feet.
- 2. Backyard Cottages, 440 square feet.
- 3. Accessory Living Quarters. 500 square feet or 30 percent of the primary single-family dwelling, whichever is less.
- G. Development Standards. Units shall conform to the height, setbacks, lot coverage and other zoning requirements of the zoning district in which the site is located, the development standards as may be modified per this subsection, other requirements of the zoning ordinance, and other applicable City codes.
- H. Lot Coverage. Per the underlying zone district.
- I. Setbacks.
- 1. Front Yards. Per the underlying zone district.
- 2. Side Yards/Street Side Yards. Per the underlying district.
- 3. Rear Yards. Shall be separated from the main home by a minimum of six feet.
- a. Second Dwelling Unit. Per the underlying zone district.
- b. Backyard Cottage and Accessory Living Quarters.
- i. Alley Present. Three feet.
- ii. No Alley Present.
- (1) Abutting an RS. 10 feet.
- c. A tandem parking space may also be used to meet the parking requirement for the Second Dwelling Unit, providing such space will not encumber access to a required parking space for the primary single-unit dwelling.
- d. An existing two vehicle garage and/or carport may not be provided in-lieu of these parking requirements unless the parking spaces are accessed from different garage doors.
- Backyard Cottage. No additional parking required.
- 4. Accessory Living Quarters. No additional parking required.
- O. Access. Vehicular access shall be provided in the following manner:
- 1. Driveways. Shall be provided per the underlying district.
- 2. Pedestrian access Access. An all-weather surface path to the Second Dwelling Unit, Backyard Cottage, or Accessory Living Quarters shall be provided from the street frontage.
- P. Mechanical Equipment. Mechanical equipment shall be located on the ground or, in the case of a tiny house on wheels, incorporated into the structure, but shall in no case be located on the roof.
- Q. Utility Meters/Addresses.
- Second Dwelling Units. Separate gas and electric meters may be permitted if approved by the Building Official and Pacific Gas & Electric.
- 2. Backyard Cottage and Accessory Living Quarters. Separate utility meters and/or addresses are not permitted.
- R. Home Occupations. Home occupations are permitted pursuant to Section 15-2735. Home Occupations.
- S. Airports. All applications shall comply with operative airports plans.

- T. Owner Occupancy Requirements. The following shall apply prior to the issuance of a building permit.
- 1 Second Dwelling Unit and Backyard Cottage.
- a. Either the primary dwelling unit, the Second Dwelling Unit, or the Backyard Cottage shall be owner-occupied.
- b. The property owner shall enter into a restrictive covenant with the City, which shall be recorded against the property.
- c. The covenant shall confirm that either the primary dwelling unit, the Second Dwelling Unit, or the Backyard Cottage shall be owner-occupied and prohibit rental of both units at the same time.
- d. It shall further provide that the Second Dwelling Unit or Backyard Cottage shall not be sold, or title thereto transferred separate and apart from the rest of the property.

Definition of Tiny House added to City of Fresno Development Code

Tiny House. A structure intended for separate, independent living quarters for one household that meets these six conditions:

- Is licensed and registered with the California Department of Motor Vehicles and meets ANSI 119.2 or 119.5 requirements;
- Is towable by a bumper hitch, frame-towing hitch, or fifth-wheel connection. Cannot (and is designed not to) move under its own power. When sited on a parcel per requirements of this Code, the wheels and undercarriage shall be skirted;
- Is no larger than allowed by California State Law for movement on public highways;
- Has at least 100 square feet of first floor interior living space;
- Is a detached self-contained unit which includes basic functional areas that support normal daily routines such as cooking, sleeping, and toiletry; and
- Is designed and built to look like a conventional building structure.

Share this with your friends, family, and others in the Tiny House community:

- f Facebook 514 (http://www.californiatinyhouse.com/new-zoning-code/?share=facebook&nb≈1)
- Pinterest 2 (http://www.californiatinyhouse.com/new-zoning-code/?share=pinterest&nb=1)
- ▼ Twitter (http://www.californiatinyhouse.com/new-zoning-code/?share=twitter&nb=1)
- t Tumblr (http://www.californiatinyhouse.com/new-zoning-code/?share=tumblr&nb=1)
- ® Reddit (http://www.californiatinyhouse.com/new-zoning-code/?share=reddit&nb=1)
- Email (http://www.californiatinyhouse.com/new-zoning-code/?share=email&nb=1)

from:

Laurie Flint < lhfsings@gmail.com>

Sent:

Wednesday, January 06, 2016 11:12 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

" Comprehensive Plan Testimony&#8221

Follow Up Flag:

Follow up

Flag Status:

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January 6, 2016

## Dear Council Members:

I'm writing to ask that you honor the 1984 Ordinance #155609 and its intent as you consider the future use of the property that has been known since 1902 as Strohecker's General Store.

This store has served as the hub of our neighborhood for generations, and it is in the interests of both the community and the new owner to retain the property's civic purpose, even as it undergoes this transformation.

I think it is reasonable to require the new owners to demonstrate how their plans will meet the requirements of the ordinance. Ground level retail establishments (grocery,post office, cafe, etc) would be profitable, retain its neighborhood 'meeting place' function and character, and enhance the appeal of the condominiums located pove them.

Communities need points of connection and communication to thrive. Strohecker's has been and should continue to be that nexus. Please help us to improve this property rather than destroy it.

Sincerely,

Laurie and Paul Flint 4222 SW Warrens Way Portland OR 97221 503-244-7344

from:

Christopher Eykamp <chris@eykamp.com>

Sent:

Wednesday, January 06, 2016 11:07 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up Flagged

.

Chris Eykamp 2101 SE Tibbetts Portland, OR 97202

RE: Zone changes for the area bounded by 16th and 19th Avenues, and Alder and Stark Streets

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

I am writing to ask you to maintain the current Comprehensive Plan designation and zoning for the area bounded by 16th and 19th Avenues, and Alder and Stark Streets as R5. This area contains many beautiful, historic houses, and, given the rate of demolitions that have been occurring across the city, it seems likely that by changing the zoning to R2.5, some of these houses could be lost.

Ince we have a mechanism in place to discourage demolition of good houses, I would be less opposed to this change. But until we do, please keep the zoning and Comp Plan designation in this area as it is.

Thank you,

Chris Eykamp

from:

Cyd Manro, RNA Board Chair <rnaboard@eco-munity.com>

Sent:

Wednesday, January 06, 2016 11:05 PM BPS Comprehensive Plan Testimony

To: Subject:

Corrected and updated comments on the Comprehensive Plan on behalf of the

Richmond Neighborhood Association

**Attachments:** 

RNA Comp Plan Comments to City Council -1.6.15.pdf; DDI Top 10 Policy

Recommendations 11.19.2015.pdf

Follow Up Flag:

Follow up

Flag Status:

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Hello,

Please replace the previously submitted letter containing comments by the Richmond Neighborhood Association on the Comprehensive Plan with this one. I apologize, but the previous letter left out key comments that the neighborhood association voted to include.

Please find attached the revised letter as well as the Top Ten Recommendations from the Division Design Initiative, which are referenced in the letter.

Thank you.

Best regards,

Cyd Manro RNA Board Chair richmondpdx.org

# Richmond Neighborhood Association

c/o Southeast Uplift 3534 SE Main ST Portland, OR 97214 (503) 232-0010 RichmondNA@yahoo.com http://richmondpdx.org



January 6, 2015

RE: Comments on the 2035 Comprehensive Plan Update

Mayor Hales and Commissioners,

I am writing you on behalf of the Richmond Neighborhood Association as its chair. We would submit the attached Top Ten Policy Recommendations for the City of Portland as part of our testimony and to highlight that the RNA has formally endorsed these by board vote on 11.9.15. These policies are an outgrowth of the Division Design Initiative, a project of the RNA in partnership with a coalition of Southeast Portland community organizations to help respond to community concerns about recent development impacts and lack of community ability for meaningful input in the recent development of Division Street. Further, we would like to clarify that the RNA does not intend implementation of the 10 attached DDI policy recommendations to decrease existing residential capacity in the neighborhood.

We encourage the City Council not to approve the Draft Comprehensive Plan without directing further assessment of some important missing components not fully analyzed as part of the published Growth Scenarios Report. We respectfully request the City Council to direct the Bureau of Planning & Sustainability (BPS) staff to conduct the following additional analysis:

- 1. Study Growth Scenario Alternatives for Increasing Infill Density with Fewer Development Impacts:
  - Higher density on wider streets, North-South corridors and major arterials, higher density at major intersection nodes to balance the reductions proposed below.
  - Reduce/refine scale of development on narrower streets and older street-car era main streets with special character.
- 2. Evaluate a more comprehensive "Missing Middle" Neighborhood Infill Scenario in addition to the "Centers & Corridors" growth scenario. This would mean further assessment of existing and potential increased neighborhood units achieved through additional Accessory Dwelling Units (ADU's), conversions of existing houses into duplexes, and more small-medium infill housing types like courtyards, row houses, etc. on major arterials and narrow streets that when balanced with the suggestions in item two below could achieve our density goals in a more context-sensitive manner.
- 3. Evaluate sustainability Impacts of focusing more density on N-S corridors (including environmental, social and economic impacts), and likely reduced shading impacts, as well as the value of maintaining reasonable fair and equitable solar access in order to:
  - Economic: retain existing economic value of residential and commercially developed properties.
  - Social: contribute to public health, well-being, and thermal comfort; and
  - Environmental: reduce costly energy consumption, generate alternative energy sources, and foster community resilience and sustainability.

Community members have expressed extensive concerns about the overly built-out, boxy nature of recent developments, the creation of large blank walls, flat facades, the lack of context-sensitivity, and buildings with significant impacts on adjacent residents and neighboring buildings.

- 4. Direct staff to come back with a recommendation for how to implement the residential FAR requirement now, in an expedited manner that does require the community to wait for code improvements until 2017. The floor area ratio requirement will help restore a more reasonable building envelope and create better code consistency and parity for the residential development in mixed use buildings.
- 5. Increase Notification Requirements per DDI Recommendations adopted by RNA, HAND, DCBA, and others. (See DDI Top 10 Policy #1):
- 6. System Development Charges (SDC's)

SDC's are fees levied for parks, transportation and water/sewer impacts when new developments are permitted. However, there is very little connection between where these are generated and where spent. Recommendations:

- a. Return a portion of SDC's (~20%) to reinvest in specific improvements in the neighborhood where they are generated to support needed capital improvements (Recent RNA LU meeting & DDC meetings both supported this concept)
- b. Waiver for Beneficial Uses (See DDI Top 10 Policy #7)
- c. Waiver for adaptive reuse of historic-designed properties (See DDI Top 10 Policy #5)
- 7. Add Permit Requirement to Document Development Impacts (See DDI Top 10 Policy #10) Most states require this. Recommended issues to be tracked should include impacts to:
  - a. Health (e.g., noise, air quality, safety)
  - b. Environment (e.g., loss of habitat, mature trees/heat island effect, climate change)
  - c. Economy (e.g., loss of affordable residential and commercial spaces, loss of solar access for energy generation, urban agriculture, etc.)
  - d. Community (e.g., loss of historic resources, important public viewsheds)
- 8. **Design Review & D-Overlay** Most of the City does not have the benefit of design review, and none of the Division recent developments have had any design review by the design commission. Community Design Standards are woefully out-of-date, and we've expanded our urban sphere without the tools we need to manage the new growth in a reasonable manner. Therefore, it is recommended that the following additional design requirements be added:
  - a. Design review for inner east-side street-car era pattern areas.
  - Design Overlay for Division to ensure developments better relate to context and provide quality infill design. (This should be added regardless of any Mixed Use Neighborhood Designation)
  - Consider adding 1-2 additional quadrant specific or "pattern area" design commissions to help ensure more context sensitive design and reduce the workload of the current City Design Commission.
- Direct staff to research and return with a recommendation to Council for a set of further incentives and programs that support greater innovation, climate resiliency and sustainability including:
  - a. Application of a "Green Factor" Program (used in Germany and Seattle) for the City of Portland or similar program that sets higher performance criteria and requirements for sustainable site and landscape requirements in new buildings. These programs help reduce urban heat island effect, advance resilient cool cities, and improved air quality benefits.
  - b. Assess impacts and value of tree preservation related to urban heat island protection, create recommendations and incentives for preserving large mature trees, and establish design goals and standards for maintaining spaces where large trees can be planted in the future.

### c. Create relevant Incentive programs for:

- "Zero Energy" verified buildings
- Incentives for Beneficial Projects: waive transportation impact fees (SDC's) for beneficial community uses such as affordable housing, senior housing, daycare, and alternative transit-oriented businesses.
- Adaptive reuse of older commercial buildings with special character (see report by preservation Green Lab, "Older, Smaller, Better" on the key value that mixed vintage buildings bring to communities)
- 10. Although we support policy 5.35 Impact of regulations on affordability: "Evaluate how existing and new regulations affect private development of affordable housing, and minimize negative impacts where possible..." to address potential equity issues with that policy, we suggest implementing the following addendum in Housing Affordability: "When calculating MFI for affordable housing qualification, use 60% MFI figures, and calculate based on the income in the census tract where the housing is built, except that if the MFI figure for that tract is above the metropolitan area average, use a figure that is no more than 5% above the average."
- 11. Where Mixed Use-Urban Center is mapped to continue through from a transit corridor to a residential street, we ask that the standards proposed in the Mixed Use Zones project section 33.130.216 apply. These state: where the commercial building is across a street from a residential zone, buildings must be set back 15' and have 5' of L2 landscaping, unless the building has residential units on the ground floor, and then they must be set back 5' with L2 landscaping. No vehicular access is allowed from this street, and height is reduced to 35' for the first 15'. We ask for added assurances that no retail will face or be accessed from these back streets.
- 12. We ask for the Design overlay to be added to the section of Division from 44th to 51st that does not have it now. We DO NOT support changing the zoning to Mixed Use-Urban Center in order to do so. As stated above, the neighborhood prefers Mixed-Use Neighborhood designation, does not want upzoning, but still wants the Design Overlay.
- 13. We ask you to change the designation on Powell from 29<sup>th</sup> to 53<sup>rd</sup> to Mixed Use-Urban Center where the width of Powell, planned High Capacity Transit, can support greater density, especially at planned stations at Chavez and at 50<sup>th</sup>. We would like the D overlay to apply to this stretch as well.

We thank you for your hard work and diligence and appreciate your consideration of these issues in this letter and in the attached Top Ten Policy Recommendations.

Best regards,

Cyd Manro Chair of the Richmond Neighborhood Association 4124 SE Caruthers ST Portland, OR 97214

# **Division Design Initiative**

# TOP TEN POLICY RECOMMENDATIONS FOR PORTLAND

The following are proactive solutions based on broad community input to fix current planning and zoning policies.

The intent is a no net density loss approach to encourage additional infill density with fewer impacts.

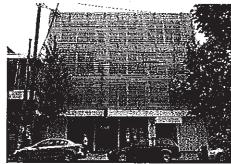
<u>Background:</u> Recent development on Division is a sharp contrast to its traditional small-scale main street character and form. We have seen a great deal of new development that often feature flat facades and rooflines, large blank walls, inconsistency in quality of materials, as well as privacy, light, noise, parking, and traffic impacts that have caused significant community design concerns. Much of this development has occurred despite more than 2-years of community outcry expressed in the media, public testimony, letters, surveys and neighborhood meetings. As we plan our growth strategy in the Comprehensive Plan and new Mixed Use Zone changes proposed by the by the City's MUZ Advisory Committee, we can - through more context sensitive design — encourage compact density and infill that meet our population goals within our urban corridors in a more unifying, intentional manner that preserves what is special and character-defining while allowing us to grow into a more compact city.



Improve notification and enable constructive community engagement about growth Eight large buildings in 18-24 months is major redevelopment, yet the neighborhood had no meaningful opportunity for real input.

(See <u>DDI Notification and Community Engagement Policy Recommendations</u>)

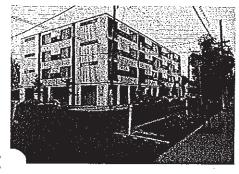
Close the Residential Floor Area Ratio Code Gap Now - There is currently no Floor Area Ratio (FAR) requirement for the residential portion of mixed use buildings which results in overly boxy, bulky buildings as projects build to the maximum envelope allowed. The City (through their Mixed Use Zones Proposal) is recommending this be fixed as part of the Comprehensive Plan adoption but it would not take effect until 2017. We recommend this be a top priority for the City to take immediate action to fix now.



3 Add Permit Review Criteria for Assessing Compatibility with Neighborhood Context (see draft Division Design guide-lines Compatibility section & comment letter to the City of Portland Hearings Examiner re: land use appeal by Brentwood Darlington Neighborhood). Request additional permit submittal requirements be added including:

- a. Elevations showing proposed development in context of adjacent building/block development,
- b. Solar shading analysis, privacy and view impact drawing
- Statement of features/approaches used to demonstrate alignment with community design goals and preferences if formal guidelines exist
- d. If no parking is required, provide a transportation demand management plan for mitigation of impacts (this could include annual bus passes for residents, shared/conjunctive use parking, on site car or bike-share options, etc.)









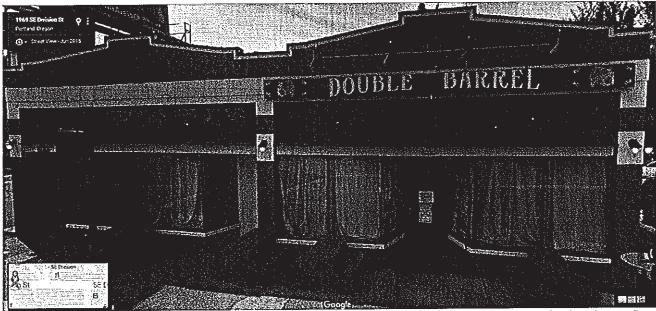
Older, smaller neighborhoods with more traditional main street character and buildings of one and two stories need better review requirements to assess compatibility with neighborhood context and adjacent residential. Good transitions in scale, screening, articulated massing and design features make the difference. The best projects are innovative in design, of durable quality materials, and show respect for the neighborhood by reflecting design preferences and desired features (note: "reflect" does not =replicate), rather than rejecting existing neighborhood architectural patterns.

Develop Density Transition Zones & Foster the "Missing Middle" – The Current Comp Plan Growth Strategy focuses on corridors and centers but leaves out small-medium "plexes", town/rowhouses, and courtyard style housing (promoted in the past with the City's "Courtyard housing design competition"). These building types may blend better within the existing neighborhood fabric and could help relieve some of the development pressure on older commercial corridors with special character like Division, Hawthorne, etc. (See Eli Spevak proposal, and Metro Innovative Design & Development Codes – Transitions Section)



Missing Middle - Good Example of medium-scale sensitive infill designed increased density at 25<sup>th</sup> & Division: Three new modern rowhouses blend in with neighborhood scale, details and simple variation of windows and patterns without being overly repetitious.

Create Incentives for Reuse & Preservation of Existing Buildings with Special Community character - Are there some areas where we don't want the zoning to transfer automatically? As shown in the study noted below, retaining a mix of diverse building vintages and sizes has been proven to encourage economic vitality, more diversity, a greater number of jobs, less chain stores, and more affordability for small businesses and tenants. We may need other incentives that support adaptive reuse of these such as waivers of SDC, transfer of development rights (not just for historic properties), etc. (See Report on "Older, Smaller, Better: Measuring how the character of buildings and blocks influences urban vitality", by Preservation Green Lab, National Trust for Historic Preservation, May 2014)

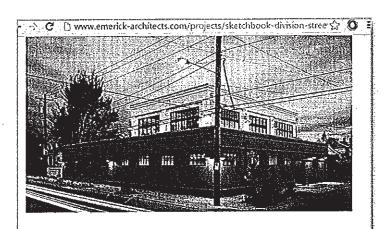


Older buildings with streetcar era main street character are scattered along our East-West Portland corridors. These often have been in disuse or disrepair but may be important buildings of quality materials and significant character that when preserved create areas of distinction and identity. Many feature common design characteristics such as recessed entries, raised sills, large storefront windows with small clerestory windows above, articulated rooflines, deco or craftsman details, brick or wood exteriors, and often angled cut façade entrances on corner buildings. Let's preserve these special buildings and make it easier to do so with good incentives. The greenest building is the one you aren't building...but perhaps the one you are adapting.



"Pearl on the String" Commercial Node- Cluster of Commercial at 20th-22nd & SE Division Street, including Bar Avignon, Mirador,
New Seasons, and multiple eateries.

6 Relate Building Height to Street Width & Consider Nodal Focus. Set different goals for narrow vs. wider streets and focus some density into nodes — visualize a "Pearls on a String" concept with the pearls as the commercial focus with residential or lower scale development as the string. This was a priority expressed for future development in the Division Green Street Main Street Plan. (See Urbsworks Policy Recommendations, Division Green Street Main Street Plan)



#### SE DIVISION STREET

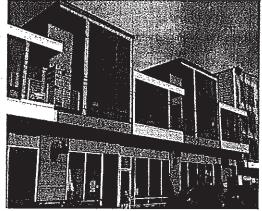
This industrial home is the poster child for adaptive reuse. Starting with a building that intermingled three structures from different periods over the last century, we reused the existing structures, as well as adding a penthouse and a roof garden to create an urban casis. Furthermore, with almost 2000 square feet of solar arrays, this project is practically off-the-grid Marrying practicality with craftsmanship, almost everything was handmade locally from raw materials by Portland artisans including cabinetry, steel work, railings, doors stairs, lighting fixtures and stucco.



- Consider Incentives in new Mixed Use Proposal for community amenities, including: high performance buildings/zero energy buildings, preservation and adaptive reuse of older buildings, provision of reasonably priced housing, and alternative transit-oriented or other community beneficial uses (daycare, small corner grocery stores, affordable/senior housing). Incentives may include waivers of SDC's, fast track permitting, bonus in square footage, or other benefits.
- 8 Incorporate solar policy into zoning code amendments to support more high performance buildings and minimize/mitigate solar shading of adjacent infill—Encourage further study of more N/S corridor density which has less shading impacts than on E/W corridors. (See New Buildings Institute Policy, state solar access policy OR 227.190, and other Oregon community solar policies such as Ashland, Jackson County, et al).

Adaptive Reuse of older structure with

#### **POSITIVE EXAMPLES**



Good example of adaptive reuse with new construction that is both modern and uses traditional materials of wood and metal, balconles, generous storefronts and stepped roofs. Residential above turns inward to a central open air courtyard that helps avoid privacy impacts and maintains access to air and light.





Move the House Project: Example of positive building form in newer construction, sustainable design elements including:

- breaking up building massing into sections with 4<sup>th</sup> floor upper roof stepbacks, bolconies, and articulation,
- creating transparency with glass skybridge and pedestrian paseos,
- references similar storefront window patterns in nearby older blacks
- incorporation or art and education through sculpture and interpretive signage
- Green features such as living roofs, bioswales at rear, and preservation and design around a mature tree, and mov-

**9** Enhance/maintain community livability through access to sun, air, light, privacy and public views for current and new residents/businesses. Address privacy issues via increased requirements for placement of and side setbacks to maintain air and light (e.g. varied rooflines, lightwells, stepbacks and stepdowns in heights), minimize privacy impacts (i.e. increased rear landscape screening requirements, sensitive location of balconies), protection of important viewsheds (e.g. reduction of large blank walls, maintain public view of community monuments such as the Hollywood Theater, Bagdad Theater, SE Hills). (These issues influence mixed use zoning requirements in development; also see Urbsworks research on lightwells and consideration of upper level skyplane context in NY Code; DDI Comment Letter to the City of Portland Re: Comp Plan & Mixed Use Zones)

The City should employ broader tracking of and accountability for development impacts. Portland, and state of Oregon do not require documentation nor impacts analysis resulting from a new development beyond fee impacts to traffic, sewer and parks. However most states require this. Critical issues could be documented during permit submittal and review. Recommended issues to be tracked should include impacts to:

- a. Health (e.g., noise, air quality, safety)
- b. <u>Environment</u> (e.g., loss of habitat, mature trees/heat island effect, climate change)
- c. <u>Community</u> (e.g., loss of historic resources, important public viewsheds)
- d. <u>Economy</u> (e.g., loss of affordable residential and commercial spaces, loss of solar access for energy generation, food production, etc.)

"What gets measured, gets managed. What doesn't get measured gets lost."

Let's not lose track of the things that matter most.

# Want to take action?

- Comment on these draft recommendations email <u>ilovedivision@gmail.com</u> with specific edits.
- Ask your Neighborhood or Business Association to take a position on these recommendations. Contact. Richmond NA -<u>fichmondpdx@gmail.com</u>; Division/Clinlon Business Assoc. - <u>dcbakate@gmail.com</u>
- Write a letter to the City expressing your support for any or all of these recommendations Contact: <a href="mailto:cputestimony@portlandoregon.gov">cputestimony@portlandoregon.gov</a>, note, for testimony it must include your name and address!

from:

Christopher Eykamp <chris@eykamp.com>

Sent:

Wednesday, January 06, 2016 11:04 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up Flagged

Chris Eykamp 2101 SE Tibbetts Portland, OR 97202

RE: Garage at 2021 SE Tibbetts Street

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

I am writing to oppose changing the Comprehensive Plan designation and zoning of the garage at 2021 SE Tibbetts Street from residential to commercial. While it had some vaguely commercial use decades ago (it was once used by neighborhood paperboys to assemble their papers), it has not been an active commercial property in this century, if ever.

lanning Bureau staff who originally proposed the change have acknowledged it was made in error, have added it to their official errata list, and are now recommending that the site continue to be classified as residential.

Please leave the site residential, and do not change its zoning or Comprehensive Plan designation to commercial.

Thank you,

Chris Eykamp

From:

Christopher Eykamp <chris@eykamp.com>

Sent:

Wednesday, January 06, 2016 11:02 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Chris Eykamp 2101 SE Tibbetts Portland, OR 97202

RE: Commercial Mixed-use zoning for People's Food Co-op's property at 3029 SE 21st Avenue and garage at 2021 SE Tibbetts Street

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.

'eople'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 Abernethey 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 become points of contention as rules governing their use were removed.

Thank you,

Chris Eykamp

From: -

Jennifer Eykamp <jen@eykamp.com>

Sent:

Wednesday, January 06, 2016 10:56 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up Flagged

Jennifer Eykamp 2101 SE Tibbetts Portland, OR 97202

RE: Commercial Mixed-use zoning for People's Food Co-op's property at 3029 SE 21st Avenue and garage at 2021 SE Tibbetts Street

Dear Mayor Hales and City Commissioners,

I am writing to ask you not to convert the People's Co-op property (3029 SE 21st Avenue) from residential to commercial zoning.

When we moved into the neighborhood over twenty years ago, it was with the assurance that there were limits in the hours of operation and noise that People's could produce. We supported their expansion in 2002, in part because we knew we were protected from increased negative impacts by the regulations covering non-conforming use in the zoning code.

Now city planners are asking you to remove these restrictions, without providing an alternate protective mechanism. While it seems unlikely that current management at People's would change the way the co-op operates, circumstances change. We have seen other businesses in the neighborhood change hands and undergo radical changes, occasionally leading to difficult and painful conflicts with their neighbors. In those cases, the businesses had commercial zoning, so neighbors had little leverage when dealing with intractable owners. Some of these neighbors ultimately moved out of the neighborhood.

We do not want to see that happen with People's.

The city gains little by converting the site to commercial. Under the current zoning, People's has thrived, and has taken great care to be a good neighbor. The current situation is working well for all parties, and has done so for decades. If People's were to leave, we would not want to see the site opened to general commercial activity. While some alternate uses would fit well with the neighborhood, many would not. The current rules give the neighborhood some control over future development of the site if People's were to leave.

I know that People's has submitted testimony supporting the change to commercial, in order to build more storage area. They may have no current plans to change their operating hours or business model, but there is no guarantee that this will remain true in the future. I understand the desire of People's to have more storage space, ut there must be a way to help them achieve their goal without stripping us of our current protections from increased negative impacts.

Please help us maintain the balance that has worked for so long. Do not change the zoning or Comprehensive

Plan designation of People's.

Thank you,

Jennifer Eykamp

From:

Thomas Eykamp <thomas@eykamp.com>

Sent:

Wednesday, January 06, 2016 10:52 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up

Flagged

Thomas Eykamp 2101 SE Tibbetts Portland, OR 97202

RE: Commercial Mixed-use zoning for People's Food Co-op's property at 3029 SE

21st Avenue

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

I'm a sophomore at Cleveland High School, and am writing to request that you not change the Comprehensive Plan designation and zoning of People's Coop (3029 SE 21st Avenue) to commercial. By changing the zoning you would hurt the coop's neighbors by taking away their protection from late night noise and other negative impacts if the coop were to change use.

I live across the street from People's. It is a great store, and my family shops there frequently. Because of their current non-conforming use status, they have restrictions on what they can do. Most importantly, they cannot stay open past 11PM. This helps limit the amount of noise they produce at night. If People's were to sell the property, the new owner would have the same restrictions, so we would continue to be protected regardless of the type of business that replaced it.

By changing the zoning to commercial, my neighbors and my family will lose these protections. The only thing the city gains is a small clean up of its zoning map. This seems like a poor tradeoff; we will pay a high price for such a small, abstract gain.

I've lived across from People's my whole life. Changing the zoning would make it more likely that People's would either leave or change its character. An intensification of use would bring more traffic into the area. An increase in late night noise would make it more difficult for me to study and get the sleep I need to do well in school.

A change would not help the neighborhood.

Thank you,

Thomas Eykamp

From:

Brian Hatt <bwhatt@gmail.com>

Sent:

Wednesday, January 06, 2016 10:15 PM

To:

Council Clerk – Testimony; BPS Comprehensive Plan Testimony

Cc:

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

Commissioner Saltzman; City Auditor Griffin-Valade; mnaLandUseCommittee@gmail.com; Anderson, Susan

Subject:

Re: Multnomah Village CS Zones

Follow Up Flag:

Follow up

Flag Status:

Flagged

Portland City Council

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

January 6th, 2016

# Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). <u>I request City Council change this designation to CM1</u>, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

Dr. Brian W. Hatt

7037 SW 33rd Place, Portland OR 9719

From:

Valerie Hill <valshill@comcast.net>

Sent:

Wednesday, January 06, 2016 9:42 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Dear madam/sir,

regarding possible plans of developing the property located on 2855 SW Patton Road in Portland, where Strohecker's grocery store is located, we ask that the 1984 ordinance number 155609 be honored and kept intact.

The store and the adjacent park are the heart and soul of this neighborhood, where we've lived for over 20 years. Any different use of the property will affect the character and livability of this beloved community.

Sincerely, Warren and Valerie Hill 2624 SW Talbot Road Portland, OR 97201

ent from my iPhone

From:

Leslie Costandi <freskaone@yahoo.com>

Sent:

Wednesday, January 06, 2016 9:26 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Re: Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Regarding property: 2855 SW Patten Road, Portland Oregon

Leslie Costandi 3640 SW Mt Adams Drive Portland, Oregon 97239

The postential for ordinance No. 155609 to be changed is unimaginable. I am a 4th generation Portlander, having spent 54 years living on Council Crest. What is incomprehensible is the fact that the city would change an ordinance meant to preserve amenities- for a development that does not fit in the scope of this neighborhood.

Portland bills itself as a green city. The question: an environmentally friendly city that promotes livability in its local neighborhoods or the green dollar that developers control the city with.

change of ordinance to allow condos at this address is not a sustainable practice. One, Patton cannot afford anymore vehicular traffic. Our roads are already out of control and when the highways are clogged drivers come over the hill and the intersections at Talbot/Patton/Humprhey and Vista/Broadway/Greenway/Patton become bumper to bumper. Never have I experienced such horrible, horrible traffic. This is contrary to Portlands quest to slash emissions. People are not getting out of their cars. For every family that moves to this area, at least two more cars are on the road. Both Ainsworth and Lincoln are bursting at the seams. There is also a safety issue. More cars, more accidents. People walk/hike/bike in this neighborhood. This city cannot sustain continued growth. It is not rational to continue building for 30,000 - 60,000 - 90,000 more people. Eventually it will implode. At least we have an opportunity to preserve neighborhood by neighborhood.

Our neighborhood is self suficient. When there is inclement weather, we have amenities near by. I imagine all neighborhoods to be like this. Stroheckers has been an important gathering place for our neighborhood. I have spent my entire life walking to this store, my children worked there and now my grandchildren have had the pleasure of walking to the store and playing in the park. If the City of Porltand is truly interested in providing walking neighborhoods then I would presume this is what the City of Portland would like its citizens to do. Get out of their cars and being able to walk to stores.

This developer (go home, back to California) and the city will force us into our cars to drive to Fred Meyers, Safeway, or Albertsons. This seems contrary to livability standards. I could walk to my neighborhood store (no gas emissions) mail a letter, pick-up my prescriptions, have coffee, grocery shop and get excercise. This is what a sustainable healthy neighborhood looks like. And this is what I think the City of Porland envisions.

We all know that developers control the city. That developers are not interested in preserving neighborhoods. They ome, they tear down, build and leave. Portland rakes in development fees and the neighborhoods are left angry. We read about it in the paper constantly. People who live, work, invest in their schools, are primary to a livable city. We envision our neighborhoods. Developers do not. They only care about profit. What is the best use for a developer does not mean, what is the best use for us, but what will garner the hightest financial return.

We are not dumb. This has been in the works. The city needs to support its greatest resource, its tax payers. If Portland wishes to retain its character then we need to preserve its legacy. What is best for 2855 SW Patton Road is continured amenities for its current residents.

Leslie Costandi

Millard and Mary Lou McClung 3640 SW Mt Adams Drive Portland, Or 97239

From:

Robyn Erickson <robtig48@gmail.com>

Sent:

Wednesday, January 06, 2016 9:24 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

"Comprehensive Plan Testimony" in the subject line Jan. 5 or 6.

Follow Up Flag:

Follow up

Flag Status:

Flagged

Name: Robyn Erickson

Address: 2325 NE 42, pdx 97213

I can't believe our city is still considering allowing these size of complex builds without parking.

We have fought this for years, and we in the Hollywood area have now been impacted with the multi apt complexes built with no parking, are narrow side streets are over flowing with residents from these units parking.

I own rental property in the Halsey street area and don't want to see the same thing happen in that area.

I guess it is time to start voting out our government reps as they continue to ignore the wish of the citizens in favor of developers who don't in the area they make the choice of not to include at least a 50% ratio of parking punits.

NO to allowing developers to build complexes without any allowance for a min of 50% parking to unit ratio.

Regards, Robyn

From:

Emily Young <artistyoung@comcast.net> Wednesday, January 06, 2016 9:03 PM

Sent: To:

**BPS Comprehensive Plan Testimony** 

Subject:

MY TESTIMONY ON PORTLAND COMPREHENSIVE PLAN with full address

Follow Up Flag:

Follow up

Flag Status:

Flagged

My name is Emily Young. I live in and own a home at 2173 NE Multnomah Street. Portland Oregon 97232. I am opposed to one specific proposal affecting an area on the south side of NE Multnomah Street from 19th to 21st Avenues within the Sullivan's Gulch neighborhood. (proposed change # 21 and 599). I oppose the proposal to change the Land Use Designation for this area to Mixed Use - Urban Center, with proposed zoning as Commercial Mixed Use 3. I urge City Council to retain the current designation as High Density Multi-Dwelling and current zoning as High Density Residential (RH). I oppose mixed use in this area, especially at the "large-scale", intense level of CM3 zoning. I do support high-density residential use.

This area has no current commercial properties. The nearest commercial property is the Marriott Residence Inn, which blends nicely into the residential character of the neighborhood. This area is not part of any "civic corridor" and does not satisfy MAX or bus service criteria for this new designation. Sullivan's Gulch is a residential neighborhood blessed with close walking access (five to twelve blocks at most) to commercial reas. Commercial areas are already available on all four sides of Sullivan's Gulch: Broadway to the north, Lloyd District to the west, Kerns neighborhood to the south, and Fred Meyer/Grant Park Village to the east. We don't need closer access to commercial activity within our neighborhood.

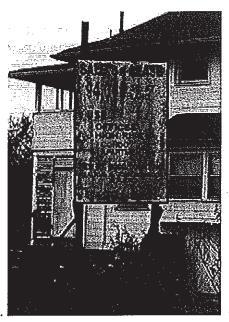
Traffic and parking issues have already increased significantly, so future commercial activity will only create additional pressure along NE Multnomah Street and 21st Avenue (which are local service streets), and a neighborhood connector street with critical access south over the Banfield Freeway. There is no room for future parking except on neighboring residential streets which are stretched to the limit.

There is already a pleasingly graceful transition from the commercial Lloyd District by the Residence Inn into the Sullivan's Gulch residential area. Allowing CM3 zoning would create a step-up, not a step-down for building heights, mass, and intensity of use. Therefore, allowing CM3 zoning would create a step-up, not a step-down for building heights, mass, and intensity of use. Both the height and intense use allowed by this zoning would be aesthetically and functionally jarring—an inappropriate application of the mixed use concept to support an elegant transition. Aesthetically, mass and height would be clearly out of character from the immediately surrounding residential area. Based on these facts, applying the mixed use concept to this area is unnecessary and potentially harmful to livability in Sullivan's Gulch. The parking increase and the traffic increase would endanger those walking, biking, and driving through this area.

This proposal was adopted by the N/NE Quadrant Plan and then incorporated into the Comprehensive Plan without broad neighborhood discussion. How was the planning process arrived at this proposal without any clear rationale other than comments made by unnamed stakeholders cited in the N/NE Quadrant Plan? I raise two objections to the planning and outreach process conducted during the development, first, of the N/ NE Quadrant Plan, and later the incorporation of this proposal into the Comprehensive Plan without broad neighborhood discussion.

1) Appearance of special interests arising from the composition and discussions of the Stakeholder Advisory Committee. Clearly, a property owner's "future redevelopment desires" is served by an upscaling of zoning to allow for commercial use. But how is this discussion of this particular area in our neighborhood informed by

broad neighborhood discussion? Do the interests of a single property owner trump the interests of the surrounding residents especially if they are uninformed.



Here is a sign that has been on this property for decades.

It was put there by the property owner Mr. E. John Rumpakis. (See references to E. John Rumpakis in the N/NEQP plan, pp. 138, 139.)

2) Outreach through the Sullivan's Gulch Neighborhood Board. After adoption of N/NE Quadrant plan in 2012, SGNA held no hearings in the neighborhood to inform residents and elicit their views on the Comprehensive Plan. The Board did not itself discuss any specific proposals, but merely received reports on the process by its Land Use Chair. A group of residents tried to raise these isssues with the Board on several occasions, with no success. Ultimately, SGNA never offered the City a letter of support for any proposal in the Plan.

It is also important to point out that the residents of Sullivan's Gulch have generally been uninformed regarding the proposed designation and zoning changes for this area.

I hope you will review the process that led to include this property in the N/NE Quadrant Plan, and later the incorporation of this proposal into the Comprehensive Plan. I feel it is incumbent on BPS to reconsider this proposal for a change in designation and I urge you to prevent commercial activity outside existing civic corridors, as stated in the Plan objectives.

From:

twyla dawn <tddwb@yahoo.com>

Sent:

Wednesday, January 06, 2016 8:33 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

822 SE 15th St.

Follow Up Flag:

Follow up

Flag Status:

Flagged

To whom it may concern,

I'm in support of the owner's proposal to change R1 to CM zoning on property: 822 SE 15th St. I support the National Historic Landmark preservation and I believe this proposal will help keep buildings/structures updated.

Sincerely, Twyla Beckner 1502 SE Morrison St. Portland, OR 97214 503 317 1413

from:

Denise and Roger <cartybrown@msn.com>

Sent:

Wednesday, January 06, 2016 8:14 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

I am writing in regard to the property currently occupied by Stroheckers Grocery at 2855 SW Patton Rd. Portland OR.

Our family has lived within 1/3 mile of Stroheckers since moving to our home 28 years ago.

I would prefer to see this property developed as a multi-use property, a low-rise residential building with retail on the street level. Specifically: a small, quality grocery (e.g. Green Zebra); a coffee shop, a wine bar, a post office, a pharmacy - all of the above.

This neighborhood is a food desert and has virtually no walkable, community gathering venues. It is essential to incorporate these aspects into any future development of this site. The current, overly large grocery space is an anachronism.

Thank you for your consideration.

Sincerely submitted,

Denise Carty 1948 SW Edgewood Rd Portland, OR 97201

From:

Tom Tuchmann < tuchmann@usforestcapital.com>

Sent:

Wednesday, January 06, 2016 7:36 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony - Oppose Stroheckers Zoning Change-2855 SW Patton

Road, Portland OR

Follow Up Flag:

Follow up Flagged

Flag Status:

Dear Sir/Madam

I am writing to strongly oppose any changes to the 1984 ordinance # 155609 that requires the Stroheckers property at 2855 SW Patton Rd to remain dedicated to its existing use. The Stroheckers store and property add tremendous value to our neighborhood's quality of life.

At a minimum, this decision should be delayed to collect more public comment. It appears that the "new" and current owners mislead the public regarding their intentions. More specifically, there were representations only a few months ago that they acquired the property to improve the store. However, if my information is correct, they did not invest in the business and sold to a developer shortly after acquiring the property. They then sat on the deal before announcing their intentions one week before your public comment period closed.

hank you very much for consideration of this request

Sincerely. Tom Tuchmann 2922 SW Periander Street Portland, OR 97201



# PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

Date December 2, 2015

To: Portland City Council

From: Portland Parks Board

Re: Comments on Proposed Comprehensive Plan

#### Dear Mayor and Commissioners:

On several occasions over the past two years, the Portland Parks Board has submitted comments to the Portland Bureau of Planning and Sustainability (BPS) on elements of the City's Comprehensive Plan Update. At its March 4, 2015 meeting, the Parks Board voted unanimously to submit comments to the Planning & Sustainability Commission (PSC) on the Proposed 2035 Comprehensive Plan that:

- Acknowledged that the issues that the Board had raised on the initial draft of the Plan had largely been responded to.
- Generally supported the parks, recreation and natural areas space elements of the Proposed 2035 Comprehensive Plan and specifically reiterated support for Proposed Plan goals and policies to protect and enhance parks, recreation facilities, open spaces and urban natural resources and to increase their equitable distribution across the City.
- Opposed in principle the concept of converting open spaces and natural areas to industrial lands.
- Specifically opposed converting the Columbia Slough golf courses to industrial lands and supported removal of West Hayden Island from the industrial lands inventory.
- Supported a strategy of investment in green infrastructure that prioritizes neighborhoods with poor access to parks, natural areas, or with limited tree canopy.
- Supported comments submitted by the Urban Forestry Commission that promote improving, protecting and restoring Portland's urban forests.

# Portland Parks Board

At its December 2 meeting, the Parks Board unanimously voted to submit comments to City Council that reiterate our prior comments to PSC. In addition, the Board desires to specifically:

- Support the Comprehensive Plan's recognition of parks and natural areas as essential infrastructure, among other reasons.
- As suggested by the Portland Bureau of Parks and Recreation in its November 18 comments, support amendment of Economic Development Policy 6.39e to clarify that protection of prime industrial land does not preclude the siting of parks.
- Because the policies adopted will direct Plan implementation through projects such as the Employment Zoning Project, request that City Council specifically reiterate the long-standing policy that parks and natural areas are permitted uses in all zones in the City.

Thank you for this opportunity to comment and for your commitment to sustaining a park and recreation system that benefits all Portlanders.

Sincerely,

Judy Bluehorse Skelton, Chair

cc: Patti Howard, Tim Crail – Commissioner's Fritz's Office
Mike Abbate, Brett Horner, Kia Selley, Jenn Cairo – Bureau of Parks &
Recreation
Jim Owens, Kathy Fong Stephens, Linda Robinson, Meryl Reddish –
Portland Parks Board
Eric Engstrom – Bureau of Planning and Sustainability

From:

Brian Hatt <bwhatt@gmail.com>

Sent:

Wednesday, January 06, 2016 6:34 PM

To:

Council Clerk – Testimony, BPS Comprehensive Plan Testimony

Cc:

Hales, Mayor; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; City

Auditor Griffin-Valade; mnaLandUseCommittee@gmail.com

Subject:

Re: Truth in Zoning

Follow Up Flag: Flag Status:

Follow up Flagged

Portland City Council

Council Clerk

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

January 6th, 2016

# Re: Truth in Zoning

I request specific language shown below be removed from the general description of land use designations on page GP10-3 the 2035 Comprehensive Plan. This would preserve neighborhood character and would reduce the number of demolitions. This would remove the exceptions that allow land divisions less than the base zone. A Comprehensive map amendment would then be required for a land division less than the base zone.

# Land use designations - Amendment

The Comprehensive Plan is one of the Comprehensive Plan's implementation tools. The Map includes land use designations, which are used to carry out the Comprehensive Plan. The land use designation that best implements the plan is applied to each area of the city. This section contains descriptions of the land use designations. Each designation generally includes:

- Type of place or Pattern Area for which the designation is intended.
- General use and intensity expected within the area. In some cases, the alternative development options allowed in single dwelling residential zones (e.g. duplexes and attached houses on corner lots; accessory dwelling units) may allow additional residential units beyond the general density described below.
- · Level of public services provided or planned.
- Level of constraint.

I also request Section 33.110.240.E of the zoning code, allowing corner lots zoned R5 or R7 to be rezoned to R2.5 if they are larger than 50 feet by 100 feet, be removed from the zoning code in the 2035 Comprehensive Plan.

Please add these to the record.

Thank you,

Dr. Brian W. Hatt

7037 SW 33rd Place, Portland OR 9719

From:

Brian Hatt <bwhatt@gmail.com>

Sent:

Wednesday, January 06, 2016 6:13 PM

To:

cctestimony@portlandoregon.go; BPS Comprehensive Plan Testimony

Cc:

Hales, Mayor; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; City

Auditor Griffin-Valade; mnaLandUseCommittee@gmail.com

Subject:

Re: Multnomah Village as Neighborhood Corridor

Follow Up Flag:

Follow up

Flag Status:

Flagged

Portland City Council

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

January 6th, 2016

# Re: Multnomah Village as Neighborhood Corridor

<u>request City Council change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.</u>

Multnomah Village is classified as a Mainstreet in the current Comprehensive Plan. The Mainstreet designation had a prescribed depth of 180 feet which is consistent with the definition of a Neighborhood Corridor. The Village is more linear in nature and thus the characteristics are better defined by the Neighborhood Corridor designation. The change would make the business district of the Village contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capitol Highway.

If the Village were designated a Neighborhood Center with a ½-mile radius, it would overlap with the boundaries of the two adjacent town centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development in these designations, overlapping with Multnomah, would leave little room for existing single-family zoning as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village.

Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted requests to change the designation to Neighborhood Corridor.

Please add this to the record.

Thank you,

Dr. Brian W. Hatt

7037 SW 33<sup>rd</sup> Place, Portland OR 97219

P. Michael Dubinsky 3734 NE Hassalo Street Portland, Oregon 97232 510-541-4951 Poxrun@comeast.net

06 January 2016

City of Portland
City Council <u>karla.moore-love@portlandoregon.gov</u>
1221 SW 4th
Portland, OR 97204

Subject: Comments on the Recommended Comprehensive Plan Update-Transportation & Parking Elements

Honorable Mayor Hales and City Commissioners:

I appreciate the opportunity to provide comment on the Recommended Comprehensive Plan for Portland. As a recently arrived resident of the City I have not been present to watch the plan evolve over time but the Transportation Section-Chapter 9 of the current version concerned me and I am certain others in my neighborhood. Our home is relatively close to Sandy Boulevard, a Corridor that is expected to accommodate some of the additional residential and businesses build out in the City. In particular I see the potential for adverse impact to existing residential neighborhoods in terms of residents, employees and patrons vehicles using the neighborhood as a parking refuge.

The language in the policy statements in the Chapter gave me the perception that the City's expectation was that all new residents of multi-unit residences would not own autos and employees and patrons of businesses would not use autos to access the area. Therefore no accommodation for automobile parking would be necessary. Everyone would walk, bike and use public transit. I believe that type of thinking is naive in today's world. Even if people walk, bicycle and use transit, as I do, they will in many cases still have and use a vehicle from time to time as I do. Absent some accommodation for parking they will utilize the close by neighborhoods as their parking lot.

As an additional step I studied the policy statements published by the Federal Department of Transportation and Federal Highway Administration concerning the implementation of bicycle and pedestrian accommodations for livable communities. The Federal policy and implementation guidance in no way suggests or recommends that communities (cities) undertake initiatives which result in adverse impacts on existing neighborhoods.

I have learned that at least to a degree my concerns were shared by others in nearby neighborhoods and they had already conducted an in depth assessment and prepared a submission in November of 2015. I have studied the submission of the Rose City Park Neighborhood Association Board of Nov 17, 2015 and agree with it and wish the record to so reflect.

Sincerely,

P. Michael Dubinsky

#### Attachments

 Nov 17, 2015 RCPNA Proposed Amendments to the Recommended Comprehensive Plan Update-Transportation & Parking Elements

2. United States Department of Transportation Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations

3. Internet links for Federal Policies and Guidance on Bicycle and Pedestrian Accommodation.

United States Department of Transportation Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations

Signed on March 11, 2010 and announced March 15, 2010

#### **Purpose**

The United States Department of Transportation (DOT) is providing this Policy Statement to reflect the Department's support for the development of fully integrated active transportation networks. The establishment of well-connected walking and bicycling networks is an important component for livable communities, and their design should be a part of Federal-aid project developments. Walking and bicycling foster safer, more livable, family-friendly communities; promote physical activity and health; and reduce vehicle emissions and fuel use. Legislation and regulations exist that require inclusion of bicycle and pedestrian policies and projects into transportation plans and project development. Accordingly, transportation agencies should plan, fund, and implement improvements to their walking and bicycling networks, including linkages to transit. In addition, DOT encourages transportation agencies to go beyond the minimum requirements, and proactively provide convenient, safe, and context-sensitive facilities that foster increased use by bicyclists and pedestrians of all ages and abilities, and utilize universal design characteristics when appropriate. Transportation programs and facilities should accommodate people of all ages and abilities, including people too young to drive, people who cannot drive, and people who choose not to drive.

#### **Policy Statement**

The DOT policy is to incorporate safe and convenient walking and bicycling facilities into transportation projects. Every transportation agency, including DOT, has the responsibility to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems. Because of the numerous individual and community benefits that walking and bicycling provide — including health, safety, environmental, transportation, and quality of life — transportation agencies are encouraged to go beyond minimum standards to provide safe and convenient facilities for these modes.

#### Authority

This policy is based on various sections in the United States Code (U.S.C.) and the Code of Federal Regulations (CFR) in Title 23—Highways, Title 49—Transportation, and Title 42—The Public Health and Welfare. These sections, provided in the Appendix, describe how bicyclists and pedestrians of all abilities should be involved throughout the planning process, should not be adversely affected by other transportation projects, and should be able to track annual obligations and expenditures on nonmotorized transportation facilities.

#### **Recommended Actions**

The DOT encourages States, local governments, professional associations, community organizations, public transportation agencies, and other government agencies, to adopt similar policy statements on

bicycle and pedestrian accommodation as an indication of their commitment to accommodating bicyclists and pedestrians as an integral element of the transportation system. In support of this commitment, transportation agencies and local communities should go beyond minimum design standards and requirements to create safe, attractive, sustainable, accessible, and convenient bicycling and walking networks. Such actions should include:

- Considering walking and bicycling as equals with other transportation modes: The primary goal
  of a transportation system is to safely and efficiently move people and goods. Walking and
  bicycling are efficient transportation modes for most short trips and, where convenient
  intermodal systems exist, these nonmotorized trips can easily be linked with transit to
  significantly increase trip distance. Because of the benefits they provide, transportation agencies
  should give the same priority to walking and bicycling as is given to other transportation modes.
  Walking and bicycling should not be an afterthought in roadway design.
- Ensuring that there are transportation choices for people of all ages and abilities, especially
  children: Pedestrian and bicycle facilities should meet accessibility requirements and provide
  safe, convenient, and interconnected transportation networks. For example, children should
  have safe and convenient options for walking or bicycling to school and parks. People who
  cannot or prefer not to drive should have safe and efficient transportation choices.
- Going beyond minimum design standards: Transportation agencies are encouraged, when
  possible, to avoid designing walking and bicycling facilities to the minimum standards. For
  example, shared-use paths that have been designed to minimum width requirements will need
  retrofits as more people use them. It is more effective to plan for increased usage than to
  retrofit an older facility. Planning projects for the long-term should anticipate likely future
  demand for bicycling and walking facilities and not preclude the provision of future
  improvements.
- Integrating bicycle and pedestrian accommodation on new, rehabilitated, and limited-access bridges: DOT encourages bicycle and pedestrian accommodation on bridge projects including facilities on limited-access bridges with connections to streets or paths.
- Collecting data on walking and biking trips: The best way to improve transportation networks for
  any mode is to collect and analyze trip data to optimize investments. Walking and bicycling trip
  data for many communities are lacking. This data gap can be overcome by establishing routine
  collection of nonmotorized trip information. Communities that routinely collect walking and
  bicycling data are able to track trends and prioritize investments to ensure the success of new
  facilities. These data are also valuable in linking walking and bicycling with transit.
- Setting mode share targets for walking and bicycling and tracking them over time: A byproduct
  of improved data collection is that communities can establish targets for increasing the
  percentage of trips made by walking and bicycling.

- Removing snow from sidewalks and shared-use paths: Current maintenance provisions require
  pedestrian facilities built with Federal funds to be maintained in the same manner as other
  roadway assets. State Agencies have generally established levels of service on various routes
  especially as related to snow and ice events.
- Improving nonmotorized facilities during maintenance projects: Many transportation agencies spend most of their transportation funding on maintenance rather than on constructing new facilities. Transportation agencies should find ways to make facility improvements for pedestrians and bicyclists during resurfacing and other maintenance projects.

#### Conclusion

Increased commitment to and investment in bicycle facilities and walking networks can help meet goals for cleaner, healthier air; less congested roadways; and more livable, safe, cost-efficient communities. Walking and bicycling provide low-cost mobility options that place fewer demands on local roads and highways. DOT recognizes that safe and convenient walking and bicycling facilities may look different depending on the context — appropriate facilities in a rural community may be different from a dense, urban area. However, regardless of regional, climate, and population density differences, it is important that pedestrian and bicycle facilities be integrated into transportation systems. While DOT leads the effort to provide safe and convenient accommodations for pedestrians and bicyclists, success will ultimately depend on transportation agencies across the country embracing and implementing this policy.

#### Ray LaHood, United States Secretary of Transportation

Update 10/2015

Internet links for Federal bicycle related transportation policy

- 1. <a href="http://www.fhwa.dot.gov/environment/bicycle\_pedestrian/guidance/inter.cfm">http://www.fhwa.dot.gov/environment/bicycle\_pedestrian/guidance/inter.cfm</a> FHWA Bicycle and Pedestrian Transportation Planning Guidance 2003
- 2. <a href="http://www.fhwa.dot.gov/environment/bicycle\_pedestrian/guidance/policy\_accom.cfm">http://www.fhwa.dot.gov/environment/bicycle\_pedestrian/guidance/policy\_accom.cfm</a>
  United States Department of Transportation Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations- 2010(Updated October 2015)
- 3. <a href="https://www.transportation.gov/safer-people-safer-streets">https://www.transportation.gov/safer-people-safer-streets</a>
  Safer People, Safer Streets: Pedestrian and Bicycle Safety Initiative See more at:
  <a href="https://www.transportation.gov/safer-people-safer-streets#sthash.dFH0JWEK.dpuf">https://www.transportation.gov/safer-people-safer-streets#sthash.dFH0JWEK.dpuf</a>

from:

Monica Donley <monica8425@gmail.com>

Sent:

Wednesday, January 06, 2016 4:12 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

RE: Proposed 5250 NE Halsey zoning change

I live at 1610 NE 65th Ave 1/2 block north of Halsey and would like to protest this zoning change. A 5 story apartment building would impact this relatively quiet residential area negatively-Halsey is already congested and the addition of many tenants would add to this and if parking is not included in the building the tenants would then need to park on adjoining streets which are narrow and already suffer from parking scarcity. I ask you to deny this zoning change.

Thank you.

Monica Donley

From:

Hales, Mayor

Sent: To: Wednesday, January 20, 2016 4:32 PM BPS Comprehensive Plan Testimony

Subject:

FW: Comprehensive Plan

From: Thomas Dana [mailto:thomashdana@gmail.com]

Sent: Wednesday, January 06, 2016 3:57 PM

To: Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Saltzman

<dan@portlandoregongov.onmicrosoft.com>; Commissioner Fish <nick@portlandoregon.gov>; Hales, Mayor

<mayorcharliehales@portlandoregon.gov>; Novick, Steve <Steve.Novick@portlandoregon.gov>

Subject: Comprehensive Plan

Please limit the height of future development on Hayden Island to be less than what it is in the Hayden Island Plan because the traffic infrastructure will not handle the additional people.

Also, please prohibit West Hayden Island from being developed. Development is not necessary and would destroy a valuable natural resource.

Thank you for your consideration,

Tom Dana
ThomasHdana@gmail.com
503-954-9217
1501 N Hayden Island Dr, Unit 110E
Portland, OR 97217

from:

Washington, Mustafa

Sent:

Wednesday, January 06, 2016 3:55 PM

To:

laurat@pdx.edu

Cc:

**BPS Comprehensive Plan Testimony** 

Subject:

RE: Save Ivy Island please!

Dear Laurie,

On behalf of Mayor Charlie Hales thank you for contacting the Mayor's office. The Mayor has heard you concerns and appreciates your feedback. Your email has been forwarded to the comp plan email inbox. They will review your testimony and reply to you.

Again, thank you for contacting the Mayor's office. We appreciate your advocacy.

Sincerely

Mustafa Washington Constituent Services Specialist mustafa.washington@portlandoregon.gov

----Original Message-----

From: laurat@pdx.edu [mailto:laurat@pdx.edu] Sent: Monday, January 04, 2016 10:49 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>

Subject: Save Ivy Island please!

Good evening Mayor,

I just wanted to voice my support for keeping Ivy Island as it is, a fantastic and lovely little gateway to St. John's. The face of Portland has been changing in so many ways lately, please let those of us who have been here for so long continue to enjoy the little things like Ivy Island that really make this place still feel like home.

Thank you so very much for your consideration of this.

Best,

Laurie

From:

Hales, Mayor

Sent:

Thursday, January 28, 2016 12:16 PM

To: Subject: BPS Comprehensive Plan Testimony FW: Proposed upzoning inIrvington

Follow Up Flag:

Follow up

Flag Status:

Completed

From: glencgilbert@gmail.com [mailto:glencgilbert@gmail.com] On Behalf Of Glen Gilbert

Sent: Wednesday, January 06, 2016 3:39 PM Subject: Proposed upzoning intrvington

Dear Mayor and City Commissioners:

I am a neighbors to Root, Hophouse and Foster & Dobbs at NE 15th and Brazee. These are the only commercial ventures in the neighborhood. We love having them close but this is really a single family home neighborhood.

I am writing to oppose the proposed Comp Plan which includes an upzoning to several sections of Irvington, one of which is the commercial node at 15th and Brazee. The current zoning is R 5, the single family zoning covering most of Irvington. The Plan map proposes to change the R 5 to CM 1, which is a new commercial zoning in the mixed use report which is part of the Plan.

This would be inappropriate in this almost entirely residential area. Thank you, Glen Gilbert

Glen Gilbert glen@thegilbert4.com main: 503-282-7758 cell: 503-680-6891

From:

Conrad, Maggie < maggie.conrad@adidas.com>

Sent:

Wednesday, January 06, 2016 3:32 PM BPS Comprehensive Plan Testimony

To: Cc:

blaine Conrad

Subject:

Comprehensive Plan Testimony / Strohecker's Market

Importance:

High

Follow Up Flag:

Follow up Flagged

Flag Status:

**Dear City Planners:** 

I'm writing in regards to the future plan for the property currently where Strohecker's marketing is: address is 2855 SW Patton Rd.

It's known in the neighborhood that this store is closing in the coming weeks. It's unfortunate that it took so long for those throughout the community know of this major change, but our neighbors are making an effort to be sure our voices are heard. The California developer who recently bought this property will naturally do whatever the city allows to maximize his profit. I speak for my family of 5, when I kindly request that the city continues to honor the 1984 ordinance that neighbors fought so hard for to keep a grocery store on the property and to maintain neighborhood livability.

The ordinance for Strohecker's that was signed into law in 1984 is Ordinance No. 155609. We'd like to ask that the city council to keep it intact.

Neighbors fought very, very hard in helping to formulate this ordinance in 1984. Having the new zoning designation honor it is truly our best chance for influencing what happens in the heart of our neighborhood. Livability, safety and property values are all at stake.

Part of what makes Portland appealing to the residential community is the uniqueness of each neighborhood. Strokeckers is a fixture in Portland Heights. My children, who are 13, 11, and 8 are beginning to experience the "controlled" independence of this original Portland neighborhood. Stroheckers is the cornerstone of this. We all hope very much that another market can take over the space there but above all else, we want it to remain something community focused and not just condominiums, which can have a negative effect on safety, community relations and transportion/traffic.

Sincere gratitude for your consideration,

Maggie & Blaine Conrad 1750 SW Terrace DR Portland, OR 97201

From:

Georgia Gootee < georgiagootee@gmail.com>

Sent:

Wednesday, January 06, 2016 3:30 PM

To:

BPS Comprehensive Plan Testimony; Matt Brischetto

Subject:

Support for CM Zoning

Follow Up Flag:

Follow up

Flag Status:

Flagged

My name is Georgia Gootee with property 2717 SE 15th Ave. I support owner Matt Brischetto's proposal for switching zoning from R2 to CM. Preserving the history of Portland is important to me, as well as maintaining livability in Portland and it's suburbs, and I believe these efforts would assist in that.

# **PERKINSCOIE**

1120 NW Couch Street 10th Floor Portland, OR 97209-4128 • +1.503.727.2000 • +1.503.727.2222 PerkinsCoie.com

January 6, 2016

Mark D. Whitlow
MWhitlow@perkinscoîe.com
D. +1,503,727,2073

#### F. +1.503.346.2073

#### VIA EMAIL

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

Re: 2035 Comprehensive Plan Supplemental Testimony - RTF & ICSC

Dear Mayor Hales and Council Members:

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

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

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

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

Very truly yours,

Mark D. Whitlow

Enclosures

CCs (with enclosures):

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

Bill Cunningham

00000-0000/31438213.1

# Fred Meyer

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

Don Forrest Division Real Estate Manger don forrest@ktoger.com

Fax.

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

December 31, 2015

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

Re: 2035 Comprehensive Plan

Dear Mayor Hales and Council Members:

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

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

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

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

Mours truly,

Cc:

Tom Armstrong, BPS

Eric Engstrom, BPS Susan Anderson, Director, BPS

RTF/ICSC GR Committee



Mayor Charles Hales Portland City Council c/o Council Clerk 1221 SW 4th Avenue, Room 130 Portland, OR 972014 January 4, 2016

VIA EMAIL

Re: 2035 Comprehensive Plan Testimony

Dear Mayor Hales and Council Members:

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

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

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

Sincerely,

Robert L. LeFeber

12 f fblu

Principal Broker

Tom Anderson, Eric Engstrom, and Susan Anderson. BPS

RTF/ICSC GR Committee



January 5, 2016

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

Re: 2035 Comprehensive Plan

Dear Mayor Hales and Council Members:

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

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

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

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

Thank you for the opportunity to comment.

Sincerely,

Jason Brandt President & CEO

Oregon Restaurant & Lodging Association

Cc:

Tom Armstrong, BPS Eric Engstrom, BPS

Susan Anderson, Director, BPS RTF/ICSC GR Committee 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



January 5, 2016

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

RE: 2035 Comprehensive Plan Testimony – RTF & ICSC

Dear Mayor Hales and council Members:

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

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

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

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

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

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

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

Respectively submitted:

INTEGRA REALTY RESOURCES - PORTLAND

Brian A. Glanville, CRE, FRICS, MAI

Senior Managing Director

From:

Ellen Finneran <ellenfinneran@gmail.com>

Sent:

Wednesday, January 06, 2016 2:47 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Hello,

I am writing to provide testimony regarding proposed zoning changes to 5250 NE Halsey Street. As a homeowner on NE 53rd Avenue, between Halsey and Glisan Streets, I am not opposed to increasing the amount of housing in Rose City Park. I am, however, vehemently opposed to any large mixed-use building in the City that does not include adequate on-site parking. The proposal for 5250 NE Halsey includes no parking, which presents several issues:

- 1) The intersection of NE Halsey and NE 53rd is already congested, especially during New Deal Cafe's business hours and during rush hours. Adding numerous housing units and more businesses to this corner would only exacerbate traffic congestion.
- 2) Many Rose City Park side streets are narrow and were not designed for the amount of traffic they already see. Negotiating them is a challenge and increasing traffic volume would create less safe roadways for motorists and cyclists alike.
- 3) Twenty-four hour parking is not allowed on NE Halsey. Any housing or additional commerce at 5250 NE Halsey, especially a development that does not include on-site parking, would further diminish available street parking. This decrease in parking would further add to traffic congestion.
  - 4) The section of NE 53rd Ave which would be affected by this proposal is a Neighborhood Greenway. Adding traffic and reducing parking on NE 53rd would drastically and negatively impact the safety of this Greenway for cyclists. Portland is a progressive city that prides itself on its bike-friendliness. Decreasing the safety of a well-traveled Greenway is a step backwards.

I urge the City not to ruin this pocket of Portland by allowing large developments without requiring them to provide adequate on-site parking for tenants and customers. I agree that the City needs more housing, but it should not come at the cost of safety or the livability of our neighborhoods.

Please, do not approve zoning changes at 5250 NE Halsey without requiring that adequate on-site parking be an integral part of any development there.

Sincerely, Ellen Finneran

801 NE 53rd Ave Portland, OR 97213

From:

John Chaney <johnrchaney@hotmail.com>

Sent: To: Wednesday, January 06, 2016 2:39 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

Portland City Council Members,

Regarding: 2855 SW Patton Road (commonly known as Stroheckers).

We attempted to voice our thoughts on the website, but unfortunately, the website does not provide verification that the comments are received. Therefore, we are choosing to also provide our views via email.

We would like to request that the City of Portland keep the ordinance (No. 155609) for the grocery store located at 2855 SW Patton Road that was signed into law in 1984. We would like to ask the city council to keep the agreement that was reached between the neighborhood and the city.

We, like many other neighbors, strongly oppose plans to rezone 2855 SW Patton Road to allow for the development of high density condominiums. The neighborhood would suffer a significant loss if our community store was replaced by condos. The neighborhood is heavily reliant on the grocery store for basic needs ... including pharmacy and post office. Development of condominiums would significantly detract from the character of the neighborhood and create traffic and other issues. Single-family residential homes are the pillar of this local community. We hope that in this case the things that Portlanders value like community, walkability, and livability, will win out over concern for profit.

John & Patricia Chaney 1235 SW Myrtle Court, Portland, OR 97201

From:

Hales, Mayor

Sent: To: Wednesday, January 20, 2016 4:32 PM BPS Comprehensive Plan Testimony

Subject:

FW: Zoning change hearing

From: gsgram@comcast.net [mailto:gsgram@comcast.net]

Sent: Wednesday, January 06, 2016 2:19 PM

To: Hales, Mayor < mayorcharliehales@portlandoregon.gov>

Subject: Zoning change hearing

# Dear Mayor Hales:

Today I received notification of a proposed zoning change to the parcel at NE 15<sup>th</sup> and NE Brazee. The change would upgrade the current R 5 single family zone to CM 1 which I understand is a new commercial zone. I do not have expertise in the world of zoning and the timeline for responding is too short for me to understand all there is to know about the new proposal. What I do know is that this small bit of land, approximately a quarter of a block, is in the midst of single family homes.

Because of the nature of the property's location, it was established many years ago that businesses on this property must be closed at 11:00pm so that the neighborhood could retain its family home character. The proposed zoning change concerns me for a couple of reasons. It appears to allow the possibility of fairly tall buildings at a future date which would be quite out of character with this neighborhood which has recently undergone Historic designation. In addition, it isn't clear to me that the restriction about closing time I noted above would continue to apply. Third, we in the neighborhood worked hard with the Hophouse to develop a Good Neighbor agreement. While that agreement is only with one business, the need for it underlines the desire and need for neighbor-friendly establishments on this <u>very small</u> parcel of land in the middle of our neighborhood.

The potential threat to the quality of life of our neighborhood leads me to advocate for retaining the current zoning designation of R 5 for the parcel at NE 15<sup>th</sup> and NE Brazee.

Thank you,

Helen Richardson 2515 NE 16<sup>th</sup> Ave Portland, OR 97212

From:

Greg McAllister < gregmca2@gmail.com>

Sent:

Wednesday, January 06, 2016 2:03 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Fwd: CM Zoning for 822 SE 15th

Follow Up Flag:

Follow up

Flag Status:

Completed

zip code is 09214

# Begin forwarded message:

From: Greg McAllister < gregmca2@gmail.com >

Subject: CM Zoning for 822 SE 15th

Date: January 6, 2016 at 1:05:33 PM PST

To: cputestimony@portlandoregon.gov

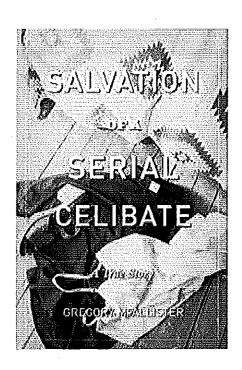
#### Dear Folks,

My name is Greg McAllister, and I live at 2125 SE Oak St., Portland, OR.

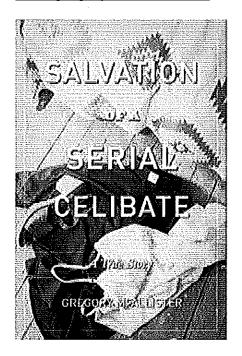
I would like to support Matt Brischetto's petition to change the property at 822 SE 15th from R1 to CM. The houses on that property are classic historical styles and deserve to be preserved. I have inspected the homes on this property and would much prefer they be preserved than be replaced by some modern project.

Thank you, Greg McAllister

www.gregorymcallister.com



# www.gregorymcallister.com



rom:

Kristina Knight <kristinalknight@hotmail.com>

Sent: To: Wednesday, January 06, 2016 1:46 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up Flagged

City of Portland Planners,

I am writing specifically about 5250 NE Halsey Street and the rezoning of that property to Mixed Use Commercial.

The stretch on 53rd between Halsey and Glisan has become increasingly hazardous since 2001 when I moved to Clackamas Street, one block south of Halsey. A dangerous situation has been created due to the increase in bike traffic, installation of small traffic circles, greater numbers of cars parked on the street, and more driving to and from the cafe, freeway, hospital and dog park. Add to this the cafe delivery trucks parked on 53rd between Halsey and Clackamas (yes, even in the no parking zone), and you can see how a bottleneck between Halsey and Clackamas on 53rd Avenue has been created.

When I turn north onto 53rd from Clackamas Street to access Halsey at the light, frequently a car is turning outh onto 53rd. There is not enough room to pass due to the cars parked on both sides of the street. Occasionally behind that car is another waiting to go south on 53rd, but that car has to wait on Halsey, creating a backup.

This stretch faces more than its share of challenges. Allowing a five-storey mixed use building with no offstreet parking will exacerbate the driving and parking situation we already face.

Please prioritize making our city a safe and pleasant place to live. You can start with keeping the zoning of this property as it is or at the very least allowing a building no more than two or three stories that also has a safe thru-entry and exit to off-street parking.

Thank you,

Kristina Knight 5334 NE Clackamas Street Portland, OR 97213

(503) 888-8270

From:

Donald Winn <winndm@q.com>

Sent:

Wednesday, January 06, 2016 11:57 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

[User Approved] Comp. Plan

Follow Up Flag:

Follow up

Flag Status:

Flagged

The idea that these corridors and centers need to have little to no parking is absolutely wrong. I just read that 2015 will be a near record year for car sales and in my 45 years of living between Halsey and Glisan Streets, I have seen cars and parking only increase in numbers. The busy restaurant and all its street-parked cars near me on Halsey has often slowed traffic down to one unmoving lane on the side street! Buildings and apartments with more than one floor need to have parking included in the site - at least one spot for each apartment and multiple spots for each business. Neighbors within at least five blocks need to be informed of any new business or apt. additions/changes. Buildings more than 3 stories seem way over size for streets bordering neighborhoods unless they have major parking behind them. Thank you for considering my input. Donald Winn, 5252 NE Multnomah St., Portland, OR 97213.

Sent from my iPad-

Mark R. Stromme 2300 SW Broadway Dr. Portland, OR 97201

2 December 2015

Portland City Council c/o Council Clerk 1221 SW 4th Ave, Room 130 Portland, OR 97204

RE: City of Portland Draft Comprehensive Plan 2537 NE 56<sup>th</sup> Ave., Portland, OR

**Dear City Commissioners:** 

Thank you for taking this request into consideration as part of updating the City of Portland Comprehensive Plan. I would also like to thank Nan Stark for discussing the pending updates with me. As the owner of the property at 2537 NE 56<sup>th</sup> Ave., I would like to provide comments and recommendations for the Comprehensive Plan as it relates to the site and the neighborhood.

My interest is for the Comprehensive Plan to encourage development that will enhance the long term interests and identity of this area. To this end, I have met with the Rose City Park Neighborhood Association (RCPNA) Land Use Committee and RCPNA Board. Both bodies voted at recent meetings in support of the proposed Zoning and Comprehensive Plan Designation below.

Existing and Future (Draft Comprehensive Plan) Zoning Designation of property:

The property at 2537 NE 56<sup>th</sup> Avenue consists of approximately 12,8005F (100' x 128') of land located on the west side of 56<sup>th</sup> Avenue just south of NE Sandy Blvd. The property includes a 13-unit apartment building which is 2-stories, plus a partially depressed first level. The building is situated on the northern 40% of the site. The current zoning designation for the property, and those immediately around it on both sides of Sandy Blvd., is Multi-Dwelling Residential – R1, a medium-density multi-dwelling zone that allows 43 units per acre or more depending on amenity bonuses. Based on this zoning, the property already contains the maximum number of allowable units, leaving the southern 60% of the site undevelopable.

The existing R1 zone is an anomaly in the context of NE Sandy Blvd. For many blocks in both directions, the properties along Sandy Blvd. are currently zoned Commercial, generally CS – Storefront Commercial to the southwest, and CG – General Commercial to the northeast. Also, the R1 zone exists in this area despite that several of the properties in the zone are not residential. These properties include the restaurant directly adjacent to the west of my property, the fire station directly adjacent to the north, the bank across 56<sup>th</sup> Ave. to the northeast, the dental office across 56<sup>th</sup> Ave. to the northeast, and the church and German American Society buildings across Sandy Blvd.

The Draft Comprehensive Plan designation for my property is R1. Of the remaining properties in the R1 zone, only the restaurant and the bank properties are being proposed for a zoning change to Mixed Use – Civic Corridor (which is the proposed zoning for the current CS and CG zones to the southwest and northeast along Sandy) to recognize the existing non-conforming uses.

#### Proposed Zoning and Comprehensive Plan Designation: (see attached exhibit)

As part of the updates to the Comprehensive Plan, I propose that the property at 2537 NE 56<sup>th</sup> Ave. be included in the new Mixed Use – Civic Corridor (MU-CC) Comprehensive Plan designation. In addition, I believe it is most appropriate that the restaurant, fire station, bank, and dental office mentioned above also be included. The MU-CC designation encourages mixed-use, pedestrian focused, transit oriented, and medium density development. My intention for the property is to allow for additional residential units on what is now an underutilized site – not to develop commercial use on the site.

#### **Explanation in Support of Proposal:**

The Mixed Use – Civic Corridor Comprehensive Plan designation I propose for my site is the same mixed-use designation that is currently proposed for properties to the southwest and northeast of my site. The inclusion of the above-referenced properties in the MU-CC will provide a more contiguous mixed-use zone along Sandy Blvd.

MU-CC seems a very appropriate designation for the Sandy Blvd. Corridor given its frequent transit service and medium-density commercial nature. According to the Draft Comprehensive Plan, "as the city grows, these corridors also need to become places that can succeed as attractive locations for more intense, mixed-use development." This is a prescription for higher density residential use along and just adjacent to Sandy Blvd. My property is a prime candidate for such development, as it is already a multi-family apartment building with an adjacent 7,500SF of currently undevelopable land that could easily support greater residential density near the NE Sandy Blvd. Transit Corridor.

Although there is a need for higher density residential, I am sensitive to the desire for commercial space not to push into lower density residential zones. Just to the south of my property, 56<sup>th</sup> Ave. offsets to the east before intersecting NE Sandycrest Terrace. This offset creates a natural break between the commercial- and transit-oriented Sandy Corridor, and the lower density neighborhood to the south.

Thank you very much for considering my proposal. Please keep me informed of opportunities to continue to participate in the conversation regarding the future of my site and neighborhood.

Sincerely

Mark R. Stromme

**Enclosures:** 

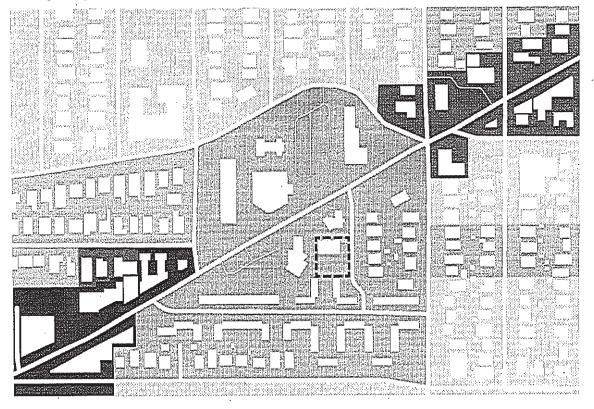
Exhibit A

cc:

Nan Stark, City Planner / Northeast District Liaison

Tamara DeRidder, Chair, RCPNA Hennebery Eddy Architects

# Existing Zoning





CS



CG



R1

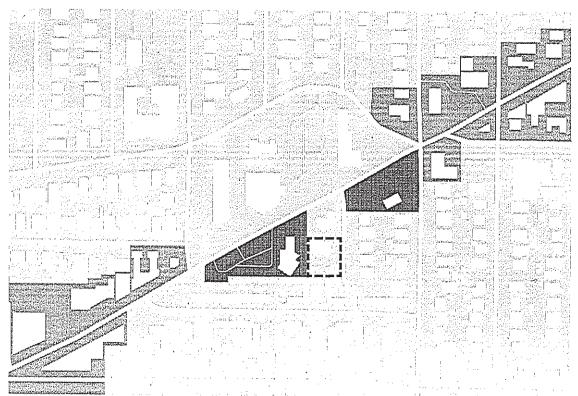




R5

Subject Property 2537 NE 56th Ave

# Current Comprehensive Plan Draft





CG/CS to MU-CC

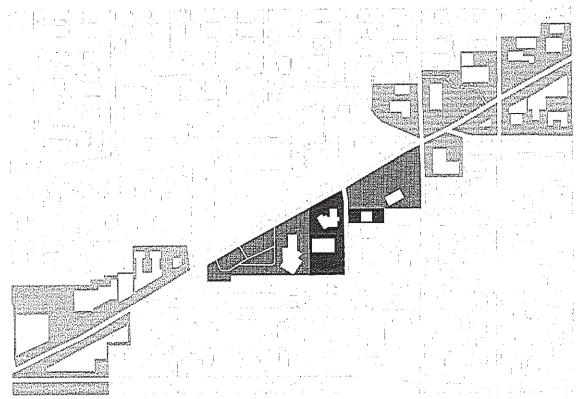


R1 to MU-CC



Subject Property 2537 NE 56th Ave

### Proposed Revision to Comprehensive Plan





CG/CS to MU-CC



R1 to MU-CC



Proposed Additional R1 to MU-CC



Subject Property 2537 NE 56th Ave Flanders Professional Building, LLC 2250 NW Flanders St., Suite 104 Portland, OR 97210

2 December 2015

Portland City Council c/o Council Clerk 1221 SW 4th Ave, Room 130 Portland, OR 97204

RE: City of Portland Draft Comprehensive Plan 2250 NW Flanders Street, Portland, OR

**Dear City Commissioners:** 

Thank you for taking this request into consideration as part of updating the City of Portland Comprehensive Plan. We would also like to thank Joan Frederiksen, West District Liaison, for discussing the pending updates with me. As the owner of the property at 2250 NW Flanders Street, we would like to provide comments and recommendations for the Comprehensive Plan as it relates to the site and the neighborhood.

Our interest is for the Comprehensive Plan to encourage development that will enhance the long term interests and identity of this area. To this end, we have met with the Northwest District Association (NWDA) Planning Committee to discuss the future zoning of the 2250 NW Flanders property. The Committee voted at its November 5, 2015 meeting in support of the proposed Zoning and Comprehensive Plan Designation below.

Existing and Future (Draft Comprehensive Plan) Zoning Designation of property:

The property at 2250 NW Flanders consists of approximately 39,500SF of land located on the south side of NW Flanders Street, just to the east of NW 23<sup>rd</sup> Avenue. The property includes a 3-story commercial office building along NW Flanders, plus a surface parking lot extending south to NW Everett. Tenants of the late-1960's era building are primarily medical-related businesses. The current zoning designation for the property is RH – High Density Residential, a high-density multi-dwelling zone that generally allows for FARs up to 4:1. Therefore, the existing commercial building is a non-conforming use within the RH zone.

The abutting property to the west and the property across NW Flanders to the north are part of the CS - Storefront Commercial zone that extends north and south along the NW 23<sup>rd</sup> Street corridor. The properties to the east and south are residential.

The Draft Comprehensive Plan designation for our property remains RH – High Density Residential. The adjacent commercial properties along NW 23<sup>rd</sup> are being proposed for a zoning change from CS – Storefront Commercial to Mixed Use – Urban Center (MU-UC).

### Proposed Zoning and Comprehensive Plan Designation: (see attached exhibit)

As part of the updates to the Comprehensive Plan, we propose that the Flanders frontage (approximately the northern two-thirds of the property) of the 2250 NW Flanders Street property be included in the new MU-UC Comprehensive Plan designation. This MU-UC designation encourages mixed-use, pedestrian focused and transit oriented development.

### **Explanation in Support of Proposal:**

The MU-UC Comprehensive Plan designation we propose for our site is the same mixed-use designation that is currently proposed for other commercial properties immediately to the west. Given the long-time commercial use of the site, MU-UC is a much more appropriate designation than the currently proposed RH.

Thank you very much for considering our proposal. Please keep us informed of opportunities to continue to participate in the conversation regarding the future of the site and neighborhood.

Sincerely

Mark R. Stromme

Flanders Professional Building, LLC

**Enclosures:** 

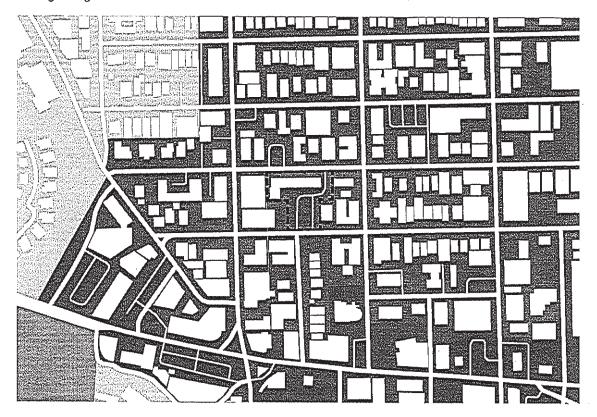
Exhibit A

cc:

Joan Frederiksen, Planner / West District Liaison John Bradley, Chair, NWDA Planning Committee

**Hennebery Eddy Architects** 

### **Existing Zoning**









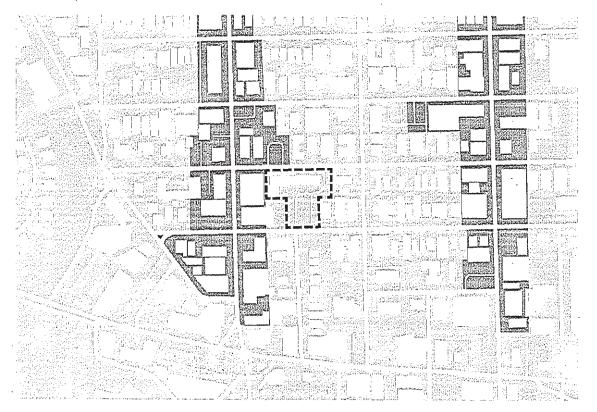


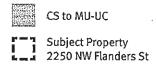




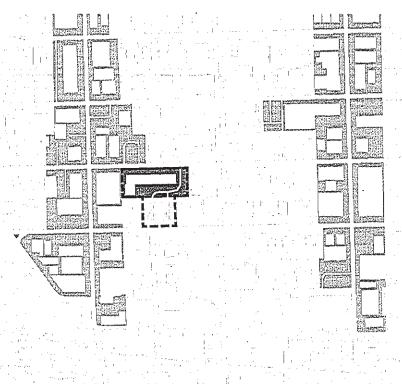
Subject Property
2250 NW Flanders St

### Current Comprehensive Plan Draft





### Proposed Revision to Comprehensive Plan





Proposed RH to MU-UC



CS to MU-UC



Subject Property 2250 NW Flanders St

### UNION PACIFIC RAILROAD 301 NE 2<sup>nd</sup> Avenue Portland, Oregon 97232

Mike Eliason Director, Public Affairs

P 503 249 3079 C 503 201 6788 F 402 233 3162

E meliason@up.com

January 6, 2016

Via Email: cputestimony@portlandoregon.gov

Council Clerk City of Portland 1221 SW Fourth Avenue, Room 130 Portland, OR 97204

Re: 2035 Comp Plan Update; St. Johns Plan District – Riverfront Sub-district

### Dear Council:

Union Pacific Railroad owns and operates the rail line that runs through the above-referenced plan area. Built long ago, the St. Johns lead has carried millions of tons of freight. We plan for it to do so well into the future.

Union Pacific understands the City's imperative to increase residential density. We further understand that this imperative will introduce residential uses into areas traditionally used for industry. We ask the City to undertake this process in a thoughtful way, and prohibit residential uses near this track.

As a general matter, the public interest supports separation of pedestrians and bicyclists from railroads. Union Pacific has a long history of working with the City and its bureaus to effect this interest. For example, we commonly hold trains in order to allow road running events. We also worked with the City on improvements to the Steel Bridge to allow safe crossing by pedestrians and cyclists.

The important factor here is context. Although railroad tracks tend to look the same to the public, they have very different functions. We were able to work with the agencies on the Springwater Trail because that line carries only infrequent linear service.

In this context, we are particularly sensitive to pedestrians and cyclists near active switching yards. Trains in those areas are typically not just moving in one direction at a consistent speed. Rather, these trains move back and forth, in between which movements they sit stationary. Furthermore, though we try to position these trains in a way that does not block crossings, that is rarely possible in a dense urban setting such

as St. Johns. Pedestrians and cyclists tend to think they can climb through a sitting train, not realizing the danger.

The St. Johns lead is just such a line. Situated between the Albina Yard and Port facilities further up the Peninsula, we are frequently building trains on these tracks.

It is never a good idea to have residential development straddle an active rail line. The St. Johns Sub-district would be a particularly bad location.

Sincerely,

Mike Eliason

Director, Public Affairs

From:

Spencer George <geospence@comcast.net>

Sent:

Wednesday, January 06, 2016 10:56 AM

To:

**BPS Comprehensive Plan Testimony** 

Cc:

Olson Blythe

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Flagged

### To whom it may concern

Any development adjacent to SW Periander and SW Homer presents a serious safety risk and traffic flow nightmare for the development and our neighborhood.

Please uphold the homeowners ordinance of 1984 and only allow development deemed appropriate at that time in this location..

At the present time SW Patton road is being used by people who live all over the city to avoid highway 26 going both east and west and at certain times of day the traffic is backed up both ways on Patton for a half a mile or more. We don't meed any more headaches with more development.

Molly and George Spencer 4232 SW Greenhills Way Southwest Hills ho,owners

> Sent from my iPhone

Kay <kaybyrne1003@yahoo.com> From: Wednesday, January 06, 2016 10:18 AM Sent: **BPS Comprehensive Plan Testimony** To: Re: Mixed use on Halsey Subject: Follow up Follow Up Flag: Flagged Flag Status: 1700 NE 49th Ave Pdx 97213 Sent from my iPhone > On Jan 6, 2016, at 9:07 AM, BPS Comprehensive Plan Testimony < cputestimony@portlandoregon.gov > wrote: > Thank you for submitting your comment. In order for us to include it > as public testimony for the Portland Comprehensive Plan, we will need > your physical mailing address. Could you provide us with such? Thank > you and bst regards, > Nora Arevalo > Community Services Aide II | Comprehensive Plan Update > nora.arevalo@portland.oregon.gov Bureau of Planning & Sustainability | > City of Portland > 1900 SW 4th Ave, Suite 7100 | Portland, OR 97201 > > ----Original Message-----> From: Kay [mailto:kaybyrne1003@yahoo.com] > Sent: Tuesday, January 05, 2016 5:23 PM > To: BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov> > Subject: Mixed use on Halsey > > Must have parking to support renters and customers for this mixed use > proposal on Halsey. Side streets with residential homes will be over > whelmed with cars parked in front of their homes

From:

sjvogels@aol.com

Sent:

Wednesday, January 06, 2016 9:51 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

### To Whom it May Concern:

I am writing to ask that the city deny any request to allow the property at 2855 SW Patton Road to be converted from a grocery store to condominiums. The property at 2855 SW Patton Road houses Stroheckers, a grocery store that serves the surrounding community. It is a neighborhood store that residents from the area can walk to and can send their children to, on foot. The store also houses a post office and pharmacy. Allowing this property to be converted to condominiums would deny the local residents vital services and severely reduce the livability of the area.

Regards,

Sarah Vogelsberg 3840 SW Dosch Road Portland, OR 97239

Re: Strohecker's grocery store at 2855 SW Patton Road

From:

Susan Rotramel <rotes@nwlink.com>

Sent:

Wednesday, January 06, 2016 9:20 AM

To:

BPS Comprehensive Plan Testimony

Subject:

[User Approved] Zone change consideration.

Follow Up Flag:

Follow up

Flag Status:

Flagged

The current farm property on NE 122nd and Shaver St. that is proposed for mixed employment and would remain zoned R3 should be reclassified as R5 for single family development. I believe the R5 zoning would better maintain the ambiance that current Argay Terrace property owners prize.

Susan Rotramel 14342 NE Rose Parkway Portland, OR 97230

From:

Martin Mcclanan <mmcclanan@earthlink.net>

Sent:

Wednesday, January 06, 2016 8:46 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony Ordinance 155609

Follow Up Flag:

Follow up

Flag Status:

Completed

### Dear Council,

I live at 3465 SW Brentwood Drive, Portland, OR 97201 and strongly want to encourage the council to preserve Ordinance 155609 which requires the Stroehecker's property at 2855 SW Patton Rd, Portland, OR to remain a grocery store. This location is a vital part of our neighborhood and changing of the property will materially harm the character, traffic and dynamics of the area. There is no community value in altering this longstanding use for the property.

Moreover, as a retailer myself, I'd like to reiterate that the new property owners have significant economic opportunity within the current regulatory framework to create a successful business. If you would be interested in my opinion, I would be happy to provide whatever help I can in the analysis.

Thank you very much for your sensitivity to this issue.

Martin McClanan 3465 SW Brentwood Drive Portland, OR 97201 503.477.7404

From:

Mary Coolidge <mcoolidge@audubonportland.org>

Sent:

Wednesday, January 06, 2016 7:14 AM **BPS Comprehensive Plan Testimony** 

To:

Subject:

Fwd: Comprehensive Plan 2035 Written comments

**Attachments:** 

CompPlanWrittenTestimony.pdf

Follow Up Flag:

Follow up Completed

Flag Status:

Hello,

Betsy Quitugua in Commissioner Fish's office recommended that I forward these Comprehensive Plan 2035 written comments for inclusion in the official record.

Best,

Mary Coolidge

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

From: Mary Coolidge <mcoolidge@audubonportland.org>

Date: Mon, Dec 14, 2015 at 4:12 PM

Subject: Comprehensive Plan 2035 Written comments

To: mayorcharliehales@portlandoregon.gov, amanda@portlandoregon.gov, dan@portlandoregon.gov, Steve

Novick <<u>novick@portlandoregon.gov</u>>, <u>nick@portlandoregon.gov</u>

Cc: Bob Sallinger <br/> <br/> sallinger@audubonportland.org>

Please find attached written comments on the Comp Plan 2035 related to testimony given at the November 19, 2015 hearing. These comments are submitted in addition to previously submitted comments by Audubon Society of Portland.

Best,

Mary Coolidge BirdSafe Portland Campaign Coordinator Audubon Society of Portland http://audubonportland.org/issues/hazards/buildings/birdsafe mcoolidge@audubonportland.org 971.200.4681 Audubon Cornell 503.866.3779 cell



President Dan Rohlf

Vice President Anne Sammis

Secretary Jay Withgott

Treasurer Michael P. Ryan

Kimm Fox-Middleton
Mark Greenfield
Russell Jones
Merril Keane
Sandy Mico
Jennifer D. Miller
Ruth Morton
Lorena O'Neill
Karen Shawcross
Patrick Slabe
Mary Solares
Tammy Spencer
Adrienne Wolf-Lockett

Inspiring people to love & protect nature since 1902.

5151 NW Cornell Road Portland, Oregon 97210

Tel 503.292.6855 Fax 503.292,1021 November 19, 2015

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

These comments supplement previous comments submitted by Audubon Society of Portland. Audubon will be submitting additional comments as we review the Comprehensive Plan 2035 document.

The incorporation of green infrastructure into the 2035 Comprehensive Plan demonstrates Portland's commitment to ecologically thoughful development of our built landscape over the next 20 years. At a time when urban areas are expanding rapidly, it is more important than ever that we maintain the ecological integrity of the built environment. The integration of BirdSafe building design and ecoroofs into the updated Green Building Policy heralds a new phase of innovative green design.

We also need to think broadly about what should be included as we define the integration of nature into our built landscape. We recommend that policies in chapters 7 and 4 of the Comprehensive Plan—related to integration of nature into the built environment and designing with nature—provide specific direction about avoiding the proliferation of blue-rich white light in both public & private development.

Blue-rich white light LED's like the ones that we are currently installing on our city streets are overly bright, create significant glare, and emit harmful blue light into the nighttime environment—light which has been demonstrated to impact circadian rhythms in humans, plants, fish & wildlife. Furthermore, blue-rich white light scatters more readily than longer wavelength sources, and therefore, may actually worsen light pollution in the Portland area.

We applaud the Climate Action Plan and City Council's efforts to increase energy efficiency, reduce greenhouse gas emissions, and to replace our streetlight design with new cobra head fixtures. However, the Plan also stipulates the use [of] Dark Skies best practices when possible to reduce light pollution and minimize bird strike hazards. Best practices in lighting design include: proper shielding to keep light focused where it is needed; careful establishment of lighting levels (not overlighting); and thoughtful consideration of the spectral composition of bulbs. These best practices should be considered by all city bureaus in developing lighting both on our streets and in our parks.

LED technology is advancing very rapidly; comparably energy-efficient bulbs designed to minimize the emission of blue light are now available at comparable cost. We encourage Portland City Council to direct efforts in city bureaus to research the best available science being published on the ecological and human health impacts of blue-rich white lighting, and to incorporate best available science and best practices

Fax 503.292.1021

into decisions about luminaire installation on our city streets, associated with building development, and in our parks and open spaces.

Thank you for your time and consideration of these comments.

Mary Coolidge

BirdSafe Portland Campaign Coordinator

Audubon Society of Portland

cc Bob Sallinger

From:

Michael Molinaro <molinaroarchitect@gmail.com>

Sent:

Wednesday, January 06, 2016 5:46 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Testimony concerning property at 822 SE 15th, Portland

Follow Up Flag:

Follow up

Flag Status:

Completed

Name: Michael Molinaro, AIA

Testimony concerning property at 822 SE 15th, Portland

I support the owner's proposal to change existing R1 zoning to CM zoning

This is one of the only ways to preserve the historic character of Portland's neighborhoods by allowing the transfer of development rights (withing a reasonable distance from the property)

Michael J. Molinaro AIA Molinaro Architect 4007 SE Taylor St. Portland, OR 97214 molinaroarchitect@gmail.com 1-312-391-9098 1-503-306-5398 Fax Licensed in OR, IL, WA.



### The Volce of Oregon Banking . Since 1905

January 6, 2016

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

RE: 2035 Comprehensive Plan and Drive-Through Facilities

Dear Mayor Hales and Members of the Portland City Council:

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

#### Discussion

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

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

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

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

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

#### Conclusion

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

Very best regards,

Kevin T. Christlansen

Government Affairs Director Oregon Bankers Association &

Independent Community Banks of Oregon

From:

Jim.Coon@Ferguson.com

Sent:

Wednesday, January 06, 2016 7:35 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

FW: City of Portland "2035 Comprehensive Plan Testimony"; My Letter Resent with full

name and address per City of Portland's request

**Attachments:** 

201601051600.pdf

Follow Up Flag:

Follow up Completed

Flag Status:

James Scott Coon 7320 NE Sacramento Street Portland, OR 97213 Mayor Charlie Hales Commissioner Nick Fish Commissioner Amanda Fritz Commissioner Steve Novick Commissioner Dan Saltzman 1221 SW 4<sup>th</sup> Avenue, Room 110 Portland, OR 97204

### Portland 2035 Comprehensive Plan

I am writing regarding Riverside Golf & Country Club's designation as future Industrial Sanctuary. I have been a member of Riverside for over 10 years. I also have been a part of the diverse fabric of the Alameda/Rose City neighborhoods (40 Years) and have enjoyed raising my family in these NE Portland neighborhoods. Riverside is an important recreational resource for all of Portland.

I am adamantly opposed to the City of Portland plans to change the 'designation' of 85 acres of Riverside's land from 'open space' to industrial sanctuary space. I have made a long term investment into Riverside Golf and Country Club for my family and also business purposes. I also believe the City of Portland is not being fair in equally applying this to all 'open space' land in the area.

Sincerely,

Jim Coon

7320 NE Sacramento Street

Portland, Oregon 97213

Commissioner in Charge: Charlie Hales, Mayor

> Bureau Director: Dante J. James, Esq.

#### January 6, 2015

Dear City Council and Bureau of Planning and Sustainability:

Overview: These comments represent the views of the Portland Commission on Disability (PCoD) and the Accessibility in the Built Environment Subcommittee (ABE) as they pertain to the City of Portland's 2035 Comprehensive Plan.

Public Testimony: These comments will accompany verbal testimony to City Council on January 7, 2015.

### Portland Commission On Disability

**Executive Committee** 

Lavaun Heaster Chair

Suzanne Stahl Vice Chair

Joe VanderVeer Chair Emeritus

Rick Hammond

Philip Wolfe

Advances in Policies Pertaining to People with Disabilities: PCoD would like to commend the City for advancing policies pertaining to people with disabilities. Throughout the Vision PDX, Portland Plan, and Comprehensive Plan processes, the City has continued to integrate testimony into its plans and processes. Additionally, the work on the Transition Plan (e.g., addressing public facilities that need improved accessibility features), adoption of the Model Employer of People with Disabilities Resolution and captioning, as well as other new efforts, show an evolution from our elected officials and civil servants.

### Policies that Support People with Disabilities:

#### Urban Form

- Policy 3.4 All ages and abilities. Strive for a built environment that provides a safe, healthful, and attractive environment for people of all ages.
- Policy 3.19 Accessibility. Design centers to be compact, safe, attractive, and accessible places, where the street environment makes access by transit, walking, biking, and mobility devices such as wheelchairs, safe and attractive for people of all ages and abilities.

Design and Development

 Policy 4.5 Pedestrian-oriented design. Enhance the pedestrian experience throughout Portland through public and private development that creates accessible, safe, and attractive places for all those who walk and/or use wheelchairs or other mobility devices.

421 SW 6th Avenue, Suite 500 • Portland, Oregon 97204 | portlandoregon.gov/oehr

- Policy 4.10 Design for active living. Encourage development and building and site design that promotes a healthy level of physical activity in daily life.
- Policy 4.15 Residential area continuity and adaptability. Encourage more housing choices
  to accommodate a wider diversity of family sizes, incomes, and ages, and the changing needs
  of households over time. Allow adaptive reuse of existing buildings, the creation of
  accessory dwelling units, and other arrangements that bring housing diversity that is
  compatible with the general scale and patterns of residential areas.
- Policy 4.25 Active gathering places. Locate public squares, plazas, and other gathering
  places in centers and corridors to provide places for community activity and social
  connections. Encourage location of businesses, services, and arts adjacent to these spaces that
  relate to and promote the use of the space.

#### Housing

- Policy 5.18 Aging in place. Encourage a range of housing options and supportive environments to enable older adults to remain in their communities as their needs change.
- Policy 5.4 Housing types. Encourage new and innovative housing types that meet the
  evolving needs of Portland households, and expand housing choices in all neighborhoods.
  These housing types include but are not limited to single-dwelling units; multi-dwelling
  units; accessory dwelling units; small units; prefabricated homes such as manufactured,
  modular and mobile homes; co-housing; and clustered housing/clustered services.
- Policy 5.5 Housing in centers. Apply zoning in and around centers that allows for and supports a diversity of housing that can accommodate a broad range of households, including multi-dwelling and family-friendly housing options.
- Policy 5.6 Adaptable housing. Encourage adaption of existing housing and the development
  of new housing that can be adapted in the future to accommodate the changing variety of
  household types.
- Policy 5.7 Physically-accessible housing. Allow and support a robust and diverse supply of
  affordable, accessible housing to meet the needs of older adults and people with disabilities,
  especially in centers, station areas, and other places that are proximate to services and transit.
- Policy 5.8 Accessible design for all. Encourage new construction and retrofitting to create
  physically-accessible housing, extending from the individual unit to the community, through
  the use of Universal Design Principles.

#### Transportation

 Policy 9.18 Pedestrian safety and accessibility. Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities.

#### Additional Suggestion:

 Policy 9.6 transportation modes should be prioritized in the following order (note that numbers 2 & 3 have been reversed): 1) Walking, 2) Transit, 3) Bicycling, 4)
 Taxi/commercial transit/shared vehicles, 5) Zero emission vehicles, and 5) Other single occupancy vehicles. As the Comprehensive Plan moves forward we would like to encourage you to continue seeking out information and perspective from the Portland Commission on Disability and the many community member with lived experience who are eager to share their wisdom.

Thank you for your dedication to this important work. Lavaun Heaster Chair of the Portland Commission on Disability January 6, 2016

Mayor Charlie Hales Members of the Portland City Council 1221 SW 4th Avenue Portland, OR 97204

Re: Recommended Draft 2035 Comp Plan

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

This letter is to inform you that the South Portland Neighborhood Association supports the request of National College of Natural Medicine that their campus area receive the new campus/institutional designation in the updated Comprehensive Plan.

SPNA and NCNM have discussed the details of this new Comp Plan designation at Land Use Committee and SPNA Board meetings. Joan Frederiksen of BPS was of great assistance in helping the neighborhood and the college understand the potential zoning and land use implications that are involved. SPNA and NCNM have reached agreement on a process for the implementation of future zone changes under the proposed designation.

Once public testimony concludes and Council begins its deliberation on the new plan, we ask that you favorably consider NCNM's request and introduce any necessary amendments before formal adoption of the updated Comp Plan. If you have any questions, please contact our Land Use Committee chair, Jim Gardner, at jimdonnachamois@msn.com, or 503-227-2096.

Sincerely,

Ken Love, President

South Portland Neighborhood Association

### LINNTON NEIGHBORHOOD ASSOCIATION

# 10614 NW St. Helens Rd. Portland Oregon 97231

January 6, 2016

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

Re: Comprehensive Plan comments

Dear Commissioners:

The Linnton Neighborhood Association has previously submitted written and oral testimony regarding the proposed new Comprehensive Plan to the Department of Planning and Sustainability. This document summarizes the key issues raised in that testimony.

### Industrial zoning in Linnton's central business district

The LNA has raised a variety of issues about the plan's provisions regarding land which falls within the Industrial Sanctuary. As a concept the LNA supports the idea of a sanctuary, but finds the implementation problematic. The plan paints with too broad a brush, and imposes unjustifiable constrains on many parcels that are included in the sanctuary for merely historical reasons unrelated to current industrial needs. Examples exist in Linnton. After discussions between Linntonites and Bureau staff, including the director, regarding three specific properties, the staff has agreed to recommend those three sites be excluded from the Prime Industrial Overlay. A copy of a map provided to the LNA by Bureau staff is attached to this document as Exhibit A. The three sites are Kingsley Park, at the north end of the town center, off NW 114th, where a community garden will be established, the riverfront property along Front Ave., which fronts onto the last remaining sandy beach on the west side of the Willamette River north of downtown., and a thin stretch of Linnton Mill site along St. Helens Rd. south of the Community Center. Unlike the rest of the mill site, this narrow strip of land between the railroad and the highway will not be part of the planned habitat project. In addition to excluding these three sites from the Prime Industrial Overlay, the last of these, the land along the highway, will be zoned ME.

City Council January 6 2015 Page 2

The LNA lobbied for and supports these changes, and appreciates the Bureau's thoughtful attention to the concerns of the neighborhood.

The LNA also lobbied for, but was unable to achieve, an exclusion from the Prime Industrial Overlay for the central section of the mill site. The LNA believes it is in the best interest of the city and the neighborhood to rezone the mill site to ME. This would have no effect in the short term, since the property is currently owned and occupied by an active business, but would become critical when the owner decided to sell and an opportunity arose to create a much needed riverfront park for NW Portland. The existing business is not river dependent or even river related.

### Earthquakes and other hazards

Linnton is at the heart of Oregon's energy industry. We have pipelines and tank farms. We also have concerns about the ability of the energy industry to function safely when the expected earthquake occurs. The comprehensive plan is not reassuring. In regard to "energy infrastructure" the plan, in policy 8.104, speaks of coordination with energy providers to encourage investments that ensure reliable, equitable, efficient, and affordable energy for Portland's residents and businesses. Safety ought to be on that list. It ought to be listed first. But, instead of providing a long term vision of moving Oregon's fuel storage and pipelines out of the high earthquake danger zone, the plan ignores safety issues. Transitioning the tank farms out of their current risky locations before liquefaction dissolves the ground beneath them ought to be a comprehensive plan goal.

### Hillside density

We have supported the draft designation of Linnton as a "Stormwater Management Challenge Area" as one tool to control hillside development through management tools such as storm water, landslide and habitat regulations. The plan acknowledges the constraints facing Linnton including soil types and steep slopes that limit storm water infiltration into the ground, lots that cannot easily connect to existing storm water pipes, and landslide and wildfire hazards.

This position follows the neighborhood position adopted almost ten years ago in the Council approved Linnton Hillside Plan which began to address these challenges by rejecting higher density zoning. Nonetheless, the potential for future increased density still remains as Linnton has many "buildable" lots even though it does not have the infrastructure to support the added population.

City Council January 6 2015 Page 3

Given the city's commitment to increased density the LNA expects there will be growing interest in the available land in Linnton, particularly since most Linnton lots come with a great view. It would be easy for new construction to overwhelm services. Managing growth is the prime justification for a comprehensive plan, but this plan doesn't provide the management that our neighborhood needs.

### The role in the plan of the Neighborhood Associations

The current draft regarding community engagement is an improvement over earlier drafts. But there is still concern the draft does not adequately acknowledge the contribution neighborhood associations can make to the achievement of the Community Involvement Goals. Many of those goals could best be achieved by enhancing the role neighborhood associations starting with an explicit commitment to neighborhood participation in planning process.

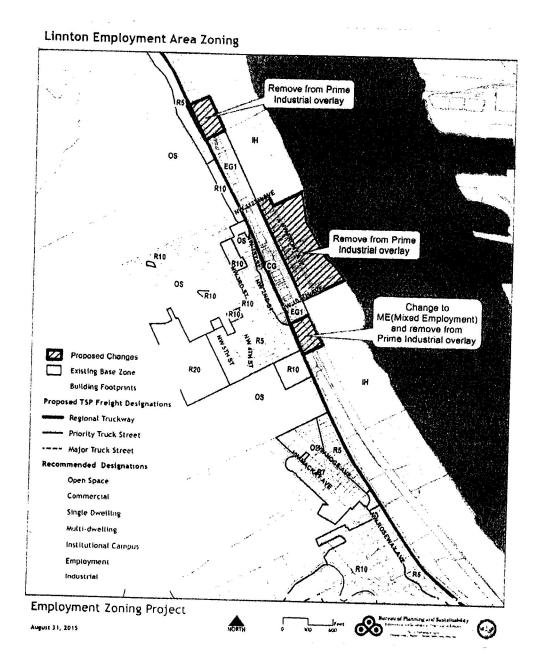
For example, the plan needs to set realistic timelines for participation in the planning process by the neighborhood associations. The LNA has general membership meetings every other month, timelines which call for comments or appeals within 10 or 30 days are unworkable; they send a strong message that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

These issues and others were discussed in the Comments on Community Engagement in the Comp Plan sent to the council on December 14, 2015. A copy of those comments is attached as Exhibit B. The LNA endorses those comments.

### Health Overlay Zones

The LNA has seen a proposal for a Health Overlay Zone in North Portland. The LNA supports the creation of such zones and would like to see Linnton included in one. The attached document, Exhibit C, sets out the goals and strategies of the proposed zones.

Shawn Looney Chair Linnton Neighborhood Association



DATE:

December 14, 2015

TO:

Portland City Council

FROM:

Neighborhood Coalition Leaders and Staff

RE:

COMMENTS ON COMMUNITY ENGAGEMENT IN THE COMP PLAN

Neighborhood coalition leaders and staff, from all seven of Portland's neighborhood coalitions, want to share with you some important concerns about the community engagement in the update of Portland's Comprehensive Plan (Comp Plan).

Our group held a special three-hour meeting on November 12, 2015 to discuss community concerns about how BPS engaged the community in the update of the Comp Plan.

We recognize that lots of process took place, but we also are hearing strong concerns in the community about the quality of these processes, who was heard, and what impact community member input has had on the development of the recommended draft.

A key message is that both planning staff and community members need more time, and that the process needs to have enough resources and realistic timelines to ensure that the community effectively is involved in shaping the final products.

As leaders and staff for Portland's seven neighborhood coalitions, we want to share with you below what we are hearing.

### SUMMARY OF KEY THEMES

# Process did not follow Proposed "Chapter 2—Community Engagement" goals and policies

 We recognize that the recommended "Chapter 2: Community Engagement" language includes goals and policies that set strong expectations for good community engagement. We find it ironic and disturbing that the process used to engage the community in the Comp Plan Update did not follow these recommended goals and policies.

### Community input appears to have had little effect

- We found many instances in which community members and neighborhood and community organizations provided extensive and detailed input but did not see that their input had any effect on the final product.
- Neighborhood and community groups and community members often did not receive a formal acknowledgement that their input was received, and often received no feedback on what was done with their input.

In some cases, more savvy neighborhood and community activists who really
understood the system and had good inside relationships were able to move some of
their priorities forward. However, community members, in general, appear to have had
little effect on the outcomes.

### Decision making processes were not transparent

- Rather than a transparent, "additive," process by which community members could see how different products and documents evolved, community input seemed to go into a BPS "black box" in which decisions were made without any explanation of how community input was or was not used and why. Community members complain that they are not able to "reverse engineer" BPS decisions to understand how these decisions were made.
- Community members want to know: What was the decision making logic? Were
  decisions just made by senior planners? What criteria did they use and what level of
  understanding of the prior community input and existing plans did they bring to their
  decisions?
- Recommendations in this process often appear to have gone forward without support
  of the groups that had been involved in helping develop the recommendations.

### Lack of Community Access to Planning Commission

Many community members feel that the Planning and Sustainability Commission (PSC)
was not accessible to the community during the process. Community input to the PSC
was filtered through the staff. Community members do not feel confident that PSC
members adequately were aware of and understood community concerns and
recommendations.

### Disconnect with prior, existing plans and earlier products

- The Comp Plan Recommended Draft proposals and recommendations do not appear to reflect earlier aspirational goal and policy language—e.g. visionPDX, Portland Plan, earlier Comp Plan aspirations, goals for specific zoning, Zoning Code density standards, existing plan districts, etc. For instance, the Comp Plan map and zoning updates and changes being proposed do not seem to correlate with the aspirational language in the Comp Plan goals and policies.
- The Comp Plan Recommended Draft does not appear to incorporate and reflect other existing plans that often were developed with significant community input: e.g. District Plans, Parks Vision 2020, Climate Action Plan, Age-Friendly City Plan, etc.

Community engagement processes were not designed to be appropriate to different audiences

- Community engagement should focus on helping community members understand how
  a project or proposed policies will affect them and their community and how they can
  have an effect on the issues that are most relevant to them.
- Many community members and organizations did not have the capacity to get themselves up to the level at which planning staff were working.
- Much of the community outreach and engagement was done in language and formats
  that many community people could not understand. Outreach and engagement also
  was not designed to be accessible to many different groups of people in our community
  and often was not tailored adequately to the needs and context and communication
  styles of different cultural communities.
- Outreach also was not tailored adequately to different areas of the city. Too many
  presentations had a general city-wide focus and were not relevant or useful to
  community members—community members could not see how the issues and
  processes would affect them and what they could do to affect outcomes that mattered
  to them.
- Outreach also needed to be staged and tailored to audiences with different levels of
  interest and expertise. Too much of the information came all at once. Processes needed
  to make sure that the right people were in the room for the content being presented—
  e.g. "101" sessions for people who are very new to planning, and more advanced
  sessions for more experienced people.

### Multiple Projects were underway in parallel without being clearly integrated

- Too many different planning projects were underway at the same time. It was not clear to most community members how they all fit together. Even the most savvy and experienced neighborhood and community activists had trouble following and understanding what was happening.
- BPS staff also often were overwhelmed and said they did not understand how all the pieces fit together. This made it difficult for them to help the community engage effectively.
- The Comp Plan is about much more than just land use, including transportation, bikes, parks, etc. This process affects so many different areas important to the community that is was easy for community members to lose track. Many felt that the whole picture was not being looked at.

### Projects were not pursued in a logical sequence with adequate time

 Projects at different levels of the planning process were happening all at the same time, rather than a logical progression from the most broad to the most specific.
 Implementation projects were started before goals and policies were finished, and often shared the same deadlines.

- The process also was marked by a feeling that BPS staff were rushing to get everything
  done to meet what appeared to be artificial deadlines. This appeared to sacrifice the
  goals of producing a quality product and ensuring that the community understood and
  was able to provide meaningful input and have an effect on the outcomes.
- In some cases, staff reports were released to the community with only a week for the community to review and respond. This was completely inadequate given the complexity and importance of many of these products.
- Many community members feel overwhelmed and exhausted trying to follow, understand, and participate in all the different processes that were happening at the same time.
- Both planning staff and community members need more time.

### Inadequate Resources

- BPS staff were overwhelmed by the scope and complexity of the processes and products they needed to deliver. While some planning staff tried hard to engage the community, BPS did not have enough people and resources to adequately involve the community in all the different projects.
- BPS staff did not have the resources to acknowledge, consider, and respond adequately
  and effectively to all the community input. This resulted in many community members
  and organizations feeling that their input was not heard or considered.

## "One-size fits all policies" do not work for many parts of Portland

- The Mixed Use Zoning project proposes a one-size fits all approach at the general level
  that amplifies the drive toward greater density and other effects that often contradict
  the goals of existing plan districts and disregard existing plans and public input. The
  more fine grain levels and impacts of these proposed policies are not clear.
- The "five Portlands" approach does not describe the Portland community members see. We need zoning and planning that reflects the neighborhoods in question.
- No mechanisms exist for neighborhood associations to have a say in design and development in their neighborhoods.
- Neighborhood livability is being sacrificed for regulatory simplicity.

# Lack of adequate analysis and modeling—identification of unintended consequences

- BPS generally has not analyzed adequately the different proposed policies to identify their likely, real-world outcomes in the community.
- Analysis has been limited primarily to static studies. Finer grained studies of the likely impacts on local areas have not been done. Analysis tools have not been responsive to the questions that the community is asking.
- BPS also does not track the actual impact of adopted policies on different neighborhoods in Portland.

Community members already are seeing unintended consequences of this process. It's
important to daylight these consequences earlier rather than later. Some additional
mechanism is needed to identify and respond to these unintended consequences as the
many elements of the Comp Plan are implemented.

#### Introduction

North Portland is a vibrant, diverse community of single and multi-family homes, commercial centers, and industrial preserves situated at the confluence of the Columbia and Willamette rivers. Our eleven neighborhoods face increasing growth and density in the coming years. The City of Portland Comprehensive Plan identifies inner neighborhood areas such as North Portland as ideal for increased density. The plan recognizes, however, that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers.

In order to meet the coming growth in our community without compromising the health and well being of our residents, North Portland's neighborhood representatives recommend a health overlay zone. This zone applies specific land use, design, and monitoring requirements on new development in North Portland to mitigate negative health and safety impacts. The health overlay zone supports a vision along with goals and strategies outlined below that together preserve and enhance our way of life while accommodating new development in our community.

Our community draws inspiration for our recommendations from two key sources. Portland's comprehensive plan update, Policy 4.28.d, encourages design and land use patterns that mitigate negative air quality and noise impacts in Portland neighborhoods, especially near high vehicle traffic areas, and other sources of air pollution. Similarly, Portland's Climate Action Plan (CAP) goals 1-4 aim to reduce the environmental impacts of new development through more sustainable land use and design principles.

### Vision

A North Portland community that preserves and enhances the health and well being of its residents while accommodating growth and density needs.

#### Goals

To achieve our vision, North Portland's neighborhoods propose the following three goals:

- Better Air and Water Quality: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on energy demand, air conditioning use, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality.
- Reduced Noise Pollution: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- Increased Safety: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on criminal activity and emergency preparedness.

### Strategies

Goals provide benchmarks by which to measure progress towards our vision. Each goal, however, is supported by specific, actionable strategies that residents, community leaders, and City of Portland staff can use to better our community. We provide an illustrative list of strategies below based on NPLUG discussions, but we expect individual neighborhood association meetings to generate and refine strategies to best fit our community vision.

### Better Air and Water Quality

- Improve storm water management design standards for new developments
- Require air filtration in all new residential developments
- Improve ventilation requirements for new residential developments
- Require building features that facilitate less energy use
- Require moisture-infiltration and ventilation features that reduce mold formation
- Eliminate exposure to harmful asbestos materials
- Install traffic-calming, pedestrian, and bicycle features to minimize the use of singleoccupancy vehicles (SOVs)
- Install more and better transit infrastructure to encourage more energy-efficient transportation modes
- Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments
- Install air-monitoring stations in North Portland neighborhoods<sup>1</sup>

### Reduced Noise Pollution

- Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

### Increased Safety

- Educate residents on emergency preparedness procedures
- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

#### Conclusion

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.

Ordinance 1878 1.3.J, page 7617

<sup>&</sup>lt;sup>1</sup> Monitoring stations do not directly affect air quality, but do allow for on-going evaluation of air quality mitigation efforts.

From:

Marinace, Leanne <leanne.marinace@intel.com>

Sent:

Tuesday, January 05, 2016 1:09 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up Completed

To Whom it May Concern – Regarding Stroheckers 2855 SW Patton Road, Portland, OR 97201

l, along with all my neighbors in Portland Heights, request that the current land use ordinance for Stroheckers, #155609, be maintained indefinitely. There are many reasons for this request, let me state a few:

- the past 2 days, Jan 3 and 4 2016, there has been an ice storm in Portland that has made the roads in the neighborhoods around Stroh's undriveable. The only way for the neighborhood to buy food has been to walk to Stroh's. In addition, the Stroh's building houses the only commercial services including pharmacy, post office and groceries, in the neighborhood.
- Portland is highly anti driving, and removing this facility would increase driving into town greatly. That goes
  against many other Portland planning efforts.
- The traffic on Patton near Stroh's is already unbearable. I would know, since my garage is on Patton and I pull out into the traffic every morning to go to work, and back into the garage every evening. There is always gridlock in front of my house. increasing the traffic by removing the store and potentially adding cars by adding condos, would make the already unbearable traffic absolutely unlivable. Have you tried to drive to East Sylvan School at 5pm on a Tuesday? Patton is backed up for literally miles back from the 4 way stop at the gas station. Instead of adding to the traffic nightmare, the city should be considering how to improve the situation. Speed bumps would be a welcome addition as well, as cars habitually drag race down the straight strip past Stroh's.
- Not to mention what condos would do to the character of the neighborhood.

thank you! Leanne Marinace 2818 SW Patton Rd Portland, OR 97201

Leanne Marinace ITIE/Intel Corporation 503-317-3381

From:

Kristin Hoobler Morgan <hooblermorgan@gmail.com>

Sent: To:

Tuesday, January 05, 2016 11:42 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

RE: Ordinance of 1984 no. 155609 for property at 2855 SW Patton Rd.

The City of Portland should reject any changes to the current zoning at the above listed address. Those of us that live near the current grocery store depend on the services it provides, especially in times of very bad weather such as we have been experiencing this past week. Neighbors fought very, very hard to formulate the ordinance and it needs to be maintained. Families depend on that location for basic needs.

Thank you for your time.

Sincerely,

Kristin Morgan 1640 SW Davenport Street Portland, OR 97201

Kristin Hoobler Morgan

"Travel is fatal to prejudice, bigotry and narrow mindedness..." - Mark Twain

From:

Morgine Jurdan <morgine@tds.net>

Sent: To: Tuesday, January 05, 2016 10:58 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status:

Follow up Completed

Dear Council Members,

Thank you earnestly for hearing honestly what I have to share with you. I and many of my neighbors out on Wasco Street, have lived here for many years, (myself over 30), paid taxes, and live on streets built back in the horse and buggy days. At night, after 5 or 6 PM, only one car at a time can drive through, and if people park right next to your driveway, you cannot turn to get into your own driveway! I would HOPE you could visit this Very Neighborhood which would be affected, after 6 PM at least one night, and See First Hand all the lives of people whom Your Decisions will affect Every Day, not just once in a while.

Some are elderly or on limited income and you now want to charge us to park in front of our own homes. Some would have to walk several blocks carrying groceries in the rain, walking several blocks in the dark at this time of year, unable to unload heavy things in front of their own homes!

I look at statistics on line and over 88% of households in Portland have one of more cars! We are not living in 2050 yet, when people might be walking more. Right now we already are lacking in parking! My neighbors and I don't want our neighborhoods to become like downtown. We already lost many streets dead-ended when Fred Myers came in and they closed 28th.

We already feel crowded when company and family cannot find parking. It is just unreasonable to grant these people permits to build apartments without adequate parking! Please just come visit our neighborhoods at night and see how many cars are currently on the streets in the evening after 6 PM! Please take Us, *your Portland Neighbors*, into consideration before granting these New People permits which save them millions perhaps, and in the process ruin thousands of lives. We Deserve better!

Please take Time to Visit and see the Parking Challenges we already face, after 6 PM, when people get home from work during the week. I Greatly Appreciate your Time and Kind Consideration. Former Mayor Charlie Hales said "We are carefully curating the kind of city we want to inhabit." Please make sure we continue to do so. Thank you very much!

Sincerely,
Roberta Large
2144 NE Wasco St.
Portland OR 97232
503-287-6424
(submitted by Morgine Jurdan on her behalf as she has no computer)

From:

Tony Jordan <twjordan@gmail.com>

Sent:

Tuesday, January 05, 2016 10:03 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

City Commissioners and Other Interested Parties,

I am writing in support of the Comprehensive Plan. If I had my way, I would change some things, but it is a compromise.

The plan is a step in the right direction. Climate change is the biggest threat to our communities and our children. This plan continues the momentum of building a sustainable and resilient city.

Critical to that momentum is making space for people to live in places that they can live lower impact lifestyles. Our centers and corridors, like Sunnyside, are ideal places to build additional housing. While I am sympathetic to concerns about rapid changes, nostalgia for an amorphous "character" of must not supersede our obligation to take action NOW for the future. One might say it is ironic that we could prevent thousands of housing units on our corridors by disallowing 4th or 5th story buildings due to the shadows they cast, surely Portlanders will be seeking that shade in the heat waves of the coming Anthropocene summers.

I urge you to consider that fear is a great motivator and change is feared by most. Hundreds of citizens spent thousands of hours in the previous rounds of this plan's development, working in good faith and with optimism to produce a good plan. It is expected that people fearing change will loudly proclaim their opposition, but I hope the quieter qualities of this compromise will carry the day.

Sincerely, Tony Jordan 4540 SE Yamhill St. Portland, OR 97215

From:

Steve Schmitt <steve.schmitt@doitbest.com>

Sent:

Tuesday, January 05, 2016 9:27 PM BPS Comprehensive Plan Testimony

To:

Subject:

Fwd: Comprehensive plan testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

Previous email did not have my zip code of 97213 included. Sorry for the inconvenience.

From: <steve.schmitt@doitbest.com> Date: January 5, 2016 at 8:58:54 PM PST To: < cputestimony@portlandoregon.gov > Subject: Comprehensive plan testimony

I would like to submit written testimony regarding the Comprehensive Plan that appears to involve a change 5250 NE Halsey zoning that will allow 5-Storey Mixed Use with no parking. I am a long time resident of NE portland, and have lived in this neighborhood for the last 20 years so I am very concerned about the adverse changes that this would bring in regards to increased traffic and parking issues. A development of this size would have a very negative impact to the surrounding neighborhood.

This must NOT be approved especially without adequate parking.

Regards, Steve Schmitt 5308 NE Multnomah St Portland, OR. 97313

From:

Mara Farrington <marafarrington@yahoo.com>

Sent:

Tuesday, January 05, 2016 9:23 PM BPS Comprehensive Plan Testimony

To: Cc:

Chris Farrington

Subject:

Comprehensive Plan Testimony for Strohecker's store site, 2885 SW Patton Road

Follow Up Flag:

Follow up

Flag Status:

Completed

To Whom It May Concern,

We understand that the Stroheckers's store location at 2885 SW Patton Road was recently bought by a developer from California and will soon be closing. Naturally, we're concerned about what might happen with the building.

As members of the community, we are writing to make our voices heard and to encourage you to consider how invaluable the presence of a grocery store is to us.

Portland is city that prides itself on local. It doesn't get much more local than a neighborhood grocery store. Please see that we aren't left without ours.

Sincerely, Mara and Chris Farrington 2777 SW Roswell Ave Portland, OR 97201

(503) 894-8925

From:

Sheila Schmitt <sheschmitt@gmail.com>

Sent:

Tuesday, January 05, 2016 9:22 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive plan testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

I would like to submit written testimony regarding the Comprehensive Plan that appears to involve a change 5250 NE Halsey zoning that will allow 5-Storey Mixed Use with no parking. I am a long time resident of NE portland, and have lived in this neighborhood for the last 20 years so I am very concerned about the adverse changes that this would bring in regards to increased traffic and parking issues. A development of this size would have a very negative impact to the surrounding neighborhood.

This must NOT be approved especially without adequate parking.

Regards, Sheila Schmitt 5308 NE Multnomah St Portland, OR. 97213

From:

martha ireland <maire36@gmail.com>

Sent:

Tuesday, January 05, 2016 8:16 PM **BPS Comprehensive Plan Testimony** 

To: Subject:

Stroheckers

Follow Up Flag:

Follow up

Flag Status:

Completed

As a member of the community, I know the importance of keeping a grocery store in this location at 2855 SW Patton Rd. It is the center of the community and a rallying place for many activities. It is walkable and safe for children. Martha Ireland

> 2566 SW Ravensview Dr Portland Oregon 97201

From:

Chris Walsh <chriswalsh72@gmail.com>

Sent:

Tuesday, January 05, 2016 7:47 PM

To:

**BPS Comprehensive Plan Testimony** 

Cc:

matt.brischetto@gmail.com

Subject:

Input regarding Comp Plan and Alfred Webb properties

Follow Up Flag:

Follow up

Flag Status:

Completed

## Hello,

I am writing in regards to the Alfred Webb properties at 822 SE 15th Ave. As a resident of Buckman, I feel that our neighborhood is defined by historical buildings such as these and so I am in favor of measures that can help retain them and the character of Buckman in the process. I understand that ammending the Comp Plan so that these properties would be re-classified from R1 to CM would be beneficial in allowing the owner to transfer land rights that could then be used to restore the buildings. It is important that we support national historic landmark preservation!

Thank you,

Chris Walsh 1621 SE Washington St.

From:

Taylor Hall <tayhall99@hotmail.com> Tuesday, January 05, 2016 7:35 PM

Sent:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive plan testimony Jan 5

Follow Up Flag: Flag Status:

Follow up Completed

Taylor Hall 1430 NE Euclid Ave Portland, OR 97213

Here is my testimony, sent today. Feel free to plagiarize, whatever.

I would like to submit written testimony regarding the Comprehensive Plan that appears to involve a change 5250 NE Halsey zoning that will allow 5-Storey Mixed Use with no parking. I have lived in the Rose City most of my life and I have seen not just immense increased traffic, which is to be expected, but parking in the neighborhood evaporated. It has become like Seattle. Twice as many cars that fit the neighborhoods.

I recently relocated by buying a house on 47th ave right by Halsey. Imagine my surprise to hear about a similar proposal chasing me to a new location. I am fine with infill but without parking, it's a sham and an imposition on our classically livable neighborhoods. Guess what? You can't park on Halsey all day, so all those cars are headed to our neighborhood. And Rose City park is famous for narrow streets that barely accommodate the limited parking they have.

This must NOT be approved without adequate parking.

From:

Linda Kaplan < lckap@hotmail.com>

Sent:

Tuesday, January 05, 2016 6:50 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Stroheckers

Follow Up Flag:

Follow up

Flag Status:

Completed

To Whom It May Concern,

Once again our neighborhood has been marooned for days thanks to winter weather. Today is the third day that travel is almost impossible on Buena Vista Drive. If we couldn't walk to Stroheckers Grocery Store at 2885 SW Patton Road we'd be in a fix. Please respect the ordinance dating back to 1984 and disallow the California developer who intends to put housing on this property.

Thank you,

Ron and Linda Kaplan 2661 SW Buena Vista Dr.

Portland 97201

503-223-7996

From:

Melissa Naito <melissa@naitodev.com>

Sent:

Tuesday, January 05, 2016 6:40 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

keeping Strohecker's a commercial establishment

Follow Up Flag:

Follow up

Flag Status:

Completed

To whom it may concern,

I am a neighbor of the current Strohecker's Market at 2855 SW Patton Rd. The store sits adjacent to a park with tennis courts and play areas. It serves the neighborhood as a gathering place, hosting events such as community picnics and soccer practices. The store is a central element of that community area. It has been that way for years and is a draw for people looking to move to the area.

As a patron of the store, I am heartbroken that the commercial enterprise could be turned into more residential housing. We need to have a place for people to congregate shop and enjoy the area. One more apartment building or condo tower will not add "value" to this area. This community asset needs to be preserved.

Please take a moment and consider the value of this property. Let's not just build more housing. We need neighborhood commercial properties just like other neighborhoods. What makes our City great is close proximity to commercial uses within residential neighborhoods. Think about the Pearl, NW Portland, NE Portland. It is what makes this area appealing. You can walk to Stroh's, you can play in the park, you can participate in a community meeting. You cannot do any of those things if the use is changed to more housing.

Keep Portland interesting. Close in neighborhoods need commercial uses close by. Otherwise, why don't we just call it Beaverton?

Thank you, Melissa L. Naito 3800 SW Hillside Drive Portland, OR 97221

From:

Keith Johnson < houseofkeith@gmail.com>

Sent: To: Tuesday, January 05, 2016 6:19 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up Completed

Flag Status:

I would like to submit written testimony regarding the Comprehensive Plan that appears to involve a change 5250 NE Halsey zoning that will allow 5-Storey Mixed Use with no parking. I am a long time resident of NE portland, and have lived in Hollywood neighborhood for the last 4 years. In that time, I saw 3 apartment

portland, and have lived in Hollywood neighborhood for the last 4 years. In that time, I saw 3 apartment buildings go up within 4 blocks of my house, and only one had limited parking. Over time, I saw not just immense increased traffic, which is to be expected, but parking in the neighborhood evaporated. It has become like Seattle. Twice as many cars that fit the neighborhoods.

I recently relocated by buying a house on 53rd ave right by Halsey. Imagine my surprise to hear about a similar proposal chasing me to a new location. I am fine with infill but without parking, it's a sham and an imposition on our classically livable neighborhoods. Guess what? You can't park on Halsey all day, so all those cars are headed to our neighborhood. And Rose City park is famous for narrow streets that barely accommodate the limited parking they have.

This must NOT be approved without adequate parking.

Thank you for considering my testimony and I request to be added to any mailing list on this topic.

Keith Johnson 503-710-4692 1614 NE 53rd Ave, Portland, OR 97213

From:

Christine Farrington <christinefarrington@me.com>

Sent:

Tuesday, January 05, 2016 6:14 PM BPS Comprehensive Plan Testimony

To: Cc:

Christopher and Mara Farrington; Christopher and Mara Farrington; Steve and Anita

Kaplan Anita Kaplan; Linda and Ron Kaplan; Macy & Pat Wall

Subject:

Comprehensive Plan Testimony for Strohecker's store site, 2885 SW Patton Road

Follow Up Flag: Flag Status:

Follow up Completed

To Whom It May Concern,

We understand that the Stroheckers's store at 2885 SW Patton Road was recently bought by a developer from California.

Since 1984, the city has honored an ordinance that neighbors fought so hard for: the ruling which provides for a grocery store and an informal gathering place for shoppers on this site.

The last few days of extreme weather have clearly demonstrated the need for a market for those of us who could not get down to town to do essential shopping for our families.

The possible development of high-density condos would significantly detract from the livability of this single family neighborhood as well as contributing to increased traffic at the crowded intersection of Patton Road and Vista Avenue.

Portland rightfully prides itself as a city of great neighborhoods. We ask you to respect the 1984 ordinance and to preserve our community.

Sincerely, Christine and Carl Farrington 1119 SW Myrtle Drive, Portland, 97201

503-227-7977

Christine Farrington christinefarrington@me.com

From:

Haig Valenzuela <tavli54@hotmail.com>

Sent:

Tuesday, January 05, 2016 5:07 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

"Comprehensive Plan Testimony" Jan. 5 or 6.

Follow Up Flag:

Follow up

Flag Status:

Completed

Hi, I appreciate your willingness to hear a few comments re: the proposed 5-story bldg. with NO parking on Halsey  $x = 52^{nd}$ .

#1. Parking spaces around here is already at a premium. We have to notify our neighbors before we invite more than a handful of folks over, just to let them know our already-crowded street is going to experience even more pressure. Thankfully, it's only temporary. This building isn't temporary, nor will the parking associated with it be temporary. Have you tried eating at the favorite neighborhood café, the New Deal, on 53<sup>rd</sup> and Halsey? My wife has MS, and can't walk there, and we can't find parking closer than where we live 3 blocks away----1807 NE 54<sup>th</sup> Ave, so we take her in the wheelchair, no matter what the weather. I wonder how much congested the parking will be?

#2. Parking.

#3. Parking.

Et. Cet.

Not sure what the plan is, but it ought to reflect the needs of the whole surrounding community, and that includes providing parking for those who will use the building. It's good to encourage public transportation and bike usage, but the car is here, it's staying, and folks who will live/work/frequent that building are going to be using their cars to get there. Once there, where will they park? I'd like to know that, cause I'd like to know where I can find these hithertosecret parking spaces.

Thanx
Haig Valenzuela
1807 NE 54<sup>th</sup>. 97213
503-281-2605

From:

Nevenka Ánastas <nevenkee@gmail.com>

Sent:

Tuesday, January 05, 2016 4:18 PM BPS Comprehensive Plan Testimony

To: Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Flag Status:

Follow up Completed

Hello,

I am writing in support of keeping Strohecker's as a neighborhood grocery store. Strohecker's is located at: 2855 SW Patton Rd.

My name and address are: Nevenka Anastas 4140 SW Downs View Ct. Portland, OR 97221

I have lived at this house for more than 17 years. I stop at Strohecker's grocery store about once a week. I pass it on the way home from work, dropping off or picking up my children from school or the health club, visiting the health club and many other random trips. The children and my husband and I occasionally walk to Strohecker's.

If a grocery store were not in that location, I would make a side trip by car. I do not pass any other store with 3 miles or so (on my most common routes home.) The only other grocery store within 2 miles of our home is Albertson's.

In the interest of maintaining a livable neighborhood and reducing auto traffic, please keep Strohecker's zoned as a grocery store.

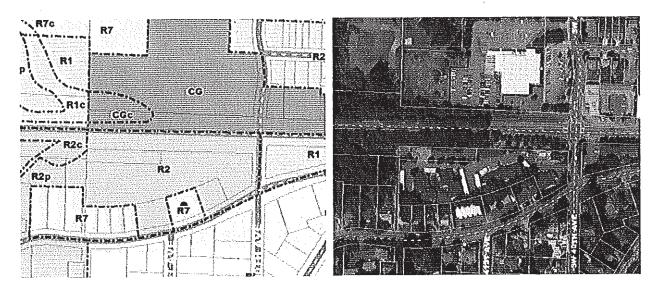
Thanks for your consideration, Nevenka Anastas January 5, 2016

Bureau of Planning and Sustainability City of Portland, Oregon 1900 SW 4<sup>th</sup> Ave., Suite 7100 Portland, Oregon 97201

Comprehensive Plan – Public Testimony
Re: Zone Change from R7 to R2 (SW Garden Home Road at 41st Ave.)

Dear Bureau of Planning and Sustainability,

My comment is that there is an opportunity to rezone the parcel at 4055 SW Garden Home Rd. Portland, OR 97204-3100 along with 8 other parcels along Garden Home Road between 41<sup>st</sup> and 43<sup>rd</sup> from R7 to R2, to expand additional residential development (see map):



A change to R2 is appropriate for this area:

- Area is currently adjacent to R2 zones on 3 sides, and multiple lots in the area are an existing R2 use.
- Existing infrastructure can support R2's higher density <u>as-is</u>. R2 designation takes advantage of proximity to Multnomah Blvd. and Capitol bus transit, Multnomah and SW 45<sup>th</sup> Bicycle Routes, and the Barbur Blvd. Park & Ride.
- Walking proximity to services in Multnomah Village town square.

For these reasons I hope City Council will consider designating this area as R2 in the 2035 Comprehensive Plan. We are happy to discuss these items in further detail, feel free to contact us.

Respectfully Submitted,

Don Holman, T.O. Allen Trust Company TR 4055 SW Garden Home Road. Portland, OR 97219 503-330-3388 don@allentrust.com

Mailing: 121 SW Morrison St., Suite 875

Portland, OR 97204

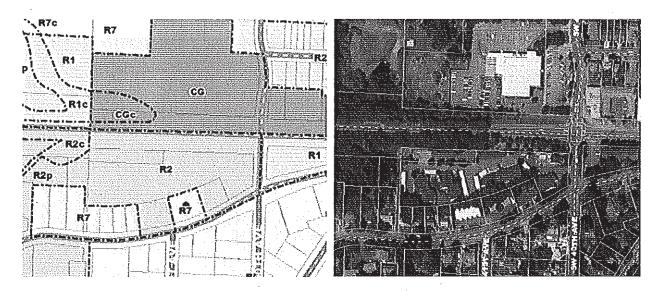
January 5, 2016

Council Clerk City of Portland, Oregon 1221 SW 4<sup>th</sup> Avenue, Room 130 Portland, Oregon 97204

Comprehensive Plan – Public Testimony
Re: Zone Change from R7 to R2 (SW Garden Home Road at 41st Ave.)

Dear Portland City Council members,

My comment is that there is an opportunity to rezone the parcel at 4055 SW Garden Home Rd. Portland, OR 97204-3100 along with 8 other parcels along Garden Home Road between 41<sup>st</sup> and 43<sup>rd</sup> from R7 to R2, to expand additional residential development (see map):



A change to R2 is appropriate for this area:

- Area is currently adjacent to R2 zones on 3 sides, and multiple lots in the area are an existing R2 use.
- Existing infrastructure can support R2's higher density <u>as-is</u>. R2 designation takes advantage of proximity to Multnomah Blvd. and Capitol bus transit, Multnomah and SW 45<sup>th</sup> Bicycle Routes, and the Barbur Blvd. Park & Ride.
- Walking proximity to services in Multnomah Village town square.

For these reasons I hope City Council will consider designating this area as R2 in the 2035 Comprehensive Plan. We are happy to discuss these items in further detail, feel free to contact us.

Respectfully Submitted,

Don Holman, T.O. Allen Trust Company TR 4055 SW Garden Home Road. Portland, OR 97219 503-330-3388 don@allentrust.com

Mailing: 121 SW Morrison St., Suite 875 Portland, OR 97204

From:

Jennifer Andres < jakandres@yahoo.com>

Sent:

Tuesday, January 05, 2016 3:38 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan testimony

Follow Up Flag: Flag Status:

Follow up Completed

## Dear Sir or Madam:

It is my understanding that the developer owning what is currently Strohecker's Grocery at 2855 SW Patton has requested a change from commercial to mixed-use zoning. As a neighborhood resident who frequently shops at Strohecker's, uses its pharmacy, barista, and post office, I urge you to honor the 1984 ordinance requiring a grocery remain on site. I would also urge the developer to maintain the post office and pharmacy. I live 1.3 miles from Strohecker's. The next closest grocery, Zupan's, is 2.8 miles. For most Portland Heights and Council Crest residents, Strohecker's is the only walkable market. The 51 bus runs so infrequently as to be almost useless. When weather becomes inclement, driving is incredibly dangerous here. Strohecker's is not only convenient, it has been a life-saving option during snow and ice storms.

I am deeply saddened Strohecker's is closing. While I understand the developer will want to maximize their investment return, I hope they understand our neighborhood not only needs a grocery but would welcome thoughtful development that could enhance the community.

Thank you,

Jennifer Andres 4260 SW Council Crest Drive portland, OR 97239

From:

Steve Ritchie <Steve.Ritchie@PACCAR.com>

Sent:

Tuesday, January 05, 2016 3:25 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

[User Approved] Stroheckers

Follow Up Flag:

Follow up

Flag Status:

Completed

Regarding the Stroheckers proposal for a change to condos, I strongly oppose this idea. The store is part of Portland's history and should be maintained as a market. Too much of our city is being converted to condos with no respect for the history and character of what made Portland a great place to live.

Steve Ritchie 3833 SW Greeuleaf Dr. Portland, OR. 97221 Cell (425) 830-8427

# CENTRAL NORTHEAST NEIGHBORS, INC.

4415 NE 87<sup>th</sup> Ave \* Portland, OR 97220-4901 503-823-3156

December 7, 2015 (Transmitted January 5, 2016)

City of Portland
City Council <u>karla.moore-love@portlandoregon.gov</u>
1221 SW 4th
Portland, OR 97204

CC: Susan Anderson, BPS Director, <u>Susan.Anderson@PortlandOregon.gov</u>
Leah Treat, PBOT Director, <u>Leah.Treat@portlandoregon.gov</u>
Joe Zehnder, Planning Manager, Joe.Zehnder@portlandoregon.gov
Nan Stark, BPS NE District Liaison, nan.stark@portlandoregon.gov

Subject: Support Letter from Central Northeast Neighbors, Inc. for RCPNA Proposed Amendments to the Recommended Comprehensive Plan Update - Transportation & Parking Elements

Honorable Mayor Hales and City Commissioners:

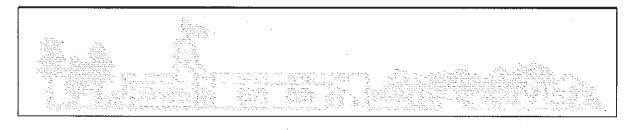
At our December 2-2015 Central Northeast Neighbors, Inc. Board of Directors meeting our board voted to support Rose City Park Neighborhood Association's Proposed Amendments to the Recommended Comprehensive Plan Update - Transportation & Parking Elements to the Draft Comprehensive Plan.

Please see the attached letter, RCPNARCP NA Testimony-TransportationParkingElementsofRecommendedCompPlanUpdate11172015-TDR (002) and CNN Board Minutes December 7, 2015.

Thank you for your consideration. Sincerely,

Jo Schaefer-

Jo Schaefer, Chair



# Central NE Neighbors Board of Directors Meeting Minutes (DRAFT) December 2, 2015

## 1. Roll Call and Call to Order

**Present:** Alison Stoll, Jo Schaefer, Bob Ueland, Catherine Wilson, Ronda Johnson, Ruth Hander, Janis Stange, Karen McAnich, John Sandie, Marilee Dea, Doug Fasching, David Sweet, Tamera DeRidder

**Excused**: Gregg Sneller, Rob Colman, Anne Lindsay, Nancy Fredricks, Kathy Campbell, Yvonne Rice

## 2. Additions To/Approval of Agenda\*

M Bob Ueland, S John Sandie, MSP

## 3. Approval of Minutes of Previous Meeting November

M Bob Ueland, S Janis Stange, MSP

## 4. Approval of Treasurer's Report\*

Ronda gave report on finances, we are under budget by \$328.94 M Catherine Wilson, S Tamera DeRidder, MSP

5. Speaker - David Sweet, CNN Rep. Residential Infill Stakeholder Advisory Committee Questionnaire will be at http://www.portlandoregon.gov/bps/67728 Contact Dave at Cullyquy@gmail.com. See attached report.

#### 6. Grant committee

Special Communication funds. RCP is the only neighborhood to apply for this grant. Doug Made a motion to approve this grant proposal that was written for \$350. There was discussion about adding \$200 to this amount for translation.

M Doug Fasching, S Bob Ueland, MSP

Doug made a motion to extend the deadline for the Special Communication Funds application. Deadline extension would be January 4, 2016 @ 5pm. Applications to be sent to Sandra. Alison will send out the application again to the Board. M Doug Fasching, Marilee Dea, MSP

Tamera Deridder & Jo Schafer Obtained

# 7. Neighborhood & CNN Committee Reports

## Cully - Janis & Mairlee

Jamie resigned for the CAN and CNN Board. Cully will be having a special board meeting in the next week to figure out some new strategies because of his resignation. Dec. 8<sup>th</sup> is there general meeting with guest speakers; Judy Brennan, PPS Family Support and School Choice Director, Jason Trombley, D-BRAC chair, and Michele Arntz, D-BRAC member, Kevin Sullivan will share the work he is doing with Raise the Wage. This will also be their annual Holiday Exchange.

#### Madison South- Ruth & Doug

General Membership meeting is tomorrow. Doug was told that the Fred Myers is going to be getting a Gas station put in, at gateway.

## Hollywood - Jo, Bob

There were about 2400 participants in the Veterans Day Parade this year. The weather was not the greatest but there was so many people who attended! The USO

Show was at the Hollywood Theater, the leftover food was donated to the Hollywood East building residents. The Grotto is giving a military discount day on Dec 7<sup>th</sup>, anyone in the service retired is able to get in with their family for free. Trimet is doing some upgrading of the bus stops in our area please note that some of the bus lines may have changed in your area.

## Rose City Park -Tamera

They are focusing on their newsletter. Next general meeting will be on December 28th the theme will be Boxing Day

## Roseway - Catherine,

Looking in to having set locations like Cully, for the newsletter to be picked up rather than hand delivering them, also looking into moving newsletter to the web. One of the questions in RW is about advertising on the web do any of the neighborhoods do this? Alison is willing to work with RW on this issue.

## Beaumont Wilshire-John

December 4 • 3:30-7:30 pm Beaumont Business Association Fremont Holiday Fest with Mr & Mrs. Claus attending. December 14 • 7:00-8:30 pm BWNA Holiday General Meeting

## Sumner- Karen

Held there first craft day and it was a great success! Sumner will host a craft day every 3<sup>rd</sup> Saturday of the month in our community room. Everyone is welcome to come and bring a craft and just visit. The SAN Tree Planting will be on Dec 12<sup>th</sup> from 9-2pm, we will have the new SAN Lot Sign dedication on that day.

## 8. New Business

## 9. Old Business

Support letter for I-205 underpass (TBOT) to Kelly Brooks

Motion to wright letter on behalf of LUTOP, like Tamera's letter, with changes to some of the language.

M Bob Ueland, S Catherine Wilson, MSP

Marilee Dea, Obstained

## 10. Adjourn Meeting\* 8:30pm

Move to adjourn Bob Ueland, second Doug Fasching and unanimous approval

\*Requires a Board Vote

From:

Margaret Terrall <mterrall@comcast.net>

Sent:

Tuesday, January 05, 2016 2:44 PM

To: Subject: BPS Comprehensive Plan Testimony Strohechers

Follow Up Flag:

Follow up

Flag Status:

Completed

We are very against condos being built at the old location of Stroheckers. We would like another store or restaurant. Our names are Margaret and Scott Terrall at 4710 SW Hewett Blvd, 97221

1

Margaret Terrall

503-292-3626

cell 503-784-2560

mterrall@comcast.net

www.margaretterrall.com

Holiday @ the Oregon coast?

www.vrbo.com Property #187233

From:

Helen Townes <helen\_townes@yahoo.com>

Sent:

Tuesday, January 05, 2016 2:33 PM BPS Comprehensive Plan Testimony

To: Subject:

Comprehensive a Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

## To whom it may concern:

My children are now the 5th generation of our family to use Stroheckers, a neighborhood grocery located at 2855 SW Patton Road. My great-grandmother, my grandparents, my parents and now my family have all lived in the neighborhood and consider Strohs to be a very important landmark and one that is needed, in whatever incarnation that makes it a community heart and meeting center. It is now closing, and there are rumors that the CA owner will be attempting to overturn the 1984 ordinance that required this property to be a grocery. It will be an enormous loss for this property to be turned into condos, no matter the potential profit. Please honor the 1984 ordinance and help preserve the spirit of this special neighborhood landmark.

Very sincerely, Helen Townes 2660 SW Gerald Ave. Portland, or 97201

Sent from my iPhone

Portland City Council
Council Clerk
cctestimony@portlandoregon.gov
cputestimony@portlandoregon.gov
1221 SW Fourth Avenue, Room 130
Portland, Oregon 97204

## Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Diagra	~44	+hic	+^	+ho	record
PIPSCP	ลกก	This	TO	THE	record.

Thank you,

(Your Name) Fred and Claudine Stock \_\_\_\_\_\_

(Your Address) 7035 SW 34th Ave. Portland, OR 97219

cc: 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
City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov
Susan Anderson, Susan.Anderson@PortlandOregon.gov
MNA Land Use Committee, mnaLandUseCommittee@gmail.com

From:

Ann-Marie and Robert <annmarieandrobert@yahoo.com>

Sent:

Tuesday, January 05, 2016 1:40 PM BPS Comprehensive Plan Testimony

To: Cc:

Ann Lamb

Subject:

Comprehensive Plan Testimony: strongly support maintaining the current Ordinance No.

155609 for 2855 SW Patton Rd

Follow Up Flag:

Follow up Completed

Flag Status:

Dear City Council:

We strongly support maintaining the current Ordinance No. 155609 for 2855 SW Patton Rd. We will use the strongest of means in order to maintain the livability of our neighborhood and reasons for purchasing our property in the first place. Additionally, it is being noted how many livability and park settings are being encroached upon by lax planning appearing to veer into greed such as negative health factors and noise from zoo concerts, tearing down parkland to put in commercial buildings in the Japanese garden, the need to protect our trail cut-throughs, etc. There is a growing recognition of the many fronts at which the city is forcing it's taxpayers to protect their livability and as one of the few means possible to taxpaying citizens to protect their rights, there is an increased movement to contact media as well as report out true activities occurring in Portland which make it a less desirable place to live and visit. We will oppose similar attempts by government and developers who appear to be looking for short-term profit in as many pockets as they can.

Our names and address are below.

Ann-Marie Lamb Robert Lunifeld 2865 SW Upper Drive Portland, OR 97201

From:

Subject:

Liz Risch < lizzyrisch@yahoo.com>

Sent:

Tuesday, January 05, 2016 1:03 PM

To:

BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony 2855 SW Patton road

Follow Up Flag:

Flag Status:

Follow up Completed

1984 is Ordinance No. 155609.

the residents of our area would appreciate and back.

Hello, I built a home in the West Hills about 12 years ago. I saw the potential plans for 2855 SW Patton (most recently Strohecker's) and I'm very upset. Not only would this change the history of the west hills, it puts an unknown in the middle of a residential area. I also own more property above ST. Thomas More (where my 3 children go to school). That area is a main hub for us, my kids go to camps in the summer & soccer in the fall. Having the post office, pharmacy and store (last minute lunches or diapers) and other things have been a wonderful over the years. I would think if we needed to change things around a smaller store, a dry cleaner, a wine bar, deli, a small restaurant etc. are all things that

I know their is a lot of anger and frustration going around when people hear that this area could be so drastically changed, the reason many of us moved into this neighborhood is for the community. I don't believe out-of-state developers have community in mind they are talking about the redoing of this area. I know that a lot of people don't even know that this is occurring and when they find out they are equally as upset. I understand their is 1984 ordinance

that protected us, it was fought for by residents of our community and we hope it is respected and withheld.

Thank you,

Elizabeth Risch 2696 SW Talbot Rd Portland OR 97201

Sent from my iPad



January 5, 2016

Council Clerk 1221 SW 4th Ave, Room 130 Portland, OR 97204

Re: Rezone three blocks between North William Avenue and North Gantenbien Avenue, Russell Street and Graham Street from IR to Mixed Use/Residential

Dear Portland City Council Members:

The following are comments and recommendations from the Northeast Coalition of Neighborhoods (NECN) regarding the rezoning of three blocks between North William Avenue and North Gantenbien Avenue, Russell Street and Graham Street from an IR to Mixed Use/Residential zone, as part of the new Comprehensive Plan, that was proposed in a letter dated November 19, 2015 by the North Northeast Business Association (NNEBA) to the Portland City Council.

NECN serves to amplify the voices of community members from twelve inner North and Northeast Portland neighborhoods. The comments included in the testimony below were referred by our Land Use and Transportation Committee and were endorsed by the NECN Board of Directors.

We urge the City to approve the rezoning of this three block area as proposed by NNEBA. This proposed rezoning would help address an over four decades long set of grievances that have been felt by the predominately African American community and businesses that were displaced by the expansion of Legacy Emmanuel Medical Center during the 1970s. As noted in NNEBA's letter, the development of 180 to 300 housing units intended to replace homes demolished by the Legacy Emmanuel hospital expansion never materialized. The rezoning of this three block area would provide the opportunity to develop the units that were promised.

Further, we recommend the NNEBA suggestion of collaborating with a development corporation in partnership with the community, Legacy Health (parent of Legacy Emmanuel Medical Center), Portland Community College, and PDC to foster the land transfer by Emanuel for 180 to 300 housing units and to also plan for the future use of the remainder of the blocks in question as part of future joint residential and commercial development.

We believe that corrective measures are long overdue. Taking this action to rezone this three block area and the creation of the proposed development corporation would begin to help meet NNEBA's goal of reviving a once thriving African American commercial and residential district of Portland.

The NECN Board of Directors and our Land Use and Transportation Committee members thank you for your important work for the future of our city, and we appreciate your consideration of our comments.

Sincerely,

Alan Silver

Chair, NECN Board of Directors

Ordinance 187832, Vol. 1.3.J, page 7641

From:

Hilary O'Hollaren <ohollaren@comcast.net>

Sent:

Tuesday, January 05, 2016 12:34 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

#### Dear sir or madam:

I strongly support keeping the land use agreement for the property at 2855 SW Patton Road, Portland, intact (Ordinance No. 155609). The neighborhood benefits greatly from a grocery store on that site, and any other use would negatively impact the composition and culture of the neighborhood.

Thank you for adding my voice to this matter, and please contact me if you have any questions.

Sincerely, Hilary O'Hollaren 5050 SW Hilltop Lane Portland, OR 97221

From:

Joan L.Kirsch < joanlkirsch@comcast.net>

Sent:

Tuesday, January 05, 2016 11:07 AM

To:

BPS Comprehensive Plan Testimony

Cc:

blytheolson@gmail.com

Subject:

comprehensive plan testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

To Whom it May Concern:

This is a plea to respect Ordinance 155609 in regard to Strohecker's at 2855 S.W. Patton Road, Portland, 97210.

It is well known that Strohecker's has been a rialto and community center for the past century. But in addition to its cohesive function it is vital to consider that this store serves as a one stop mini mall for the Southwest Hills. It is not merely a place for luxury or discretionary buying, but a full service shop, deftly organized in one small space to provide e.g.: food (fresh, frozen, staples), meat and fish accommodating special orders, medical prescriptions, United States Post Office, delicatessen, cafe, flowers, household items, liquor, etc. These goods and services obviate the need to drive to disparate stores at considerable distance in Beaverton or downtown. Minimal bus service to the Southwest Hills makes nearby shopping here even more important.

I hope you will give these priorities due consideration in allowing a small grocery to continue where it has always been. Thank you. Sincerely, Joan Kirsch

Joan L. Kirsch joanlkirsch@comcast.net 4610 S.W.Greenhills Way Portland, Or.97221 503-228-9320

From:

Gabe Schiminovich <Gabriel.Schiminovich@mfin.com>

Sent:

Tuesday, January 05, 2016 11:00 AM BPS Comprehensive Plan Testimony

To: Cc:

blytheolson@gmail.com

Subject:

FW: Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status:

Completed

I would like to request that we keep ordinance (No. 155609) for Strohecker's that was signed into law in 1984. I would ask the city council keep the agreement that was reached with the neighborhood and the city.

Gabriel Schiminovich

5306 SW Hewett Blvd

Portland, OR 97221

From: Mary O'Connor <marycaroloconnor@gmail.com>

Sent: Tuesday, January 05, 2016 10:39 AM

To: BPS Comprehensive Plan Testimony
Cc: blytheolson@gmail.com

Subject: Comprehensive Plan Testimony

Follow Up Flag: Follow up Flag Status: Completed

I would like to request that we keep ordinance (No. 155609) for Strohecker's that was signed into law in 1984. I would ask the city council keep the agreement that was reached with the neighborhood and the city.

Mary O'Connor

5306 SW Hewett Blvd

Portland, OR 97221

Council Clerk 1221 SW 4<sup>th</sup> Ave room 130, Portland 97204

RE: Zone Change Request 15724 E BURNSIDE ST Portland, OR 97233

#### City Council Members:

My property at 15724 E BURNSIDE ST. Portland, OR; is a great place to live. It is on the MAX line and very close to the transit station. People are always walking back and forth in front of my home. I have lived here for 12 years and the traffic has gotten much busier. I am on a fixed income but also have a small business to supplement. I am reliant on this income for my retirement plans. My neighbor told me that you were considering increasing the zone to include small businesses. I would like to develop my property into a small 8 unit apartment building with a store front for my small business. This area has great traffic in front and the MAX brings new people to the area every day. I am a minority business owner and would be very grateful if you could allow me to operate a storefront business from this location. My house has more traffic than many other locations available to me. Please help address the need in our community. Shops and apartments would really help the whole neighborhood. It would also mean a lot to me personally as I would be able to comfortable retire. The recession hit me very hard and this zone change would really help me.

Thank you very much for your consideration.

Kindly.

Wayne King 15724 E Burnside St. Portland, OR 97233

Scott Collins Bridgetown Equity Construction Inc. 347 NE 92<sup>nd</sup> Ave. Portland, OR 97220

Council Clerk 1221 SW 4<sup>th</sup> Ave room 130, Portland 97204

RE: R217943 15706 E. Burnside Portland, OR 97233 Zone Change Request

#### Addressed to City Council:

My property at 15706 E. Burnside Portland, OR; is an excellent candidate to consider a zoning density increase and allowed use change. This will include the ability to use the property for commercial retail, office space as well as its current residential use. The property is currently in the R1 zone and can only be used for residential. This particular block of R1 zone is within ½ mile of the Max Transit Station area at 162<sup>nd</sup> and also inside the Rosewood Neighborhood Prosperity Initiative Area where at least 30% of the businesses are minority owned. I have consulted with the adjacent land owners and we all agree the area would benefit from a change to a mixed-use designation with a neighborhood commercial or mixed use zone for future options in an area that really lacks services. We have gotten very enthusiastic reception from the Rosewood Neighborhood Center as well; there are several minority owned businesses that have expressed interest in starting businesses at this location including early childhood education and nutrition education and low income housing.

Especially given that the property is located along the Max light rail line where there has been a serious lack of amenities and services. This neighborhood is severely underserved in terms of childcare, nutritious food options, financial services, hardware stores and affordable family housing. I feel that comprehensive plan and zoning changes for the area, including this property, is warranted.

Thank you very much for consideration of this vital issue.

Sincerely

Scott Collins

Robert Synak (US - Advisory) <robert.synak@pwc.com> From:

Tuesday, January 05, 2016 9:55 AM Sent: BPS Comprehensive Plan Testimony To:

Comprehensive Plan Testimony Subject:

Follow Up Flag: Follow up Flag Status: Completed

Regarding land use at 2855 SW Patton Rd. Portland. This grocery store property has recently been sold and as a neighbor. I am concerned about it's future use and the impact of that use on the community.

I am concerned by negative impacts to property values and resident welfare, caused by the following possible development paths:

 Lack of enforcement of Ordinance 155609, which restricts building size and mechanics to something appropriate for the neighborhood

 Closure of a local grocery and potential development of the property without a stipulation to maintain a grocery on the property, making the neighborhood will become a food island, without walking distance produce and goods for the residents

Addition of high density housing, without significant developer contributions to schools and infrastructure, resulting in a strain already full institutions (such as Lincoln High and West Sylvan), and further snarling traffic in and out of the neighborhood

My preference is that the property be kept non-residential, a grocery and within the bounds of Ordinance 155609

Robert Synak 3566 SW Council Crest Drive Portland, OR 97239

Home: +1 503 241 2891 Mobile: +1 917 539 9423 robert.synak@pwc.com

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From

Louisa Neumann <louisa@louisaneumann.com>

Sent: To:

Tuesday, January 05, 2016 6:08 AM

Subject:

**BPS Comprehensive Plan Testimony** 

Ordinance #155609 Strohecker's Grocery Store SW Portland Heights

Follow Up Flag: Flag Status:

Follow up Completed

To Whom It May Concern,

Lunderstand that ordinance #155609 is up for debate. As a homeowner at 2798 SW Montgomery Drive, any change happening at the Strohecker's/Periander Park property concerns me. We were saddened to learn that Strohecker's grocery store, pharmacy and post office will be closing within weeks. We visited the store at least 3x a week. The grocery store and adjacent park are an important part of the fabric of the neighborhood - it's the only community gathering place in the immediate neighborhood. It will certainly be a big loss for the neighborhood. The convenience of having a grocery store, pharmacy and postoffice 3 blocks away cannot be underestimated. I hope you will find a way to resurrect a commercial space there quickly.

Thanks for your consideration,

Louisa Neumann 2798 SW Montgomery Drive 503-407-3693

From:

Dave Preston <david.l.preston@gmail.com>

Sent:

Tuesday, January 05, 2016 5:51 AM BPS Comprehensive Plan Testimony

To: Cc:

blytheolson@gmail.com

Subject:

Comprehensive Plan Testimony Strohecker's property

Follow Up Flag: Flag Status:

Follow up Completed

To Whom It May Concern

I live in the Southwest hills of Portland at 3749 SW Chehalem Ave, 97239

I am very concerned that the developer that now owns the property at 2855 SW Patton Rd. (where Strohecker's grocery store has been for the last 100 or so years) will be developed into something other then a grocery store.

The city agreed with the SW hills neighbors in 1984 on Ordinance No. 155609. I feel strongly that this ordinance signed into law in 1984 is still the proper ordinance and that the city council should keep it intact.

One of the most wonderful things about Portland is it's livability and a local grocery store is a key enabler of that in our neighborhood.

Thanks for listening. David L. Preston 3749 SW Chehalem Ave. Portland, Oregon 97239

From:

Shriver, Katie

Sent: To: Monday, February 01, 2016 12:10 PM BPS Comprehensive Plan Testimony

Subject:

FW: [Approved Sender] Requested Changes to the Comp Plan "Future Public Trail

Alignments" in SW Portland

Follow Up Flag:

Follow up

Flag Status:

Completed

I wanted to make sure we submitted this testimony.

Katie Shriver
Office of Commissioner Steve Novick
1221 SW 4th Ave. # 210
Portland, OR 97204
503-823-3005
katie.shriver@portlandoregon.gov

----Original Message-----

From: Nebel, Erika

Sent: Wednesday, January 06, 2016 9:49 AM

To: Don Baack <back@q.com>

Cc: Shriver, Katie <Katie.Shriver@portlandoregon.gov>; Hales, Charlie <Charlie.Hales@portlandoregon.gov>; Alpert, Josh

<Josh.Alpert@portlandoregon.gov>; Novick Steve <stevenovick96@gmail.com>

Subject: RE: [Approved Sender] Requested Changes to the Comp Plan "Future Public Trail Alignments" in SW Portland

Thanks, Don. I imagine you sent a copy to PBOT, right?

Erika Namioka Nebel
Policy Advisor & West Portland Liaison
Office of Commissioner Steve Novick
1221 SW 4th Ave., Suite 210
Portland, Oregon 97204
503-823-3114
www.portlandoregon.gov/novick

----Original Message----

From: Don Baack [mailto:baack@q.com] Sent: Tuesday, January 05, 2016 11:25 AM

To: Hales, Charlie < Charlie. Hales@portlandoregon.gov>; Alpert, Josh < Josh. Alpert@portlandoregon.gov>; Nebel, Erika

<Erika.Nebel@portlandoregon.gov>; Novick Steve <stevenovick96@gmail.com>

Subject: [Approved Sender] Requested Changes to the Comp Plan "Future Public Trail Alignments" in SW Portland

The following changes are requested to the "Future Public Trail Alignments" for SW Portland. A copy of the changes shown on a SW Walking Map was submitted to the City Clerk in early December at the hearing at the MJCC.

See the attached photos ((not in this draft)) of various sections of the SW Urban Trails Map for the key numbers.

Starting from the SW on the SW Walking Map. See Photo 2016 1 5 Comp Plan Trials 1

1. Change the route for Urban Trail 5 west of Dickinson Park so the trail follows SW Huddelson, SW 64th and then goes into a parcel owned by BES to connect to tentative routes being discussed with Metzger and Tigard which will take the route west to Metzger Park and the future trail connecting Tigard and Washington Square. The prior route results in a dead end.

See Photo 2016 1 5 Comp Plan Trials 2

- 2. Change the route for Urban Trail 6 south of SW Maplecrest. from the route shown to a new trail that will connect south Marshall Park through Oregon State Parks lands to connect with the soon to be constructed bridge over Tryon Creek at Boones Ferry Road. The other route was temporary until the planned route was constructed. When complete, this trail will be the Hillsdale to Lake Oswego Regional Pedestrian Trail.
- 3. Confirm the route through Lewis & Clark College to follow that on the walking map. (It is not possible to confirm the route on the map in the Recommended Comp Plan.)

See Photo 2016 1 5 Comp Plan Trials 3

- 4. Add a short segment for Trail 6 that will go from SW 19th east along Capitol Hill Road to SW 17th where it enters Stephens Creek Natural Area. The trail is currently marked for this route which was made possible with Parks purchase of land in Stephens Creek Natural Area after the Urban Trails Plan was developed. This will be the route of the Hillsdale to Lake Oswego Regional Pedestrian Trail.
- 5. Add the segment of Urban Trail 3 from about SW Capitol Hill Road to SW Maplewood Road. This is the city council approved route for Trail 3 except A. Capitol Hwy did not have a sidewalk when the SWTrails Plan was developed, hence we want to use the sidewalk to save about a 20 foot loss of elevation on the other route, B. extend the trail from SW Nevada Ct to a new trail in Gabriel Park, thence through the park to SW 45th where it crosses to land owned by the Multnomah Presbyterian Church who have agreed to an easement but is still in process. The trail then connects to Maplewood Road and continues west. C. West of April Hill Park, continue on Miles Court to Oleson Road did not have sidewalks when the SW Urban Trail plan was developed. This route will follow lower traffic streets and will be safer walking route.

See Photo 2016 1 5 Comp Plan Trials 4

6. The map in the Recommended Comp Plan is hard to read so we are submitting a clear description of the Red Electric connections east of Terwilliger to Corbett. The route will follow SW Nebraska, SW Parkhill Drive and then go a short distance west in Himes park, switch back east, go under Barbur and then loop around to go north across the Newbury Structure to connect with the abandoned Slavin Road and then to connect to the remaining part of Slavin Road and thence Corbett and the Hooley Pedestrian Bridge.

See Photo 2016 1 5 Comp Plan Trials 5

7. The Draft Comprehensive Plan does not have the trail from Patton/Dosch down to Albert Kelly Park. (See also 9) We ask that the route on SW Dosch Road, SW Tunnelwood, SW Jerrod, SW 36th Place thence south to Hamilton and then Albert Kelly Park and SW 18th Place be included. It is very difficult to walk from the crest of the hill at Patton/Talbot into the Bridalmile neighborhood. The SW Urban Trails

Plan took the trail down what is called the Water Meter Trail (see 9) which follows a utility easement and should continue as a desired future route as it is a much safer route.

8. Trail 6 in the SW Urban Trails Plan shows the route going from SW Jackson north to SW Montgomery. However, it is not feasible to build a trail along this right of way. Rather, we seek to have the route run on private property to make the trail feasible. An easement will be needed. Discussions with the landowner about 5 years ago showed that he was willing to negotiate an easement. The second part of the trail linkage allows walkers to avoid a longer and more dangerous route by utilizing a set of stairs that were specified in a land subdivision but never constructed. This will link SW Montgomery to SW Cable.

See Photo 2016 1 5 Comp Plan Trials 6

- 9. Add an alternative route along what is known as the "Water Meter Trail" so that if at some future date arrangements can be made to gain a pedestrian easement, a much better pedestrian connection can be made. The route is an existing water and sewer easement, and is walkable but needs to be improved to make it safer.
- 10. While not a part of the SW Urban Trail system, including a short segment of trail along the south side of I 405 will make bicycle and pedestrian access much better. The route would run from SW 18th to SW Terwilliger along I 405.
- 11. A second key addition to the SW part of the Trail Network is a ped/bike trail along the western edge of Gabriel Park, and a reasonable connection to this route from south. This route is very much needed to provide a safe north south linkage at a much lower cost than rebuilding SW 45th from Vermont to Multnomah. See Photo 2016 1 5 Comp Plan Trials 3.

Members of SWTrails are very willing to meet with the appropriate staff to discuss these important changes.

Don Baack baack@q.com 503-246-2088 call if you need response quickly 5 January 2016

Mayor Charlie Hales Portland City Council 1221 SW 4th Avenue, Room 340 Portland, OR 97204

Re: Portland Comprehensive Plan

Dear Mayor Hales and Portland City Commissioners,

The road to a new Comprehensive Plan has been very long, but fruitful. We applaud the Bureau of Planning and Sustainability for a thorough and thoughtful process. As a comprehensive plan, this document does a good job of providing direction. That said, there are a few suggestions we ask you to consider.

#### Harbor Jobs Forecast

Using the low range marine jobs forecast is disconcerting. On one hand, it's easy to dismiss the choice because any forecast will eventually be wrong. It is only a forecast. On the other hand, it carries two messages that bother us:

- 1. To some, it appears the City is saying the one employment sector worthy of reduction is marine industrial.
- 2. Using the low range forecast in only this one projection raises questions about intent. It's our belief that Planning staff initially used the mid-range forecasts throughout the document—a reasonable and predictable thing to do.

We suggest using the mid-range forecasts in all cases and adjusting policy to fit the numbers, rather than adjusting the numbers to fit the policy.

#### Brownfield Redevelopment

While we're very excited about the increased desire for brownfield redevelopment, we're concerned about the very ambitious targets without increased funding. It's far past time for us to get more serious about cleaning up contaminated sites. They're bad for the economy, the environment, human health and Portland pride.

CCA has worked on the brownfield paradox for over ten years and has a good understanding of the obstacles. We applaud city efforts to improve our brownfield legacy. The Comp Plan is a continuation of those efforts; however, words without funding tend to fall short. The funding doesn't have to come from the City, but the City does have to take steps to make funding available.

We suggest including language that either suggests adequate funding to hit the brownfield redevelopment targets or legislative changes, such as increased protection for buyers, that will lead to availability of more private funding. If we had done this in the last Comp Plan, our City would be a healthier place today.



#### **Industrial Zoning Designation**

We are heartened by the attention to the industrial sector. There were some good ideas, but at least one that got distorted into not such a good idea. CCA was initially pleased with the idea to give all the Columbia Corridor golf courses a special zoning designation that would allow them to easily convert to industrial, should they desire to do so. If this designation had been applied evenly, as initially intended, it may have worked. However, exemptions were given to Columbia Edgewater Country Club and City-owned Heron Lakes Golf Club. The result is that Riverside Golf & Country Club has had to battle the public perception that they are converting to industrial land while the others are not. This has created a financial burden on their marketing efforts.

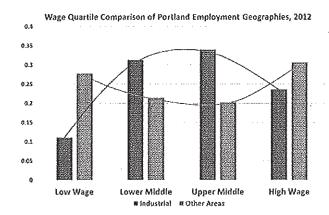
We ask that you give Riverside the same exemption from this designation that was given to Columbia Edgewater and City-owned Heron Lakes.

At the same time, Broadmoor Golf Course welcomes the zoning designation as a potential benefit to their long-term plans. Keeping the zoning designation for this property would be beneficial to Broadmoor and the City's Comp Plan.

#### Middle Wages and Equity

Portland has done much to improve equity, but we often overlook some of the most effective solutions. The growing wage gap has perhaps the greatest negative impact on communities of color and our poorest neighborhoods. It leads to disparities in employment, income, education, criminal justice, health and housing. Some of the solution lies in our industrial sector.

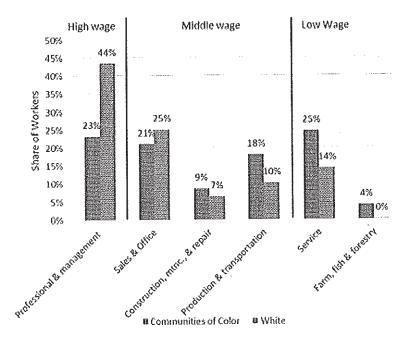
CCA has worked with City staff to study Portland's wage gap. Some of the findings are:



The industrial sector provides primarily middle wage jobs, offsetting the wage gap created by the other employment sectors in Portland.

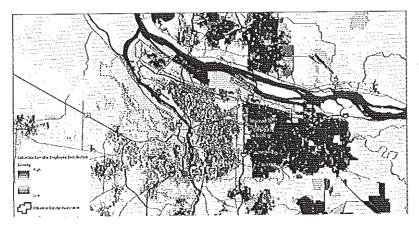
Source: Portland Bureau of Planning & Sustainability

## COLUMBIA CORRIDOR



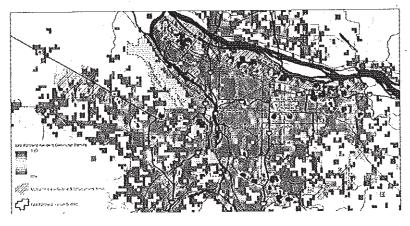
Industrial businesses hire more communities of color than any other middle or high income sector. The other sectors that hire high percentages of communities of color pay low wages, exacerbating the wage gap and increasing the need to fund affordable housing.

Source: Coalition of Communities of Color in Multnomah County



The hotspots for where Columbia Corridor employees live are east of I-205. The middle wages earned in industrial jobs are going to the neighborhoods that need it most.

Source: Portland Bureau of Planning & Sustainability from LEHD data



The hotspots for where east Portlanders work are primarily in industrial areas. Hash marks designate industrial zoning.

Source: Portland Bureau of Planning & Sustainability from LEHD data

## COLUMBIA CORRIDOR

The Comp Plan should recognize that the industrial sector has a greater impact on Portland's wage gap than any other employment sector. Industrial employment does more to lift the middle class and communities of color than any other employment sector. The industrial sector offered \$15/hour and above as minimum starting wages for employees without degrees or experience long before the current debate over a phased \$15/hour minimum wage. The industrial sector included sick leave as the norm long before the City debated a sick leave policy. Industrial employers make their share of mistakes, but they provide good living wages for families that need it most.

We respectively suggest adding a call for reduction of the wage gap in an effort to reduce racial disparities. Efforts to assist employment sectors that pay middle wages and employ high percentages of communities of color should be prioritized in our long range planning.

Thank you for your efforts and consideration of our requests.

Respectfully submitted,

Corky Collier Executive Director January 5, 2016.

Mayor Hales and Members of the City Council City of Portland 1221 SW 4th 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, we 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.

Our primary concern regarding the proposed Comprehensive Plan Designations has to do with the new Comprehensive Plan designation of Mixed Use Dispersed on three of our properties. Although we know that at this time you are addressing only the Comprehensive Plan Designations, the Discussion Draft of the Mixed Use Zones Project provides additional evidence demonstrating that for several of our properties, the proposed Mixed Use Dispersed plan designation is inappropriate.

In general we have three major objections to the Comprehensive Plan designations as proposed at this time.

- First, the proposed Mixed Use Dispersed plan designation is implemented by only two zones, limiting application of zones that may be more appropriate when properties are considered individually.
- Second, the Mixed Use Zoning project is in process and although language is proposed, changes
  are certainly forthcoming. Impacts of the Comprehensive Plan designations cannot be understood
  and/or evaluated until the Mixed Use Zoning Project is finalized.
- Third, we have great concerns about future zoning regulations that may make any of our existing sites and/or buildings non-conforming in terms of use and/or development standards.

Proposed Mixed Use Dispersed Plan Designation

The proposed Mixed Use Dispersed plan designation is the least intense of the proposed mixed use plan designations. This designation allows mixed use, multi-dwelling, or commercial development that is small in scale, has little impact, and provides services for the nearby residential areas. Development will be similar in scale to nearby residential development to promote compatibility with the surrounding area.

2001 SIXTH AVENUE—SUITE 2300 SEATTLE, WASHINGTON 98121 PH 206.448.1975 | FX 206.448.1978 richardp@belmarprop.com

This designation is intended for areas where urban public services are available or planned. Areas within this designation are generally small nodes, rather than large areas or corridors.

Six of our properties are proposed to be designated Mixed Use Dispersed. For three (3) of those properties, the Mixed Use Dispersed plan designation seems appropriate. However, for the other three, the Mixed Use Dispersed plan designation is inappropriate. The three properties that we do not believe to be appropriate for the Mixed Use Dispersed plan designation are shown on Table One.

Table One
Mixed Use Dispersed Plan Properties

Address	Map Change Number	Existing Use	Existing Plan	Proposed Plan	Existing Zoning	Proposed Zoning
907-915 SW Gibbs	1144	Retail	Urban Commercial	Mixed Use Dispersed	Commercial Storefront	CM1
825 SE 60th	254	Vacant	Office Commercial	Mixed Use Dispersed	Commercial Office -1	CM1
60 <sup>th</sup> & Belmont	254	Vacant	Office Commercial	Mixed Use Dispersed	Residential 5,000 square foot lots (R-5)	CMI

Only two zoning districts are proposed to implement the Mixed Use Dispersed plan designation — Commercial Mixed Use 1 (CM1) and Commercial Employment (CE). The CE zone allows limited manufacturing and distribution and may not necessarily be compatible with residential development. That means for properties within existing residential and commercial nodes, only one zone designation is available to implement the Mixed Use Dispersed plan designation, that zone is CM1. Although we understand that there is a need for smaller scale mixed use developments, we believe that there are sites within mixed use nodes suitable for more intense development based on the availability of transit and other services, adjacent development patterns and topography. These sites may warrant individual consideration as the Mixed Use Zoning Project continues. But as the proposed Comprehensive Plan is drafted, the properties that are designated in the plan as Mixed Use Dispersed have only one option in nodes where employment uses are less appropriate.

Specifically, we believe the properties at 60<sup>th</sup> and SE Belmont and at 915 SW Gibbs are suitable for a zone that allows greater development intensity than that which is allowed by the CM1 zoning. The property at SE 60<sup>th</sup> and SE Belmont is comprised of two adjacent properties. The city identifies one as 825 SE 60<sup>th</sup> Avenue and the other as SE 60<sup>th</sup> and SE Belmont, as shown in Table One. This location is well served by transit, is on a corner, is across the street from the five story Acute Rehab Medical Facility, and is appropriate for mixed use development. The CM1 zone has a maximum height allowance of 35 feet with no provision for a height bonus. The only other available zoning designation within the Mixed Use Dispersed plan designation is the CE zone that allows a maximum height of 45 feet and is designed more for employment based uses, allowing for light manufacturing and distribution. The limited height of the CM1 zone is not necessary at this location given the nearby development. Considering the property's proximity to transit and the nearby development patterns, it is appropriate for four stories. The CM2 zone, which allows additional height and FAR, is more consistent with established development in the area, but is not an option so long as the Mixed Use Dispersed designation proposed for the site remains.

The Gibbs property is within the densely developed medical service neighborhood of OHSU where mixed use development is desired and the 35 foot height limitation is not necessary. A result of this limited

Comprehensive Plan Amendment process to simply gain the development rights of the CM2 zone, a more appropriate zone, but not available with the Mixed Use Dispersed plan designation. We believe staff should have the ability to apply the CM2 zone where appropriate. It should be noted that both the CM1 and CM2 zones are intended to be pedestrian-oriented and generally compatible or complementary to the scale of adjacent residentially zoned areas.

Additionally, the property at SW Gibbs is currently zoned Commercial Storefront (considered a medium scale zone), which allows for a maximum height of 45 feet and a base FAR of 3:1. However, the only two allowable zones within this Mixed Use Dispersed plan designation are CM1 and CE, which allow maximum heights of 35' and 45' feet, respectively, and a Base FAR of 1.5:1 and 2.5:1, respectively. Either zoning designation reduces the development potential from that which is allowed today, which we don't believe is the goal of either the new Comprehensive Plan or the Mixed Use Zones Project.

There are ways to address the limitation of the proposed Mixed Use Dispersed Comprehensive Plan designation, such as the following:

- Remove the definition of the Mixed Use Neighborhood plan designation for corridors and centers
  only, and designate the 60<sup>th</sup> and Belmont property and the Gibbs property as Mixed-Use
  Neighborhood. This would provide an opportunity to rezone the properties to the more appropriate
  CM2 zone.
- Allow the proposed CM2 zone to be implemented within the Mixed Use Dispersed plan designation. This would provide staff discretion in applying zoning and would allow the CM2 zone to be applied where appropriate. Within the proposed plan designations that are intended for the greatest density and intensity, Mixed Use Civic Corridor and Mixed Use Urban Center, all four of the proposed mixed use zoning designations are allowed, including the most restrictive zone (CM1). This allows staff to use discretion for those sites and apply lower density zoning designations, CM1 and CE, that may not meet the strict definition of the two higher density plan designations. However, the Mixed Use Dispersed plan designation is proposed to be implemented with only two zones, eliminating the application of a more appropriate zone where a site does not require the limitations imposed by the CM1 zone. We suggest that the CM2 zone be allowed as an implementing zone in the Mixed Use Dispersed plan designation to allow its application where appropriate, such as the properties at SE 60th and SE Belmont and 915 SW Gibbs.

Non Conforming Development

We understand that the mixed use zoning project addresses building scale, transitions, historic and local character and other design and context related issues. These standards have the potential to create nonconforming development issues for our 27 built properties affected by the mixed use zoning project. As the proposed comprehensive plan designations will be implemented by the zoning designations, we are not able to support any plan that may render existing development non-conforming. If properties are made to be non-conforming, it may hinder their upkeep and/or expansion.

At this time, we also opposes the specific designation of Mixed Use Dispersed on the three properties identified above. We request that these properties be designated Mixed Use Neighborhood in order to be evaluated for the CM2 zoning designation or that the CM2 zone be allowed as an implementing zone within the Mixed Use Dispersed plan designation. I have attached

3

March 11, 2015, as well as a copy of the letter we have submitted regarding the Mixed Use Zones Project, dated November 16, 2015.

Thank you for the opportunity to present this testimony.

Sincerely

Richard Piacentini Belmar Properties

Attachments

Cc: Marty Stiven, Stiven Planning & Development Services, LLC. Mike Robinson, Perkins Coie

November 16, 2015

City of Portland Bureau of Planning and Sustainability Attn: Mixed Use Zones Project 1900 SW 4<sup>th</sup> Avenue, Suite 7100 Portland, OR 97201

My name is Richard Piacentini and I am submitting this written testimony regarding my review of the Mixed Use Zones Project Discussion Draft – September 2015. 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

We applaud the city in its effort to revitalize the existing commercial zoning within the city and simplify the existing code. However, we would encourage you to continue to maximize development opportunity where development is warranted and likely to occur. At the same time, we ask that you allow flexibility in use and standards within the outlying areas of the mixed use zoning area where uses are likely to change less radically over time. We encourage you to review the following concerns:

#### New Commercial/Mixed Use Zones.

Drive-Through Uses

One of the concepts behind the Mixed Use Zone project is to foster economic development and to encourage development in outlying areas of the city. As shown on Table 1, eight (8) of our properties are located in outlying areas of Portland that are not likely to redevelop in the foreseeable future.

It is important that these properties retain flexibility to respond to market demand in the interim until the opportunity to redevelop occurs. To that end, several of these sites currently allow drive through windows associated with banks, pharmacies and coffee shops. As proposed in the Mixed Use Zone Concept draft, drive through uses will only be allowed in the CE zone. They are prohibited in CM1, CM2 and CM3 zones. As shown below, five (5) of the following properties allow drive through uses today, a feature that will be lost under the proposed zoning code. Two of the properties, those located at 4504 SE 122<sup>nd</sup> and 10350 SE Holgate are also properties unlikely to redevelop in the near future and should be flexible in attracting tenants by allowing drive-through uses. The newly created CE zone allows drive-through uses and can be applied to all of the properties below. For that reason, the properties in outlying areas should be rezoned to CE as identified below:

2001 SIXTH AVENUE—SUITE 2300 SEATTLE, WASHINGTON 98121

PH 206.448.1975 | FX 206.448.1978 richardp@belmzeprop.com

## Existing and Proposed Zoning Drive-Through Allowances

Address	Existing Zoning	Drive-through Allowed	Proposed Zoning	Drive-Through Allowed
12217 SE Foster Road	CG	Yes	CM2	No
11132 SE Division	CN2	Yes	CM2	No
16226 SE Division	CN2	Yes	CM1	No
16152 NE Sandy	CN2	Yes	CM1	No
13521 SE Powell	ÇG	Yes	CE	Yes
11030 NW St. Helens Road	CG	Yes	CM2	No
4504 SE 122 <sup>nd</sup> Avenue	CS	No	CM2	No
10350 SE Holgate	CS	No	CM1	No

#### **Unrealized Development Potential**

Eight (8) properties have the potential to accommodate more density than is proposed in the new Mixed Use Zone Project. They are shown in Table Two.

Table Two
Unrealized Development Potential
Existing and Proposed Zoning

Address	Existing Zoning	Proposed Zoning	Requested Zoning
60th & Belmont (2 lots)	CO1/R5	CM1	CE
907-915 SW Gibbs	CS	CM1	CE
8511 SW Terwilliger	CN2	CM1	CM2
2038 SE Division	CS	CM2(d)	CM3
2983 SE Belmont	CS	CM2 (d)	CM3
1930 E Burnside	CS	CM2(d)(m) .	CM3
1206 SE Belmont	CG	CM2 (d)	CM3
2270 NW Glisan	CS	CM2(m)	CM3

All of these properties are located in areas where additional development could be accommodated. All are small and in areas where redevelopment is poised to occur. However, these small sites are inefficient to develop and greater density potential will provide more incentive for development to occur. In all of these properties the higher densities are appropriate and will help to serve a growing city. These properties are discussed below:

#### 60th and Belmont

These two vacant properties are located at the northeast corner of 60th and Belmont. On the northwest corner is a single story pharmacy. However, both the southeast and the southwest corners are developed with properties in excess four and five story buildings and neither corner is proposed for rezoning. One is a multi-family development and the other is a former hospital dormitory. Our properties are adjacent to an existing two story development and could easily accommodate additional development with no negative impact on the residential development that occurs away from the immediate intersection.

8511 SW Terwilliger 2038 SE Division 2983 SE Belmont 1930 E Burnside 1206 SE Belmont 2270 NW Glisan

These properties are in active neighborhoods where there is a strong demand for housing, and redevelopment is either occurring or is likely to occur. They are located at or near intersections where additional height and FAR could easily be accommodated. The city is missing an opportunity to increase development potential by not applying greater density at these locations.

#### **Decreased Development Potential**

In two specific cases the proposed zoning is actually a significant down zone and a reduction in development potential and allowed uses. The properties at 907-915 SW Gibbs and the property at 10350 SE Holgate are both currently designated as Commercial Storefront (CS) and proposed to be rezoned to Mixed Commercial 1 (CM1). According to Page 72 of the Discussion Draft, the existing Commercial Storefront Zoning (CS) is considered a medium scale zone, but the proposed CM1 zone is a small scale zone and allows the least intense development of the new small scale zones. If approved the allowable height is reduced from 45 feet to 35 feet and FAR base is reduced from 3:1 to 1.5:1. Even with the potential for FAR bonus in the CM1, the maximum FAR allowed in the proposed zone is 2.5:1. This is a significant reduction in development potential. The Mixed Use Dispersed plan designation has been proposed at these locations, which prohibits the CM2 zoning. Therefore either the plan designation should be changed to Mixed Use Neighborhood to allow the CM2 zoning, or the CE zoning should be applied and the Mixed Use Dispersed Plan designation retained.

#### Expansion of the New Design Overlay (d)

The following properties have a Design Overlay (d) as shown in Table 3. Some have existing Design overlays but some are new by virtue of being designated on the Comprehensive Plan as Mixed Use Urban. Table 3 shows those properties that retain the (d) overlay and those where a new (d) overlay is proposed.

Table Three
Existing and Proposed Zoning
Design Overlay

Address	Existing Zoning	Proposed Zoning	
2038 SE Division	CG	CM2 (d)	
2983 SE Belmont	CS	CM2 (d)	
2730 NE Glisan	CN2	CM2(d)	
1930 E Burnside	CN2	CM2(d)	
1206 SE Belmont	CN2	CM2(d)	
3320 NE Sandy Boulevard	CS(d)	CM3(d)	
9101 N. Lombard	CS(d)	CM2(d)	
1505 N Going	EX(d)	CM3(d)	

All of these properties are being placed into a new Design Overlay district because they are designated on the Comprehensive Plan as Mixed Use Urban. It is unknown at this time what changes might be made to

requiring future amendments. These amendments should be identified prior to adopting the Mixed Use zoning code or the map changes.

#### Application of New Centers Main Street Overlay Zone (m)

The purpose of the new (m) overlay is to enhance the active pedestrian main street qualities of key streets within Comprehensive Plan designated centers. The tool is designed to be applied throughout the city in areas where these more specific pedestrian-oriented qualities, active uses and minimum levels of development are desired. In addition to the Centers Main Street Overlay Zone, two properties fall within newly designated Plan Districts. In those cases both the regulations of the Centers Main Street Overlay and the Plan Districts apply.

Table Four
Existing and Proposed Zoning
Center Main Street Overlay

Address	Existing Zoning	Proposed Zoning	Proposed Plan District	Preferred Zoning
4904 N Lombard	CS	CM2	None	CM2
3506 SE 52nd	CG	CM2 (m)	None	CM2
16226 SE Division	CG .	CM2 (m)	None	CE
7210 SE Milwaukie	CS	CM2 (m)	None	CM2
3425 SW Multnomah Bivd.	CS	CM2 (m)	None	CM2
2270 NW Glisan	CS	CM2 (m)	None	CM3
1930 E Burnside	CS	CM2(d)(m)	None	CM3
2730 NE Glisan	CS	CM2 (m)	None	CM2
2038 SE Division	CS(j)* '	CM2	Division Street	CM3
3320 NE Sandy	CS(j)*	CM3	Sandy Boulevard	СМЗ

<sup>\*</sup>Main Street Corridor

All but two of these properties currently front on transit streets. Those sites along transit streets must meet many of the same or similar standards for building location, ground floor windows, and entry doors. Nonetheless, the concern regarding the Centers Mains Streets overlay zone as described in the Discussion Draft 33.415.100 is based on the fact that all of these properties are occupied with existing successful retail shops. These existing sites may be out of compliance with several provisions of the proposed 33.415.100. Specifically they are unlikely to be in compliance with the follow proposed provisions:

#### 44.415.320 Maximum Building Setbacks

The maximum building setbacks allowed in the CM2 and CM3 zones is between 10 and 20 feet. The typical retail store will have parking between the street and the building, inconsistent with this standard.

#### 33.415.330 Location of Vehicle and Exterior Display Areas

These provisions limit no more than 40 percent of the frontage on a transit street to be used for vehicle areas or exterior display. Many of the retail stores have a majority of the frontage used for vehicle areas.

Also, this section prohibits surface parking areas and access to surface parking area within 40 feet of a corner. Many stores are not in compliance with this section.

Two of the properties, 3425 SW Multnomah and 7200 SE Milwaukie, do not front on a transit street, so the "m" overlay introduces a new set of standards to the sites. The Discussion draft does not propose to change the standards for non-conforming development (33.258), so as long as future building alteration moves a development closer to compliance with the standards in effect at the time of the application, there should be no impact.

#### Plan Districts

Further, two of the properties on Division and Sandy Boulevard are subject to the provisions of the newly established plan districts. The Division Street Plan District adds further restrictions which will add to the non-conformance of the properties. These provisions reinforce the prohibition of surface parking area within 40 feet of a corner.

The Sandy Plan District standards may make the placement of the building along Sandy Blvd out of compliance with 33.575.110 Building Facades Facing Sandy Boulevard.

Again, so long as the non-conforming standards section of the code is not changed and any building alteration moves the development closer to compliance, there should be no problem with future development. However, it should be noted that we are relying on no changes to the non-conforming development standards.

#### Transportation Impact Review

Section 33.852 has been redrafted to be applied to mixed use projects. It is unclear what will trigger a Transportation Impact Review. It is my understanding that much about the Transportation Impact Review is unknown and will not be adopted until the city has a new Transportation System Review. Therefore, the Mixed Use Zoning code should not be adopted until the details of the new Transportation System Review are identified.

I encourage you to consider these changes as you move ahead with the Mixed Use Zoning Project.

Very truly yours,

Richard Piacentini Belmar Properties

Cc: Mike Robinson, Perkins Coie

Marty Stiven, Stiven Planning & Development Services, LLC

March 11, 2015

Chairman Baugh and Members of the Planning and Sustainability Commission City of Portland 1900 SW 4<sup>th</sup> Avenue, Suite 7100 Portland, OR 97201

Dear Chairman Baugh and Members of the Commission,

My name is Richard Piacentini and Lam submitting this written testimony regarding the Proposed 2035 Comprehensive Plan Map designations. My company, Belmar Properties, manages properties controlled by members of the John Piacentini family, including those in the following ownerships:

- Rosehili investment, LLC
- Siena Capital, LLC
- John B. Piacentini Trust
- Louise Piacentini
- J&F Investments, LTD

Collectively, the companies and individuals own 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. A complete list of the properties and the proposed Comprehensive Plan Map Designations is attached as Appendix A.

We have delayed responding to the proposed Comprehensive Plan Map Designations until now as we have been attempting to understand how the plan designations would be implemented through the corresponding zoning. As you know, the Mixed Use Zoning Project is ongoing and at this time much is unknown about the future zoning, which makes us unable to evaluate the impact of the Comprehensive Plan designations. Therefore, at this time we are unable to support any of the proposed plan designations as there is too much that is unknown about how the Comprehensive Plan Designations will be implemented.

In general we have three major objections to the Comprehensive Plan as proposed at this time.

- First, the proposed Mixed Use-Dispersed plan designation is implemented by only two zones, limiting application of zones that may be more appropriate when properties are considered individually.
- Second, the Mixed Use Zoning project is in process and although concepts have been proposed, nothing is certain and changes are certainly forthcoming. Impacts of the Comprehensive Plan designations cannot be understood and/or evaluated until the Mixed Use Zoning Project is further along.
- Third, we have great concerns about future zoning regulations that may make any of our existing sites and/or buildings non-conforming in terms of use and/or development standards.

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#### Proposed Wixed Use - Dispersed Plan Designation

Six of our properties are proposed to be designated Mixed Use Dispersed. These six properties have existing Comprehensive Plan Designations of Office, General, Urban and Neighborhood Commercial and Residential, Their current zoning includes CO1, CG, CS CN2 and R5. Their addresses are as follows:

- 825 SE 60<sup>th</sup> and adjacent property (2 parcels)
- 1817 SW Skyline Boulevard
- 915 SW Gibbs
- 10350 SE Holgate
- 16152 NE Sandy

As of now, only two zoning districts are proposed to implement the Mixed Use-Dispersed Plan Designation — Commercial Mixed Use 1 (CM1) and Commercial Employment (CE). As proposed, all of the CE zoned properties require a location within either a designated center or corridor. That means that for properties outside of centers or corridors only one zone designation is available to implement the Mixed Use — Dispersed Plan designation, that is CM1. Although we understand that there is need to for smaller scale mixed use developments, we believe that there are sites outside of designated centers and corridors that are suitable for more intense development based on the availability of transit and other services, adjacent development patterns and topography. These sites may warrant individual consideration as the Mixed Use Zoning Project continues. But as the proposed Comprehensive Plan is drafted, the properties that are designated in the plan as Mixed Use Dispersed have only one option if they are outside of a center or corridor and that is the very restrictive CM1.

Specifically, we believe the vacant property at 60<sup>th</sup> and Belmont and the property at 915 SW Gibbs are suitable for a zone that allows greater development intensity. The site at 60<sup>th</sup> and Belmont is well served by transit, is adjacent to 6 story development and is appropriate for mixed use development. The Gibbs property is within the densely developed medical service area where mixed use development is desired. However, because they are proposed to be designated as Mixed- Use Dispersed, and outside of a center or corridor, the only implementing zone available for the sites is CM1. A result of this limited implementation of the plan designation is that property owners will be required to go through the Comprehensive Plan Amendment process to simply gain the CM2 zoning. There are several ways to address this limitation of the Proposed Comprehensive Plan such as the following:

- Remove the restriction of the Mixed Use Neighborhood plan designation for corridors and centers
  only, and designate the 60<sup>th</sup> and Belmont property and the Gibbs property as a Mixed-Use
  Neighborhood. This would provide an opportunity to rezone the property to the more
  appropriate CM2 zone.
- Allow the proposed CM2 zone to be implemented within the Mixed Use-Dispersed Plan Designation. This would provide staff discretion in applying zoning and would allow the CM2 zone to be applied where appropriate. Within the proposed plan designations that are intended for the greatest density and intensity, Mixed Use Civic Corridor and Mixed Use Urban Center, all four of the proposed mixed use zoning designations are allowed, including the most restrictive one (CM1). This allows staff to use discretion for those sites that may not meet the strict definition of those two plan designations. However, the reverse is not being proposed. The Mixed Use Dispersed plan designation is proposed to be implemented with only two zones, eliminating the application of a more appropriate zone where a site does not require the limitations imposed by the CM1 zone. We would suggest that the CM2 zone be allowed as an implementing zone in the Mixed Use Dispersed designation to allow its application where appropriate, such as the properties at 825 SE 60th and 915 SW Gibbs.

#### Mixed Use Zoning Project

In addition to the limited zoning options within the Mixed Use Dispersed designation there are many unknowns about the implementing zoning that prohibit a complete understanding of its impacts. Specifically,

- Although the city is proposing to eliminate the current allowance for unrestricted residential FAR within mixed use zones, it is unknown how the FAR allowances will be revised to compensate for this loss;
- Within the proposed CM1 and CE zones, staff is contemplating further restrictions to retail
  development. These restrictions may be limited to maximum tenant sizes, but there is no specific
  proposal at this time. Six of our properties proposed for CE or CM1 zoning are retail
  establishments and would be subject to the proposed limits on retail development.
- The proposed CE zone restricts residential use, but in what manner is unknown at this time. Five sites scattered among the four proposed Mixed Use Comprehensive Plan Designations are proposed to be rezoned to CE.
- As currently proposed, eight of our properties will have reduced maximum height standards. In some cases the current height may be restored through bonus provisions. The eight properties are scattered throughout proposed as Mixed Use Civic Corridor, Mixed Use Dispersed, Mixed Use Neighborhood, or Mixed Use Urban Center. However, what those bonus provisions may provide will be developed through the Mixed Use Zoning project, making it impossible for us to evaluate the impact of the proposed Comprehensive Plan Designations at this time.

#### Non Conforming Development

We understand that the mixed use zoning project is addressing building scale, transitions, historic and local character and other design and context related issues. These standards have the potential to create nonconforming development issues for the 29 built properties affected by the mixed use zoning project. As the proposed Comprehensive Plan Designations will be implemented by the zoning designations, we are not able to support any plan that may render existing development non-conforming. If properties are made to be non-conforming, it may hinder their upkeep and/or expansion.

At this time Belmar Properties also opposes the specific designation of Mixed Use Dispersed designation on the six properties identified above. We request that these properties be designated Mixed Use Neighborhood in order to be evaluated for the CM2 zoning designation.

Based on the information presented in this letter, we request that the Planning Commission delay a recommendation to City Council regarding the Mixed Use Comprehensive Plan designations until the Mixed Use Zoning Project is presented in its final form. We look forward to continuing to work with the

planning stan as they refine the zoning concepts that have been made available to the public. We are continuing to work with the neighborhood planners on map designations and design concepts, but believe it is premature to recommend Comprehensive Plan designations prior to understanding their impact on individual properties. Comprehensive Plans are long range documents, 20 years in this case. Map designations are difficult to change. Property owners and the city have a good opportunity to get it right now and minimize the need for changes in the near future.

Thank you for the opportunity to present this testimony.

Very truly yours,

Richard Piacentini President

Attachment

CC: Barry Manning, Mixed Use Project Manager

From: BPS Comprehensive Plan Testimony

To: Engstrom, Eric

Subject: Fw: mas response to: DEMOLITION/ASBESTOS CONCERNS POSTED ON NEXTDOOR: SUNNYSIDE

**Date:** Monday, February 6, 2017 10:37:48 AM

From: Moore-Love, Karla

**Sent:** Tuesday, January 5, 2016 6:42 PM **To:** BPS Comprehensive Plan Testimony

**Subject:** FW: mas response to: DEMOLITION/ASBESTOS CONCERNS POSTED ON NEXTDOOR:

**SUNNYSIDE** 

**From:** Schwab Mary Ann [mailto:e33maschwab@gmail.com]

**Sent:** Sunday, January 03, 2016 3:02 PM

**To:** Moore-Love, Karla < Karla. Moore-Love@portlandoregon.gov>

 $\textbf{Cc:} \ \textbf{Kincaid Maryhelen < jamasu88@msn.com>; Molinaro, Michael < molinaroarchitect@gmail.com>;} \\$ 

Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Grumm, Matt

<Matt.Grumm@portlandoregon.gov>; Pellegrino, Martha

<Martha.Pellegrino@portlandoregon.gov>; McCullough, Robert <Robert@mresearch.com>; Jordan

Tony <twiordan@gmail.com>

Subject: mas response to: DEMOLITION/ASBESTOS CONCERNS POSTED ON NEXTDOOR: SUNNYSIDE

#### Good Morning Karla, et al:

Kindly enter my email into the official Comp Plan 2035 testimony and share hard-copies with City Council.

In addition, I am hereby requesting Commissioner Dan Saltzman instruct Martha Pellegrino's Team to take this serious public health issue related to flying asbestos and lead paint dust in the air to Governor Brown's attention.

SB 705 Asbestos Rule-Making Requirement mandating survey PRIOR to a residential demolition continues to be blindsided when it comes to beautiful treasured turn-of-the-century bungalows constructed in

Mixed Commercial zones; e.g., along SE Division, SE Hawthorne Blvd., and SE Belmont?

#### Take for example:

Four Stories Proposed to Replace 1909 Hawthorne Home ... www.portlandchronicle.com/four-stories-replace-106-year-old-hawthorn...

Jan 14, 2015 - **Demolition** Confirmed for 1909 Hawthorne **Home**, Protest Today ... The**property** is located at 3423 **SE Hawthorne Blvd**. in the Sunnyside neighborhood. ... A sign on on the **house** reads "Hawthorne **Monkey** Tail

#### Apartments.".

I have been told, that Developer's sub-Contractor was not required to notify immediate property owners when to expect their dumpster to arrive, giving a seven (7) day notice -- via a door-hanger. Nor was their Demolition Permit posted on or near the site. Did I fail to mention, located next door to a open patio, where patrons sat eating meals?

Nor was this Developer's sub-Contractor required to issue protective eye/face masks, leather gloves for their demolition crews. So at what point does OSHA come into play here to protect day-labors paid minimum wages, without health benefits?

I am hopeful that DRAC stakeholders will join forces with Martha Pellegrino's efforts when lobbying both the State of Oregon and the city of Portland to close the gap between citizen complaint calling for DEQ Inspectors completing their survey and BDS requesting DEQ documentation, prior to issuing the Developer a demolition permit regardless of the ZONE(S) existing.

As always, Mary Ann Schwab, Community Advocate 605 SE 38th Avenue Portland, OR 97214 (503) 236-3522

\*\*\*

#### **Demolition/Asbestos concerns**1d ago

Ben Peterson from North Richmond

?

Hi everyone -

A few homes adjacent to us have been slated for demolition and development (on 44th and Hawthorne). Although demolition is inevitable, my wife and I are concerned about the proper inspection and removal of asbestos from the two homes before they are knocked down. As the Oregonian has reported (<a href="http://www.oregonlive.com/portland/index...">http://www.oregonlive.com/portland/index...</a>), a ton of homes have been leveled with no inspection for hazardous fibers and, consequently, no regard for the safety of the neighborhood.

Does anyone have experience checking in on developers and their process of demolition? Or who we might contact to ensure that the developers follow safe protocol?

# Thanks neighbors! Ben Shared with North Richmond + 7 nearby neighborhoods in General THANK REPLY 6 View all 6 replies

Ted Mittelstaedt from North Richmond 1d ago

Ben,

If you see them bagging stuff they are probably following removal practices. Particularly if they have respirators. The usual handling method in Portland for demolitions is to pull up a dumpster and toss the stuff in, no bagging.

Incidentally, the siding in most Portland homes is asbestos-impregnated and most homeowners insurance companies won't write a policy anymore on homes with it, so they have to tear off and re-side in many cases to sell the home. (well, you CAN buy a policy but if you don't tell them about it and give them a chance to turn you down, they won't pay for asbestos cleanup after a fire)

Most flooring tile until -very recently- is asbestos impregnated.

The reality is that if they don't grind the stuff and produce dust your going to be fine. Most jobs with a lot of asbestos contamination are when people try sanding the stuff off and then get in there with a plain old shop vac and clean up. Then after they have pumped the house full of asbestos fiber dust they insulate the heck out of the house and seal and caulk and seal and caulk and put in double paned windows to guarantee that the dust is going to stay in the house for years.

You might think old homes are cold and drafty but our ancestors that built them that way weren't complete idiots and knew a thing or two about comfortable living spaces IMHO.

The way the abatement companies do it is they go room by room, seal each room off and attach a sealed vac to the room and put the room under negative pressure, then do whatever they can when they are removing the stuff to avoid cutting it or breaking it - and the stuff goes directly into bags - they also use a vaporizer and buckets of water to wipe down everything while they are prying it up. And of course the workers are going to be in bunny suits with masks.

Truthfully, even if they do it absolutely wrong, the biggest danger is to the people buying the homes, not to the neighborhood. There's a lot of hysteria out there generated by people who want to make teardowns difficult but I doubt you can find a case of asbestoses in the literature that was caused by an improper teardown down next door.

#### Thank Flag

mariah thanked Ted



Kelly Fisher from North Richmond 20h ago

Hi Ben, I actually reported the guy on 48th who was featured in the Oregonian article. My concern at the time was more lead than asbestos but apparently the samples tested by the state were full of both. I called everyone: DEQ (in charge of asbestos), OSHA (bc of the unprotected workers), the CCB (in charge of lead for state), and the EPA, and I think they all sent someone out, and from what I've heard they worked together in the investigation/prosecution. In my experience OSHA is quickest to respond, CCB usually can't

get out til the next day, EPA can take forever but has the biggest sticks, so I'd call as soon as it looks like there might be trouble. For lead, be super concerned if you see open flame being used to soften paint for removal, electric sanding, or it looks like they're creating dust or not containing their mess with tarping and such. I'm less informed about asbestos but my CCB guy tells me it's commonly in plaster and sheetrock, so if you see that getting demolished and not being contained be concerned.

т	han	k	FI	lan	1
_	Hall	<u>n</u> .		au	ı

Andrea and Ben thanked Kelly



Nancy Matela from Inner Mount Tabor 20h ago

Demolition contractors are supposed to have a testing certificate telling them what needs to be specially bagged after testing is completed. Ask them for it. And report them to DEQ if they don't have it. The State is over burdened with enforcement but they need to hear from us when procedures are not followed. When the Woodstock New Season demolition was going on, I knocked on the construction office door and asked them for it. Surprised the heck out of them. but they had it.

#### Thank Flag

Ben thanked Nancy



Mayor Charlie Hales and Council Members 1220 SW Fifth Ave Portland, OR 97204

January 5, 2016

Dear Mayor Hales and Council Members,

I am writing to request that my properties at 3410 N Williams Ave and 19 NE Ivy St not be changed from its present designation of Central Residential (RXd) to High Density Residential (RH) as it is inconsistent with the development pattern and the Eliot Neighborhood Plan's desire to have ground floor retail on Williams Avenue.

As you know, you approved LU13-109305 which changed the zoning on my property and the property to the north to RXd in 2013. That zone change approval established special height limits on the site ranging from 65' to 40' on my property (and up to 85' on the property to the north), as well as a variety of other conditions for development. A legislative remapping of the site would remove these special conditions and only the new base zone requirements would need to be met.

The selection of RH is particularly problematic because

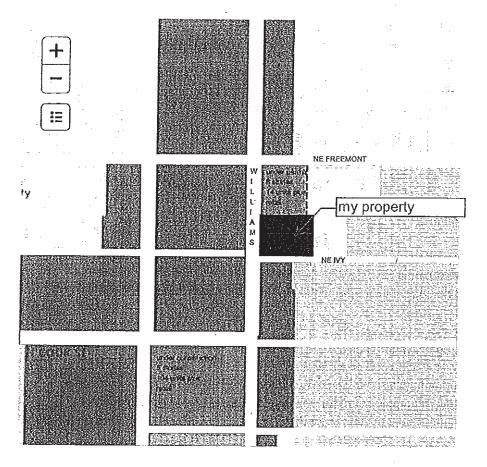
- Ground Floor Retail is not allowed
- The RH height limits exceed the Council approved heights for the site
- Design Review would not be applied in the RH zone.

The property to the north of mine is already under permit review under the RXd zoned regulations and would not be affected by the remapping. The property to the south across Ivy St and to the west across Williams is being mapped as CM3, which allows ground floor retail. This means that my property would create a hole in the main street character as the only property with no ground floor retail.

In sum, leaving the property with its present RXd designation is the best way to ensure that the property develops in way that is appropriate for the site.

Yours truly,

Rick Michaelson



Address Search

Map Proposal

Commen

Proposed Change # 127

Proposed Comprehensive Plan Designation High - Density Multi - Dwelling

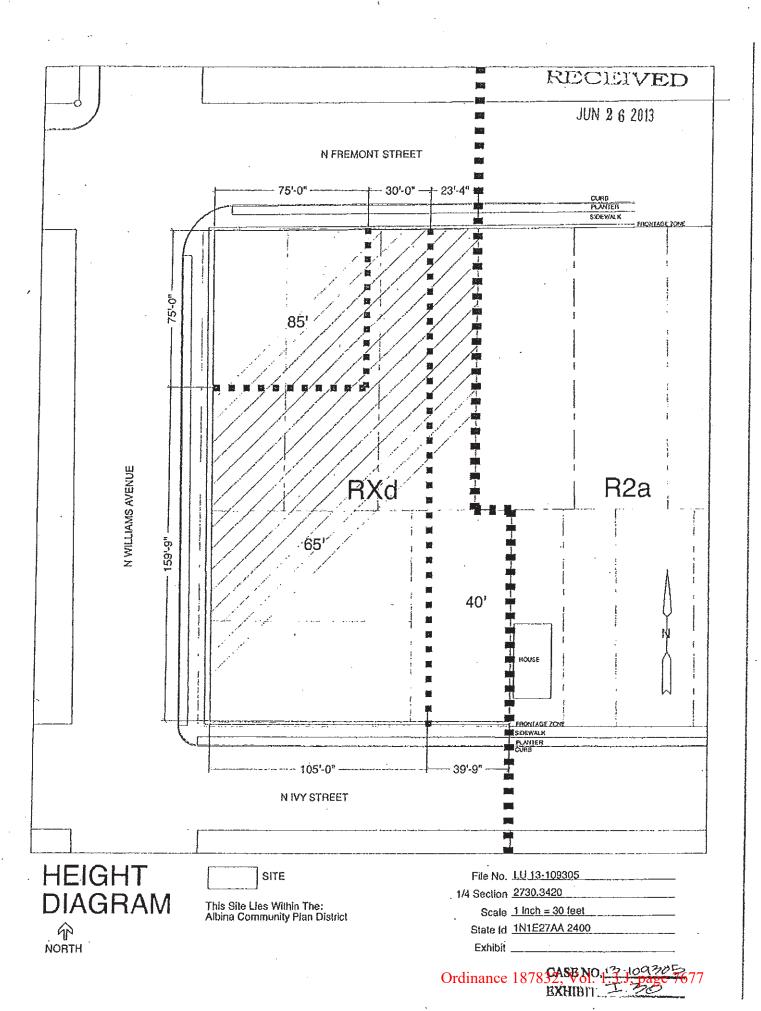
Existing Comprehensive Plan Designation Central Residential

Proposed Residential designation will ease the transition in scale between new buildings and adjacent residential development.

High - Density Multi - Dwelling

This designation is intended for the Central City, Gateway Regional Center, Town Centers, and transit station areas where a residential focus is desired and urban public services including access to high-capacity transit, very frequent bus service, or streetcar service are available or planned. This designation is intended to allow high-density multi-dwelling structures at an

Ordinance 187832, Vol. 1.3.J, page 7676



### WILLIAMS AVENUE ZONING OPTIONS

	FAR	HEIGHT	SIDEYARD SETBACK	DESIGN REVIEW/ NEIGHROHOOD CONTACT
RX	4 to 1	85',65',40' PER COUNCIL	0'	design review
RH 4:1	4 to 1	75'	5'-14'	no
CM3	3 to 1	65' except 45' within 25' of R1 zone	10'	neighborhood contact
CM3, w bonus	5 to 1	75' except 45' within 25' of R1 zone	10'	neighborhood contact

From:

Joanne M.Klebba <hljk@pdx.edu>

Sent: To: Monday, January 04, 2016 10:15 PM BPS Comprehensive Plan Testimony

Subject:

Stroheckers, Ordinance No. 155609

Follow Up Flag: Flag Status: Follow up Completed

Zoning Commission and City Council:

ANY COMMERCIAL DEVELOPMENT OF THE STROHECKER PROPERTY (2855 SW PATTON ROAD, PORTLAND, OR 97201]

OTHER THAN AS IS SPECIFIED IN ORDINANCE 155609 IS UNACCEPTABLE TO THE NEIGHBORS, THE NEIGHBORHOOD AND

THE SINGLE FAMILY RESIDENTIAL QUALITY OF THE NEIGHBORHOOD. ANY DEVIATION FROM THIS ORDINANCE MAY ALSO

BE ILLEGAL.

Joanne M. Klebba 2766 SW Old Orchard Rd. Portland, Oregon 97201 E-mail: <u>klebbaj@pdx.edu</u> Telephone: 503-827-8575

From:

Danielle Erb <dlerb716@gmail.com>

Sent: To:

Monday, January 04, 2016 8:37 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag:

Follow up

Flag Status: Completed

Regarding the following property - Strohecker's Store 2855 SW Patton Road, Portland OR 97201 - Please honor the 1984 ordinance to keep a grocery store on this property and to maintain neighborhood livability. (The ordinance for Strohecker's that was signed into law in 1984 is Ordinance No. 155609.) This is the only store within walking distance in this neighborhood. This location also has a pharmacy and a post office; all 3 of these businesses are mandatory for the livability of our community. Our area has only ONE bus line, which runs hourly at best except for M-F during rush hour. This adds to the need for a local store. The store is next to a park, the whole complex helps to define the neighborhood, without the store the park will become part of whatever is built there and it will essentially become "THEIR" park and will no longer be a park for the community. Please do what you can to keep help us keep our neighborhood and our community livable. I moved to this area of Portland in 1992 and hope to live here for 30 more years, but I need a store, pharmacy and a post office that I can get to.

Danielle Erb 2658 SW Talbot Road Portland, Oregon 97201

Sent:

From: Stephen Effros <stepheneffros@mac.com>

Monday, January 04, 2016 6:29 PM To: BPS Comprehensive Plan Testimony

Suzanne Pardington Cc:

Comprehensive Plan Testimony - 60th Ave. Station Area Rezoning Subject:

Follow Up Flag: Follow up Flag Status: Completed

To Whom It May Concern,

My name is Steve Effros. I live with my family in the 60th Ave. Station Area of the Rose City Park neighborhood. I am writing to discuss this area relative to the Comprehensive Plan Update.

The Rose City Park Neighborhood Association brought to our attention the potential for properties in the 60th Ave. Station Area District to be re-zoned to significantly increase residential density from largely single family residences to medium and high density, multi-family housing.

While we support the overall density goals of the comprehensive plan update, we are concerned that the current plan too simplistically applies a circular area of increased density onto this historically gridded section of our neighborhood.

We would ask that there be a public land use review process to consider all of the impacts of higher density to the 60th Ave. Station Area.

This portion of the Rose City Park Neighborhood, while it has a lot of people filtering through it to use MAX, bicycle to work, drive across or downtown, and access the industrial warehouse properties along the freeway, its infrastructure is severely under-designed and under-built; there are narrow sidewalks, little to no landscape buffer zones along its busy streets, and a disproportionate amount of unpaved roads.

Any increases in residential density to the 60th Ave. Station Area should include a careful, considered land use review process to provide a well-thought out plan for development, including safe and adequate pedestrian, bicycle and vehicular access to and though this portion of the neighborhood.

Thank you for your consideration.

Sincerely,

Steve & Suzanne Effros 1426 NF 58th Ave.

From:

Sue Hatt <suehatt@gmail.com>

Sent:

Monday, January 04, 2016 4:45 PM

To:

Council Clerk - Testimony; BPS Comprehensive Plan Testimony

Cc:

Hales, Mayor; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; City Auditor Griffin-Valade; Anderson, Susan; mnaLandUseCommittee@gmail.com;

Auditor Griffin-Valade Commissioner Fish

Subject:

Truth in Zonina

Follow Up Flag: Flag Status: Follow up Completed

Sirs,

I request specific language shown below be removed from the general description of land use designations on page GP10-3 the 2035 Comprehensive Plan. This would preserve neighborhood character and would reduce the number of demolitions. This would remove the exceptions that allow land divisions less than the base zone. A Comprehensive map amendment would then be required for a land division less than the base zone.

#### Land use designations - Amendment

The Comprehensive Plan is one of the Comprehensive Plan's implementation tools. The Map includes land use designations, which are used to carry out the Comprehensive Plan. The land use designation that best implements the plan is applied to each area of the city. This section contains descriptions of the land use designations. Each designation generally includes:

- Type of place or Pattern Area for which the designation is intended.
- —General use and intensity expected within the area. In some cases, the alternative development options allowed in single-dwelling residential zones (e.g. duplexes and attached houses on corner lots; accessory dwelling units) may allow additional residential units beyond the general density described below.
- Level of public services provided or planned.
- Level of constraint.

I also request Section 33.110.240.E of the zoning code, allowing corner lots zoned R5 or R7 to be rezoned to R2.5 if they are larger than 50 feet by 100 feet, be removed from the zoning code in the 2035 Comprehensive Plan.

Please add these to the record.

Thank you,

Ordinance 187832, Vol. 1.3.J, page 7682

Susan M. Hatt

7037 SW 33rd Place, Portland OR 97219

From:

Sue Hatt <suehatt@gmail.com>

Sent:

Monday, January 04, 2016 4:34 PM
Council Clerk – Testimony: BPS Comprehensive Plan Testimony

To: Cc:

Subject:

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

Commissioner Saltzman: City Auditor Griffin-Valade; Anderson, Susan:

mnaLandUseCommittee@gmail.com

Multnomah Village as Neighborhood Corridor

Follow Up Flag: Flag Status: Follow up

Sirs.

I request City Council change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

Multnomah Village is classified as a Mainstreet in the current Comprehensive Plan. The Mainstreet designation had a prescribed depth of 180 feet which is consistent with the definition of a Neighborhood Corridor. The Village is more linear in nature and thus the characteristics are better defined by the Neighborhood Corridor designation. The change would make the business district of the Village contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capitol Highway.

If the Village were designated a Neighborhood Center with a ½-mile radius, it would overlap with the boundaries of the two adjacent town centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development in these designations, overlapping with Multnomah, would leave little room for existing single-family zoning as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village.

Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted requests to change the designation to Neighborhood Corridor.

Please add this to the record.

Thank you,

Susan M. Hatt

Portland City Council Council Clerk cctestimony@portlandoregon.gov cputestimony@portlandoregon.gov 1221 SW Fourth Avenue, Room 130 Portland, Oregon 97204

# Re: Multnomah Village CS Zones

Thank you,

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Tamara S. Markham		
7025 SW 34th Aveniue		
Portland, OR 97219		

ce: 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

City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov

Susan Anderson, Susan.Anderson@PortlandOregon.gov

MNA Land Use Committee, mnaLandUseCommittee@gmail.com

# Arevalo, Nora From: Sue Hatt' < suehatt@gmail.com> Sent: Monday, January 04, 2016 4:29 PM Council Clerk - Testimony: BPS Comprehensive Plan Testimony To: Hales, Mayor: Commissioner Fritz: Commissioner Fish; Commissioner Novick; Cc: Commissioner Saltzman; City Auditor Griffin-Valade; Anderson, Susan; mnaLandUseCommittee@gmail.com Multnomah Village CS Zones Subject: Follow Up Flag: Follow up Flag Status: Completed The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan. With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City. Please add this strongly held opinion to the record. Thank you, Susan M. Hatt 7037 SW 33rd Place, Portland OR 97219 cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov

Commissioner Amanda Fritz, Amanda@portlandoregon.gov

Commissioner Nick Fish, nick@portlandoregon.gov

Commissioner Steve Novick, novick@portlandorese7.832, Vol. 1.3.J, page 7688

Commissioner Dan Saltzman, dan@portlandoregon.gov

City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov

Susan Anderson, Susan.Anderson@PortlandOregon.gov

MNA Land Use Committee, mnaLandUseCommittee@gmail.com

From:

Annie Dolle <dollewood@gmail.com>

Sent:

Monday, January 04, 2016 4:25 PM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

Land ordinance testimony SW pdx

Follow Up Flag: Flag Status:

Follow up Completed

2855 SW Patton road has housed a store named stroheckers, now going out of business . Please don't let the developer who owns property to change it to housing only. We need something there for community of this neighborhood. My kids need a place to buy a sandwich, meet up with neighbors and we love convenience of a store nearby. I'm so sad that anyone doesn't see the benefits od such a space and if done well will BE WELL SUPPORTED BY NEIGHBORHOOD. Please don't allow dense housing let's keep character of west side and maintain our community meeting places. Please. We'd be devastated if this changed. I'm native to neighborhood shopping here for 30+ years and it means a lot to have a place for community here as a draw for park and people.

Ann & Chris Dolle 2791 SW montgomery drive Portland oregon Sent from my iPad

Sent from my iPad

Portland City Council
Council Clerk
cctestimony@portlandoregon.gov
cputestimony@portlandoregon.gov
1221 SW Fourth Avenue, Room 130
Portland, Oregon 97204

Thank you,

# Re: Multnomah Village as Neighborhood Corridor

I request City Council change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

Multnomah Village is classified as a Mainstreet in the current Comprehensive Plan. The Mainstreet designation had a prescribed depth of 180 feet which is consistent with the definition of a Neighborhood Corridor. The Village is more linear in nature and thus the characteristics are better defined by the Neighborhood Corridor designation. The change would make the business district of the Village contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capitol Highway.

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Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted requests to change the designation to Neighborhood Corridor.

submitted requests to change the designation to Neighborhood Corridor.	
Please add this to the record.	

Tamara S. Markham
7025 SW 34th Avenue
Portland, OR 97219

cc: 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

City Auditor, La Vonne Griffin-Valade, La Vonne@portlandoregon.gov

Susan Anderson, Susan.Anderson@PortlandOregon.gov

MNA Land Use Committee, mnaLandUseCommittee@gmail.com

Portland City Council

Council Clerk

cctestimony@portlandoregon.gov

cputestimony@portlandoregon.gov

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

# Re: Truth in Zoning

I request specific language shown below be removed from the general description of land use designations on page GP10-3 the 2035 Comprehensive Plan, This would preserve neighborhood character and would reduce the number of demolitions. This would remove the exceptions that allow land divisions less than the base zone. A Comprehensive map amendment would then be required for a land division less than the base zone.

# Land use designations - Amendment

The Comprehensive Plan is one of the Comprehensive Plan's implementation tools. The Map includes land use designations, which are used to carry out the Comprehensive Plan. The land use designation that best implements the plan is applied to each area of the city. This section contains descriptions of the land use designations. Each designation generally includes:

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  - Level of public services provided or planned.
  - Level of constraint.

I also request Section 33.110.240.E of the zoning code, allowing corner lots zoned R5 or R7 to be rezoned to R2.5 if they are larger than 50 feet by 100 feet, be removed from the zoning code in the 2035 Comprehensive Plan.

Please add these to the record.

Thank you,

Tamara S. Markham

7025 SW 34th Avenue

Portland OR 97219

cc: 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

City Auditor, La Vonne Griffin-Valade, La Vonne@portlandoregon.gov

Susan Anderson, Susan.Anderson@PortlandOregon.gov

MNA Land Use Committee, mnaLandUseCommittee@gmail.com

From:

Jane Guyn <theguyns@gmail.com>

Sent: To: Monday, January 04, 2016 3:45 PM BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status: Follow up Completed

To Whom it May Concern,

Our Names: Jim and Jane Guvn

Our Address: 2744 SW Montgomery Dr., 97201

Regarding plan for "Strohecker's Market" property located at 2855 Patton Rd.

We moved into this neighborhood with our family less than 2 years ago from a suburb of Minneapolis, Minnesota. We have all loved living in this walkable neighborhood after 18+ years in our previous neighborhood which was totally car dependent.

We actually moved from a house with 5 garages in Minneapolis. Since we have 6 kids (many of whom had part time jobs and there was no public transportation), we had 5 cars to go with our 5 garages.

When we moved here to Portland, one of the things we were looking for was a walking distance grocery store. Strohecker's was right around the corner from our house and we were sold! We've shopped at Stroh's on a several time a day basis since we got here in May of 2014. Our son walks over with his buddies to get a sandwich and puts it on our account. The market has been an incredibly important part of our life here.

We have been told that the new owners of "Strohs" are going to close the market. We are writing in strong support of Ordinance No 155609.

We feel that this ordinance should be kept in place in order to maintain the character of the neighborhood.

Thank you for your help.

Jim Guyn MD Jane Guyn PhD 612-802-1878

--(612) 802-1878

From:

Kirsten Birkeland <kkolding@gmail.com>

Sent:

Monday, January 04, 2016 3:13 PM BPS Comprehensive Plan Testimony

Subject:

comprehensive plan testimony: Strohecker's Zoning Ordinance

Follow Up Flag:

Follow up

Flag Status:

Completed

Hi I would like to add my family's input to the comprehensive plan testimony regarding Ordinance No. 155609. This refers to the Strohecker's zoning. Strohecker's address is 2588 SW Patton Road, Portland 97201.

I am strongly requesting that the City Council keep this zoning intact. As you may know, this ordinance was formulated with extensive input from the neighborhood community and those desires remain to this day. Issues of livability, safety and property values all come into play and the neighborhood continues to be thoughtful about what is best for the city and the neighborhood. Thank you for your consideration.

Kirsten Koldinger - 2615 sw sherwood dr portland 97201

From:

lane.lane@comcast.net

Sent:

Monday, January 04, 2016 2:41 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive plan testimony

Follow Up Flag: Flag Status: Follow up Completed

Our names are Luise & James Lane and we live at 4221 SW Patrick Place, Portland OR 97239. As thirty-six year residents of the Healy Heights area in SouthWest Portland we are writing to urge you to support the incorporation of ordinance 155609, which was passed in 1984, as a part of the comprehensive plan for future development of the area. Having a grocery store in the southwest hills has enabled the residents to have access to food supplies that they can get to on foot or with a minimum amount of driving distance and many people take advantage of this. Strohecker's has had a family owned store in the westhills for many, many years and it has long been a well known landmark and a focal point in the community. The property at 2855 SW Patton Road, the current site of the store, should be reserved for this or a similar use as there are no other apropriate sites that could accommodate such a business enterprise.

Thank you,

James & Luise Lane

From: Doug Coates <doug.coates@coatesassociates.com>

Sent: Monday, January 04, 2016 2:25 PM
To: BPS Comprehensive Plan Testimony

Subject: Strohecker's Grocery

Follow Up Flag: Follow up Flag Status: Completed

My name is Doug Coates. I have lived at 3040 SW Periander St, Portland, OR 97201 for about 21 years. I am writing regarding the closing of Strohecker's Grocery at 2855 SW Patton Rd, Portland, OR 97201, which is less than a block from my residence.

### It is my understanding:

- The city made a written agreement with the neighborhood in 1984, concerning the expansion of the store, and that this agreement states that the property will only be used for a grocery operation.
- This agreement was made to protect the character of the neighborhood from congestion and commercialization.
- In the years since the agreement was made, the area has become a significant commuter route, and congestion
  has become even more of a problem for neighborhood residents.
- The store is closing in a few weeks, and there now appears to be active discussion about using the property for purposes that would violate the 1984 agreement.
- The current owner was fully aware of the restrictions on the property when they purchased the property, and
  no agreement should have been made with this owner to change or violate this agreement, even informally,
  without consulting with area residents.

I have direct experience in the grocery industry, and it is clear to me that the property can succeed as a grocery operation, if it is properly stocked, merchandized and promoted. Changes to update the 1984 agreement, if any, should be minor and should be solely for the purpose of making a grocery operation more viable at the location. Such changes will only be seen as valid if they support the original intent of the agreement.

Proposals to use the property for housing or commercial purposes completely unrelated to grocery store operation would completely violate the 1984 agreement, and would benefit no one except the current owner. Such a change would also damage the credibility of the city to comply with agreements between the city and neighborhood groups, concerning zoning and related matters.

For these reasons, I urge city officials to leave the current agreement in place with no substantial changes. Any changes that are made should be made solely for the purpose of supporting a viable grocery operation.

#### Doug Coates

3040 SW Periander St, Suite 100 Portland, Oregon 97201 (503) 320-1133 Doug's cell Doug.Coates@CoatesAssociates.com

From:

WALTER BOHNSTEDT <walterb@teleport.com>

Sent:

Monday, January 04, 2016 2:22 PM BPS Comprehensive Plan Testimony

To: Subject:

Rezoning of NE Shaver from R3 To R5

Follow Up Flag: Flag Status: Follow up Completed

To Whom it may Concern

We have lived in Argay for 52 years and have great concern for our livability here. Why would want to add more apartments & Business to all of NE Shaver from 122nd to Argay Park.

We presently have empty business locations @ NE 131 & 141st on Sandy just a few blocks North of Shaver . In each of these locations there are only 2-4 business occupying centers designed for for 12 or more business. I think is called "blight". We should fill these first before building more.

As for apartments or multiple residental units we should have developments such as those that are behind the Post Office. The apartments along Sandy in that area have seen a lot of bad situations over the years I am opposed to that development along Shaver.

Walter & Jane Bohnstedt 13923 NE Beech ST

From:

Karen Livingstone < livekaren@gmail.com>

Sent:

Monday, January 04, 2016 2:21 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Strohs Closing

Follow Up Flag: Flag Status: Follow up Completed

Is it true that the new owners the Strohecker Market on SW Patton Rd are bound by an initiative the City agreed to in 1984-ish, to keep a market for the neighborhood so that there is a modicum of liveability? I would like to endorse this!!!

I am a hiker but the steep hill makes it difficult to carry home groceries by bike or cart. The postal center at Strohs is almost a full time job as well, and is a wonderful amenity that I use more than the pocket park. Please do a traffic study from 7 to 9 am and 4 to 7 pm to determine if there is any way a lot of new traffic from apartments or condos, as is being predicted as replacements for the market, would not be detrimental, and perhaps cause stoplights to be needed or push rushing(/texting?) traffic onto double-parked, windy streets. Thank you for reading my comments.

Karen Livingstone

2758 SW Summit Dr

Portland City Council
Council Clerk
cctestimony@portlandoregon.gov
cputestimony@portlandoregon.gov
1221 SW Fourth Avenue, Room 130
Portland. Oregon 97204

# Re: Multnomah Village as Neighborhood Corridor

I request City Council change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

Multnomah Village is classified as a Mainstreet in the current Comprehensive Plan. The Mainstreet designation had a prescribed depth of 180 feet which is consistent with the definition of a Neighborhood Corridor. The Village is more linear in nature and thus the characteristics are better defined by the Neighborhood Corridor designation. The change would make the business district of the Village contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capitol Highway.

If the Village were designated a Neighborhood Center with a ½-mile radius, it would overlap with the boundaries of the two adjacent town centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development in these designations, overlapping with Multnomah, would leave little room for existing single-family zoning as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village.

Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted requests to change the designation to Neighborhood Corridor.

Please add this to the record.

Thank you.

(Your Address) 7035 SW 34th Ave. Portland, OR 97219

cc: 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
City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov
Susan Anderson, Susan.Anderson@PortlandOregon.gov
MNA Land Use Committee, mnaLandUseCommittee@gmail.com

From:

Steve Russell <steve@steelbridgerealty.com>

Sent: To: Monday, January 04, 2016 12:51 PM BPS Comprehensive Plan Testimony

Cc:

Stark, Nan

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status: Follow up Completed

To Whom it May Concern.

I am the owner of 4210 and 4224 NE Shaver Street in Portland, and I am requesting that the zoning for the properties be changed from R5 to R2 as part of the Comprehensive Plan process.

More information about the properties:

- 1. 4210 NE Shaver Street is a 7 unit apartment property on a 18,515sf parcel that is zoned R5
- 2. 4224 NE Shaver Street is a single family house on 4,677 parcel that is also zoned R5
- 3. Both properties are considered non-conforming uses.

Reasons I believe the zoning should be changed:

- 1. The City of Portland is trying to eliminate non-conforming uses
- The R2 zoning would allow the current number of units to be rebuilt in the event of a fire, earthquake or other catastrophe, whereas the current R5 zoning would only allow the construction of 4 single family homes.
- In an area of the City with few affordable apartments, reconstructing the property as a multifamily will continue to provide affordable housing options for the neighborhood.

Thank you for your attention to this matter, and please let me know if you need additional information.

Steve Russell 42 Shaver LLC 623 NE 23rd Avenue Portland, OR 97232 Phone: 503-784-8785

Phone: 503-784-8785

Email: steve@steelbridgerealty.com

Portland City Council
Council Clerk
cctestimony@portlandoregon.gov
cputestimony@portlandoregon.gov
1221 SW Fourth Avenue, Room 130
Portland, Oregon 97204

# Re: Truth in Zoning

I request specific language shown below be removed from the general description of land use designations on page GP10-3 the 2035 Comprehensive Plan. This would preserve neighborhood character and would reduce the number of demolitions. This would remove the exceptions that allow land divisions less than the base zone. A Comprehensive map amendment would then be required for a land division less than the base zone.

# Land use designations - Amendment

The Comprehensive Plan is one of the Comprehensive Plan's implementation tools. The Map includes land use designations, which are used to carry out the Comprehensive Plan. The land use designation that best implements the plan is applied to each area of the city. This section contains descriptions of the land use designations. Each designation generally includes:

- · Type of place or Pattern Area for which the designation is intended.
- General use and intensity expected within the area. In-some cases, the alternative
  development options allowed in single-dwelling residential zones (e.g. duplexes and
  attached houses on corner lots; accessory dwelling units) may allow additional residential
  units beyond the general density described below.
- Level of public services provided or planned.
- Level of constraint.

I also request Section 33.110.240.E of the zoning code, allowing corner lots zoned R5 or R7 to be rezoned to R2.5 if they are larger than 50 feet by 100 feet, be removed from the zoning code in the 2035 Comprehensive Plan.

Please add these to the record.

Thank you,

(Your Name) Fred and Claudine Stock

(Your Address) 7035 SW 34th Ave. Portland, OR 97219

cc: 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
City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov
Susan Anderson, Susan.Anderson@PortlandOregon.gov

MNA Land Use Committee, mnaLandUseCommittee@gmail.com

From:

marilynne@eichingerfineart.com

Sent:

Monday, January 04, 2016 8:27 AM

To:

**BPS Comprehensive Plan Testimony** 

Subject:

[User Approved] Comprehensive Plan Testimony

Follow Up Flag:

Follow up Completed

Flag Status:

RE: Strohecker's Market 2855 SW Patton Road Portland, OR 97201

My husband and I live at 2520 SW Sherwood Drive and are horrified to think that the city would disregard a 1984 ordinance that our community fought so hard for. Having a local grocery store makes our community livable. High density housing does just the opposite. People already are bypassing Beaverton Hillsdale Highway and 26, using the Patton-Broadway connection to go to and from work. The road is unusable at certain hours. Adding to this congestion will do no one any good.

Please do not permit them to build high density housing on the site but maintain the property as a grocery outlet. We need this access to keep us out of our cars, especially when the weather is bad or there is a last minute cooking need.

Sincerely,

Marilynne Eichinger

Ray Losey.

From: Blythe Olson < blytheolson@gmail.com > Date: January 4, 2016 at 9:35:46 PM PST

To: undisclosed-recipients:;

Subject: Strohecker's property - last chance for input

Dear Neighbor,

After making a post on the website <u>Nextdoor Southwest Hills</u> about Stroh's yesterday, we have added 30 (and counting) more endorsers for our Comments for the City Council. In case you haven't seen it already, I'm sending you this copy of the post so that you can see what some other options are for giving input. Quite a few neighbors are also submitting individual comments by email or plan to testify Thursday evening. I'll be re-submitting our November comments (tweaked slightly to take Stroh's impending closure into account) with all of the additional names by Thursday's deadline. As before, thanks for your involvement.

Here is the post made on the neighborhood website:

#### Strohecker's - RED ALERT

We are at a critical point for having our voices heard on what happens to the Strohecker's property. It is fine to want a New Seasons or cafe or community center but, unfortunately, this is not our decision to make. The California developer who recently bought this property will naturally do whatever the city allows to maximize his profit. We've spoken with both a land use attorney and real estate professional who independently advised that high-density condos would be the highest return on his \$5.4 million investment. Our best and perhaps only way to have a voice in what happens is by making sure that the city continues to honor the 1984 ordinance that neighbors fought so hard for to keep a grocery store on the property and to maintain neighborhood livability. A large group of neighbors living close to Stroh's submitted formal comments both to the zoning commission and city council on this issue in the past year and will be submitting them again with additional endorsers by the upcoming deadline (final city council hearing on Comp Plan affecting use of the property is this Thursday, Jan. 7th). You can add your voice to demand this by signing on to our group comments and/ or by submitting your own statement. Do this by contacting me with your name and address to join our group submission or speak up independently by one of the following means:

- Online: Go to <a href="www.portlandoregon.gov/bps/mapapp">www.portlandoregon.gov/bps/mapapp</a>. You may need to copy and paste this link into a new window. Click on Land Use, View Map and then plug in the Stroh's address which is 2855 SW Patton Rd. There is a link for comments.
- Email: Send to <a href="mailto:cputestimony@portlandoregon.gov">cputestimony@portlandoregon.gov</a> with "Comprehensive Plan Testimony" in the subject line. Be sure to include your name and mailing address and Stroh's address.

- Letter: Send to "Council Clerk 1221 SW 4th Ave., Rm 130 Portland 97204 Attn: Comp. Plan Testimony".
- In person: Attend public hearing Thursday January 7, 6-9 pm. Center for Self Enhancement (SEI) 3920 No. Kerby Ave. Sign up to give testimony at least one hour before hearing.

The ordinance for Strohecker's that was signed into law in 1984 is Ordinance No. 155609. If you wish a copy, I will send one via my e-mail. We strongly suggest that you ask the city council to keep it intact. If they do (which our zoning commission liaison has said is likely), then we will at least stand a chance of having some negotiating power on what goes in there. Remember, Jan. 7th is the deadline for comments.

Neighbors fought very, very hard in helping to formulate this ordinance in 1984. Having the new zoning designation honor it is truly our best chance for influencing what happens in the heart of our neighborhood. Livability, safety and property values are all at stake.

Blythe Olson blytheolson@gmail.com

# Melinda B. Wilde, LLC.

# ATTORNEY AT LAW

P.O. Box 14652, Portland, OR 97293 1300 SE Oak St., Portland, OR 97214 tel. (503)238-6658 fax.(503)232-0966 email:mwildeatty@llco.info

January 4, 2016

Council Clerk 1221 SW 4th Ave room 130, Portland 97204

RE: Property ID #'s: R217946&R217945 /Zone Change Request

Portland City Council:

I am one of the members of an LLC that owns properties located at 158<sup>th</sup> and E Burnside which are further identified by the tax id numbers shown above.

When the Max line was installed on E Burnside and all street parking removed, we were told that all properties along the Max corridor would be re-zoned for high density. This has not occurred even though the East side Max line has been operating for more than 25years.

I would ask you to consider a zoning density increase and allowed use change. This will include the ability to use the property for commercial retail, office space as well as its current residential use. The property is currently in the R1 zone and can only be used for residential housing. This particular block of R1 zone is within ¼ mile of the Max Transit Station area at 162nd and also inside the Rosewood Neighborhood Prosperity Initiative Area where at least 30% of the businesses are minority owned. All adjacent land owners agree that the area would benefit from a change to a mixed-use designation with a neighborhood commercial or mixed use zone for future options in an area that lacks services. The Rosewood Neighborhood Center is enthusiastic about this possibility and there are several minority owned businesses that have expressed interest in starting businesses at this location including early childhood education and nutrition education and low income housing.

There has been a serious lack of amenities and services along this Max light rail line such as now exist along the N. Interstate Max line, which is due in large part to the current zoning restrictions. I believe E Portland would benefit significantly from a zoning change.

This neighborhood is severely underserved in terms of childcare, nutritious food options, financial services, hardware stores and affordable family housing. I feel that comprehensive plan and zoning changes for the area, including this property, is warranted.

Thank you for your consideration of this requested and needed change.

Very truly yours,

Melinda B. Wilde

From:

Jennifer Lyons <lyons@easystreet.net>

Sent: To: Sunday, January 03, 2016 10:19 PM

Subject:

BPS Comprehensive Plan Testimony comprehensive

Follow Up Flag: Flag Status:

Follow up Completed

Hello,

In regards to Strohecker's at 2855 SW Patton Road, we ask that you keep the 1984 ordinance intact. We will miss the store here--it is the only place in the West Hills that we can walk to the store, which we do often. Taking away the store will make us all drive more. There was an ordinance for Strohecker's that was signed into law in 1984 (Ordinance No. 155609). We ask the city council to keep it intact to keep the livability and safety of our neighborhood alive. There is rumor of high density condominiums, which is not appropriate for this neighborhood.

Thank you,

Jennifer Lyons 3220 SW Sherwood Place, 97210

From:

A. Rosenfeld <alisonrosenfeld@gmail.com>

Sent:

Sunday, January 03, 2016 10:07 PM

To:

BPS Comprehensive Plan Testimony

Subject:

Comprehensive Plan Testimony

Follow Up Flag: Flag Status: Follow up Completed

To Whom it May Concern:

I am a neighbor of the Strohecker's Grocery store located at 2855 SW Patton Rd. Portland, OR 97201.

The store has recently closed and many neighbors including myself think it is imperative that the ordinance for Strohecker's that was signed into law in 1984, Ordinance No. 155609, be honored still.

The local grocery store is a hub for the community and a resource for old and young alike.

Sincerely, Alison Rosenfeld 2755 SW Upper Dr. Portland, OR 97201

From:

Iffg1@comcast.net

Sent:

Sunday, January 03, 2016 9:19 PM BPS Comprehensive Plan Testimony

To: Subject:

"Comprehensive Plan Testimony"

Follow Up Flag:

Follow up

Flag Status:

Completed

I would like to add my voice that keeping a the property at 2855 SW Patton Rd, the old Stroheker's grocery store as a grocery or deli or similar type combination of small business is vitally important to the neighborhood and traffic patterns.

My understanding is that there is an ordinance for Strohecker's that was signed into law in 1984 is Ordinance No. 155609, and this should be maintained.

Thank you, Frederick Gordon 3088 SW Sherwood Place Portland, OR 97201 503-490-7287

From:

Christine Yun <cpypdx@gmail.com>

Sent:

Sunday, January 03, 2016 8:48 PM

To:

**BPS Comprehensive Plan Testimony** 

Cc:

Christopher Eykamp

Subject:

Rezoning of non-conforming commercial uses in HAND to CM1

Follow Up Flag:

Follow up

Flag Status:

Completed

My name is Christine Yun and I live at 1915 SE Alder St. in Portland.

I have been made aware of the proposal to convert existing nonconforming commercial uses in HAND at 21st & Tibbetts, 1996 Ladd Avenue and at 1540 SE Clinton to CM1.

Although I am not a resident of HAND, I am familiar with these sites and feel that to zone these sites as CM1 in an area that is strictly residential will introduce future friction and problems.

The non-conforming status of these sites gives the existing surrounding residential lots protections against what could be overwhelming and incompatible uses. A case in point is the New Seasons on 20th & Division, where the surrounding residential neighborhood is completely overwhelmed by the parking and loading demands of this very popular store.

The concern is that a future business could move in under the new zoning and since it would be allowed by right, there would be no requirement that the future business would be compatible with the surrounding residential zoning.

Does the new CM1 zoning have standards that require use of the site to be sensitive to surrounding R zoning? If not, then I strongly oppose changing these 3 sites to CM1.

Sincerely, Christine Yun

From:

DONNA HARRIS Owner <donna.harris1900@q.com>

Sent: To: Friday, January 01, 2016 12:23 PM BPS Comprehensive Plan Testimony

Subject:

[User Approved] Rezoning Request to R5 involving East property on NE 122nd Avenue

and Shaver - Argay Downs Neighborhood

Follow Up Flag:

Follow up Completed

Flag Status:

Please consider rezoning the area East of 122nd and Shaver street to R5 rather than R3. - I purchased my townhome (not to be confused as a condo) several years ago due to the beauty, quietness and view. Unfortunately there has been a large amount of house burglaries, car break ins, stolen car batteries, wheels and trailers this past year. We are daily watching for, and seeing suspicious characters parked in cars at the dead end street on NE 146th and Rose Parkway, people scouting the neighborhood and/or coming to front doors aggressively asking for people who do not live there with the intent of forcing entry into homes for robbery (this tactic was confirmed by the police). As neighborhood we are in contact with each other through the Nextdoor Argay computer communication site alerting each other to be on the lookout when we see something suspicious or someone unfortunately has been robbed. For whatever reason our neighborhood is repeatedly targeted by not only 1 person/group but so many various ones. If apartments are allowed in our neighborhood this will only bring a greater influx of crime, robbery, drugs and gang activity. Is this what the City wants? Move all crime and low income housing to East of 122nd? Really? - Please, come visit our neighborhood, drive on NE Rose Parkway to the dead end on 146th. It makes no sense to allow R3 zoning in this neighborhood. - Once again please please please rezone this area to R5. -

Thank you.

Donna Harris Resident 14614 NE Rose Parkway Portland OR 97230