## Arevalo, Nora

| From: | Lauren Danahy [info@willamettenurseconsultantgroup.com](mailto:info@willamettenurseconsultantgroup.com) |
| :--- | :--- |
| Sent: | Friday, January 08, 2016 5:59 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | lauren@danahy.net |
| Subject: | City Council meeting on 1/7 |
|  |  |
| Importance: | High |

To Whom it May Concern: 5112 SW news H BlVd
1 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 $4 \mathrm{p}-7 \mathrm{p}$ 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

Ordinance 187832, Vol. 1.3.J, page 6820

URL: www.willamettenurseconsultantgroup.com
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## Arevalo, Nora

| From: | Hales, Mayor |
| :--- | :--- |
| Sent: | Friday, January 08, 2016 2:54 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | Thomas Karwaki |
| Subject: | 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](mailto:amanda@portlandoregon.gov); Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov); Commissioner Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov); Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com)
Cc: Lum, Leslie [Leslie.Lum@portlandoregon.gov](mailto:Leslie.Lum@portlandoregon.gov); Kelley, Mary [mary@npnscommunity.org](mailto: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

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 commmity 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 harmulashestos materiols 832 Vol 3 J. page 6823
- Install traffic-calming, pedestian, addicycle qeaturesto mmintze theuse oflitgee oceupancy 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

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.

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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. 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.


## 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.

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- 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 ${ }^{1}$


## 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

[^0]- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
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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.

## Arevalo, Nora

From:
Sent:
To:
Subject:
Attachments:

Hales, Mayor
Friday, January 08, 2016 2:52 PM
BPS Comprehensive Plan Testimony
FW: University Park Neighborhood Association Comments on Comprehensive Plan 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](mailto:amanda@portlandoregon.gov); Commissioner Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov);
Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com); Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov);
Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)
Cc: Lum, Leslie [Leslie.Lum@portlandoregon.gov](mailto: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 O 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
Portiand OR 97203
253-318-2075 cell
karwaki@yahoo.com

# UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION 

TESTIMONY on COMPREHENSIVE PLAN
January 7, 2016

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$$
\text { Ordinance 187832, Vol. 1.3.J, page } 6830
$$

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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
Ordinance 187832, Vol. 1.3.J, page 6831

To: His Honor Charlie Hales, Mayor and the Portland City Council<br>Commissioner Nick Fish<br>Commissioner Amanda Fritz<br>Commissioner Steve Novick<br>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 controiled 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
Ordinance 187832, Vol. 1.3.J, page 6834
(503) 823-4682

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

Ordinance 187832, Vol. 1.3.J, page 6835

## Arevalo, Nora

| 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:tim27@caa.columbia.edu]
Sent: Thursday, January 07, 2016 5:08 PM
To: Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov);
Commissioner Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)
Cc: Fritz, Amanda [Amanda.Fritz@portlandoregon.gov](mailto: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.
Ordinance 187832, Vol. 1.3.J, page 6836

From: Hales, Mayor

Sent:
To:
C:
Subject:

Friday, January 08, 2016 2:35 PM
Robert Bernstein
BPS Comprehensive Plan Testimony
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 W/ashington
Constituent Services Specialist
mustafa.washington@portlandoregon.gov

From: Robert Bernstein [mailto:bobbo1946@yahoo.com]
Sent: Thursday, January 07, 2016 8:19 PM
To: Haies, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov); Commissioner Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov);
Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com);
Commissioner Novick [novick@portlandoregon.gov](mailto: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:
Cc:
Subject:
Jan Roxburgh
BPS Comprehensive Plan Testimony
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 W/ashington
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](mailto:mayorcharliehales@portlandoregon.gov); Commissioner Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov);
Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Commissioner Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov); Commissioner
Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com)
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 Portiand 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 ,Vo. 1.3.J, page 6838
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 Eagies 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

## Arevalo, Nora

From:
Brandon Spencer-Hartle [Brandon@restoreoregon.org](mailto:Brandon@restoreoregon.org)
Sent:
To:
Subject:

Friday, January 08, 2016 11:09 AM

BPS Comprehensive Plan Testimony
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](mailto: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 |
| To: | BPS Comprehensive Plan Testimony |
| 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](mailto: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 Twitter: @PortlandBPS
Subscribe to the BPS Enews
Like us on Facebook
From: Katherine Wilson [mailto:katherinewil@gmail.com]
Sent: Thursday, January 07, 2016 11:50 PM
To: BPS Mailbox [BPSMBX@portlandoregon.gov](mailto:BPSMBX@portlandoregon.gov); Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)
Cc: Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Commissioner Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov); Commissioner
Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com); Commissioner Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov); Frost, Liam [Liam.Frost@portlandoregon.gov](mailto:Liam.Frost@portlandoregon.gov)
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 $6^{\text {th }}$ 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.

Ordinance 187832, Vol. 1.3.J, page 6841

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. http://imdb.me/katherinewilson. 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.
- Perfect for the Semi's who need access to the Freeways
- Perfect for the various 12 separate film departments with its Garage doors for loading and unloading
- Perfect for building sets in.
- Will foster low carbon footprint with its proximity to the train station and Trimet.

Ordinance 187832 , Vol. 1.3.J, page 6842

- Enough space for parking for cast, crew, trucks AND Semi's!
- Near filmmakers' favorite restaurants and shopping!
- Space for moving vintage structures onto to create a back lot!
- A place big enough to intern young people into the business
- An eventual Tourism destination
- A green industry,
- 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.
- Great light, clear fir, and non toxic building materials for sensitive artists
- Besides all that:
- Keep this last piece of Portland land for the next 7 generations!
- 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 principies
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!

## Ordinance 187832, Vol. 1.3.J, page 6843

*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 wildife. 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 BIDDERl Keep it off the marketl

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 alone 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,

$$
\text { Ordinance } 187832, \text { Vol. 1.3.J, page } 6844
$$

## Katherine Wilson

PO Box 398
Walterville, Oregon 97489
(541) 521-3378

Ordinance 187832, Vol. 1.3.J, page 6845

| 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 |

From: Hales, Mayor
Sent: Friday, January 08, 2016 9:01 AM
To:
David Kemper
BPS Comprehensive Plan Testimony
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@portiandoregon.gov
....-Original Message----
From: David Kemper [mailto:djk@djk.name]
Sent: Friday, January 08, 2016 7:53 AM
To: Haies, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov); Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov);
Commissioner Fritz [amanda@portiandoregon.gov](mailto:amanda@portiandoregon.gov); commissioner-novick@portlandoregon.gov; Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.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: 1 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.

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

Ordinance 187832, Vol. 1.3.J, page 6847

## From:

Sent:
To:
Subject:

Vijay Balakrishnan [bvijaykr@gmail.com](mailto:bvijaykr@gmail.com)
Friday, January 08, 2016 8:54 AM
BPS Comprehensive Plan Testimony
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 atter 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 [bvijaykr@gmail.com](mailto:bvijaykr@gmail.com) wrote:
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.

## From:

Sent:
To:
Subject:

Dori Lyon [dorilyon.lpc@gmail.com](mailto:dorilyon.lpc@gmail.com)
Friday, January 08, 2016 8:49 AM
BPS Comprehensive Plan Testimony
Fwd: Comprehensive Plan Testimony
---------- Forwarded message $\qquad$
From: Dori Lyon [dorilyon.lpc@gmail.com](mailto: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

Northeast Coalition of Neighborhoods

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

## Arevalo, Nora

From:
Sent:
To:
Subject:
kammymatt@aol.com
Thursday, January 07, 2016 10:58 PM
BPS Comprehensive Plan Testimony
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 $\$ 25 \mathrm{~K}$ 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

## Arevalo, Nora

| From: | Julia Hall [juliahall@cuneocellars.com](mailto:juliahall@cuneocellars.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 10:37 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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<br>Attn: Mixed Use Zones Project<br>1900 SW 4th Avenue Suite 7100<br>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 longterm 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 $7^{\text {th }}$. 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 Portiand 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 Portiand 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<br>Supply Chain Operations Manager - GTM<br>Pepsi Beverages Company

## Arevalo, Nora

## From:

Sent:
To:
Subject:

Amy Brewer [amybrewer@cIncsunnyside.net](mailto:amybrewer@cIncsunnyside.net)
Thursday, January 07, 2016 10:14 PM
BPS Comprehensive Plan Testimony
Fwd: Comprehensive Plan Testimony

Including address in signature.

Forwarded message $\qquad$
From: Amy Brewer [amybrewer@cincsunnyside.net](mailto:amybrewer@cincsunnyside.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 "Sumnyside'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).

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.

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@c/ncsumnyside.net

Clear Light Neighborhood Coalition - Sunnyside
www. einesunnyside.net
503.478 .1997

CLNC works for transparcency in the real estate development process, by supporting and inplementing clear communication channels for neighbors who want to work with developers and governing agencies.
-.
Amy Brewer
4408 SE Morrison Strect
Portland OR 97215
amybrewer@cIncsunnyside.net
Clear Light Neighborhood Coalition - Sunnyside www. elncsunnyside.net
503.478.1997

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

## Arevalo, Nora

| From: | Heather FlintChatto [heather@newbuildings.org](mailto: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 $32^{\text {nd }}$ Avenue Portland OR 97214
P.S. I would have submitted it in person but they were turning people away at the hearing.

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 both 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 contextsensitive development and will go a long way towards engendering more broad support of mixed use density by existing communities 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,

# 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:
a. 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 $\mathrm{x} \%$ 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 $21^{\text {st }}$.

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.
2. Scale Building Heights to Street Widths -> Build taller buildings on wider streets.
3. 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. $8^{\prime}-12^{\prime}$ 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 façade

## 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)



Ordinance 187832, Vol. 1.3.J, page 6862

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


2. 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 $<75 \mathrm{~F}$ ), which shows the preponderance of these hours at low angle winter times.
3. 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.

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:

1) 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.
3) 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.
4) 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
c. 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

## Arevalo, Nora

| From: | Carol Adams [carolcadams@gmail.com](mailto:carolcadams@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 9:14 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | Portland Adams |
| Subject: | Comprehensive plan testimony |
| Attachments: | 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](mailto: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 2855 SW Patton Road, Portland, Oregon 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

Ordinance 187832, Vol. 1.3.J, page 6866

## Arevalo, Nora

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

Ordinance 187832, Vol. 1.3.J, page 6868

## Arevalo, Nora

From: Peter Adams [pfadams@fqrc.net](mailto:pfadams@fqrc.net)
Sent: Thursday, January 07, 2016 8:56 PM
To:
BPS Comprehensive Plan Testimony
Subject:
Attachments:
Comprehensive Plan Testamony
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 $4^{\text {th }}$ 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

## Arevalo, Nora

```
From: Janine <j9lpdx@gmail.com>
Sent: Thursday, January 07, 2016 8:21 PM
To: 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; ;91pdx@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 $10,000 \mathrm{ft}$; the City proposes to rezone my property in a manner that reduces the number of dwelling units that can be constructed to one per $20,000 \mathrm{ft}$.

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 supportedby 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 Ordinance 187832, Vol. 1.3.J, page 6871

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

## Arevalo, Nora

| From: | chevylane@juno.com |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 8:18 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | CPU Testimony |

From:
chevylane@juno.com
Sent:
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 calis 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. Thats 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

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. Don't Over-emphasizes "Displacement" Concerns. "Stop displacement" has been a rallying cry for many in the Comp Plan process. (l 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. Promote Environment and Watershed Health. I support the Draft's efforts to promote and protect Environment and Watershed Health.
5. Allow Sellwood To Change More. 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 $13^{\text {th }}$ Ave. at Sherrett Street. The designation makes sense for the entirety of SE $13^{\text {th }}$ 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

Ordinance 187832, Vol. 1.3.J, page 6877

HOSFORD-ABERNETHY
NEIGHEORHOOD DISTRICT ASSOCIATION
January 7, 2016

Mayor Charlie Hales<br>Commissioner Nick Fish<br>Commissioner Amanda Fritz<br>Commissioner Steve Novick<br>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


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 struetures that reinforce local identity, histories and cultures and contribute to way finding 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 Managentent. 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 Portiand'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 functionalility, 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.

HOSFORD-ABERNETHY
NEIGHBORHOOD DISTRICT ASSOCIATION
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.

## Capitalize on "the Missing Middle" - Add Density Without Destroying Neighborhood Fabric

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.
## Provide Better Opportunities for Meaningful Engagement in Proposed Development

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 aș 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

HOSFORD-ABERNETHY
NEIGHBORHOOD DISTRICT ASSOCIATION

## Division Design Initiative Top Ten Policy Recommendations.

(1) 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.
(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
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.)
(4) 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)
(3) 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)
6) 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)

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NEIGHBORHOOD DISTRICT ASSOCIATION

77 Consider Incentives in new Mixed Use Proposal for community amenities, including: high performance buildings/zero energy buildings, preservation and adaptive reuse of oider 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).
(8) 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 EM 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).
(9) 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)
(10) The City should employ broader tracking of and accountability for development impacts. Portiand, 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.

HOSFORD-ABERNETHY
NEIGHBORHOOD DISTRICT ASSOCLATION
January 7, 2016

Mayor Charlie Hales<br>Commissioner Nick Fish<br>Commissioner Amanda Fritz<br>Commissioner Steve Novick<br>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

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NEIGHBORHOOD DIStrict assoclation
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<br>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<br>Commissioner Nick Fish<br>Commissioner Amanda Fritz<br>Commissioner Steve Novick<br>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 $12^{\text {th }}$ 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 $12^{\text {th }}$ 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.

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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 implemientation 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 $11^{\text {th }}$ 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<br>HAND Chair

HOSFORD-ABERNETHY
NEIGHBORHOOD DISTRICT ASSOCLATION

NAMED
STREETS

| Clay | Market | Mill | Stephens | Harrison |  | $\underline{\text { Lincoln }}$ |  | Grant | Sherman |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

NUMBERED STREETS

|  |  |  |  |  |  |  | 12th (onl) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 3rd | 6th | 7th | 8th | 9th | 10th | 11th | 12th) |
| 1532 SE |  |  |  |  |  |  |  |
| \#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 <br> 2035 maybe | 1616 SE | 1609,1607, |
|  |  |  |  |  | commercial | 1612 SE | 1631 SE |
|  |  |  |  |  | 2025 SE | 2407-commercial | 1633 SE |
|  |  |  |  |  | 1532, 34, 36, 38 apts | 2442 SE | 16377 Abo |
|  |  |  |  |  |  | 2335 SE | 1711 SE-q |
|  |  |  |  |  |  | 2329 SE | 1717, 25, 1 |

HOSFORD-ABERNETHY NEIGHBORHOOD DISTRICT ASSOCLATION

| 2321 SE | 2011 SE |
| :--- | :--- |
| 2311 SE | 2019 SE |
| $2303-4$ plex | 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) | $2407 \mathrm{SE}-4 \mathrm{p}$ |
| 2007 SE | 2417 SE |
|  | 2421 SE |

HOSFORD-ABERNETHY
neighborhood district association
January 7, 2016

Mayor Charlie Hales<br>Commissioner Nick Fish<br>Commissioner Amanda Fritz<br>Commissioner Steve Novick<br>Commissioner Dan Saltzman<br>\section*{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 bikeunfriendly 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 $1 / 4$ mile 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 $1 / 4$ 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

## HOSFORD-ABERNETHY

NEIGHBORHOOD DISTRICT ASSOCLATION
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

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- 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

HOSFORD-ABERNETHY
NEIGHBORHOOD DISTRICT ASSOCIATION
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 nonconforming 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.

NEIGHBORHOOD DISTRICT ASSOCIATION
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:

1. Notice should be provided early in the process, before any decisions are forwarded to the PSC, so stakeholders can have the opportunity to testify.
2. 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.
3. 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

THE BOOKIN GROUP LLC

Land Use \& Institutional Planning

Policy Analysis

Project
THangement
Group
Facilitation

January 7, 2015
Mayor Charlie Hales and City Commissioners
c/o Council Clerk
1221 SW $4^{\text {th }}$ 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 45 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 $45^{\text {th }}$ 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 45 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.


Chris Hagerman, PhD, Principal



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/46 ${ }^{\text {th }}$ \& SW Florida St - R666535
TL\#501-4545 SW California St - R666528

## PeRKINSCOİ

January 7, 2016

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## 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
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Providence asks that the City Council consider revisiting the Plan policies following the PSC recommendation to the City Council concerning the $\mathrm{CI}-1$ and $\mathrm{CL}-2$ 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 Cónditional 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
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> 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,

## Bubal CRalest

Michael C. Robinson

MCR:rsr
Enclosure

[^1]
# Perkinscoie 

March 13, 2015

Michael C. Robinson
MRobinson@perkinscoie.com
D (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.

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 [blytheolson@gmail.com](mailto:blytheolson@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 8:42 PM |
| 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: dena higgins [denavision@gmail.com](mailto:denavision@gmail.com)

Sent:
To:
Subject:

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

## Arevalo, Nora

From: Pat Willey [pat@willey.ws](mailto:pat@willey.ws)
Sent: Thursday, January 07, 2016 8:06 PM
To: BPS Comprehensive Plan Testimony
Subject: Submission of Comment/Public Testimony on the Recommended Comprehensive Plan
Attachments:

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

## Arevalo, Nora

From:
Sent:
To:
Cc:
Subject:

Christopher Otero [christoph.otero@gmail.com](mailto:christoph.otero@gmail.com)
Thursday, January 07, 2016 8:03 PM
BPS Comprehensive Plan Testimony
matt.brischetto@gmail.com
Zoning change

Whom it concerns,
I'm writing to support the zoning proposal of the property at 2717 SE 15 th 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: | Scott McAuslan [smcauslan88@gmail.com](mailto:smcauslan88@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07,2016 7:51 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | Matt Brischetto |
| Subject: | 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: | Rosalyn Scaife [rozscaife@hotmail.com](mailto:rozscaife@hotmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 7:22 PM |
| To: | 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 Wainut 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, selfesteem, 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

## Arevalo, Nora

| From: | Christopher Eykamp [chris@eykamp.com](mailto:chris@eykamp.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 6:54 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive Plan Testimony |

Dear Portland City Council members,

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

1. 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

Ordinance 187832, Vol. 1.3.J, page 6910

| From: | Leah Woods [leahwoods1027@gmail.com](mailto:leahwoods1027@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 6:18 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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 I 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

## Arevalo, Nora

## From:

Sent:
To:
Subject:
Attachments:

Lindsay Jensen [lindsay@stjohnsmainstreet.org](mailto:lindsay@stjohnsmainstreet.org)
Thursday, January 07, 2016 5:44 PM
BPS Comprehensive Plan Testimony
Comp plan - addressing needs in St. Johns
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 hoid 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@stiohnsmainstreet.org
503-841-5522

From:
Sent:
To:
Cc:

## Subject:

Don Q Baack [baack@q.com](mailto:baack@q.com)
Thursday, January 07, 2016 5:42 PM
Hunting, Duane
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 [User Approved] Re: "Comprehensive Plan Testimony" - HNA Comments on Wilson High School Zoning Adjustment

Good job Duane, thanks.

Don Baack
503-246-2088 baack@q.com
6495 SW Burlingame PI
Portiand, Or. 97239

On Jan 7, 2016, at 14:45, Hunting, Duane [duane.hunting@zgf.com](mailto:duane.hunting@zgf.com) wrote:

Portland City Council:

## MAP ZONE CHANGE REQUEST:

The Hillsdale Neighborhood Association (HNA) is requesting that the Comprehensive Plan zoning designation for the Wilson High School campus at 1151 SW Vermont Street, Portland, Oregon 97219 be returned to "conditional use" within an R7 (Residential 7,000 sf) zone designation 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 $4^{\text {th }}$ 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

Ordinance 187832, Vol. 1.3.J, page 6914

## Arevalo, Nora

| From: | Lisa Maxfield [lamaxfield@pacificnwlaw.com](mailto:lamaxfield@pacificnwlaw.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 5:31 PM |
| To: | 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

## Arevalo, Nora

## From:

Sent:
To:
Cc:
Subject:

Attachments:

Ann Naughton [thenaughtons1@comcast.net](mailto:thenaughtons1@comcast.net) Thursday, January 07, 2016 5:23 PM
Scarzello, Christina; BPS Comprehensive Plan Testimony 'Michael Naughton'; jnaughton61@gmail.com; thenaughtons1@comcast.net RE: Comprehensive Plan Testimony, James and Michael Naughton, 9 NE 120th Ave, and 9 NE 120th Ave \#WI, Portland, OR 97220
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 $120^{\text {th }}$ 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](mailto:Christina.Scarzello@portlandoregon.gov); cputestimony@portlandoregon.gov
Cc: 'Michael Naughton' [mpnaughton@ipns.com](mailto:mpnaughton@ipns.com); 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

To the Comprehensive Plan Couricil and City of Portland,

We are writing to request a Comprehensive Plan designation and zone change on our properties located at Burnside and NE $120^{\text {th }}$ Ave. from RH to the new proposed CM3/Mixed Use-Civic Corridor. Jim Naughton and Mike Naughton currently own both properties at 9 NE $120^{\text {th }}$ Ave. (R175182) and the lot next to it 9 NE $120^{\text {th }}$ 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 $122^{\text {nd }} \mathrm{MAX}$ stop two lots away (there is no NE $121^{\text {st }}$ 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 $122^{\text {nd }}$, 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 CM 3 both properties will:
Ordinance 187832, Vol. 1.3.J, page 6916

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

Arevalo, Nora
From:
Sent:
To:
Cc:
Subject:
Nancy Seton [NancySeton@comcast.net](mailto:NancySeton@comcast.net)
Thursday, January 07, 2016 5:16 PM
BPS Comprehensive Plan Testimony
Gloria Reich; Kady Al-Saeed; Kara Stone; Karen Healey; Kelly Reece; Lee Doss; Margaret Gossage; Ryan Fedie; Sean Baioni
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](mailto: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

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 instail 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 amenitypoor 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 weicome 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.

## Arevalo, Nora

| From: | Blythe Olson [blytheolson@gmail.com](mailto:blytheolson@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 5:10 PM |
| To: | 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 EIm 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

PORTLAND<br>BUSINESS ALLIANCE<br>Commerce - Community • Prosperity

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 thelr 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 appreclates 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 achleve a "prosperous, healthy, equitable and resillent city" over the last two years including the assumption of a mid-cargo marine forecast, the 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 pollcles that, if fully implemented, would go a long way towards ensuring Portland's economic prosperity over the next 20 years. These policles include 9.29 - 9.35 and are critical to maintaining an efficient and complete freight system including air, marine, rall and truck capacity and promoting our tradedsector 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,
Candia Inesongs
Sandra McDonough
President \& CEO
cc: Susan Anderson
Bureau of Planning and Sustainability
Portland City Council

## APPENDIX OF COMMENTS

## Transportation

Design and Planning
Pollcy 9.6 Transportation strategy for people movement. Design the system to accommodate the most vuinerable 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. Bicyoling
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 does not apply to frelght 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 "inovement 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

Pollcy 9.13 Streets for transportation and public spaces. Integrate beth parking, place-making and transportation functions when designing and managing streets. by-eneouraging desiff; development, and operation of streets to enhanee opportunitlee for them to sepve as plaees-for eommunity Interaetion, environmentalfunction, open space, tree eanopy, recreation, and-other cemmunity purposes,

Pollcy 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 Pollcies

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 Automoblle transportation. Maintain acceptable laivels of moblity and access for private automobiles whille 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 Intérchanges 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 onstreot 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 offstteet 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 paiking to achileve 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.

## Arevalo, Nora

| From: | Alice Blatt [aliceb@pacifier.com](mailto:aliceb@pacifier.com) |
| :--- | :--- |
| Sent: | 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

## Arevalo, Nora

| From: | Blythe Olson [blytheolson@gmail.com](mailto:blytheolson@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 5:00 PM |
| To: | 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

J. Mary Taylor

2719 SW Old Orchard Rd
2718 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 |


| 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 |


| 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 ${ }^{\text {th }}$ 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 PI |
| Claudia Brown | 2926 SW Periander St |
| Camille Hunt | 2656 SW Upper Dr PI |
| 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 PI |
| James Braun | 4211 SW Patrick PI |
| 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 | 1703 SW Myrtle St |
| Alison Friday | 1909 SW Laurel Place |
| Sara Matarazzo |  |

## Arevalo, Nora

| from: | jill neuwelt [jneuwelt@hotmail.com](mailto: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 ! 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
Portland, Oreogon 97239

Sent from my iPad

Mayor Charlie Hales and members of the Portland City Council
City of Portland
1221 SW $4^{\text {th }}$ 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 all new development and redevelopment shall include transportation and stormwater infrastructure (pedestrian, bicycle, access to transit) consistent with its street classification.

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
 transportation projects were prioritized, but one cannot easily find these maps and tables on the TSP
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 $4^{\text {th }}$ Drive
Portland, OR 97219
(503) 246-1847, Fitzgerald.marianne@gmail.com

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](mailto:thenaughtons1@comcast.net)
Sent:
To: Thursday, January 07, 2016 4:53 PM Scarzello, Christina; BPS Comprehensive Plan Testimony 'Michael Naughton'; jnaughton61@gmail.com; thenaughtons1@comcast.net Comprehensive Plan Testimony, James and Michael Naughton, 9 NE 120th Ave. and 9 NE 120th Ave \#WI, Portland, OR 97220
Tax ids.pdf
Attachments:

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 $120^{\text {th }}$ Ave. from RH to the new proposed CM3/Mixed Use-Civic Corridor. Jim Naughton and Mike Naughton currently own both properties at 9 NE $120^{\text {th }}$ Ave. (R175182) and the lot next to it 9 NE $120^{\text {th }}$ 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 $122^{\text {nd }} \mathrm{MAX}$ stop two lots away (there is no NE $121^{\text {th }}$ 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 $122^{\text {nd }}$, 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

| Presented by: | Ann Naughton <br> Keller Williams Realty Profes, |
| :--- | :--- |


|  |  |  |  |
| :--- | :--- | :--- | :--- |
| Tax ID: | R175182 |  |  |
| Prop Addr: | 9NE 120TH AVE | Latest Listing ID: |  |
| Clty/State/ZIp: | PORTLAND OR 97220-2348 | County: | Multnomah |
|  |  | Carrier Rt: | C014 |

OWNER INFORMATION

| Owner Name: | NAUGHTON MICHAEL P |
| :--- | :--- |
| Owner Addr: | 12803 NW LILYWOOD DR |
| CIty/State/ZIp: | PORTLAND OR 97229-8545 |

Ann Naughton
Keller Williams Realty Profes.

| Lot SqFt: | 10255 | Lot Dim: | $0 \times 0$ | Acreage: | 0.24 |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | 1972 | BUILDIN | INFORMATIO | Parking SF: |  |
| Eff Yr Built: | 1972 | Bathrooms: | 0 | Garage: |  |
| Style: | COLONIAL | Living SF: | 4234 | Fuel: |  |
| Stories: |  | BIdg SF: | 4234 | Heat Method: |  |
| \# of Bldgs: | 1 | Bldg SF Ind: | BUILDING | Sewer: |  |
| Bldg Code: | MEDICAL OFFICE | Bsmnt SF: | 1800 | Roof Cover: |  |
| Fireplace: |  |  |  | Roof Type: |  |
| Fireplace Type: |  |  |  | Alr Cond: |  |
| Foundation: |  |  |  |  |  |
| Exterlor Finlsh: |  |  |  |  |  |



| Tax Perlod: | 15-16 | Market Land: | $\begin{aligned} & \text { FORMATIO } \\ & \$ 120,120 \end{aligned}$ |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Tax Year: | 2015 | Market Impv: | \$584,320 |  |  |
| Tax Amt: | \$8,956.07 | Market Total: | \$704,440 | Assessed Total: | \$414,710 |
|  |  | LEGAL | FORMATION |  |  |
| Map Page: | 598 | Map Code: | 1N-2E-34-SE-NE | Census Tract: | 81001019 |
| Map Column: | A | Townshlp: | 01N | Census Block: |  |
| Map Row: | 6 | Range: | ${ }_{34}^{02 E}$ | Lot: <br> Zoning: |  |
|  |  |  | 34 | Zoning: <br> Tax Area Code: |  |
| Nbrhd Code: School Dist: | C680 | Qtr Sectlon: 16th Section: | $\begin{aligned} & \mathrm{SE} \\ & \mathrm{NE} \end{aligned}$ | Tax Area Code: <br> Tax Rate: |  |
| Prop Class: Land Use: Subdivislon: Legal Desc: | COMMER MEDICA HAMLER HAMLER | NG | CPTINST |  |  |

Ordinance 187832, Vol. 1.3.J, page 6942
Presented by:

Ann Naughton
1/7/2016 1:14:29 PM Keller Williams Realty Profes.

| Tax ID: Prop Addr: Clty/State/Zip: | R175181 <br> 9 NE 120TH AVE \#WI <br> PORTLAND OR 97220-2348 |  | Latest Listi 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: <br> Carrier Rt: | C053 |




| Tax Period: | 15.16 | Market Land: |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Tax Year: | 2015 | Market Impv: | \$3,550 |  |  |
| Tax Amt: | \$967.27 | Market Total: | \$125,280 | Assessed Total: | \$44,790 |
|  |  | LEGAL | NFORMATION |  |  |
| Map Page: | 0 | Map Code: | 1N-2E-34-SE-NE | Census Tract: | 81001019 |
| Map Column: |  | Township: | 01N | Census Block: | 2 |
| Map Row: | 0 | Range: | O2E | Lot: | 6 |
|  |  | Section: | 34 | Zoning: | RH |
| Nbrhd Code: | C680 | Qtr Section: | SE | Tax Area Code: | 113 |
| School Dist: |  | 16th Section: | NE | Tax Rate: | 0.000 |
| Prop Class: | COMME |  |  |  |  |
| Land Use: | COMMERCIAL (NEC) |  |  |  |  |
| Subdivision: | HAMLER ADD |  |  |  |  |
| Legal Desc: | HAMLER ADD, BLOCK 2, LOT 6 |  |  |  |  |

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 $30^{\text {th }} 2013$ 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 $9^{\text {th }} 2015$ 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 weiders, 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 heid 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

[^2]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 $122^{\text {nd }}$ Ave, SE Stark, $82^{\text {nd }}$ 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 $82^{\text {nd }}$. 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 (H078A).
- 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 l-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 $185^{\text {th }}$.
- 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 (1-5/Broadway/Weidler Interchange, Phase 2): Acquire right-of-way to improve safety and operations on $1-5$, connection between $1-84$ and $1-5$, 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

Ordinance 187832, Vol. 1.3.J, page 6947

- 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 $17^{\text {th }}$ 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,

## Bia Weld

Pa Welch
PFC Chair

## Arevalo, Nora

| From: | M.E.Andre [andme@teleport.com](mailto:andme@teleport.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 4:41 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | DDI Top Ten Recommendations |

From: M.E.Andre [andme@teleport.com](mailto:andme@teleport.com)
Sent:
Subject:
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

Ordinance 187832, Vol. 1.3.J, page 6949

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

Portland, Oregon 97207-0751

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 shouid 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 Ordinance 187832, Vol. 1.3.J, page 6950
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.

Specific Changes that We are Suggesting: 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 "agefriendly" 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 AgeFriendly 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.

Sincerely,


Margaret B. Neal, Ph.D., and Alan DeLa'Torre, Ph.D
Institute on Aging, Portland State University and
Co-Chairs, Age-Friendly Portland and Multnomah Advisory Council
c: Age-Friendly Portlandridihttnceah 8

# Perkinscoie 

January 7, 2016

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F. +1.503 .346 .2036

VIA EMAIL CPUTESTLMONY@PORTLANDOREGON.GOV

City of Portland, City Council<br>1900 SW Fourth Avenue, Suite 7100<br>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 supports 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 Plaming 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 supportive 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.

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 33 rd 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.)



BROADMOOR SITE
Proposed Development Areas \& Concept Plan
Portland, Oregon


Ordinance 187832, Vol. 1.3.J,

| From: | Susan Lindsay [lindsays@pdx.edu](mailto:lindsays@pdx.edu) <br> Sent: <br> Thursday, January 07, 2016 4:23 PM |
| :--- | :--- |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | 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 $\qquad$
From: Susan Lindsay [lindsays@pdx.edu](mailto: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](mailto:amanda@portlandoregon.gov), Steve Novick < Novick@portlandoregon.gov>, Commissioner Saltzman [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov), Nick Fish [nick@portlandoregon.gov](mailto: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.

Ordinance 187832, Vol. 1.3.J, page 6956

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
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Susan Lindsay
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Susan Lindsay

## Ordinance 187832, Vol. 1.3.J, page 6957




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 $21^{\text {st }}$ Ave
Portland, OR 97211

## Arevalo, Nora

| From: | Pat Willey [pat@willey.ws](mailto: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 $4^{\text {th }}$ 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.

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


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

Ordinance 187832, Vol. 1.3.J, page 6963


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



517 SE 16TH


525 SE 16TH


615-17 SE 16TH


512 SE 17TH


536 SE 17TH

| PHOTO | YEAR <br> BUILT | LOT AREA | HOUSING TYPE | CONTRIBUTING STRUCTURE |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |
| 622-24 SE 17TH | 1910 | 10000 SF | $\begin{aligned} & \text { 2-PLEX + } \\ & \text { 6-PLEX } \end{aligned}$ | $\begin{aligned} & \text { YES } \\ & \text { NO } \end{aligned}$ |
| 521 SE 18TH | 1904 | 4000 SF | SF | YES |
|  |  |  |  |  |
| 535 SE 18TH | 1906 | 6000 SF | SF | YES |
|  | $1920$ | 5000 SF | 8-PLEX | YES |
|  |  |  |  |  |
| . 515 SE 19TH | Ordimance 1878340godrol. 1.3.J, page 6966 |  |  | YES |



| PHOTO | YEAR <br> BUILT | LOT AREA | HOUSING TYPE | CONTRIBUTING STRUCTURE |
| :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |
| 1535 SE ALDER | 1904 | 10000 SF | 3-PLEX | YES |
|  |  |  | $\stackrel{ }{ }+$ |  |
| 1915 SE ALDER | 1905 | 5000 SF | SF | YES |
|  |  |  |  |  |
| 1505 SE WASHINGTON | 1905 | 6500 SF | SF | YES |
|  |  |  |  |  |
| 1816 SEWASHINGTON | 1904 | 6223 SF | SF | YES |

# Portland Comprehensive Plan Proposed Zoning Changes for Buckman 





zonatis x


R2.5

R1
$\theta$


R5 (5000 SF) lots are changed to R2.5 (2500 SF ) lots A 5000 SF lot can be subdivided into two 2500 SF lots with two larger homes


Original building footprints
What would be allowed under the new zoning


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, bullder-architects, built many of the houses in Buckman.


## Arevalo, Nora

| From: | Eileen Wallace [eileen.wallace@gmail.com](mailto:eileen.wallace@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07,2016 3:52 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Testimony - City Council Hearing - Portland Comprehensive Plan |
| Attachments: | Testimony - Eileen Wallace_4001-4007 SW Collins Street_Comprehensive Plan Update_ |
|  | $1.7 .2016 . d o c x$ |

## 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

Name: Eileen Wallace
Mailing Address: 8716 SW $21^{\text {st }}$ 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, Portiand, OR 97219, off of SW $41^{\text {st }}$ 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 MultiDwelling 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 $21^{\text {st }}$ 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 MixedUse 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



Ordinance 187832, Vol. 1.3.J, page 697 Bage 2 of 3

Proposed


Thank you,
Eileen Wallace
eileen.wallace@gmail.com

Ordinance 187832, Vol. 1.3.J, page 6974

From:
Madeline Kovacs [madeline@orangesplot.net](mailto:madeline@orangesplot.net)
Sent: . Thursday, January 07, 2016 3:48 PM
To:
Cc:
Subject:

Attachments:

BPS Comprehensive Plan Testimony; Parsons, Susan
Stark, Nan; Eli Spevak; Sweet, David
CPU Testimony: Businesses along West side of NE 42nd request MUZ designation change from CM1 to CM2
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 42 nd 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

## Zone Change Request for the West side of NE 42 ${ }^{\text {nd }}$ Ave. from 4837-5013 Proposal: Change comprehensive plan designation from CM1 to CM2.

As property owners along the west side of NE $42^{\text {rd }}$ 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 $42^{\text {nd }}$ 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 $42^{\text {nd }}$ 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 $42^{\text {ed }}$ Ave.


December 21, 2015

## Zone Change Request for the West side of NE $42^{\text {nd }}$ Ave, from 4837-5013

Proposal: Change comprehensive plan designation from CM1 to CM2.
As property owners along the west side of NE $42^{\text {nd }}$ 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.

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Thank you for considering this request to support a more balanced density profile along NE $42^{\text {nd }}$ Ave.


## Arevalo, Nora

| From: | Susan Lindsay [lindsays@pdx.edu](mailto:lindsays@pdx.edu) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 3:45 PM |
| To: | 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 $\qquad$
From: Susan Lindsay [lindsays@pdx.edu](mailto:lindsays@pdx.edu)
Date: Fri, Mar 13, 2015 at 11:14 PM
Subject: BCA Comp Plan Testimony
To: Planning \& Sustainability Commissioners [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov), julie.ocken@portlandoregon.gov, "Stein, Deborah" [Deborah.Stein@portlandoregon.gov](mailto:Deborah.Stein@portlandoregon.gov)

Please see attached.
Susan Lindsay
Co-Chair, Buckman Community Association
--
Susan Lindsay

March 12, 2015
Planning and Sustainability Commission
1900 SW $4^{\text {th }}$ Avenue
Portland, OR 97214
Dear Chair Baugh and fellow PSC Commissioners,
At the March $12^{\text {th }}$ 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 $15^{\text {th }}$ to $19^{\text {th }}$ 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 $12^{\text {th }}$ 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.

$$
\text { Ordinance 187832, Vol. 1.3.J, page } 6980
$$

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 $12^{\text {th }}$ Avenue to the river and one block east from $20^{\text {th }}$ 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.
$14^{\text {th }}$ and SE Stark:
In addition to the rejection of the proposed zoning changes from SE $15^{\text {th }}-19^{\text {th }}$, the Association also unanimously voted to reject the proposed rezoning of two properties on SE Stark at $14^{\text {th }}$ 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 $17^{\text {th }}$ and $19^{\text {th }}$ 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,


[^3]
## Jeff Cole

4343 SE Madison St.
Portland, OR 97215
Tel: 503.927.7748
Thursday, January 7th, 2016

Attn: Comprehensive Plan Testimony<br>Council Clerk (cputestimony@porllandoregon.gov)<br>1221 SW 4th Ave, Room 130<br>Portland, OR 97204

CC: Marty Stockton, Southeast District Liaison, BPS<br>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 Portiand 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 Portiand (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 rapld spread of the Mixed Use Bullding 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 <br> 20,000 SQFT LOT <br> 52,380 SQFT BLDG. <br> 5,5589 SQFT RETAIL <br> 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 $20^{\prime}$ to $62^{\prime}$ 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.


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 bullding 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.


Quick study \#2: 3490 SE Hawthorne; 2-4 story Mixed Use Project (2003) ( $25,000 \mathrm{sq} \mathrm{ft}$. 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 $38^{\prime}$ 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 Hear//Full Spectrum fitness ( $10,000 . \mathrm{ft}$.)
- 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. $\mathrm{ft}+$, two levels)
- American Apparel ( 5,000 sq. $\mathrm{ft}+$ )
- numerous stores $2500+$ sq. ft

Existing businesses that have expanded on Hawthorne Blyd. 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 Porlland 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 Sunnsyide 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 materiais 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 38 ft 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 3.28-3.31Portland'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.

Portiand 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, 82 nd 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, Portiand 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 Tilikum 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.

From: Cathy Galbraith [cathyg@visitahc.org](mailto:cathyg@visitahc.org)

Sent:
To:
Cc:

Subject:
Attachments:

Thursday, January 07, 2016 3:42 PM BPS Comprehensive Plan Testimony
Hales, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Saltzman; Commissioner Novick
Portland's Draft Comprehensive Plan Testimony
Cathy letter 2015 Comp Plan Testimony.docx

Importance:

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
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www. VisitAHC.org
Portland Preservation Blog
http://portlandpreservation.wordpress.com/

Ordinance 187832, Vol. 1.3.J, page 6993


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 any 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 $17^{\text {th }}$ and SE $20^{\text {th }}$ 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 highdensity 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,
Cethy Gebraith
Cathy Galbraith
Executive Director
$2154 \mathcal{N}$ SE. Broadway, Suite $200^{\circ}$ Portland, Oregon 97232-1590
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City Council Hearing Proposed Comprehensive Plan Review
January 7, 2016

City of Portland

Mayor Charlie Hales and City Commissioners

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; $\mathrm{R}-5=5,000$ square feet, $\mathrm{R}-75=7,500$ square feet, $\mathrm{A}-25=$ 2,500 square feet, and $\mathrm{A}-1=1,000$ 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 $21 / 2$ 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 EG BE ASSIGNED TO THIS PARCEL OF LAND.

## 2. Central City South Lloyd Center area

Close in east side, NE $12^{\text {th }}$ to NE $20^{\text {th }}$, 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 central city and will remain with that zoning and have the same FAR and height possibly that are now assigned to the parcel.

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



Ordinance 187832, Vol. 1.3.J, page 7001

Weston Investment Co．LLC
Properties from NE $12^{\text {th }}$ to NE 20th

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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 15 th. 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 16 th 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
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 15 th) 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 $\mathrm{k}-12$;
* 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.




It's Your Oregon

222 NW Davis Street
Suite 309
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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 coreaffordable 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 pollutionkeeping 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<br>Deputy Director<br>Oregon Environmental Council<br>(and Portland resident)<br>503-222-1963 $\times 102$<br>chrish@oeconline.org

# WHM CREATING AND PRESERVING AFFORDABLE HOMES NEAR TRANSITIS 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 2013 shows that a well-designed program to put more aDordable 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 beneDts.

Conducted by the nationally recognized Center for Neighborhood Technology (CNT), the analysis identiled 36,000 -plus surveyed households that had provided all relevant demographic and travel data and divided them into Dve income groups, living in three types of locations based on their proximity to public transportation:

- Transit-Oriented Development (TOD) as deDned by the California Department of Housing \& Community Development (HCD) requires homes be bull within a 14 mile radius of a qualifying rail or ferry station or bus stop with frequent service. $\square$
- TOD as deDned 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 deDnition.
- Non-TOD areas that do not meet either of these de■nitions.

Two key ■ndings include:

- Lower Income households drive $25-30 \%$ fewer miles when living within $V$ ? mile of transit than those living in non-TOD areas. When living within HCD's 14 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 14 mile of frequent transit. This underscores why it is critical to ensure that low-income families can a口ord to live in these areas.

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 alordable housing located within 14 mile of frequent transit can dramatically reduce GHGs.

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 $2015 / 15$ through FY 2017118 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 oll 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 signiDcantly 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 eD ciency requirements.

Finally, TransForm and CHPC oDer a methodology for verifying and reporting the reductions.

## To read the full report please visit: <br> - www.chpc.net <br> - www.transformca.org



California Housing Partnership
Corporation
Callfornio's Experts on Affordoble Housing Finance, Advocacy \& Policy

## UNIVERSITY PARK NEIGHBORHOOD ASSOCIATION <br> TESTIMONY O 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 $97209 \cdot(720.218 .2925) \cdot$ wcrossiter@yahoo.com

January 7,2016

Mayor Charlie Hales and City Commissioners
City of Portland, City Hall
1221 SW 4 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 neighborhood character, 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 singlefamily 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,

## Wendy Chung

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Sincerely,


Wendy Chung

Encl.

## Wendy Chung

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## 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 plan 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 and expand existing historic preservation and design review tools to accommodate growth in ways that identify and preserve 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 rafe 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 $_{2}$-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)
Designate. P $_{\text {Protect }}$ prot and encourage the restoration and improvement of historic resources in centers and corridors.

## Historic and cultural resources (PAGE GP4-11)

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## 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. Identify, fprotect 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. Update and Mregularly maintain and-poriodically updatePortland's Historic Resources Inventory to inform historic and cultural resource preservation strategies.

Policy 4.50 Preservation equity. Expand historic presemation 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 both beautiful and ordinary 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<br>3536 SE 26th Ave<br>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.


[^4]SERVICE EMPLOYEES INTERNATIONAL UNION LOCAL 49

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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.

January 7, 2016
Name: Eileen Wallace
Mailing Address: 8716 SW $21^{\text {st }}$ 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 $41^{\text {st }}$ 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 MultiDwelling 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 $21^{\text {st }}$ 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.

1 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 MixedUse 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,
Thank you,
eileen.wallace@gmail.com

Portland City Council
Bureau of Planning and Sustainability

RE: City of Portland Comprehensive Plan Update - 2135 NW $29^{\text {th }}$ Ave

Dear Council:

We are currently under contract to purchase a $55,000 \mathrm{SF}$ parcel of land located at $2135 \mathrm{NW} 29^{\text {th }}$ Ave (Tax IDs: R307720 \& R307719). The sites are bounded by NW Nicolai St. on the North, NW $29^{\text {th }}$ Ave. on the East, NW $30^{\text {th }}$ 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 and 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 72016

 Laurie KovackI 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 1 talked with were OK with these changes. The zoning change to R1 came after the the community meetings with the July 2014 map proposals. $\rightarrow$ and did not fael the need to testify.
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
Portiand OR 97214


Aph16. 2015


Proposed Comprehensive ian Designations July doily.


Grey area - unchanged zoning
Bine area - changed from single family to $R, 2$
Yellow area - charge a from single family $R 5$ to SF 2.5 Ordinance 187832, Vol. 1.3.1, phage 7827.

## Proposed Comprehensive P lan Designations



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 $O^{\prime}$ 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 R 1 to CN 1 . 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


## 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 membershipbased 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.
Number of Riverside Members


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.

## Portland Metropolitan Population Forecast










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 innercity 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 <br> 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/car hater Transportation policies in Chapter 9.

Respectively submitted,
Terry Parker
Northeast Portland

# Testimony on Historic Preservation and the 2035 Comprehensive Plan Before Portland City Council 

By James S. Hewer, Chairperson, Portland Coalition for Historic Resources
January 7, 2016
Mayor Hales and Members of the Portland City Council, my name is Jim Hewer, 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 Hener, 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 enviromment... 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 amnexed to Portland in the 1990 s, 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 oyer 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 tuming" 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 $25^{\text {th }}$ 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



ATHACHMENT B


# 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 StewardSouth 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 and Incentivize 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 incentivize these actions." 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

4-2

Thank you for this opportunity to submit testimony regarding Land Use determinations and zoning considerations in the Comprehensive Plan.

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:

1. 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 RH 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 www.mesopdx.org.

Sincerely,
Nita M. Shat
Nita Shah
Executive Director
nshah@mesopdx.org
(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):

## 1. Policy 7.11 Urban Forest

Strengthen the current language used in Policy 7.11.a -- Tree Preservation to "Require or encomage 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 and 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 $9^{\text {th }}$ Avenue
Portland, OR 97212

# LINNTON NEIGHBORHOOD ASSOCIATION <br> 10614 NW St. Helens Rd. <br> 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 Linton 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 Linton'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 Linton Mill site along St. Helen 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.

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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.

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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<br>Chair<br>Linnton Neighborhood Association



DATE: December 14, 2015

## TO: Portland City Council

FROM: $\quad$ 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 declsions 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 tallored 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 presentedegg. "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 quallty 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.


## 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. Porfland's comprehensive plan update, Policy $4.28 . \mathrm{d}$, 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 ${ }^{1}$


## 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.

[^5]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 $122^{\text {nd }}$ 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 (1/4mile 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 $\mathrm{R}-5$ 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 $122^{\text {nd }}$ 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 $122^{\text {nd }}$ 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.

11422 SW Barber Street

## Hayden Island Plan Reality

## History

The Hayden Istand 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 Isiand and Marine Drive.
3. Exfension of the Light Rail to Hayden Island/Vancouver.
4. Extension of Tomahowk 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 Istand 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 Columbla River. These ramps are overfoaded during peak rush hours, especially during the aftemoon evening hours by all the Northbound Washington residents who work in Oregon. Holidays create other congestion periods, especially Christmas.

Access to the easf of $1-5$ 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 $N$ Tomahowk Island Dr frequently closes the road down to a single lane, creating significant congestion and sometimes dangerous fraffic problems. Note that there are no altemative routes, nor the ability to provide any due to the narowness of the island.

The Yacht Harbor Apariments 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.

Hoyden Istand currently has about 2800 residents - Yacht Harbor will add about $27 \%$ more residents based on an occupancy of 2 people per unifl Yel 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 infrostructure and accessi Curent zoning on the East end of the island will allow an overall increase to about double the current poputation.

Additional lssues

- Hayden Island is a sand and grovel island that is very susceptible to earthquake - new studies need to be made based on the projected 7-9 magnitude eorthquake that is projected for the NW.
- There are no evacuation or emergency plans for the island in case of disaster.
- Yachl Harbor is $\sim 1$ mile from bus service and there are no plans to extend it.
- Fire Engine access is greatly restricted to the East end of the lsland during Spring/Summer months.


## Change the Hayden Island Plan

The zoning needs to properly reflect aclual available infrastructure and should reset the overall zoning to $\mathrm{C}-1$ that has a rnaximum helght of 32 feet.

The Hayden Island Plan made two maximum height changes on the east end of the istand reflecting the anticipated upgrades in infrastructure. These changes were to $80^{\prime}$ and $90^{\prime}$. These no longer make any sense given the limited infrastrucfure, the difficulty of evacuating the Istand in an emergency, and growing congestion, nor does the height fit with the current character of the isiand.

Presented by: Ron Ebersole - 11630 N Island Cove In - Portand 97217- He242egmall.com - 503 320.8398

City of Portland, Comprehensive Plan Testimony<br>Nanci Luna Jiménez<br>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
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. 1 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<br>215 N. Stafford Street<br>Portland, Oregon 97217<br>Luna Jiménez Seminars<br>PO Box 12371<br>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: $\quad$ 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.

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 Jimenez 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 communitybuilding.

In Gratitude,
Jofiombé A. prow x

Tshombe Brown
PO Box 5861
Portland, OR 97228

City of Portland, Comprehensive Plan Testimony Nichole June Maher<br>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

Petition to Change Zoning on NE Freemont from North Mississippi Street to North Vancouver Avenue

| Petition summary and <br> background | As long time business and property owners in NE, we are having serious concerns regarding current zoning limits in a rapidly <br> developing inner N/NE. We have watched as outside developers have procured property, changed zoning and prospered off <br> 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 |  |, | Ae, the undersigned, are Concerned citizens who urge our leaders to act now to change the use of North Fremont extending. |
| :--- | :--- |
| from North Mississippi Street to North Vancouver Ave. from its current zoning of Residential Use to Mixed Use. |




## 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.

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)



June 15, 2015
City of Portland, Oregon // Bureau of Ptanning \& Sustainability // Geographic Information System The informatyon on this map was derived from city of Portland Gus databases. Care was taken in the creation of this map but it is pronded "3a is". The City of Portland eannot aceept any responsibility for error
missions or positional accuracy:

NORTH


P. Michael Dubinsky<br>3734 NE Hassalo Street<br>Portland, Oregon 97232<br>510-541-4951<br>Foxungemcomeast,nct

06 January 2016
City of Portland
City Council karlamore-lowemondaregongov
1221 SW 4th
Portland, OR 97204
Subject: Comments on the Recommended Comprehensive Plan UpdateTransportation \& 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 $Y$ 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.


Attachments

1. 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,


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

J. Mary Taylor

2719 SW Old Orchard Rd
2718 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 |


| 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 |


| 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 ${ }^{\text {th }}$ 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 PI |
| Claudia Brown | 2926 SW Periander St |
| Camille Hunt | 2656 SW Upper Dr PI |
| 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 $\mathrm{O}^{\prime}$ 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 PI |
| James Braun | 4211 SW Patrick PI |
| 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 MicClung | 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 | 1703 SW Myrtle St |
| Alison Friday | 1909 SW Laurel Place |
| Sara Matarazzo |  |

## Derek Sandoz 2014 SW 17th Ave

Candy You 1750 SW Broadway Dr
Ed UIman 1553 SW Elizabeth St
Wendy UIman 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 ( Cl 1 and Cl 2 ) 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 highereducation 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 Legman
Director, Bond Program
cc: John Cole, Senior Planner, Bureau of Planning and Sustainability

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 $1 / 2$ 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 $11^{\text {th }}$ 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/l-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 21 st and Multnomah will have an impact on the connection between the trail and 21 st. at street level. Grant Park Village is also planning construction on phase II, this will also impact the connection from the trail to 32 nd. 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 1-84 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
bear Cit Counsil:
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# Brian Posewitz <br> 8508 SE $11^{\text {th }}$ Ave. <br> Portland, OR 97202 <br> 503-432-8249 <br> brianposewitz@comcast.net 

January 7, 2016

## Mayor Charlie Hales and City Commissioners <br> 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. Don't Over-emphasizes "Displacement" Concerns. "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. Promote Environment and Watershed Health. I support the Draft's efforts to promote and protect Environment and Watershed Health.
5. Allow Sellwood To Change More. 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 $13^{\text {th }}$ Ave. at Sherrett Street. The designation makes sense for the entirety of SE $13^{\text {th }}$ Ave., which historically has had commercial and industrial uses all the way to the southern end.

Thank you for considering my comments.

 $(503) 236-3522$ Katherine Wilson curs here, the Godmother of feer in Oregon - dove 3 hours to testify, from a fem edit, and wants to remind you the to泡密 look 7 generations into the futurefor
Portland - and put Terminal 1 in a land bank so that 7immakus can bring Ifs! (she sterthas a fins studies

# 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 ( $\mathrm{R}-1$ ) 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.


9200 SE Sunnybrook Boulevard, $\$ 410$ : Clackamas, OR 97015 1-866-554-5360 | Fax: 503-652-9933 | TY: 1-877-434-7598
aarp.org/or | oraarp@aarp.org | twitter: Gaarpor
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

# Working Waterfront COALITION 

City of Portland City Council
January 7, 2016
Portland City Hall
1221 SW Fourth Avenue
Portland, OR 97204

## 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 not 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 Clity achieve its equity and housing affordability goals. Harbor businesses are major Portiand 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

## Working Waterfront C O A L I TION

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 Poriland 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


## Working Waterfront C O A L I T I O N


#### Abstract

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?
#### Abstract

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,


Ellen Wax, Executive Director

# Working Waterfront C O A L I T I O N 

## 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 Amendment

WWC Issue Matrix

| Issue | WWC's Position | PSC Recommendation | WWC's Response |
| :---: | :---: | :---: | :---: |
| 1. Cargo Forecast. Should the City assume a medium-growth cargo forecast for harbor-related tonnage across all cargo types? | Yes. <br> - A low-growth cargo forecast is not supported by substantial evidence in the record. <br> - A low forecast overlooks historical trends, recent infrastructure improvements and it sends the wrong message to Oregon businesses and the public. <br> - A low cargo forecast is inconsistent with region's forecast assumptions | No. PSC adopted a low cargo forecast due to land supply challenges. | The City Council should adopt a medium-growth forecast for harbor-related tomage 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? | No. <br> - 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). | 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. Unfunded Transportation Improvements. Should the City assume that unfunded transportation improvements will create more cargo efficiency and ucrease industrial land capacity along the harbor? | No. <br> - The city should not take credit for the additional through-put that could resulf 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. <br> - 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? | Yes <br> - 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. <br> - 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. | No. PSC low forecast assumes $1 \%$ or less of annual growth in the harbor - limiting job opportunities and procurements of supplies, raw materials and services from local businesses. | 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 <br> - Targeting investment and polices to support harbor business expansion <br> - Expediting permitting <br> - Addressing conflicting regulations that hinder harbor business investment |

## Attachment B



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.


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

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

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# 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 worid. 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.


| Longview | Export Grain Terminal (2012) | \$230 milion | Nens grain termina |
| :---: | :---: | :---: | :---: |
| Kalama | Tenicollc (2015) | \$100 milion | increase capacity (gran) |
|  | Port of Kalama (2014-15) | \$7 miltion | Rail tporades at the Port |
|  | Kalana Exporl Grain (201]) | \$36 minicn | - Increase stofage camacity |
| Varcotrver | United Grain Corporation (2012) | \$80 mintion | Enlarge storage and handing capacity |
|  | West Vancowver Freight Rail Access (2015) | 3228 midion | Rail expansion, new loop irack, and roed improvement |
|  | Tidewater Barge lines (2015) | \$30 mithon | Thiee new fugiooats |
| Portland | Columbia Grain (2015) | \$44 milion | Upgraded grain sforage and handing |
|  | Knder Morgan Bulk Terminal (2013) | \$10 midion | New ship loading facilites |
|  | International Raw Materials (2014) | \$2 mition | Improvemerts to rail and storage tanks |
|  | LD Commmaties (2014) | \$21 milicen | Expanded grain storage and moying faclities |
|  | Vigor Irduslial (2014) | \$50 milion | Lafgest drydock in the US |
|  | Rivergate Road and Raif Improvements (2012) | \$82 militon | limprove road and rail access and capacity |
|  | Canpotex - Portland Buk Terminal (2013) | \$140 milion | Increase effelency of shiploading |
|  | Shaver Transportation (2014) | \$21 nillion | New barge. nex fug and new engines |
| Sub Total <br> Proposed Investments | $\therefore \because \because$ | \$1,08 Bthton | $\because \therefore \therefore \therefore \quad \because \quad \cdots \quad$. |
|  |  |  | - * |
| Longview | Millenoium Butk Terminal (2018) | \$600 milion | New coal terminal |
|  | Millennium Butk Termenal (2018) | \$25 milfion | Smelter removal and environmental cleanup for new bulk terminal |
| Kalama | NuTWorks (201?-18) | \$1.8 bilion | New methanol plant |
| St. Helens Port Westward | Ghoal - Cohmbia Pacific Bio-Reinery (2018) | \$80 mifion | Ifereased storage and rall improvements |
|  | NWWorks (2017-18) | \$1.8 bilion | New methanol plant |
|  | Ambre Energy (2018) | \$242 million | Coaltranspori |
| Vancouver | Vancouver Energy (2018) | \$100 mimion | Rail improvements and loading facitites |
| Portiand | Pembina (20:8) | \$500 mition | Propane export terminal |
| Total Proposed | $\cdots$ ? | \$5.35 Bllion |  |

## Attachment C

## Portland larbor Workforce Demographics 31,000 jobs



2014 Portland MSA wage comparison


Sources: U.S. Census Bqueau, ECONNorthwest, with data from U.S. BLS 2014
Note: Wages chart based on Average Annual Pay for these NAlCS cods (from loft to right): 483211 Indand Water Freight Transportation), 237990 (Other Heavy and Civil Engineeing Constuction), 488320 (Marine Cargo Handing), 488330 (Navigational Services to Shippingl, 336611 (Shio Buling and Repaing)
*2013 data used
'"2012 data used (curent is not cisclosed)

## Poritand Marbor Workforce Demographics <br> 31,000 jobs

Workforce place of residence

## Attachment D

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# Economic Linkages from Marine Industrial Businesses 

Prepared for:<br> Commerce - Community - Prosperity

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


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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.

$14 \%$
m Local E Regional s Natlonal s International

s Local * Regional \& National \# International

## 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


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- 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,
- Supplies and Parts: Baxter Auto Parts, General Tool \& Supply, Parr Lumber, Vancouver Bolt \& Supply
- Technology/Communications: Centurylink, Integra Telecom
- Transportation Equipment, Services, and Repair: 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

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- 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 401 k 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:


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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 avallable. 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)

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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:
- Planning and architecture firms
- Law firms
- Engineering firms
- Skilled 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

- 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 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
|  | 2012 Spend |  | 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 |  |  |  |  |
| 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 |  |  |  |  |
| 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 | Zip | Description | Category |
| :---: | :---: | :---: | :---: | :---: | :---: |
| ACME Construction Supply | 330 SE Salmon St | Portiand, 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 instailation 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 | Portiand, OR | 97202 | Headquartered in Kent, WA with local location and other branch locations in CA and $B C$, 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 |

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| 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 \$ 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 PI | 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 <br> Materials |
| Argo International | 13481 SE Johnson Rd | Portland, OR | 97222 | Global 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 <br> Materials |
| Arjae Sheet Metal | 8545 SE Mctoughlin Blvd | Portland, OR | 97222 | Sole proprietorship in Portland, OR; sheet metal fabrication, commercial and industrial installation, $\mathrm{HVAC} / \mathrm{R}$ service and repair | Direct Materials |
| Associated Hose Products | 6326 NE Columbia BIvd | Portland, OR | 97218 | Single location distributor of industrial hose, fitting, and assembly products | Indirect <br> 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 | Portiand, 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 headquitered supplier/servicer of products and services for industrial and municipal testing, control, monitoring, and calibration instruments and equipment; locations in multiple states | Indirect <br> Materials |
| Buckaroo <br> Thermoseal Inc | 5410 NE 109th Ave | Portland, OR | 97220 | Single location roofing contractor | Services |
| Cal-Cert Co | 6709 SE Lake Rd | Portland, OR | 97222 | Portiand, OR based provider of callibration 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, QR headquartered supplier of petroleum products and services with branch offices throughout Oregon | Indirect Materials |


| ide <br> Arınitectural \& 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 Columbla 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 Hawall | Capital Goods |
| Conrey Electric | 1903 SE 7th Ave | Portland, OR | 97214 | Single location sales and service provider of electric motors | Capital Goods |
| Consolidated <br> Electrical <br> 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 <br> 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 | Portiand, 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 Coil 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 |
| OEX Media West LLC | 10200 SW Greenburg <br> Rd | Portland, OR | 97223 | Supplier of media services | Services |
| DHL | 15509 NE Airport Way | Portiand, 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 Inc. | $1300 \mathrm{~W} \text { 12th St }$ | Vancouver, WA | 98660 | Seattle, WA based supplier of processing and recycling services of wastewater and oll products | Services |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Empire Rubber \& Supply | 80 SE Taylor St | Portiand, 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 Blyd | Portland, OR | 97203 | Chicago, IL 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 suppller of industrial products and services | Indirect Materials |
| Fastsigns | 10309 SE 82nd Ave | Portland, OR | 97086 | Provider of signs, banners, and vehicle graphics based in Carroliton, TX | indirect Materials |
| Faulkner <br> $f$ 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 | Portiand, 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 |

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| Fred Meyer | 3800 SE 22nd Ave | Portland, OR | 97202 | Retail department store chain; subsildiary of Cincinnati, OH based Kroger Co. | Indirect <br> 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. Louls, 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 LIC | 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 <br> Materials |
| Hardchrome Inc | 1152 NW Commerce $\mathrm{Ct}$ | 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 <br> 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 |


| Hatalne | 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 <br> Materials |
| Honey Bucket | 2301 SE Hidden Way | Vancouver, WA | 98661 | Puyallup, 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 <br> 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 | Portiand, 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 repalr services based in Portland, OR with six Pacific Northwest facilities | Indirect <br> Materials |
| Integra Telecom | 825 NE Muitnomah 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 |
| International Inspection Inc | 10521 N Lombard St | Portland, OR | 97203 | Provider of nonddestructive testing and examination services | Services |
| IRC Aluminum \& Stainless Inc | 9038 N Sever Ct | Portland, OR | 97203 | Single locationnonferrous metal service center | Indirect Materials |
| Iron Horse Group | 5501 NE 223rd Ave | Fairview, OR | 97024 | Single location utility and industrial services provider | Services |
| JI Calibrations Inc | 7007 SE Lake Rd | Portland, OR | 97267 | Instrument calibration services provider based in Portland, OR | Services |
| John C. Murdoch Inc | 5555 N Channel Ave | Portland, OR | 97217 | Marine surveyor located in Portland, OR | Services |
| Johnstone Supply | 11632 NE Ainsworth Circle | Portland, OR | 97220 | Wholesale distributor to the HVAC/R and property maintenance industries | Indirect Materials |
| Jubitz 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 Portiand, 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 <br> 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 highquality packaged ice | Services |
| KY-RO Inc | 18209 SW Boones <br> 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 <br> 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 <br> 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 Inc | 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 Inc | 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 |

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| $\begin{array}{\|ll}  & \text { cott Equipment } \\ 1 & \text { ic } \\ \hline \end{array}$ | 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 <br> 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 <br> Materials |
| McGuire Bearing Co Inc | 947 SE Market St | Portiand, 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 <br> 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 Portiand, 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 Inc | 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 Inc | 940 Northeast 57th Avenue | Portland, OR | 97213 | Distributor of industrial MRO supplies based in Birmingham, AL; subsidiary of Genuine Parts Company of Atianta, GA | Indirect Materials |
| MSC Industrial Supply Co Inc | 12207 NE Marx St | Portland, OR | 97230 | Distributor of MRO supplies, industrial equipment and tools based in Melville, NY | Indirect Materials |
| Mt Hood Solutions Co $\qquad$ | 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 <br> 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 ${ }^{\text { }}$ | 323 SE Martin Luther <br> 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 copying, printing, document reproduction, shipping, and computer setup and repair; based in Boca Raton, FL | Indirect Materials |


| Iter Service Co | 615 SE Market | Portland, OR | 97214 | Single location provider of filters and hose <br> assemblies, and manufacturer of custom <br> fittings and adapters | Indirect <br> Materials |
| :--- | :--- | :--- | :--- | :--- | :--- |
|  <br> Barge Inc | 7900 NW St Helens Rd | Portland, OR | 97210 | Division of Seattle, WA base Harley Marine <br> Services and provider of marine tug, barge, <br> and port assist transportation and logistics <br> services | Services |


| Pape Material <br> Handling Inc | 7000 SW Sandburg St | Portland, OR | 97223 | Provider of sales, rental, and product <br> support of lift trucks and material handling <br> equipment based in Eugene, OR | Capital Gooc |
| :--- | :--- | :--- | :--- | :--- | :--- |



| Supply | 1176 N Hayden Meadows Dr | Portland, OR | 97217 | Watsonville, CA based wholesale distributor of marine related products | Indirect <br> 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 residentiai 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 |
| 1 r Webster Co | 41 NE Walker St | Portland, OR | 97211 | Supplier of new and remanufactured truck and traller 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 rallcar 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 |
| Precise <br>  <br> Engineering | 12403 Ne 60th Way | Vancouver, WA | 98682 | Provider of engineering services to operators of blast furnaces and steel mills based in Vancouver, WA | Services |
| Precision Equipment Inc | 8440 N Kerby Ave | Portland, OR | 97217 | Industrial parts repair and custom manufacturing based in Portland, OR | Services |
| Precision Hydraulics LLC | 2715 NW St Helens Rd | Portland, OR | 97210 | Portland, OR based tooling hydraulic outfitter | Services |
| Premier Gear \& Machine Works | 1700 NW Thurman St | Portland, OR | 97209 | Portland, OR based manufacturer of machinery, gears, and controls and machine and gear shop services | Services |
| Premier Rubber \& Sunoly | 9841 N Vancouver Way | Portland, OR | 97217 | Portland, OR based rubber products wholesaler | Indirect Materials |

\(\left.\begin{array}{|l|l|l|l|l|l} \& \& \& \begin{array}{l}Sells \& services engineered mechanical <br>
solutions including boilers, pumps, <br>
controls, valves, burners, stack, tanks, <br>
hydronic and steam solutions; offices <br>

located in OR, WA, and AK\end{array} \& Services\end{array}\right\} .\)| Wroctor Sales Inc |
| :--- |
| 27180 SW 95th Ave |


| I. City Awning Co | 1638 NW Overton St | Portland, OR | 97209 | Portland, OR based sales and service of awnings, tarps, canoples, 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 <br> Materlals |
| Safway Services ULC | 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 <br> Machine Works Inc | 8010 NE 19th Ct | Vancouver, WA | 98665 | Single location machining, fabrication, and manufacturing facility | Services |
| Seal Source Inc | 16027 NE Cameron Blyd | Portland, OR | 97230 | Single location supplier of seals and gaskets | Indirect Materials |
| Spare 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 <br> 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 <br> 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 <br> Service and <br> 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 | Portiand, 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 <br> 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 Columbla 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 | 5555 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, fluidhandling 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 <br> 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 <br> Blvd P | Portland, OR | 97218 | Single location distributor of steel products <br> (plate, tubing, pipe, bars, etc.) | Direct Materials |
| :--- | :--- | :--- | :--- | :--- | :--- |
| The Western Group | 4025 NW Express Ave | Portland, OR | 97210 | Portland, OR headquartered supplier of <br> woven wire, rubber screens, polyurethane <br> screens, and perforated plate with <br> locations in the US and Canada | Direct 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 <br> 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 boits, 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 <br> 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 <br> 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 |

One Northwest Consulting, LLC | 14209 NE 95 th Circle. Vancouver. WA 98682 |(360) 975-9466

| ( 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 Blyd | 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 <br> 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 |

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## Attachment E

## Brownficla/ Greenfield

## Development Cost Comparison Study EXECUTIVESUMMARY



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## PROJECT TEAM

| Port of Portland | Greg Theisen |
| :--- | :--- |
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| City of Portland- Bureau of Planning | Steve Kountz |
| METRO | Lydia Neill |

## Consultant Team

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| Site Development Case Studies | Bob Thompson |
| Johnson Gardner | Jerry Johnson |
| Financial Analysis | Bill Reid |
| ERM | Bob Carson |
| Brownfield Characterization Analysis | Dave Einolf |
| Renova Partners | Susan Hollingshead |
| Brownfield Redevelopment Advisors | Michael McMullen |

## 1. 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 $350,000 \mathrm{SF}$ high-tech facility is tested that includes two $125,000 \mathrm{SF}$ fabrication plants, one $40,000 \mathrm{SF}$ central utility building, one $60,000 \mathrm{SF}$ 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, $630,000 \mathrm{SF}$ 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, $400,000 \mathrm{SF}$ 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 $450,000 \mathrm{SF}$ in three buildings - a $100,000 \mathrm{SF}$ user, a 150,000 SF user, and a $200,000 \mathrm{SF}$ 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 <br> (acres) | Building Area <br> (SF) | Parking <br> Stalls |
| :--- | :--- | :---: | :---: | :---: |
| High - Tech <br> Manufacturing | Brownfield | 35.75 | 350,000 | 725 |
|  | Greenfield | 53.20 | 350,000 | 725 |
| Industrial Park | Brownfield | 45.50 | 630,000 | 1,130 |
|  | Greenfield | 44.50 | 630,000 | 1,130 |
| Warehouse $/$ <br> Distribution | Brownfield | 37.95 | 400,000 | 200 |
|  | Greenfield | 23.85 | 400,000 | 200 |
|  | Brownfield | 35.75 | 450,000 | 1,100 |
|  | 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

[^6]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 Remedjation 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


Key financial findings include:

- Under each of the scenarios, the greenfield site delivered the lowest developmient 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
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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.

|  | Brownfield <br> Remediation Costs |  | Greenfield Infrastructure Costs |  | Overall Cost Differential |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Use | Total | PSF-BIdg. | Total | PSF- Bldg. | Total | $\begin{aligned} & \text { PSF- } \\ & \text { BIdg. } \end{aligned}$ |
| Industrial Park | \$8.471.756 | \$13.45 | (\$5,181,167) | (\$8.22) | \$982,055 | \$1.56 |
| General Manufacturing | \$22,980,475 | 851.07 | (\$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 <br> site | Greenfield <br> site | PSF <br> Differential | Conclusion |
| :--- | :---: | :---: | :---: | :--- |
| High Tech <br> Manufacturing | Dark | Light | $\$ 77.23$ | Same site as General <br> Manufacturing site - more <br> expensive use |
| Industrial Park | Moderate | Dark | $\$ 1.56$ | Difficult greenfield site <br> Warehouse/Distribution Moderate |
| Light | $\$ 21.38$ | Greenfield site is better served <br> 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.

|  | Brownfield <br> Public Benefits | Greenfield <br> Public Benefits | Public <br> Benefit Differential |
| :--- | :--- | :--- | :--- |
| Use | Annual | Annual | Annual |
| Industrial Park | $\$ 1,400,000$ | $\$ 977,000$ | $\$ 423,000$ |
| Gencral Manufacturing | $\$ 1,300,000$ | $\$ 465,000$ | $\$ 835,000$ |
| High-Tech Manufacturing | $\$ 3,430,000$ | $\$ 2,100,000$ | $\$ 1,330,000$ |
| Warchouse/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 fax 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

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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 brownficld 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.


#### Abstract

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

| Breakdown of City of Portland Major Projects and Citywide Programs List |  |  |  |  | Number of Projects in City FC | \% of <br> project <br> category <br> in FC | Cost in FC |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Type of Project | Number of Projects | $\%$ of Total <br> Projects | Total Cost (both Financially Constrained and Non FC) | $\%$ of Total Cost |  |  |  | Share of FC Dollars |
| Active Transportation | 219 | 75\% | \$ 1,293,097,793 | 69\% | 163 | 74\% | \$ 976,915,666 |  |
| Motor vehicle | 35 | 12\% | \$ 271,082,218 | 14\% | 19 | 54\% | \$ 100,461.305 | 8\% |
| Multi Modal | 19 | 6\% | \$ 251,379,529 | 13\% | 12 | 63\% | \$ 125,868,476 | 10\% |
| ITS/Other | 20 | 7\% | \$ 54,710,717 | 3\% | 17 | 85\% | \$ 53,077,428 | 10\% |
|  | 293 | 100\% | \$ 1,870,270,257 | 100\% | 211 |  | \$ 1,256,322,875 | 100\% |

## 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

The Portland Harbor tonnage includes both public and private terminals. The Port of Portland terminals represent about half of the total. The loss of contalner 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.

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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

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## Arevalo, Nora

| From: | Jim Owens [jim.owens@coganowens.com](mailto: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 $1616 . d o c x$ |

## 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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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.
- 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.
- 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.
- 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

Legacy Health 1919 NW Lovejoy St. Portland, OR 97209 503.415.5600 phone

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 costeffective 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 Cl 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 Cl 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 $\cdots$--from the standpoints of location, services and mission $\cdots$-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

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,



[^7]
## Arevalo, Nora

| From: | Hunting, Duane [duane.hunting@zgf.com](mailto: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, Syivia; |
|  | Frederiksen, Joan |
|  | "Comprehensive Plan Testimony" - HNA Comments on Wilson High School Zoning |
| Subject: | Adjustment |
|  | 2268_001.pdf |

## Portland City Council:

## MAP ZONE CHANGE REQUEST:

The Hillsdale Neighborhood Association (HNA) is requesting that the Comprehensive Plan zoning designation for the Wilson High School campus at 1151 SW Vermont Street, Portland, Oregon 97219 be returned to "conditional use" within an $R 7$ (Residential 7,000 sf) zone designation 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 $4^{\text {th }}$ 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: $\quad$ 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 13 ${ }^{\text {th }}$ 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 Residentlal |
|  | R 7 - Residential 7,000 |
| Comp Plan Overlay | $\mathrm{n} / \mathrm{a}$ |
| Historic District | $\mathrm{n} / \mathrm{a}$ |
| Conservation District | $\mathrm{n} / \mathrm{a}$ |
| Plan District | $\mathrm{HD}-$ Hillsdale |
| Natural Resource | $\mathrm{n} / \mathrm{a}$ |
| Management District |  |
| Quarter Section | 3627 |

Historical Resource
n/a

Urban Renewal Area
n/a

Storefront Improvement Area
n/a

## Business Dlstrlct

n/a

## 1151 SW VERMONT ST

## PORTLAND, OR 97219

PROPERTY

| Year Bullt |  |
| :---: | :---: |
| Description | MISC YARD |
|  | IMPROVEMENTS |
| Neighborhood | Hillsdale |
| Jurisdiction | Portland / Multnomah |
| Zoning | IR - Institutional Residential OS - Open Space |
| Owner | SCHOOL DISTRICT NO 1 <br> (LEASED HILLSDALE <br> FARMERS MARKET ATTN FINANCE DEPT |
| Owner Address | PO BOX 3107 |
|  | PORTLAND, OR 97208-3107 |

Parks
Nearby
Wilson Pool
0.52 acres
DeWitt Park

| 1.09 acres |
| :--- |
| George Himes Park |
| 33.35 acres |
| Stephens Creek Natural Area |
| 4.73 acres |
| SW Terwilliger Blvd Parkway |
| 101.09 acres |

Assessor
Property Values (2015)
Market Value $\quad \$ 2,328,230.00$

Assessed Value $\$ 0.00$

Taxes (2015)

Property Taxes $\quad \$ 0.00$
Total Taxes $\$ 0.00$

Schools

Attendance Area

| District | PORTLAND (\#1J) |
| :--- | :--- |
| Elementary School | RJEKE, K-5 |
| Middle School | GRAY MIDDLE, 6-8 |
| High School | WILSON HS |

Nearby Schools

| Wilson High | 973 ft |
| :--- | ---: |
| Public $9-12$ |  |
| Rieke Elementary | 1175 ft |

Public K-5
Maimonides Jewish Day School 0.75 ml
Private P-5
Gray Middle $\quad 0.76 \mathrm{mi}$
Public 6-8
Portland Jewish Academy 0.82 mi
Private P-9

Public Safety

Crime Statistics



R2d

21

## Arevalo, Nora

## From:

Sent:
To:
Subject:

Dave Brook [dbrookportland@gmail.com](mailto:dbrookportland@gmail.com)
Thursday, January 07, 2016 2:40 PM
BPS Comprehensive Plan Testimony
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 - 16 th to 21 st Ave.
- NE Weidler 17 th to 24 th 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 oneway 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 21 st. 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 21 st 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.

| From: | Sean Baioni [seanbaioni@gmail.com](mailto: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
 228 NE Morris St
Portland, OR 97212

## Arevalo, Nora

| From: | Brent Carpenter [brent@full-tilt-boogie.com](mailto:brent@full-tilt-boogie.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 2:30 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive Plan Testimony |
| 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 $18^{\text {th }}$ and $20^{\text {th }}$ 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 MultiDwelling 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

## 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 $18^{\text {th }}$ and $20^{\text {th }}$ is currently zoned office commercial or is non-conforming R 1.

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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 MultiDwelling 1000 to match what exists on the ground.

Thank you for your time and consideration.

1926-1932 SE Ash St.
Lot Size: 11,400 sq. ft .
Usage: 8 units
Built: 1949
Zoned: R 2.5
Proposed: no change
Actual use: Non-conforming R1
1902-1924 SE Ash St.
Lot size: 11,619 sq. ft.
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-confo <br> Actual Use: Non-conforming R1

212 SE $18^{\text {th }}$
Lot size: 10000 sq. ft.
Zoned: CO1
Proposed: CM2


# SIMPSON \& COMPANY <br> A PROFESSIONALOORPORATION <br> OERTIFIEO PUBLIC ACCOUHTANTS 

January 7, 2016

Portland Planning and Sustainability Commission<br>Comprehensive Plan Update<br>1900 SW $4^{\text {th }}$ Avenue, Suite 7100<br>Portland, OR 97201

Re: Proposed Comprehensive Plan Map Change
To whom it may concern:
In the early $1970^{\prime}$ '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.
2165 SW Main Street
Portland OR 97205

900 S.W. Fith Averuic, Suite 2600
Portland, Oregen 97204
mein 503.224 .3380
fax 503.220.2480
wher.stocl.com

STEVEN W. AbEL
Direct (503) 294-9599
January 7, 2016
steve,abel@stocl.com

# VIA E-MAIL CPUTESTIMONY@PORTLANDOREGON.GOV AND U.S. MAIL 

Portland City Council<br>c/o Council Clerk<br>1221 SW Fourth Ave, Room 130<br>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. ${ }^{1}$

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.

cc: Mark Jordan

[^8]
## Arevalo, Nora

| From: | Kathy Mccann [fabcollector@gmail.com](mailto: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 Chang- 366
We the undeusuqned hequerl
that ch blochs of seyvamol. SE Elis a be leedway between 5 m milwaukie Ave $x$ IE $17^{4 h}$ be cegoned 12.2.5. Sunyle famcly.
Tathleen F mecaun 163952 Elliso
I Faklem y mokan
CARL LOBHARTBK $16 V^{4} 4$ SE HAROCD
GAFy Shapk 1618 NEHAnold st Say thank
Dan Palmer 1647 SE Reedwn
Laura Harris 1647 gE Redway LamaHanse
Peggy MacMillan 1629 se Ellis St. PezgoMacMill-
Tom Mangold 1629 SE Ellis St. ̧ruylamgolcf
JESSICA POST-GIOLDBLUM 1618 SE ELLS ST.
Ordinance 187832 , Voll 3 J, page 7203

## Arevalo, Nora

From:
Sent:
To:
Cc:
Subject:
Attachments:

Nicole Holt [ndholt@gmail.com](mailto:ndholt@gmail.com)
Thursday, January 07, 2016 1:52 PM
BPS Comprehensive Plan Testimony
Heather FlintChatto; rebecca grace
Testimony to support the Division Design Initiative's Top Ten Policy Recommendations
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 $1 / 4$ 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 Tookit 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.
$\square$
Sincerely,
Nicole Holt
Rebecca Grace
Architecture For Humanity | Portland
1624 SE 54th Ave.
Portland, OR 97215

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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 homeownership. 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 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

## Show efta-

Rebecca Grace
$48 m$

Architecture For Humanity | Portland

1624 SE 54th Ave.
Portland, OR 97215



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 | 1 like the new direction / 1 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 | 1 l 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 |
| 1 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 |  |  |
| 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 |  |  |
| More public space | 4 | Music | 1 |  |  |
|  |  | No Smoking | 1 |  |  |

## Mad Libs - Summary of responses - Beauty

|  | 1 see beauty in |  |  |
| :---: | :---: | :---: | :---: |
| Nature/epen Space 105 Nature/Open Space 105 <br> People 38 People/Community 54 |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Everything rry |  |  |  |
| Neighborhoods: 24.23 |  |  |  |
| Past/Old/History $\quad 23 \times 13$ |  |  |  |
|  |  |  |  |
| Architecture/Buildings 13.10 |  |  |  |
| Diversity 10 Urban/Density $\quad 10 \quad 2$ |  |  |  |
|  |  |  |  |
|  |  |  |  |
| $\mathrm{Art}$$5$ |  |  |  |
| Small businesses a |  |  |  |
| Character/Vibe 4 |  |  |  |
|  |  |  |  |
| Food |  |  |  |
| Equality/Justice |  |  |  |
| Houses |  |  |  |
| Creativity$1$ |  |  |  |
| Sustainability | 1 |  |  |

Mad Libs - Summary of responses - I love

|  |  |  |  |
| :---: | :---: | :---: | :---: |
| Walking | 35 | Small businesses / Shopping / Specific Business | 50 |
| 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 |  |  |
| Buildings/streetscape | 2 |  |  |
| Weirdness | 1 |  |  |
| Public transportation | 1 |  |  |

Mad Libs - Summary of responses - 1 come to Division to

| Eat | 219 | Eat / Drink | 282 |
| :---: | :---: | :---: | :---: |
| Shop | 125 | Shop | 125 |
| Walk | 74 | Waik | 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 |  |  |
| Visit | 5 |  |  |
| Haircut | 4 |  |  |
| Drive | 4 |  |  |

Mad Libs - Summary of responses - Distance \& mode


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 |  |
|  |  |  | 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 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 |  |

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 |  |  |
|  | 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 | 4 |  |  |
| auto repair shops | 3 |  |  |
| Noise | 3 |  |  |
| Buses | 2 |  |  |
| Blank walls | 2 |  |  |
| Bikes | 2 |  |  |
| Density | 2 |  |  |
| Low Density | 1 |  |  |
| Design comment, General | 0 |  |  |

Sample of Graphics for Mad Libs Responses



| From: | Brent Carpenter [brent@full-tilt-boogie.com](mailto: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.
l'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.

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Thank you for your time and consideration.
Sincerely,


## Arevalo, Nora

| From: | Hales, Mayor |
| :--- | :--- |
| Sent: | Wednesday, January 20, 2016 4:30 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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](mailto: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 $11: 00 \mathrm{pm}$. 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 $2 \mathrm{a} . \mathrm{m}$. 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 R 5 to CM 1 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

Arevalo, Nora

## From:

Sent:
To:
Subject:
Attachments:
Follow Up Flag:
Flag Status:

Hales, Mayor
Wednesday, January 20, 2016 4:30 PM
BPS Comprehensive Plan Testimony
FW: Written testimony for Council by tonight's deadline
CompPlanCommentsJan2016jshWrittenTestimony.pdf; ATT00001.htm
Follow up
Completed

From: Dean P. Gisvold [mailto:deang@mcewengisvold.com]
Sent: Thursday, January 07, 2016 1:24 PM
To: Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)
Cc: Commissioner Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov); Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Commissioner
Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov); Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com);
jsheuer@easystreet.net; bing [bings@serapdx.com](mailto: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
5032843885

Sent from my iPad
Begin forwarded message:
From: Jim Heuer < jsheuer@easystreet.net>
Date: January 7, 2016 at 2:59:30 PM CST
To: "pdx-chr@googlegroups.com" [pdx-chr@googlegroups.com](mailto:pdx-chr@googlegroups.com)
Cc: Rod Merrick <merrick map@yahoo.com>, "Steve Dotterrer (kradot@hevanet.com)" [kradot@hevanet.com](mailto:kradot@hevanet.com), Holly Chamberlain <HollyC@,visitahc.org>, "Dean P. Gisvold" [deang@mcewengisvold.com](mailto:deang@mcewengisvold.com)

Subject: Written testimony for Council by tonight's deadline Reply-To: [jsheuer@easystreet.net](mailto:jsheuer@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.

## Arevalo, Nora

| From: | John Moody [john.moody@gmail.com](mailto: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

## Arevalo, Nora

| From: | Sue Sue [suesuecorso@yahoo.com](mailto: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, $11^{\text {th }}$ Floor
Portland, Oregon 97204
January 7, 2016

## Via E-Mail

Mayor Hales and City Council Members
c/o Council Clerk
1221 SW $4^{\text {th }}$ 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. ${ }^{1}$

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.

[^9]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 minimurn lot size in neighborhoods with good access to transit and other urban amenities. ${ }^{2}$
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.

[^10]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,


Housing Land Advocates

## Arevalo, Nora

| From: | Beverly Bookin [bookin@bookingroup.com](mailto: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](mailto:rskarstad@yahoo.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 12:09 AM |
| To: | BPS Comprehensive Plan Testimony |
| 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 highdensity 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 rommunity well for over 30 years. It should not be undone with the hopes of attracting or appeasing an out-of! .ate developer.

Regards,
Robin Skarstad
2511 SW Arden Road
Portland, Oregon 97201
(503) 243-1124

## Arevalo, Nora

| From: | Erik Lawrence [elawrence@tenbridgepartners.com](mailto: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 Parfners, LLC
516 SE Morrison, Suite 1200
Portland, OR 97214
(971) 277-1080 Phone
(503) 320-3026 Cell

## www.tenbridgepartners.com

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## Arevalo, Nora

| From: | Derek Sandoz [dereksandoz@gmail.com](mailto: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

## Arevalo, Nora

| 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.vashington@portlandoregon.gov

From: Leonar80msu [mailto:leonar80msu@gmail.com]
Sent: Sunday, December 27, 2015 4:23 PM
To: Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto: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

## Arevalo, Nora

| From: | Washington, Mustafa |
| :--- | :--- |
| Sent: | Thursday, January $07,201611: 36$ 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:iilaincorporated@gmail.com]
Sent: Monday, December 28, 2015 2:57 PM
To: Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)
Subject: Keep Ivy Isiand

Hello! Please keep Ivy Island in St Johns. It gives our town character and green areas that are much needed!

Lila Zamani

## Arevalo, Nora

| 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](mailto: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

## Arevalo, Nora

| 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](mailto: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

## Arevalo, Nora

| 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](mailto: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

## Arevalo, Nora

| From: | Pete Conklin [petermconklin@msn.com](mailto:petermconklin@msn.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 11:19 AM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive Plan Testimony |

Council members,
l 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](mailto: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 $11: 00 \mathrm{pm}$. 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

Arevalo, Nora

| (rom: | Suzanne Starr [suzannestarr@me.com](mailto:suzannestarr@me.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 10:36 AM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | 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.

## Arevalo, Nora

. rom:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Chris Yeargers [cyeargers@yahoo.com](mailto:cyeargers@yahoo.com)
Thursday, January 07, 2016 10:24 AM
BPS Comprehensive Plan Testimony
Proposed change to designations and zoning in Comprehensive plan
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 ( yat 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
5038479463

## Arevalo, Nora

| sm: | Vailey Oehlke [vaileyo@multcolib.org](mailto: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 ( Itiple 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 $\mid$ Multnomah County Library
919 NE 19 th 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 My Librarian

[^11]Why let a computer tell you what to read? Get personalized reading recommendations at My Librarian

## Arevalo, Nora

| rom: | James MacLowry [ermjdm@icloud.com](mailto: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

## Arevalo, Nora

| .rom: | george pfundheller [arizonasonny@gmail.com](mailto: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.

Arevalo, Nora
.rom:
Sent:
To:
Subject:

## Follow Up Flag: <br> Flag Status:

Jim Rosenbaum [rosenbaj@ohsu.edu](mailto:rosenbaj@ohsu.edu)
Thursday, January 07, 2016 8:57 AM
Edward Neuwelt; jill neuwelt; BPS Comprehensive Plan Testimony
RE: Comprehensive plan testimony
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

## Arevalo, Nora

| from: | Jim Braun [james.e.braun@gmail.com](mailto:james.e.braun@gmail.com) |
| :--- | :--- |
| Sent: | Thursday, January 07, 2016 8:50 AM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | 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 Ito 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@mcewengisvoid.com]
Sent: Thursday, January 07, 2016 8:04 AM
To: Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)
Cc: Commissioner Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov); Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Commissioner
Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov); Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com); Patty A.
Richardson [pattyr@mcewengisvold.com](mailto:pattyr@mcewengisvold.com); jsheuer@easystreet.net; holberg [holberg@comcast.net](mailto:holberg@comcast.net)
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 15 th 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 $\underline{11 \mathrm{pm}}$. I'm really concerned that this protection for the neighborhood might go away. Believe me on a summer night it's loud enough at 11 pm 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
5032843885
Sent from my iPad
rrom:
Sent:
To:
Cc:
Subject:
Follow Up Flag:
Flag Status:

Edward Neuwelt [neuwelte@ohsu.edu](mailto:neuwelte@ohsu.edu)
Thursday, January 07, 2016 7:57 AM
jill neuwelt; BPS Comprehensive Plan Testimony Jim Rosenbaum
RE: Comprehensive plan testimony

Follow up
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

## Arevalo, Nora

rrom:
John Hickox [johnhickox@yahoo.com](mailto:johnhickox@yahoo.com)

Sent:
Thursday, January 07, 2016 7:44 AM
To:
Subject:

Follow Up Flag:
Flag Status:

Comprehensive Plan Testmony

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 ( lust
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 Jr
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.

Respectfuliy John E. Hickox

## Our Links: Past to Present

H










 trestern tlit theserted it ther capaeter for se years
 Hecanse of gasatine rationtmg, the Clob had a "transportation directory" to inform and eneour age fide shat mog among thembers A pot tion of the shob groumds was used for vegetable gardens, which members planted and rended Whiti goll balls bemp searee, Iddie encouraged members to t'arn in "to ofd hats for one nety batl"

In 1945, Riverside hosted the I'aeific Northwest I'ro Am. Kiverside also hosted the Oregon State Ilest Hall in the 1040 s. This event soon became the Riverside thes Itall Invitational and is lonown as one of the premier golf events for amateurs and protessionals alike in the northwest to this day
In. June of 194 B $_{\text {, the Colmmbia liver broke a dilie near Vanport - roughly }}$


Eddie Hogan where Delta Fark and Fontland International Raceway are today - flooding the clubhouse and golf course under if feet of wateh The high water plaque remams today on the big tree to the right of \#5 green. Members stepped forwand to support a three year rebuldings reconstruction and tree replantimg program.
Upon retiontay from playing in = by invitation - the Iting Crosby Tournament at Pebble Deach in 1953, Lidie wrote in the club newsletter, The Tatter, "I really had a very empoyable trip and met many wonderful persons, but as I always say, there's no place lile Portland and deat old Ifiverside Colf and Country Club."
from the Riverside Golf of Country Club Inheres. Ilatch for "Our Limks Past to Present" ith your
 monthly Leadertoand!


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\$ Riverside News
6.7 Membershíp
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\$ Club tifighights
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12 teaderstaip Connections

1\% From the Kitchen
11 December 2015
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Our Links: Past to Present
In 1925, a group of twenty-five golfers filled Articles of Incorporation to purchase sizty-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 $90^{\text {hh }}$ 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 driveup 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

J. Mary Taylor

2719 SW Old Orchard Rd 2718 SW Old Orchard Rd

Anne Rogness
Jeannie Santos
Leonard Santos
Sandra Joos
Valerie Hill
Warren Hill
Brook Howard
Ann Howard
Rachel Young
Chapin Titcomb
Minah Titcomb
Alison Friday
Sara Matarazzo

2740 SW Talbot Rd
2681 SW Vista Ave
2681 SW Vista Ave 4259 SW Patrick Place

2624 SW Talbot Rd
2624 SW Talbot Rd
4243 SW McDonnell Terrace
4243 SW McDonnell Terrace
2493 SW Arden Rd
2846 SW Labbe Ave
2846 SW Labbe Ave
1703 SW Myrtle St
1909 SW Laurel Place

| 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 |  |


| 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 |
| :---: | :---: |
| 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 |


| Michele Bowler | 2649 SW Georgian Place |
| :---: | :---: |
| Erez Russo | 2662 SW Grenwolde PI |
| Claudia Brown | 2926 SW Periander St |
| Camille Hunt | 2656 SW Upper Dr PI |
| 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 PI |
| James Braun | 4211 SW Patrick PI |
| 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 |


| 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 ${ }^{\text {th }}$ 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 |  |


| 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 Old Orchard Rd |  |
| Cat Wise |  |
|  |  |


| 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 |
| To: | BPS Comprehensive Plan Testimony |
| 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](mailto:mayorcharliehales@portlandoregon.gov)
Cc: Patty A. Richardson [pattyr@mcewengisvold.com](mailto:pattyr@mcewengisvold.com); jsheuer@easystreet.net; Barb Christopher
[barbfc@comcast.net](mailto:barbfc@comcast.net); Steven Cole [stevencole86@gmail.com](mailto:stevencole86@gmail.com); Nathan.Corser@ch2m.com; Nikki Johnston
[ndjz@yahoo.com](mailto:ndjz@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 16 th 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 16 th 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.
4. 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. 15 th 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
5032843885

Sent from my iPad

## 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 West 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 $162^{\text {nd }}$ ). 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.

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 Wildife Corridor ${ }^{1}$, environmental protections ${ }^{2}$, conservations efforts ${ }^{3}$, and climate change ${ }^{4}$.
${ }^{1}$ City of Portland, Parks and Recreation, The Westside Wildlife Corridor,
hitps://www portlandoregon.gov/parks/article/204516
"The Westside Wildilife 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 wildife migration corridor from Forest Park south along the west hills,"
${ }^{2}$ City of Portland Bureau of Environmental Services, https://www.portlandoregon.gov/bes/article/474043 2014 Stormwater Management Manual, page two.
"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."
${ }^{3}$ City of Portland Bureau of Envirommental Services, Total Maximum Daily Load (TMDL) Implementation Plan, https://www.portlandoregon gov/bes/article/509613 Excerpt. TMDL parameter, Temperature, Gener , Support Collins View Nelghor Riverview Natural Area management plan

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:
(a) Specific Purposes; Conservation Values. The more specific purpose of this Easement is to prevent any use of, or activity

[^12]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 wildife 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:
I. At 145 acres, the Property contains the largest remaining unprotected and undeveloped habitat patch in the West Hills Wildife 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.
2. 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.
3. The protection of seven intermittent and perennial streams and the associated riparian forest provides benefits to water quality and wildilife, including stream shade for favorable water temperatures, stream bank protection, runoff filtration, large wood recruitment, willlife 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 Wildife Corridor.
5. 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

City Council Agenda Item 52, Riverview Natural Area Management Plan, CVNA testimony
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 ${ }^{\text {nd }}$ 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 PLANNI NG and SUSTAI NABI LITY COMMISSI ON.pdf |
|  | Neiah Coal Dir \& Chairs-- Comp Plan discussion -- summary of maior points -- 1210 2015.docx |

Please see attached material for submission to the Comprehensive Plan official record.

--<br>Robert McCullough<br>Managing Partner<br>McCullough Research<br>6123 S.E. Reed College Place<br>Portland, Oregon 97202<br>Robert@mresearch.com<br>www.mresearch.com

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## Eastmoreland Neighborhood Association

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 l 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. ${ }^{1}$

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

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## Eastmoreland Neighborhood Association

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 $36^{\text {th }}$ 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

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## Eastmoreland Neighborhood Association

bring the minimum lot size back into balance with the existing use. ${ }^{3}$ The letter was accepted and placed in the comprehensive plan process.

The staff review indicated support of a portion of the proposal. ${ }^{4}$ 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

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## Eastmoreland Neighborhood Association

the rate of neighborhood change, ${ }^{5}$ 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. ${ }^{6}$ 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. ${ }^{7}$

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.

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## Eastmoreland Neighborhood Association

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. ${ }^{8}$ 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." ${ }^{9}$ 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. ${ }^{10}$

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!

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## Eastmoreland Neighborhood Association

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 <br> Portland Comp Plan Update <br> 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 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 presentede.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.

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

TRANSCRIPT OF PROCEEDINGS

DEBORAH COOK, RPR, CSR COOK COURT REPORTING, INC. 1102 N. Springbrook Road Suite 136
Newberg, Oregon 97132
(503) 537-0339
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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,
including planning and development. So that will be at IRCO, and you can find that information -- actually, I have some postcards $I$ can pass around, but that may be of interest.

CHAIR BAUGH: Thank you. Other items? We have two Consent Agenda items, and we will take them separately.

Consideration of minutes from 4/28/15
meeting. Will they be accepted or approved?
CHAIR BAUGH: Aye.
COMMISSIONER GRAY: Aye.
COMMISSIONER HOUCK: Aye.
COMMISSIONER OXMAN: Aye.
COMMISSIONER RUDD: Aye.
COMMISSIONER SHAPIRO: Aye.
COMMISSIONER SMITH: Aye.
COMMISSIONER ST. MARTIN: Aye.
COMMISSIONER TALLMADGE: Aye.
CHAIR BAUGH: That passes.
Right-of-way No. 7880 for buttress
prevacation North Terminal Road east of North Lombard Street.

UNIDENTIFIED COMMISSIONER: Second.
CHAIR BAUGH: That's been moved and seconded. All in favor?

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CHAIR BAUGH: Aye.
COMMISSIONER GRAY: Aye.
COMMISSIONER HOUCK: Aye.
COMMISSIONER OXMAN: Aye.
COMMISSIONER RUDD: Aye.
COMMISSIONER SHAPIRO: Aye.
COMMISSIONER SMITH: Aye.
COMMISSIONER ST. MARTIN: Aye.
COMMISSIONER TALLMADGE: Aye.
CHAIR BAUGH: That passes.
Introductions.
MR. ENGSTROM: Thank you, Chair Baugh.
This is one of a number of Comprehensive Plan work sessions, as you know. I think this is No. 6. We have two primary subjects today, as you already indicated. The first piece, Deborah and I will go over a number of issues related to residential densities. She'll start out, and then I have a follow-up related to Concordia.

And then the second half -- or second major component of today is the economic follow-up as you noted, which has a number of sub issues that you already identified.

And then we will wrap up with a brief 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
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

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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 $R 5$ 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 $R 7$ 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 R 7 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 $R 7$ 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 R 7 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 R 5 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 36 th . In this new revised proposal, we would recommend going one set of lots east of 36 th, 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 36 th ?
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.

UNIDENTIFIED COMMISSIONER: There's even a 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 36 th 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 growth allocation, there's actually an increase, only because we changed our assumptions about accessory dwelling units. But the capacity check, it looks like there was -- let's see, two acres of vacant and underutilized land in the analysis, capacity for five new units on the existing plan; five with the proposed plan. So really not a material difference in the number of units.

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.
COMMISSIONER ST. MARTIN: So what happens to the places that are already in an $R 5$ 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 $R 5$ 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
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 $R 7$ 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 $R 5$ 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.

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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?

Eric, what is the timing on that?
MR. ENGSTROM: The map changes we're
talking about are part of the overall comp plan package, 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 $R 5$ to $R 7$ 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.

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 $R 7$. 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 36 th, 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.

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Where we ran into ambiguity was in South
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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 $36 t h$, which has more of an $R 5$ 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

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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 36 th than it is west of 36 th. 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 36 th, 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
blip in development activity trying to beat the clock.
COMMISSIONER SHAPIRO: That's why -- asking for an ordinance.

CHAIR BAUGH: So what $I$ hear is there's general acceptance, again, for No. 1, and I -- can I say hesitancy for Eastmoreland and Burlingame, or --

COMMISSIONER HANSON: I would say
(inaudible).
CHAIR BAUGH: For a zone change?
COMMISSIONER HANSON: Yeah, I'd like to see -- (inaudible).

COMMISSIONER RUDD: To retain the R5 -CHAIR BAUGH: To retain the R5. Retain the R5 for South Burlingame.

MS. STEIN: So our recommendation was to not down designate Burlingame.

CHAIR BAUGH: So everybody is okay with
that?
COMMISSIONER SHAPIRO: The language gets triple not double.

CHAIR BAUGH: And then for Eastmoreland, are we hesitant to down zone it?
(Inaudible statement, no microphone.)

MS. STEIN: No. 1 here meant for the other
study areas. And I was separating out Eastmoreland with the options of -- our recommendation was that if you are down designating, you would go to 36th. That's one line of homes, the planned district boundary.
(Inaudible statement.)
MS. STEIN: Right. And I can show you the map again so you can see the area of Eastmoreland. I know this is confusing.
(Inaudible statement.)
CHAIR BAUGH: So do we need to vote? Or is
there --
MR. ZEHNDER: It would be best if we got a motion and a vote on this today for clarity. CHAIR BAUGH: Who's in favor of east of 36th, staying current zoning? East of $36 t h$-- we're -COMMISSIONER TALLMADGE: So do not down zone?

MS. STEIN: And again --
MR. ZEHNDER: Can we get a motion and a vote? I think that would be best. Thank you. (Inaudible).

CHAIR BAUGH: I am going.
COMMISSIONER SMITH: I am going to ask my question again. No. 1, the July 2014 recommendations did not include any parts of Eastmoreland?

MS. STEIN: Did not include any parts of Eastmoreland or South Burlingame. It's the other areas, Lents, et cetera.

CHAIR BAUGH: Is there a motion to amend the current recommendation around Eastmoreland?

COMMISSIONER SHAPIRO: There is.
Oh, you want me to state it? I move we retain the zoning east of 36 th Street in -- east of 36 th Street, retain the zoning.

COMMISSIONER HANSON: I second.
(Inaudible statements.)
COMMISSIONER SHAPIRO: I am saying retain the zoning east of 36 th Street.

CHAIR BAUGH: And west of 36 th would be, to clarify, to be down zoned?

COMMISSIONER SHAPIRO: That is correct. That's correct. The motion is specifically east of $36 t h$.

CHAIR BAUGH: Is there a second?
COMMISSIONER HANSON: I will second.
MR. ZEHNDER: And clarification, just to be clear, so the west side is $R 7$, the east side the proposal is R5. The line that Deborah recommended included -- it's both sides of $36 t h$. So a very small 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 36 th, and you are going to have another discussion west. And some of you are assuming that you are motioning about the whole thing. And I want to clarify that.

CHAIR BAUGH: I think we're motioning --
Howard, is your motion on the whole part of Eastmoreland?

COMMISSIONER SHAPIRO: No, it is not.
CHAIR BAUGH: Just on east? On the west
part --
(Multiple Inaudible Voices.)
CHAIR BAUGH: We're going to do it -- so on the west part of Eastmoreland -- we have to vote on this first.

MR. ZEHNDER: You need a second of that
motion.
CHAIR BAUGH: Don seconded.
Julie, let's do a vote. Julie a vote.
We're voting on the amendment to east of 36 th as to it will retain its current zoning, R7.

COMMISSIONER TALLMADGE: Just that --
CHAIR BAUGH: R5. I am sorry, R5. R5,
it's just on -- we're going to come back and vote on

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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).
(AYE: Baugh, Gray, Hanson, Houck, Oxman Rudd, Shapiro, Smith, St. Martin, Tallmadge.)

CHAIR BAUGH: The west side motion.
COMMISSIONER HANSON: I move that we change the designation east of 36 th -- west -- west of 36 th , from R5 to R7 -- (Inaudible Statements, Multiple Voices) -- the plan district which includes the lots that front on the east side of 36 th.

COMMISSIONER HOUCK: Second.
CHAIR BAUGH: Discussion?
MR. ZEHNDER: No, we need a separate motion on 1 and 3.
(Inaudible Statements, Multiple Voices)
CHAIR BAUGH: So a clarifying question on this, would this include properties within the 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 the largest lots.

CHAIR BAUGH: They tend to be the largest
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 this.

MR. ZEHNDER: So, Commissioners, I believe you have a motion and a second on the table.

CHAIR BAUGH: Julie, vote.
(AYE: Gray, Hanson, Houck, Oxman,
Shapiro.)
(NAY: Baugh, Rudd, Smith, St. Martin,
Tallmadge.)
CHAIR BAUGH: It fails. So it retains the current zoning.

So need a motion on the overall
recommendation.
ROBERT McCULLOUGH: I want to make a comment here --

CHAIR BAUGH: There's no public comment, sir --

ROBERT McCULLOUGH: -- you are leading up to litigation. You have one standard for one part of
the city, and another --
CHAIR BAUGH: -- sir, there's no public
comment.

ROBERT McCULLOUGH: There will be legal
comment.
CHAIR BAUGH: A motion on the current recommendation, as amended.

UNIDENTIFIED COMMISSIONER: So I move we accept recommendation 1 and 3 .

UNIDENTIFIED COMMISSIONER: Second.
CHAIR BAUGH: And it would include the
motion that was passed earlier -- the amendment passed earlier, correct? Okay.
(Multiple Voices.)
CHAIR BAUGH: Julie.
(AYE: Gray, Hanson -- )
(Inaudible, multiple Voices.)
CHAIR BAUGH: Is there a discussion? I
thought we had already discussed it. Do you want to -is there a discussion? (Inaudible.)

Gary?
COMMISSIONER OXMAN: So what we are doing -- are we leaving unresolved the question what happens on the west side of 36 th?

CHAIR BAUGH: No.

COMMISSIONER OXMAN: So it stays as is?
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 designation in effect.

CHAIR BAUGH: We're essentially just leaving things as you recommended in July.

MS. STEIN: No --
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
recommendation for Eastmoreland?
MR. ENGSTROM: R7.
MS. STEIN: No, up to 36th, but stopping in the center line of 36 th. 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 36 th 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.
(AYE: Baugh, Gray, Hanson, Houck, Oxman, 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 R 5 or R 7 , 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 142 nd 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 R 2.5 zone, through this single-family project. And that's the Staff recommendation to this particular request.

CHAIR BAUGH: Discussion. Chris?
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
zone design type?
MR. ENGSTROM: In R2.5 it's both. There's underlying plats, and it's zoned for 2500-square-foot lots. So it's both.

CHAIR BAUGH: Other discussion?
Are we okay with the recommendation? I think we're good.

COMMISSIONER TALLMADGE: I did have a question, sorry, about -- just as a point of reference, why didn't you discuss infrastructure in relation to Eastmoreland, or did we discuss that at our July 2014 in terms of access to --

MR. ENGSTROM: We did provide the same infrastructure on that in our Staff Report. And Concordia has better -- fewer constraints than Eastmoreland.

COMMISSIONER TALLMADGE: Okay. MR. ENGSTROM: But not a huge difference. CHAIR BAUGH: Okay. We're okay with it. Thanks.
(Proceedings concluded at 1:15 p.m.)

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STATE OF OREGON )
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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.


DEBORAH L. COOK, RR Certified Shorthand Reporter OREGON CSR \#04-0389
CALIFORNIA CSR \#12886
WASHINGTON CSR \#2992

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January 7, 2015
Council Clerk
1221 SW $4^{\text {th }}$ Avenue, Room 130
Portiand, 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 owried 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.


[^18]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 ${ }^{2}$

[^19]
## 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.

- Transítions 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 vuinerable 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

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.

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.

Mayor Hales and City Commissioners<br>January 7, 2016<br>Page 3

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.

Mayor Hales and City Commissioners
January 7, 2016
Page 4

## 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 ikely 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.


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)

# PORT OF PORTLAND 

7200 NE Airport Way, Portand, Oregon 97218
(503) $415 \cdot 6522$

# MEMORANDUM from Policy and Planning 

Date: January 5, 2016
To: $\quad$ 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 midrange 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, $\$ 44 \mathrm{~m}$ at Columbia Grain and $\$ 21 \mathrm{~m}$ 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 ( 3 m 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.

Attachment A

Table 1. Portland Harbor Capacity Improvements

| Terminal/Year | Operator | Commodity | Cost | Tons/hour | Prior Capacity <br> (annual) | Current Capacity <br> (annual) |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| T-4/2013 | Kinder <br> Morgan | Soda Ash | $\$ 9.5 \mathrm{~m}$ | 3000 | 2.5 m MT | 3.5 m MT |
| T-5/2015 | Canpotex | Potash | $\$ 140 \mathrm{~m}$ <br> facility <br> enhancem <br> ent, $\$ 25 \mathrm{~m}$ <br> loader | 6000 | $3-3.5 \mathrm{~m} \mathrm{MT}$ | $5-6 \mathrm{~m} \mathrm{MT}$ |
| T-5/2014 | Columbia <br> Grain | Grains <br> (wheat, corn, <br> soy) | $\$ 44 \mathrm{~m}$ | Unknown. <br> Probably <br> 2000mt | 4.5 m MT | $6 \mathrm{MT*}$ |
| Louis Dreyfus <br> - Stee! <br> Bridge/2015 | LD <br> Commodities | Wheat | $\$ 21 \mathrm{~m}$ | Unknown | $1 \mathrm{~m} \mathrm{MT**}$ | $1.5-2 \mathrm{~m} \mathrm{MT}^{* *}$ |


| Terminal/Year | Operator | Commodity | Cost | Additional <br> acreage | Prior Capacity <br> (annual) | Current Capacity <br> (annual) |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| T6, AWC - <br> Ford <br> 2014,2016 | Auto <br> Warehousing <br> Corporation | Automobiles | $\$ 2.8 \mathrm{~m}$ <br> $\$ 6.7 \mathrm{~m}$ | 9 <br> 19 (marine <br> reserve) | 0 | 90,000 units per |
| year |  |  |  |  |  |  |

*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.
**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)

Summary Port Comments on PC Recommended Draft
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| :---: | :---: | :---: |
| Figure 1-1. <br> 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 <br> 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 leffective 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 <br> 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 <br> Freight. <br> (formerly Policy 5.24 <br> 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. <br> A similar policy should also apply to City Greenways. |
| 3.65 <br> Urban habitat corridors | Establish a system of connected, wellfunctioning, | WHI is designated as an Urban Habitat Corridor on Figure3-6. As land not currently |

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| City | 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 connectivity of existing habitat corridors, and establish new habitat corridors in developed areas. | 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. |
| Employment Areas (formerly Policy 5.16 Industrial and River) | Narrative <br> Industrial Districts: Industrial districts are in the low, flat areas along Portland 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. <br> Regional Truck Corridors: Maintaining 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 distribution industries. | Revise to say "Existing industrial districts..." in recognition that future industrial districts could be located in other parts of the city. |
| 3.69 <br> Regional Truck Corridors. (formerly Policy 5.23 Corridors and connections.) | Enhance designated streets to accommodate forecast freight growth and support intensified industrial use in nearby freight districts. See Figure 3-7 Employment Areas. Designated regional truckways and priority truck streets (Transportation System Plan classifications are shown to illustrate this network). | Current draft policy appears to do a better job of recognizing the importance of freight routes. |
| 3.73 Industry and port facilities <br> (formerly Policy 5.19 <br> Focused investments) | Enhance the regionally significant economic infrastructure that includes Oregon's largest seaport and largest airport, unique multimodal freight, rail, and harbor access; the region's critical | Revised policy does a better job of recognizing the investment in infrastructure. |

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|  | energy hub; and proximity to anchor manufacturing and distribution facilities. |  |
| Figure 3-1 Policy 5.26 Greenways | Figure 3-1 <br> 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 <br> 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? |
| $4.21$ <br> 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 <br> Industrial edge <br> (Formerly Policies <br> 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 nonindustrially zoned land. Need to clarify that adverse impacts can be addressed on nonindustrial zoned property. |
| 4.73 <br> Natural hazards and climate change risks and impacts. <br> (formeriy 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 changerelated 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. |

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| 5.11 <br> 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 nonresidential uses. |
| 6.39.e. <br> Prime industrial land retention | 6.39.e. 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 <br> 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 <br> 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 <br> 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 <br> Natural resource protection. <br> (formerly Policy 4.5 Atrisk habitats and Policy 4.15 Efficient use of land) | Policy 7.19 Natural resource protection. Protect the quantity, quality, and function of significant natural resources identified in the City's natural resource inventory, including:... grassland habitat | A number of the significant natural resources listed in this policy (including grassland habitat) are not well defined. <br> 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 |

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| :---: | :---: | :---: |
|  |  | resources. This is more clearly stated in Policy 7.21. |
| $7.23-7.26$ <br> 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 of mitigation approaches that fully mitigate unavoidable impacts.... | 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. <br> 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" conflicting uses |
| 7.25 <br> 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: <br> 1. On the site of the resource subject to impact with the same kind of resource; if that is not possible, then <br> 2. Off-site with the same kind of resource; if that is not possible, then <br> 3. On-site with a different kind of resource; if that is not possible, then <br> 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 <br> Sensitive Habitat Willamette River Watershed. Policy 4.24.f. (Protect and enhance grasslands, beaches, wetlands, and other critical habitats for shorebirds and waterfowl, including | Policy 7.38 Sensitive habitats. Protect and enhance grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific Flyway and the Willamette River corridor. | This policy treats the ESEE process as a foregone conclusion that will result in the protection of the resource regardless of the other factors. <br> 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 |

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| :---: | :---: | :---: |
| species that migrate along the Pacific flyway and Columbia River corridor.) |  | Goal 5 inventory and ESEE analysis. |
| 7.39 <br> Riparian Corridors- <br> Willamette River <br> Watershed. <br> (Formerly 4.24.e. <br> (Promote rehabilitation of riverbank sections that have been significantly altered because of development to create more natural riverbank conditions.)) | 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. <br> Riparian corridors cannot be increased in width without going through a Goal 5 process. |
| 7.45 <br> 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. <br> Riparian corridors cannot be increased in width without going through a Goal 5 process. |
| 7.46 <br> Sensitive habitatsColumbia Slough Watershed. <br> (Formerly Policy 4.25 <br> Columbia Slough <br> Watershed <br> 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.)/ | 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. <br> 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. |
| 7.49 <br> Portland International | Protect, restore, and enhance natural resources and functions in the Portland | Are all natural resources identified in the Portland International Airport/Middle |

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| Airport - Columbia <br> Slough Watershed. | International Airport plan district, as <br> identified in Portland International <br> Airport/Middle Columbia Slough Natural <br> Resources Inventory. Accomplish this <br> through regulations, voluntary <br> strategies, and the implementation of, <br> special development standards. | Columbia Slough Natural Resources Inventory <br> intended to be protected, restored and <br> enhanced as implied by this policy? |
| 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. |  |  |

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| :--- | :--- | :--- |
| 1. Open Space | space, or ecological function, or provide <br> visual relief. Lands in this designation <br> are primarily publicly-owned but can be <br> in private ownership. Lands intended for <br> the Open Space designation include <br> parks, public plazas, natural areas, <br> scenic lands, golf courses, cemeteries, <br> open space buffers along freeway <br> margins, railroads or abutting industrial <br> areas, and large water bodies. The <br> corresponding zone is OS. | margins, railroads, abutting industrial areas, <br> or large water bodies such as the Willamette <br> and Columbia Rivers. This seems to be an <br> over reach and will result in additional <br> complexity when developing, maintaining or <br> managing these areas. The stated intent, "for <br> lands that serve a recreational, public open <br> space, or ecological function or, provide <br> visual relief" is not consistent with the <br> 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


May 1, 2013

Eric Engstrom, Principal Planner
City of Portland Bureau of Planning \& Sustainability
1900 SW $4^{\text {th }}$ Avenue, Suite 7100
Portland, Oregon 97201

Re: City of Portland Comprehensive Plan Update Working Draft - Part 1

Dear Eric:

Thank you for the opportunlty 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 sectlon-specific comments.

## KEAKSUES

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 "industrlal" corridor type. The Port is concerned that the Civic Corridors and Greenways designations will conflict with the modal designations for frelght Identified in the City of Portland Transportation System Plan and Freight Master Plan.

Transportation Hlerarchy. The new pollicies 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 quallty 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 welf-being." This goal is followed by policles 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 Alrport Futures are described in the subsequent table.

The Port looks forward to continuing to work with the Clty to resolve these issues and the issues outlined in the attached table prior to adoption of Comprehensive Plan Update.


Susie Lahsene,
Regional Transportation \& Land Use Policy Manager
c: Tom Armstrong, Portland Bureau of Planning and Sustainability
Tom Boullion
Lise Glancy

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| 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. <br> 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. <br> Modify the draft policy language to state (w/new language underlined): "Maintain and planfor 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 vears. |

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| Draft Gaals 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. <br> Modify the draft policy language to state ( $w /$ new language underlined): "Coordinate land use planning and prioritize 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 acknowiedge that relationship. <br> Modify the draft policy language to state ( $\mathrm{w} / \mathrm{new}$ language underlined): "Protect the muitimodal freight-hub industriai 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 riverrelated 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 altemative 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. <br> Modify the draft policy language to state ( $\mathrm{w} / \mathrm{new}$ language underlined): "Prioritize investment in brownfield sites redevelepmentreseres 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. <br> 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. <br> 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. <br> Modify the draft policy language to state ( $w / n e w$ language underlined): "Maintain and enhance major natural areas, or open spaces outside of prime industrial areas, or constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridar industrial areas." |



| 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 <br> outcome, within an urban setting, these policies should address the need to balance environmental <br> 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., <br> grassland could include a goff course, play field, or barren weedy fill, categorizing it as an "at-risk <br> habitat" that presumably would become a regulated feature is problematic. The addition of the word <br> "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, man- <br> made detention pond or other similar feature as a habitat for wildlife. This would be problematic and <br> could compromise the primary function of the structure (for transportation, stormwater retention, <br> etc.). Some clarification is needed regarding the intent of this policy as it relates to manmade <br> structures. |
| Policy 4.7 Habitat corridors. | The Conceptual map of potential habitat corridors appears to identify West Hayden Island as a Habitat <br> Corridor. While a portion of West Hayden island functions as a habitat patch, in this location the <br> columbia River functions as the primary corridor for wildife movement. In addition, the definition of <br> Habitat Corridor is so broad that it could potentially apply to the entire City, but appears to have been <br> applied selectively based on other criteria that are not explicit in the definition. For example, a portion <br> of the narrative suggests corridors could be established by"...incorporating naturescaping into yards <br> and landscaped areas...". Further clarification of this designation is needed. |
| Policy $4.11 a, ~(C o n s i d e r ~ t h e ~ c o n d i t i o n ~ o f, ~$ <br> and potential cumulative impacts on, <br> natural resources when creating land use <br> and infrastructure plans.) | This policy suggests considering cumulative impacts when creating land use and infrastructure plans. <br> However, the term "cumulative impacts" is not defined and it's unclear how this would work in the <br> context of balancing statewide planning goals. |

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| Draft Gouts and Policies |  |
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| Policy 4.11.b. (Strive to sustain the <br> carrying capacity of air, land, and water <br> resources by enhancing natural resource <br> quality and function.) | The term "camying capacity" is not defined, so it is unclear how this policy wouid be implemented. It <br> 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 <br> appropriate." However, this concept is not made clear in the policy itself. The proposed modification is <br> intended to clarify this point. Further, the Port would recommend putting the emphasis on the quality <br> of the mitigation rather than its location. If better mitigation can be accomplished off-site then that <br> 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 fuily mitigated. Generally, |  |
| grioritize onsite mitigation or mitigation in the same watershed within the city over mitigation in |  |
| another watershed or outside of the city, butencourage atternative approaches which will provide |  |
| better mitigation opportunities." |  |

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| Draft Goals and Policies | Comments |
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|  | 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. <br> Modify the draft policy language to state ( $\mathrm{w} /$ 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 emvironmental protection with conflicting land uses and policies. <br> 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 <br> 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. <br> Also, as noted previously, the Port is concemed 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 signiffcant Goal 5 resources rather than all |

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| Draft Goals and Policies |  |
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| spaces and anchor upland habitats). | remaining open spaces. The suggested modifications are intended to clarify this point. <br> Modify the draft policy language to state (w/new language underlined): "Protect and maintain the <br> functions of femaining designated open spaces and anchor upland habitats outside of prime industrial <br> areas." |
| 4.26 Columbia River Watershed | The commentary for this section states that "However, West Hayden Island and the northem portion <br> of Portland Harbor provide some of the best shoreline, shallow-water, wetland, and floodplain habitat <br> in Portland's urban services boundary." The Port is concerned about the scientific basis for this claim <br> especially given the hydrologic controls (dams) on the Columbia River. Also, the tem "floodplain <br> habitat" appears to be used inappropriately since floodplain is a river function across a range of habitat <br> types. "Floodplain" is not a habitat in and of itself. |
| 4.26.b. (Enhance grassland, beach, and <br> wetland habitats and improve other <br> ecological functions, while continuing to <br> provide flood control.) | It is unclear what is intended by "improve other ecological functions". Some further clarification should <br> be provided. <br> Also as noted previously, the Port is concerned about the use of the term "grasslands". This should be <br> clarified as "native grasslands". |

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| Draft Goals and Policies | Comments |
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| Commentary (p. 5-3) | The Portland Plan recognizes the importance of a strong economy and job creation to a healthy city <br> and individual well-being. While this is acknowledged in Chapter 3, the linkage is not made in the other <br> chapters. The commentary addresses wildife habitat connections and environmental health, but does <br> not address the economy or industry. Metro 2040 Design types such as employment and RSIA are not <br> mentioned. While the identification of the Industrial and River area as a discrete geography is helpful, <br> 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 <br> job creation as well as health, resilience and equity. In addition, the importance of the Crity as a <br> regional and statewide hub is not addressed. Alternatively, a new goal named "A city designed to <br> work", as well as a corresponding, policy emphasizing Industrial Smart Growth, could be added to <br> address these concerns. |
| Goal 5.B. Context-sensitive <br> 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 <br> 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, <br> there are several issues which could be addressed by additional sub policies: |

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| Draft Goals and Policies |  |
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| regionally significant nexus of Oregon's <br> largest seaport and largest airport; unique <br> multimodal freight, rail, and harbor <br> access; and proximity to anchor <br> manufacturing and distribution facilities.) | related uses. |
| Policy 5.16.c. (Enhance and complete the <br> area's system of riverside trails and <br> strengthen active transportation <br> connections to Portland's neighborhoods) | This policy appears to be contradictory to the broader policy contained in Policy 5.16 to support the <br> area's prime industrial lands. As an example, completing a trail along the river through Albina'Yard <br> would likelv diminish the ability of that key freight hub to operate. |
| 5.16.d. (Enhance the strong river <br> orientation of the area's residential areas.) | Because river frontage should be reserved for river-related and dependent uses, this policy should be <br> 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." |  |

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| Draft Goals and Policies | Comments |
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| Policy 5.26 Greemways | 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. <br> 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 nonindustrial 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 . <br> Modify the draft policy language to state (w/new language underlined): "Protect existing non-industrial tands development from potential demonstrated adverse impacts of pan industrial activities and development" |
| 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 |
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| 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. White 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. <br> 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 longterm 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. <br> Add language as follows: "Require compatible land use designations and development within the noise-affected area of Portiand 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." |



| Draft Goals and Policies | Comments |
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| Commentary (p. 6-12) | There are several factual errors in the commentary section: <br> - (2nd bullet) it seems likely that the Port of Portland should be included under the list of locai "transportation facilities and services" providers. <br> - (4 $4^{\text {ih }}$ bullet) This item suggests that rail facilities are provided by "the Burlington Northem Railroad". The official name for this company is BNSF Railway. In addition, there are several other railroads operating in Portiand including the Union Pacific Railroad, Portland and Western Railroad, Portland Terminal Railroad and Peninsula Terminal Railroad: <br> - ( $10^{\text {th }}$ 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. <br> - (12 ${ }^{\text {th }}$ 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. |
| 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. <br> Add draft policy language to state ( $\mathrm{w} / \mathrm{new}$ 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 |
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|  | 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 6.25 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. <br> 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 |
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| . | users. The proposed modification below is intended to address this concern. <br> Modify the draft policy language to state ( $\mathbf{w} /$ 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. <br> Modify the draft policy language to state ( $\mathrm{w} / \mathrm{new}$ language underlined): "Preserve and manage City owned 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: <br> Portland International Airport <br> 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. <br> 6.100 Regulations <br> Implement the Airport Futures Plan through the implementation of the Portiand 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 |
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|  | 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. <br> 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. <br> 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 wildjife and aircraft. <br> 6.101 Partnerships <br> Partner with the Port of Portland and the regional community to address the critical interconnection between economic development, environmental stewardship, and social responsibility. <br> A. Support an ongoing public advisory committee for Portland Intemational Airport (PDX) <br> 1. Support meaningful and collaborative public dialogue and engagement on airport related planning and development: <br> 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 <br> 3. Raise public knowledge about the airport and impacted communities. <br> 6. 102 Investments <br> Ensure that new development and redevelopment of airport facilities supports the City's |

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|  | 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 |
| $\frac{\text { development options, minimize environmental impacts, use land resources }}{}$efficiently, maximize operational efficiency, ensure development can be effectively <br> phased, and address Federal Aviation Administration's airport design criteria. |  |

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| Draft Goals and Policies | The relationship of this element of the Comprehensive Plan to other existing Plan documents such as <br> the Airport futures and Freight Master Plan would be helpful. In addition, as noted earlier, the <br> Comprehensive Plan was amended only two years ago to reflect Airport Futures. These goals and <br> policies, which were the result of a significant planning effort, are included in Airport Futures as <br> proposed amendments to the Comprehensive Plan. If they are no longer included in the <br> Comprehensive Plan itself it is unclear what their status would be in terms of adopted policy. |
| :--- | :--- |
| Commentary $\{$ 7-3\} | The Portland Plan recognizes the importance of Portland's advantages as a trade and freight hub and <br> West Coast trade gateway. While Goal 7.A does refer to "economic prosperity" as a benefit of the <br> transportation system, Goal 7.B does not include prosperity as an important factor in "quality of life". <br> This seems to be inconsistent with the Portland Plan. |
| GOAL 7.E $7 . B$ | As noted above, while the Portland Plan recognizes the importance of freight movement to Portland's <br> economy, this is the only overall transportation goal that acknowledges freight. However, the current <br> wording ("by providing efficient multimodal access to employment areas, educational institutions, and <br> enhanced freight access to industrial areas.") is too limited in scope. Freight mobility should address <br> Portland's role as a West Coast trade gateway and should recognize need for robust multi-modal <br> freight (air, marine, rail\} as well as the role that the transportation system plays in supporting |
| prosperity. |  |


| Draft Gools and Policies | Comments |
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| 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 Portiand'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 Portiand Plan which speak to "...strengthening our freight transportation network, which connects us to global markets..." <br> 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 |
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| 7.13.6. 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. <br> 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 frejght 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. <br> Modify the draft policy language to state ( $w / n e w$ 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-dependant 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. <br> Modify the draft policy language to state (w/new language underlined): "Shippine_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. Faciltate 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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|  | 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. <br> 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 focal 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 "Prionitize 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 resuiting 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 prionitized 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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|  | seeing them disappear..." Overall, this policy should be strengthened and sub-policies addressing the <br> importance of the airport should be included. Alsa, as noted earlier, the Comprehensive Plan was <br> amended only two years ago to reflect Airport Futures. These policies need to be included. |



December 31, 2013

Susan Anderson, Director
City of Portland Bureau of Planning and Sustainability
1900 SW $4^{\text {th }}$ 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 policles 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 82 nd 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.

Susan Anderson
December 31, 2013
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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,


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 Boulllion, Port of Portland
Lis Clancy, Port of Portland

## MAP APP

## 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. $33^{\text {rd }}$ Avenue north of Columbla Boulevard as a Greenway seems inconsistent with the current freight function. in addition, NE $33^{\text {rd }}$ serves existing industrial uses, as well as future industrial uses identifjed at the SW Quad and NE $33^{\text {td }} /$ 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 $82^{\text {nd }}$ 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 Clty of Vancouver's Transportation 2040 Plan, with a separate set of policles for "Moving Goods and Delivering Services" distinct from a hierarchy for "Moving People". We belleve this approach will protect critical freight routes throughout the city rather than allowing them to be cannibalized with overlapping and sometimes contradlctory 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, notural areas and open space.
b. Support intensification and expansion of existing businesses by prioritizing frelght infrastructure projects
c. Create public incentives to clean-up brownfield's
d. Convert vacant and underutilized commercial or residential land to employment uses in East Portland
- Are there other strategies or implementation appraaches (legislation, incentives, funding, portnerships) 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 zoning of 300 acres on West Hayden Island for industrial use at a reasonable cost and a final ciean up remedy for the Portland Harbor Superfund at reasonable cost for harbor businesses and City rate payers while still being protectlve 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 voluntarliy convert to industrial ușe, 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 sultablity 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 Councll 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 opportunitles?
- The City's limited financial resources mean only a few street car corridors can be developed in the next 25 years. With th/s 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.
- 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 Portiand Export initiatlive; 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 Portiand citizens should be a priority.

## Specific Comments

Under the Potential Transportation Projects layer, add the South Rivergate Overcrossing Project at South Rivergate 8oulevard. 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 5 , 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 habltat 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 vicinlty 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 Commerclal" 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 milllon 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 Portiand 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 Initlative.


## 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
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 mentloned 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 brownfleld 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 lnvesting 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 utillty 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 wellibeing 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 reglon. It is aiso 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 identifles 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 920 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 Initlative, led by the Office of the Mayor of Portland and the Portland Development Commission, with a broad reglonal task force, should also be clted as a source document for this section. One of the policy recommendations is to "Develop a shared state, reglonal, and city freight policy: a) Prioritize arterial roads for getting freight to market, b) Support the region's gateway role with international air and marlne 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 dlscussion 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 Dellvery

- 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 Sanitory Sewer and Stormwater Rates heading, there is no discussion about the Portiand Harbor Superfund Charge as a portion of current residents' and businesses ${ }^{\text {t }}$ 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 Clity 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 specffic reference to the fact that the Clty 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 Clty 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 llmited to Clty 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 Columbla 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 iș developed with many different uses, including a 104 acre federally deslgnated dredge materlal 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,
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 Ralifroad Bridge". It is unclear which bridge is being described, since the only bridge owned by the Union Pacific Railroad in Portiand is the Steel Bridge. The rail lift span bridge over the Willamette River near Wacker Siltronic is owned by the BNSF Railway. The BNSF Rallway also owns the Hayden Island Rail Brldge 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 Multl-Modal Transportation heading, mentions the lack of modal preference in the TSP as a problem. As mentioned in the Port's comments from the Portiand Comprehensive Plan Working Draft-Part 1, the concept of a green and active transportation hierarchy were borrowed in part from the City of Vancouver, 8.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 $82^{\text {nd }}$ 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 Clvic 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 Dellvering 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-S. Specifically, the Columbia River $1-5$ bridge crossing is the only lift span bridge on the entire l-5 system between the Canadian and Mexican borders and has been identified as a key bottleneck to the regional freight network. The proposed $\mathrm{I}-5$ 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


Andre Baugh, Chair
Portland Planning and Sustainability Commission
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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.

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## ADEQUACY OF ECONOMIC POLICY

The Portland Plan emphasized the role of economic prosperity and affordability as one of three strategles, 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 reglon'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 Isiand 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 Councll 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.

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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 competliveness, 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 policles 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 ANO 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 facllities 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, especlaily middle-income job growth continues to be a priority for the Port.

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

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


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## 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 policles 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 policles; 6.14, 6.39, and 6.40) difficult if not impossible to achieve is 7.46 . This policy suggests grasslands and floodplains must be protected and enhanced within the Willamette River watershed. Grasslands as shown on the current City Natural Resources Inventory map includes many fallow areas consisting of barren and weedy fill on existing developed industrial sites and underdeveloped brownfield sites not currently regulated within industrial districts. Floodplains are currently regulated for flood protection, not as a habitat feature. It is hard to imagine how both outcomes can be accomplished with these confilcting pollcies.

## 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 Columbla 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.

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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 lapan. 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 countles in the region and state that rely on the Portland freight hub. This rurai-urban economic linkage should be acknowledged in the Comprehensive Plan.

Strateglc 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.Portiand'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).

Portiand'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 sllde in the Portland Offlce of Transportation presentation at the February $24^{\text {th }}$ PSC hearing on the TSP, the City is allocating a minimal amount of expenditures to freight when compared to other transportation modes.

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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 insufficlent. 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;


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


Senior Manager, Transportation and Land Use Policy
cc: Susan Anderson, Bureau of Planning and Sustainability Eric Engstrom, Bureau of Planning and Sustainability Kristen Leonard, Port of Portland

## Attachment - Port of Portland Recommendation for the T5P project list:

TSP ID 40032: Columbla/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 ${ }^{\text {th }}$ Ave Corridor Improvements
Consider revising the project description to note that the intersection improvements at $47^{\text {th }}$ / Columbia are complete but $47^{\text {th }}$ Avenue between Columbia and Cornfoot stilf needs to be improved.

TSP ID 110190: Killingsworth/l-205 Interchange improvements
Remove the Port as a lead agency. The Port listing dates back to the flrst Colwood plan amendment but the Port no longer has any invoivement in this project.

TSP 1D 40102: Columbla 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 $1-5$ Rail Capacity Study and again as part of the Port Rail Plan but the project is reglonal in nature and benefit.

TSP ID 40001: $11^{\text {th }} / 13^{\text {th }}$ 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: $82^{\text {nd }}$ and Alrport 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 Alrport Way Outbound east of $82^{\text {nd }}$

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 bulding.
Cost: $\$ 16,330,700$

## Add the following Other Agency Proiects with Region as lead agency:

## Willamette Rlver Channel Deepening

Deepen the portions of the Willamette River with deep draft infrastructure to $-43^{\text {t }}$ where appropriate. Allow Willamette River terminals to also benefit from the Columbia River's new controlling depth.
Cost: \$200,000,000


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

Dear Chairman Baugh and Commission Members:

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

1) The Draft Growth Scenarios Report defines performance measures. The performance measures proposed do not actually evaluate the economic measures of success defined in the Portland Plan. We have proposed five alternative performance measures for the Commission to consider (see attached letter "Draft Growth Scenarios Report").
2) The Economic Opportunities Analysis (EOA) March 2015 proposed draft recommends the low forecast scenario for the harbor lands. As noted in our April 17 ${ }^{\text {th }}$ 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,

\$usie Lahsene, Senior Manager
Transportation and Land Use Policy

Attachments


Andre Baugh, Chair
Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, Oregon 97201
Chair Baugh and Commissioners,
Thank you for the opportunity to comment on the Draft Growth Scenarios Report (GSR). We understand and appreciate the GSR has been evolving since initially published in 2013. We also understand that the root of the GSR is found in the 2012 Portland Plan, specifically the Portland Plan's 12 Measures of Success.

1. Equity and inclusion
2. Resident satisfaction
3. Educated youth
4. Prosperous households
5. Growing business
6. Job growth
7. Transit and active transportation
8. Reduced carbon emissions
9. Complete neighborhoods
10. Healthier people
11. Safer city
12. Healthy watersheds

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

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

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

Andre Baugh, Chair
June 23, 2015
Page 2

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

## उAKE ACTION

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

- Most, if not all, of the Performance Measures selected in the GSR are already reflected in other City documents. Examples include:
- 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;
- 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.


Susie Lahsene, senior Manager
Transportation and Land Use Policy

## Investment Growth and the

## Continued Economic Impact of the Portland Harbor



The deepening of the Columbia River shipping channel in 2010 opened a floodgate of investments at terminals and ports along the river. Nowhere is this more evident than in the Portland Harbor. Columbia Grain and LD Commodities upgraded and expanded their grain terminals. Kinder Morgan increased the capacity of their bulk-commodities terminal. International Raw Materials and Canpotex invested in their fertilizer operations Servicing the larger ships that carry more cargo requires larger, more powerful tugs. Shaver Transport invested in a new fug 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 US. 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 woutd not have happened in the Portland Harbor.

## $\$ 370$ Nillion

Total Investment at the Portland Harbor Since 2010
$\$ 4.5$ Nillion
Estimated Increased Annual Tax Revenue from Investments at the Portland Harbor

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

| Project (On-Line Date) | Investment Amount | Descriolion |
| :---: | :---: | :---: |
| 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) | $\$ 2$ mitlion | Improvements to rail and storage fanks |
| LD Commodities (2014) | \$21 miltion | Expanded grain storage and moving facilites |
| Vigor industrial (2014) | $\$ 50$ million | Largest dry dock in the US |
| Rivergate Road and Rail Improvements (2012) | $\$ 82$ million | mprove road and rail access and capacity |
| Canpotex - Portland Bulk Terminal (2013) | \$140 milion | Increase efficiency of shiploading |
| Shaver Transportation (2014) | \$21 million | New barge, new tug and new engnes |
| Ceplial Investments to Date | \$370 milliors |  |
| Pembina (2018) (Proposed) | \$500 million | Propane export terminal |
| Receni and froposed lnvesiments | \$870 million |  |

# Impacts of Channel Deepening on the Columbia River 

## IMPORTANCE OF THE SHIPPING CHANNEL



The Columbia River Navigation Channel runs from the Astoria bar to the Portand 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 connechon 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 invesled in facilities and transportation capabilities that are dependent on river commerce. Much of the investment made by private industry has beer as a result of the channel deepening.

## IMPORTANCE OF CHANNEL PAINTENAACE

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

## \$370 inillion <br> Total investment in the Portland Harbor

## $\$ 1$ Billion

Total Investiment on the Columbia River Since 2010
95.15 Billion

Additional Investments Planned for the Columbia River

| Port | Piojoct, , | Invesimens Amount | Docoriplion, , , , , , , , , - , - , |
| :---: | :---: | :---: | :---: |
| Longrew | Exponl Gran Temmal (2012) | \$230 mation | New gram Ietmel |
| Kolama | Terico LLC (2015) | \$100 mation | Increase capacity (gran) |
|  | Port of Katerna (2014.15) | \$7 metron | Farl upgracos ailine Port |
|  | Kalame Expori Gian (2011) | \$36 milion | Increase stornge rapacty |
| Voncouver | United Gram Corporation (c012) | \$80 malion | Enarge storage and handing capactly |
|  | West Vancouver Fferghi Red Access (2015) | \$228 mithon | Rast expansion, naw toop thack, and road mprovement |
|  | Fidowater Borge Lines (2015) | \$30 mitmon | Thre日 new fugboats |
| Potuand | Columiva Gtam 2015 ) | \$44 rudion | Upgraded gian stotaga and handing |
|  | Kuncer Motgon Bulk Terminal \{2013) | \$10 milion | New ehyp loading fachues |
|  | Internationd Raw Matensls (2014) | 52 mation | Improvements to rail and slorage tanks |
|  | LD Commotites (2014) | \$21 milion | Expandsd grein sforage and mosting fachlies |
|  | Vigor Indusitual (2014) | 850 mallon | Largest diydock in the US |
|  | Rivargate Road and Rat improvemonis (2012) | \$82 mulion | improve road and int acceass and capacty |
|  | Cenpolex - Poriland Butk Termmal (2013) | $\$ 140 \mathrm{miton}$ | Increase efticiency of shuploading |
|  | Shover Tranaportation (2014) | \$21 mution | New barge, now lug and now ergmes |
| Sub rotal | +- | $\$ 1.08$ siliton | - |
| ploposed investmenis |  |  |  |
| Longview | Miltennum Bulx Tarmial (2018) | \$600 milion | New cool termmal |
|  | Nillonnum zulk Termnal (2018) | 525 mithen | Smater femovel and envirenmental cleanup tor new butiterman |
| Kolama | NW Works (2017-18) | \$18bum | New inothend plant |
| St Holans Porl Westword | Globol - Cohmiba Pacilic 8io.Rehnery \{2018\} | \$80 mation | increased storage and teil imptowements |
|  | NW Yorks (2017-18) | \$18 bilbon | New methanot plant |
|  | Ambre Energy (2018) | \$242 milion | Coaltunsport |
| Vancuuvet | Vencouver Enetgy (2018) | \$100 milion | Red mprovements and londing facisfes |
| Pottond | Pembina (2018) | \$500 mition | Propane export lerminal |
| Yolal Proposed | ". | 86.16 alliton |  |



Impacts of Channel Deepening on the Columbia River

## June 2015

## CONTACT INFORMATION

Ed MacMullan, Lisa Rau, Lizzie Gooding, and Tina Morgan prepared this report. ECONorthwest is solely responsible for its content.
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 acknowiedge the assistance of staff from ports and terminal operators who provided intormation 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 Fioad 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. ${ }^{\text {T }}$ The size of vessels continues growing as shippers strive for increasing efficiency gains that reduce costs. The second is the widering and deepening of the Panama Canal. When completed in 2016, the canal will accommodate ships with draft of up to 50 leet, 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 comperition 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 folfowed provides shipping and commodity firms with certainty-certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that today's global economy requires. Firms have confidence that shipments won't face backlogs at ports due to capacity constraints. Shipments move efficiently. Firms also spend less time monitoring, planning. and developing contingency shipping plans. ${ }^{4}$

## Figure 1: Columbia River Ports



Source: Esri, Oigrta/Glabe, GeoEye. incubed, Earthstor Geographics. CNES/Aurbus D5, USDA, USGS. AEX, Getmapping, Aerogrid. IGN, IGP, swisstopo, and the GIS Usar Community

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:
5 The first new grain terminal buitt in the U.S. in 25 years
mi. Expansion of the largest export grain terminal on the West Coast of the U.S.
m The first new grain barge on the Columbia River since 2011
m 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 irvestments, reduce economic activity. and impact jobs.

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

| Port | Proioce | investment Amount | Description |
| :---: | :---: | :---: | :---: |
| Longview | ExportGrain Terminal (2012) | \$230 miltion | New grain terminal |
| Kalama | Temco LLC (2015) | \$100 million | Increase capacity (grain) |
|  | Port of Kalama (2014-15) | \$7 mition | Rail upgrades at the Port |
|  | Kalama Export Grain (2011) | \$36 million | Increase storage capacity |
| Vancouver | United Gran Conporation (2012) | \$80 million | Enlarge storage and handling capocity |
|  | West Vancouver Freight Rail Access (2015) | \$228 million | Rail expansion. new loop track, and road improvernent |
|  | Tidewater Barge Lines (2015) | \$30 million | Three new lugboats |
| Portand | Columbia Grain (2015) | \$44 million | Upgraded grain storage and hancling |
|  | Kinder Morgan Bulk Terminal (2013) | 510 mition | New ship loading facilites |
|  | Internationat Raw Materiats (2014) | \$2 million | improvements to fail and storage lanks |
|  | LD Commodities (2014) | 521 miltion | Expanded grain storage and moving fackities |
|  | Vigor Industrial (2014) | 550 million | Largost drycock in the US |
|  | Rivergate foad and Fais Improvernents (2012) | \$82 malkon | Improve road and rail access and eapacity |
|  | Canpotex - Portland Bulk Teminal (2013) | \$140 mition | Increase efficiency of strploading |
|  | Shaver Transportation (2014) | \$21 million | New barge, new tug and new engines |
| Sub Tozal | U-5 - | st:08 Billian |  |
| Proposed tivertmersts |  |  |  |
| Longview | Miliennium Bulk Terminal (2018) | \$600 million | Now coal terminat |
|  | Miliennium Bulk Teminal (2018) | \$25 mition | Smetrer removal and envikormemal cleanup lor new souk termunas |
| Kadama | NW Works (2017.18) | \$1.8 billion | New methanol plant |
| St. Helens Port Westward | Ghobal - Columbia Paeirc Exo-Refinery (2018) | \$80 million | increased storage and rail improvements |
|  | NW Works (2017-18) | 51.8 billion | Now methanot plant |
|  | Ambre Energy (2018) | \$242 mintion | Coal transpors |
| Vancouver | Vancouver EnerQy (2018) | \$100 million | Rath improvements and loading lacitites |
| Portland | Pembina (2018) | \$500 million | Propane export terminal |

[^20]
## INVESTMENT DETALSS

The Columbia River tederal 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 channe! 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.

THECHANNEL DEEPENING MAKES THEPHONE RING ATPORIS AND VERMIBALS.
Soon atter 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, or 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

## PORT OF LONGVEW

Export Grain Terminal
The Export Grain Terminal ( $\varepsilon G T$ ) 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 $\$ 230$ milion in their
certainty that ports, terminals and vessels can manage the mix of commodities and tonnage that competing in today's global economy requires Firms have contidence 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, "'

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. ${ }^{5}$

## Millennium Bulk Terminal

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

[^21]
## 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 $120 .{ }^{\text {a }}$
The Port of Kalama invested $\$ 7$ million in rail upgrades at the port to facilitate and support the increased rail traffic. ${ }^{9}$

## Kalama Export Company

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

## NW Innovation Works

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

## PORT OF ST. HELENS AND PORT

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

## NW Innovation Works

NW Innovation Works is also considering the Port Westward location for a methanol piant. This plant would also happen over two phases with a total investment of $\$ 1.8$ billion and fulltime 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 Cotumbia River have a cost and time advantage over Gulf Coast ports for corn and soybean shipments to the Pacific Rim. Eefore 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 requite 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: ${ }^{12}$

[^22][^23]
## BECAUSE OF THEDEEPENIAG.

 COLUMGEA RNER PORTS AND TEEMONALS ARE WELL POSITIONEO TO ESPOND TO GROWING DEMAND FRONI THEPACIFIC REM Many terminal operators indicateo that without the deepening they would not have invested in upgrading their facilities With orowing demand from China and other countries along the Pacific Rim, this would have been a significant lost opportunity for terminal operators and shippers. Now, terminais along the Columbia River are well positioned to sake advantage of this growth ts
## VANCOUVER

## United Graln 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 20082009. 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


storage and transport capabilities for grains new to this market-corn and soybeans-along with their traditional wheat product ${ }^{16}$

## West Vancouver Freight Rail Access

The Fort of Vancouver is investing $\$ 2.28$ million in rail and road improvements to meet the transportation demands of terminal operators such as United Grain Corporation. These investments include expanding rall tracks, adding a loop track, and improved road and rail access to the port and terminals. ${ }^{17}$

## Vancouver Energy

Vancouver Energy is investing approximately $\$ 100$ million in a "crude-by-rail" terminal. The project is projected to start in 2016. The investment includes new rail lines and storage facilities to move crude oil through the terminal This terminal will be one of those serviced by the new West Vancouver Freight Rail Access investments. ${ }^{10}$

[^24]IMPACTS OF CHANNEL DEEPENING ON THF COLUMBIA RIVER ! 5

## DEEPENING-RELATED

## INVESTMENTS STRETCH BACK TO

## THE MIDWEST

Most of the investments spurred by the deepening happened or:are happening at terminals atong 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 terminats on the river. These investments include unittrain cars, rail loops, and foading facilities in Montana and North Dakota: ${ }^{20}$

## Tidewater Barge Lines

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

## PORTLAND

## Columbia Grain

Columbia Grain is expanding their grain storage and handling capacity with a $\$ 44$ million investment. In addition to more storage capacity, the expansion will allow Columbia Grain to store and move 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. ${ }^{23}$

## LD Commodities

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

## Vigor Industrial

The largest floating drydock in the U.S., the Vigorous, arrived at Vigor Industrial's Portland shipyard in August of 2014. Vigor invested $\$ 40$ million building the drydock and $\$ 10$ million delivering and assembling it. Demand for the new drydock will come from servicing cruise ships, post-Panamax vessels and U.S. Military Sealift Command ships. At the time the Vigorous arrived at Vigor Industrial, two targe 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 privale 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 wharts. These investments are necessary to meet the growing demand for

[^25]61 ECONorthwest
ransportation services from expanded terminals that service larger ships with deeper berths that use the added depth in the shipping channel. ${ }^{\text {º }}$

## 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 Fortland terminal. ${ }^{27}$

## Shaver Transportation Company

Shaver Transportation Company has been on a steady program of upgrade and construction since the channel deepening. The company responded to the increased demands from larger vessels with a repowering and new construction program kicked off in 2011. Shaver invested $\$ 9.5$ million in a new tug, the SUMMER $S$, which is being fabricated in Portland at Diversified Marine. They also invested \$4.9 million in new engines and repowering some of their existing tugs. They also invested $\$ 7$ million in two new grain barges, the first new grain barges on the Columbia River since 2011, ${ }^{28}$

## Pembina

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


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

## CONCLUSION

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

[^26]
## 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 <br> Policy is consistent with retaining WHI Policy 6.41 from prior draft and as proposed in this letter. |
| 6.14 <br> Brownfield <br> 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. <br> 6.14.b Pursue grants, loans and or other technical assistance to make redevelopment financially viable to a private developer. <br> 6.14.c Commit füture city budget surplus to brownfield redevelopment |
| 6.39 <br> 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 6-3. - Industriol and Employment Districts) that is prioritized for long-term retention. | Support |
| 6.39.a. <br> Prime industrial land retention | Strit 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. <br> Prime industrial land retention | Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area. dentify hou-regulations affect the eapacity, affor lability, and viability-0findzstrialuses, and finit minimize these-impacts. | Support |


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


|  | Natural hazards are treated as something to be avoided in the policy section, p 7-10 when in fact they are a component of well-functioning ecosystems. A healthy natural system has a healthy occurrence of natural hazards. | Rewrite policy paragraph 2, p7-10 to clarify that natural hazards are a function of wellfunctioning 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 <br> Habitat and biological communities | Bullet added states: Support recovery of species under the Endangered Species Act, and prevent new listings | Restate: <br> Strike PREVENT, replace with "preclude the need for new listings." <br> 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 <br> 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. <br> Change to: <br> 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 <br> Contaminated sites | Easure that plans-and investments-are consistent-with <br> and aduanee 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: <br> Promote and support programs that facilitate the cleanup and reuse of the Portland Harbor Superfund site and other contaminated upland sites. |


| 7.49 Portland <br> International Airport | New policy: <br> Protect, restore, and enhance natural resources and functions in the <br> Portland International Airport plan district, as identified in the Portland <br> International Airport/Middle Columbia Slough Natural Resources Inventory. <br> - Accomplish this through regulations, voluntary strategies, and the <br> implementation of special development standards. | Support <br> 9.5 Mode Share Goals <br> and Vehicle Miles <br> Travelled Reduction <br> A goal should be added for reducing vehicle hours of delay. |
| :--- | :--- | :--- |
| TSP Project List | The City of Portland Major Projects and Programs List has some funding for <br> freight mobility projects and programs but the majority of freight mobility <br> projects are on the separate Other Agency Major Projects list. | Reducing vehicle miles travelied doesn't <br> necessarily reduce emissions if vehicles are <br> idling in traffic and spending more time to <br> travel less miles. There is also an economic <br> cost for Portiand businesses associated <br> with vehicle congestion. |
| 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

January 7, 2016

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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 ${ }^{1}$ 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 $\mathrm{I}-84$ to the north and the on-ramp to the east, as depicted below.


[^27]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 $120^{\prime}$ 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
cc: Brent Lower and Josh Keene, Washington Holdings (via email) Council Clerk (via email)
Barry Manning and Rachel Hoy, BPS (via email)

Mayor Hales and Commissioners
PROTECTING YOUR RIGHT TO ROAM

City of Portland
1221 SW Fourth Ave.
Porlland 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
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,
PROTECTING YOUR 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: | 201617 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](mailto: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](mailto:Dan.Saltzman@portlandoregon.gov); Grumm, Matt [Matt.Grumm@portlandoregon.gov](mailto: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
...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.

Develop Pedestrian Oriented Greenways and enhance the Western Neighborhoods distinctive system of trails to increase safety, expand mobility.....

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.

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.

Encourage the continued use of alleys for parking access while preserving pedestrian access. Expand the number of alley-facing accessory dwelling units.
.... 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.

MFI is not defined in the text, explain it.

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.

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

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.

Plan, improve, and maintain the citywide trail system so that it connects and improves access to and through 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 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 wheel and spoke approach of connecting to activity centers.
8.55 Coordinate the planning and improvement of pedestrian and bicycle 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.

Add: Recognize that pedestrian and bicylcle trails are also key components of the transportation network.

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.

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.

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

Guide the location and design of new street, pedestrian, bicycle and trail infrastructure.

Promote street and trail alignments and designs that respond to topography and natural features, when feasible, and protect streams, wildlife habitat, and native trees.

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.

Create, sign, and document more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment

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.

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 poplulatin.

Stephens Creek Stormwater System Improvements. Add: Coordinate all actions with PBOT to assure the street, trail and other transportation needs are met concurrently.

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 sucessful 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.

## Portland Comprehensive Plan: Chapter 9: Transportation

Design and planning
9.2.d. 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.

## Streets as public spaces

Streets, including sidewalks on-street parking 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 functionș. 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 parking, 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
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](mailto: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 $60^{\text {th }}$ 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 $6^{\text {th }}$ 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 $60^{\text {th }}$ 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. $7^{\text {th }}$ 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 Youll>

At the January $6^{\text {th }}, 2016$, 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:

1. 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 $60^{\text {th }}$ 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 $60^{\text {th }}$ 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,

Tamara DeRidder, AICP
Chair, RCPNA
1707 NE $52^{\text {nd }}$ Ave.
Portland, OR 97213
Exhibits:
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 $60^{\text {th }}$ Ave. Station Area.
RCPNA Testimony
Page 2 of 2
Jan. 7th, 2016

Recommended Comp. Plan Map
Ordinance 187832, Vol. 1.3.J, page 7459

City Council Testimony 01072016 - RCPNA Recommended Provisional Map Amendment of $60^{\text {th }}$ Ave. Station Area



Tamara DeRidder, AICP - RCPNA Chair
Page 2 of 2
1707 NE $52^{\text {nd }}$ 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 $52^{\text {nd }}$ Ave.
Portiand, OR 97213
RCPNA Recommendefoftip Alpe eestiqn832, Vol. 1.3.J, page 7462ge 1 of 1

# New Deal Café Rezone from R5 to Mixed Use Commercial 


#### Abstract

Rose City Park Neighborhood Association Position Statement: . Proposed Amendments (\#347) to the Recommended Comprehensive Plan Map: 1. Deny the up-zoning of the 2 properties that contain the New Deal, located on the SW corner of NE Halsey and NE 53rd Ave. The Recommended Plan Map has this site identified as Mixed Use Commercial, an upzone from R-5. There is serious concern regarding a Mixed Use Commercial zone on this property, including:

RCPNA Commentary: The neighborhood would lose control of what could be built on the site if it were rezoned to Mixed Use Commercial. It could become an apartment building with no parking or high trafficked commercial use. We appreciate the possible Dispersed Commercial (CMI) zoning designation. But, the list of allowed uses' is too broad for a very isolated pre-existing non-conforming commercial use. The concern also is that if this property were rezoned Commercial then this could start the neighborhood on the slippery slope of making all of the Halsey Corridor commercial, as is the case for our neighborhood on NE Fremont.


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I am opposed to this CM1 zoning proposal for the reasons stated clearly by the RCPNA above.


Comments

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Signature Vandade Wermand Date 1-3-16 Address 5326 is Hoyt. St Apt.A 97213 Comments

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Signature
 Date l-3-16 Address 1420 N.
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Signature Vicki Reinter Date 3-JAN-16
Address 1412 NE 53 r
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Address 5334 NE ClaCkamas St.


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I have lived heresure 1984 *

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Address 1411 NE $49^{\text {th }}$ Are.


## 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 cfount@earthlink.net
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 mitigation 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.

## $R 5$ to $R 7$ 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

01/07/2016
Eastmoreland Neighborhood Association PO Box 82520 - Portand, OR 97282 -0520 - ww.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.


Eastmoreland Neighborhood Association
Robert McCullough, President


## Needs Fixing

Chapter 3 "Pattem Areas" Clarify " 5 Portiands" 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 Preservation Theme missing: Preserve what we love and improve what is neglected and unloved.

THANKS FOR YOUR CONSIDERATION

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## 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 $=8,086 \mathrm{sq} . \mathrm{ft}$.
- NE Quadrant $=7,062 \mathrm{sq} . \mathrm{ft}$.
- SW Quadrant $=6.764$ sq. ft .
- SE Quadrant $=5,592 \mathrm{sq} . \mathrm{ft}$.


Rec. Comprehensive Plan Summary Testimony

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362755 cospse
brizaumar arex

## 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 clean up useful and already available and wellconnected brownfields 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


# (HTTP://WWW.CALIRORNIATINYHOUSE.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:

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 tot 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.
4. Second Dwelling Unit. 6,200 square feet.
5. Backyard Cottage.
a. Interior Lot Size; 6,000 square feet.
b. Corner Lot Size: 5,000 square feet
6. Accessory Living Quarters. 5,000 square feet.
E. Type of Unit.
7. 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.
8. 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.
9. Accessory Living Quarters. Accessory Living Quarters provide dependent living quarters. They 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. 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-famlly 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.
4. Front Yards, Per the underlying zone district.
5. Side Yards/Street Side Yards. Per the underlying district.
6. 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 Líving 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.
7. Backyard Cottage. No additional parking required.
8. Accessory Living Quarters. No additional parking required.
O. Access. Vehicular access shall be provided in the following manner:
9. Driveways. Shall be provided per the underlying district.
10. 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.
11. Second Dwelling Units. Separate gas and electric meters may be permitted if approved by the Building Official and Pacific Gas \& Electric.
12. 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 owneroccupied.
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 Californla 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)
P 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=tumbir\&nb=1)
(6) Reddit (http://www.californiatinyhouse.com/new-zoning-code/?share=reddit\&nb=1)

Email (http://www.californiatinyhouse.com/new-zoning-code/?share=email\&nb=1)

## Arevalo, Nora

| from: | Laurie Flint [lhfsings@gmail.com](mailto:lhfsings@gmail.com) |
| :--- | :--- |
| Sent: | Wednesday, January 06, 2016 11:12 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | \&\#8220; Comprehensive Plan Testimony\&\#8221 |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Flagged |

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 oove 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

## Arevalo, Nora

from:
Sent:
To:
Subject:

Follow Up Flag:
Flag Status:

Christopher Eykamp [chris@eykamp.com](mailto:chris@eykamp.com)
Wednesday, January 06, 2016 11:07 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony

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 R 2.5 , 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

## Arevalo, Nora

from:
Sent:
To:
Subject:

Attachments:

Follow Up Flag:
Flag Status:

Cyd Manro, RNA Board Chair [rnaboard@eco-munity.com](mailto:rnaboard@eco-munity.com)
Wednesday, January 06, 2016 11:05 PM
BPS Comprehensive Plan Testimony
Corrected and updated comments on the Comprehensive Plan on behalf of the Richmond Neighborhood Association
RNA Comp Plan Comments to City Council -1.6.15.pdf; DDI Top 10 Policy Recommendations 11.19.2015.pdf

Follow up
Flagged

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<br>3534 SE Main ST<br>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 abiiity 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 contextsensitive 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 comfor; 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 ( $\sim 20 \%$ ) 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.
b. 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)
c. 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.
9. 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 $15^{\prime}$ and have $5^{\prime}$ of $L 2$ landscaping, unless the building has residential units on the ground floor, and then they must be set back $5^{\prime}$ with L2 landscaping. No vehicular access is allowed from this street, and height is reduced to $35^{\prime}$ for the first $15^{\prime}$. 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 44 th to 51 st 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 $29^{\text {th }}$ to $53^{\text {rd }}$ 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 $50^{\text {th }}$. 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.

Backaround: 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 DDI Notification and Community Enqagement 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 guidelines 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.)


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 $25^{\text {th }} \&$ Division: Three new modern rowhouses blend in with neighborhood scale, details ond simple variation of windows and patterns without being overly repetitious.
(5) 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)


[^28]
"Pearl on the String" Commercial Node- Cluster of Commercial at $20^{\text {th }}-22^{\text {nd }}$ \& 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)


7. 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 $\mathrm{N} / \mathrm{S}$ 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 all).

POSITIVE EXAMPLES


Good exomple of adaptive reuse with new construction that is both modern and uses traditional materials of wood and metal, bolconles, 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: Exomple of positive building form in newer construction, sustainable design elements including:

- breaking up building massing into sections with $4^{\text {th }}$ floor upper roof stepbacks, bolconies, and articulation,
- creating transparency with glass skybridge and pedestrian paseos,
- references similar storefront window patterns in nearby older blocks
- incorporation or art and education through scuipture 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)

10 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. Environment (e.g., loss of habitat, mature trees/heat island effect, 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 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?

1. Comment on these draft recommendations - email ilovedivision@gmail.com with specific edits.
2. Ask your Neighborhood or Business Association to take a position on these recommendations. Contact: Richmond NA -nichmondodx@gmail.com; Division/Clinton Business Assoc. - dcbakafe@gmail.com
3. Write a letter to the City expressing your support for any or all of these recommendations Contact: cputestimony@portiandoregon.gov, note, for testimony it must in. clude your name and address!

## Arevalo, Nora

from: Christopher Eykamp [chris@eykamp.com](mailto:chris@eykamp.com)
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

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](mailto: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](mailto:jen@eykamp.com)

Sent: Wednesday, January 06, 2016 10:56 PM
To:
Subject:
BPS Comprehensive Plan Testimony
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 nonconforming 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

## Arevalo, Nora

From:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Thomas Eykamp [thomas@eykamp.com](mailto:thomas@eykamp.com)
Wednesday, January 06, 2016 10:52 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony
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 'mpacts 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

## Arevalo, Nora

From:
Sent:
To:
Cc:

## Subject:

Follow Up Flag:
Flag Status:

Brian Hatt [bwhatt@gmail.com](mailto:bwhatt@gmail.com)
Wednesday, January 06, 2016 10:15 PM
Council Clerk - Testimony; BPS Comprehensive Plan Testimony
Hales, Mayor; Commissioner Fritz; Commissioner Fish; Commissioner Novick; Commissioner Saltzman; City Auditor Griffin-Valade;
mnaLandUseCommittee@gmail.com; Anderson, Susan
Re: Multnomah Village CS Zones
Follow up
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). 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.

Thank you,
Dr. Brian W. Hatt
7037 SW $33^{\text {rd }}$ Place, Portland OR 9719

## Arevalo, Nora

1
From: Valerie Hill [valshill@comcast.net](mailto:valshill@comcast.net)
Sent: Wednesday, January 06, 2016 9:42 PM
To:
Subject:
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony
Follow Up Flag:
Flag Status:
Follow up
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
ənt from my iPhone

## From:

Sent:
To:
Subject:

## Follow Up Flag:

Flag Status:

Leslie Costandi [freskaone@yahoo.com](mailto:freskaone@yahoo.com)
Wednesday, January 06, 2016 9:26 PM
BPS Comprehensive Plan Testimony
Re: Comprehensive Plan Testimony

Follow up
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 4 th 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 l 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 30,000-60,00090,000 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 sme, they tear down, build and leave. Portland rakes in development fees and the neighbhorhoods 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 develper 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

## Arevalo, Nora

From: Robyn Erickson [robtig48@gmail.com](mailto:robtig48@gmail.com)
Sent: Wednesday, January 06, 2016 9:24 PM
To:
Subject:
BPS Comprehensive Plan Testimony
"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 s units.

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](mailto:artistyoung@comcast.net) |
| :--- | :--- |
| Sent: | Wednesday, January 06, 2016 9:03 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | MY TESMMONY 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.

## Arevalo, Nora

from:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:
twyla dawn [tddwb@yahoo.com](mailto:tddwb@yahoo.com)
Wednesday, January 06, 2016 8:33 PM
BPS Comprehensive Plan Testimony
822 SE 15th St.
Follow up
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 15 th 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
5033171413

## Arevalo, Nora

from: Denise and Roger [cartybrown@msn.com](mailto:cartybrown@msn.com)
Sent: Wednesday, January 06, 2016 8:14 PM
To:
Subject:
BPS Comprehensive Plan Testimony
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

## Arevalo, Nora

1

| From: | Tom Tuchmann [tuchmann@usforestcapital.com](mailto: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 <br>  <br> Road, Portland OR |
| Follow Up Flag: | Follow up |
| Flag Status: | Flagged |

## 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

Jutly BhaHorse Skehon, Chair
Toma Booker - Kendall Clanson - Pamicta Frobes * Kathy Fous.Stephens
fint faquiss - Dion Jordan - smdy Nelson - Jim Omens - Linda Rebitson



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.

cc: Patti Howard, Tim Trail - 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

## Arevalo, Nora

From:
Sent:
To:
Cc:
Subject:
Follow Up Flag:
Flag Status:

Brian Hatt [bwhatt@gmail.com](mailto:bwhatt@gmail.com)
Wednesday, January 06, 2016 6:34 PM
Council Clerk - Testimony; BPS Comprehensive Plan Testimony
Hales, Mayor; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; City Auditor Griffin-Valade; mnaLandUseCommittee@gmail.com
Re: Truth in Zoning

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. Insome 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 residentiat 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 R 5 or R 7 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 $33^{\text {rd }}$ Place, Portland OR 9719

From: Brian Hatt [bwhatt@gmail.com](mailto:bwhatt@gmail.com)
Sent:
To:
Cc:
Subject:
Follow Up Flag:
Flag Status:
Wednesday, January 06, 2016 6:13 PM

Re: Multnomah Village as Neighborhood Corridor
Follow up
Flagged
cctestimony@portlandoregon.go; BPS Comprehensive Plan Testimony
Hales, Mayor; Commissioner Fritz; Commissioner Novick; Commissioner Saltzman; City
Auditor Griffin-Valade; mnaLandUseCommittee@gmail.com

Portland City Council
1221 SW Fourth Avenue, Room 130
Portland, Oregon 97204
January 6th, 2016

## Re: Multnomah Village as Neighborhood Corridor

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 $1 / 2$-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 $33^{\text {rd }}$ Place, Portland OR 97219

P. Michael Dubinsky<br>3734 NE Hassalo Street<br>Portland, Oregon 97232<br>510-541-4951.<br>Poxrungricomeast net

06 January 2016
City of Portland
City Council karlamere-lowemporlandoresongov:
1221 SW 4th
Portland, OR 97204
Subject: Comments on the Recommended Comprehensive Plan UpdateTransportation \& 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 concemed 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 adyerse 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 bave 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.


## Attachments

1. 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 ençouraged 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 Regulation (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. http://www:fhwa.dot.gov/environment/bicycle pedestrian/guidance/inter.cfm FHWA - Bicycle and Pedestrian Transportation Planning Guidance 2003
2. http://www.fhwa.dot.gov/environment/bicycle pedestrian/guidance/policy_accom.cfm United States Department of Transportation Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations- 2010(Updated October 2015)
3. https://www.transportation.gov/safer-people-safer-streets

Safer People, Safer Streets: Pedestrian and Bicycle Safety Initiative - See more at: https://www.transportation.gov/safer-people-safer-streets\#sthash.dFH0JWEK.dpuf.

## Arevalo, Nora

| From: | Monica Donley [monica8425@gmail.com](mailto: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 65 th 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

## Arevalo, Nora

| From: | Hales, Mayor |
| :--- | :--- |
| Sent: | Wednesday, January 20, $20164: 32$ PM |
| To: | 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](mailto:amanda@portlandoregon.gov); Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com); Commissioner Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov); Hales, Mayor [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov); Novick, Steve [Steve.Novick@portlandoregon.gov](mailto: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

## Arevalo, Nora

from:
Sent:
To:
Cc:
Subject:

Washington, Mustafa
Wednesday, January 06, 2016 3:55 PM
laurat@pdx.edu
BPS Comprehensive Plan Testimony
RE: Save Iyy 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](mailto: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

## Arevalo, Nora

| From: | Hales, Mayor <br> Sent: |
| :--- | :--- |
| Thursday, January 28, 2016 12:16 PM |  |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | 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 inIrvington
Dear Mayor and City Commissioners:
I am a neighbors to Root, Hophouse and Foster \& Dobbs at NE 15 th 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

| :rom: | Conrad, Maggie [maggie.conrad@adidas.com](mailto:maggie.conrad@adidas.com) |
| :--- | :--- |
| Sent: | Wednesday, January 06, 2016 3:32 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | blaine Conrad |
| Subject: | Comprehensive Plan Testimony/ Strohecker's Market |
|  |  |
| Importance: | High |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Flagged |

## 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

## Arevalo, Nora

| From: | Georgia Gootee [georgiagootee@gmail.com](mailto: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 | +1.503 .727 .2000 |
| :--- | ---: |
| 10 th Floor | +1.503.727.2222 |
| Portland, OR $97209-4128$ | PerkinsCoie.com |

January 6, 2016
Mark D. Whitlow
D. +1.503 .727 .2073

VIA EMAIL
F. +1.503 .346 .2073

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


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

# Fred Meyer 

Corporate Real Estate<br>3800 SE $21^{\text {st }}$ Ave.<br>Portland, OR 97202

```
Don Fomest
Division RentEstate Manger
don. forrestek doger.com
December 31, 2015
Mayor Charles Hales
Portland City Council
c/o Council Clerk
1221 SW 4th Avenue, Room 130
Portland, OR 972014
```

(503) 797-3117

Tax
(503) 797-3539

## 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.

[^29]
## Commercial <br> Realty <br> NORTHWEST, LLC

Mayor Charles Hales
January 4, 2016
Portland City Council
c/o Council Clerk
VIA EMAIL
1221 SW 4th Avenue, Room 130
Portland, OR 972014

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

RLA
Oregon Restaurant
\& Lodging Association
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,



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


January 5, 2016

Mayor Charles Hales
Portland City Council c/o Council Clerk
1221 SW $4^{\text {th }}$ 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 Porfland 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](mailto: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 53 rd 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

## Arevalo, Nora

| From: | John Chaney [johnrchaney@hotmail.com](mailto:johnrchaney@hotmail.com) |
| :--- | :--- |
| Sent: | Wednesday, January 06, 2016 2:39 PM |
| To: | 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: | Wednesday, January 20, 2016 4:32 PM |
| To: | 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](mailto:mayorcharliehales@portlandoregon.gov)
Subject: Zoning change hearing
Dear Mayor Hales:
Today I received notification of a proposed zoning change to the parcel at NE $15^{\text {th }}$ 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 $11: 00 \mathrm{pm}$ 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 very small 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 $15^{\text {th }}$ and NE Brazee.

Thank you,
Helen Richardson
2515 NE $16^{\text {th }}$ Ave
Portland, OR 97212

## Arevalo, Nora

| From: | Greg McAllister [gregmca2@gmail.com](mailto: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](mailto: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 15 th 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


## Arevalo, Nora

rom:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Kristina Knight [kristinalknight@hotmail.com](mailto:kristinalknight@hotmail.com)
Wednesday, January 06, 2016 1:46 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony
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 south onto 53 rd. 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

## Arevalo, Nora

| From: | Donald Winn [winndm@q.com](mailto: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.<br>c/o Council Clerk<br>1221 SW 4th Ave, Room 130<br>Portland, OR 97204

## RE: City of Portland Draft Comprehensive Plan <br> 2537 NE $56^{\text {th }}$ 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 $56^{\text {th }}$ 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, 1 have met with the Rose City Park Neighborhood Association (RCPNA) Land Use Committee and RCPNA Board. Both bodies voted at recent meetïngs 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 $56^{\text {th }}$ Avenue consists of approximately 12,800 SF ( $100^{\prime} \times 128^{\prime}$ ) of land located on the west side of $56^{\text {th }}$ 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 Blyd., 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. $56^{\text {th }}$ Ave. to the northeast, the dental office across $56^{\text {th }}$ Ave, to the northeast, and the church and German American Soclety 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 $56^{\text {th }}$ 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-feferenced 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 easlly support greater residential density near the NE Sandy Blvd. Transit Coridor.

Although there is a need for higher density residential, I am sensitive to the desire for commercial space not to pushinto lower density residential zones. Just to the south of my property, $56^{\text {th }}$ 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.


## Existing Zoning



Current Comprehensive Plan Draft


CG/CS to MU-CC

R1 to MU-CC
in $^{-4}$ Subject Property 2537 NE 56th Ave

## Proposed Revision to Comprehensive Plan



WG/CS to MU-CC
R1
23 Proposed Additional
R1 to MU-CC
5" Subject Property I_」 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 owrer 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 $23^{\text {rd }}$ 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 $23^{\text {rd }}$ 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 $23^{\text {rd }}$ 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.


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


## Current Comprehensive Plan Draft



## CS to Mu-UC

[-1 Subject Property 2250 NW Flanders St

## Proposed Revision to Comprehensive Plan



UNION PACIFIC RAILROAD
301 NE $2^{\text {nd }}$ Avenue Mike Eliason Director, Public Affairs
Portland, Oregon 97232
P 5032493079
C 5032016788
F 4022333162
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 abovereferenced 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.

Mike Eliason
Director, Public Affairs

## Arevalo, Nora

| From: | Spencer George [geospence@comcast.net](mailto: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

| From: | Kay [kaybyrne1003@yahoo.com](mailto:kaybyrne1003@yahoo.com) |
| :--- | :--- |
| Sent: | Wednesday, January 06, 2016 10:18 AM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Re: Mixed use on Halsey |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Flagged |

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](mailto: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](mailto: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
$>$
> Sent from my iPhone

## Arevalo, Nora

| 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

## Arevalo, Nora

| From: | Susan Rotramel [rotes@nwlink.com](mailto: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 122 nd 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](mailto: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: | Foilow 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, Portiand, 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, l'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

## Arevalo, Nora

| From: | Mary Coolidge [mcoolidge@audubonportland.org](mailto:mcoolidge@audubonportland.org) |
| :--- | :--- |
| Sent: | Wednesday, January 06, 2016 7:14 AM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Fwd: Comprehensive Plan 2035 Written comments |
| Attachments: | CompPlanWrittenTestimony.pdf |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Completed |

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
$\qquad$ Forwarded message
From: Mary Coolidge [mcoolidge@audubonportland.org](mailto: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 [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov), nick@portlandoregon.gov
Cc: Bob Sallinger [bsallinger@audubonportland.org](mailto:bsallinger@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
www.audubonportland.org

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
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](mailto:molinaroarchitect@gmail.com)
Sent:
To:
Subject:
Wednesday, January 06, 2016 5:46 AM
BPS Comprehensive Plan Testimony
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.

#  <br> ASSOCIAT1ON <br> The Votse of Oregon Banking - Shuco 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 drivethrough facllities. 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.

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

Arevalo, Nora

## From:

Sent:
To:
Subject:
Attachments:
Follow Up Flag:
Flag Status:

James Scott Coon
7320 NE Sacramento Street
Portland, OR 97213

Jim.Coon@Ferguson.com
Wednesday, January 06, 2016 7:35 AM
BPS Comprehensive Plan Testimony
FW: City of Portland " 2035 Comprehensive Plan Testimony"; My Letter Resent with full name and address per City of Portland's request
201601051600.pdf

Follow up
Completed

Mayor Charlie Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
1221 SW $4^{\text {th }}$ 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.


7320 NE Sacramento Street
Portland, Oregon 97213

Portland Commission On Disability

Executive Committee Lavaun Heaster Chair Suzanne Stahl Vice Chair

Joe VanderVeer Chair Emeritus Rick Hammond

Philip Wolfe

## 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.

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.
- 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.

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 62015
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<br>Chair<br>Linnton Neighborhood Association

Linnton Employment Area Zoning


DATE: December 14, 2015

TO: Portland City Council
FROM: $\quad$ Neighborhood Coalition Leaders and Staff

## RE: <br> 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 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 presentede.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
- 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.


## 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 ${ }^{1}$


## 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.

[^30]
## From:

Sent:
To:
Subject:

## Follow Up Flag: <br> Flag Status:

Marinace, Leanne [leanne.marinace@intel.com](mailto:leanne.marinace@intel.com)
Tuesday, January 05, 2016 1:09 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony

Follow up
Completed

To Whom it May Concern -
Regarding Stroheckers 2855 SW Patton Road, Portland, OR 97201
I, 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 5 pm 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

## Arevalo, Nora

| From: | Kristin Hoobler Morgan [hooblermorgan@gmail.com](mailto:hooblermorgan@gmail.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 11:42 PM |
| To: | 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

## Arevalo, Nora

## From:

Morgine Jurdan [morgine@tds.net](mailto:morgine@tds.net)
Sent:
To:
Subject:

## Follow Up Flag:

Flag Status:

Tuesday, January 05, 2016 10:58 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony
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)

## Arevalo, Nora

| From: | Tony Jordan [twjordan@gmail.com](mailto: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](mailto:steve.schmitt@doitbest.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 9:27 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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](mailto:steve.schmitt@doitbest.com)
Date: January 5, 2016 at 8:58:54 PM PST
To: [cputestimony@portlandoregon.gov](mailto: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](mailto:marafarrington@yahoo.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 9:23 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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

## Arevalo, Nora

From:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Sheila Schmitt [sheschmitt@gmail.com](mailto:sheschmitt@gmail.com)
Tuesday, January 05, 2016 9:22 PM
BPS Comprehensive Plan Testimony
Comprehensive plan testimony
Follow up
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

## Arevalo, Nora

| From: | martha ireland [maire36@gmail.com](mailto:maire36@gmail.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 8:16 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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

## Arevalo, Nora

| From: | Chris Walsh [chriswalsh72@gmail.com](mailto: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 15 th 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.

## Arevalo, Nora

| From: | Taylor Hall [tayhall99@hotmail.com](mailto:tayhall99@hotmail.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 7:35 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive plan testimony Jan 5 |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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.

## Arevalo, Nora

| From: | Linda Kapian [Ickap@hotmail.com](mailto:Ickap@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

## Arevalo, Nora

From: Melissa Naito [melissa@naitodev.com](mailto:melissa@naitodev.com)
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Follow up
Tuesday, January 05, 2016 6:40 PM
BPS Comprehensive Plan Testimony
keeping Strohecker's a commercial establishment

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, lam 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

## Arevalo, Nora

| From: | Keith Johnson [houseofkeith@gmail.com](mailto:houseofkeith@gmail.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 6:19 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 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

## Arevalo, Nora

From: Christine Farrington [christinefarrington@me.com](mailto:christinefarrington@me.com)
Sent: Tuesday, January 05, 2016 6:14 PM
To: BPS Comprehensive Plan Testimony
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: Follow up
Flag Status: 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

## Arevalo, Nora

From: . Haig Valenzuela [tavli54@hotmail.com](mailto:tavli54@hotmail.com)
Sent: Tuesday, January 05, 2016 5:07 PM
To: BPS Comprehensive Plan Testimony
Subject:

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 $52^{\text {nd }}$.
\#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 $53^{\text {rd }}$ 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 $54^{\text {th }}$ 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 $4^{\text {th }} .97213$
503-281-2605

## Arevalo, Nora

| From: | Nevenka Ánastas [nevenkee@gmail.com](mailto:nevenkee@gmail.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 4:18 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive Plan Testimony |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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 $4^{\text {th }}$ 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 $41^{\text {st }}$ and $43^{\text {rd }}$ 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 as-is. R2 designation takes advantage of proximity to Multnomah Blvd. and Capitol bus transit, Multnomah and SW 45 ${ }^{\text {th }}$ 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,

January 5, 2016

Council Clerk
City of Portland, Oregon
1221 SW 4 ${ }^{\text {th }}$ 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 $41^{\text {st }}$ and $43^{\text {rd }}$ from R7 to R2, to expand additional residential development (see map):


A change to $R 2$ is appropriate for this area:

- Area is currently adjacent to R2 zones on 3 sides, and multiple lots in the area are an existing $R 2$ use.
- Existing infrastructure can support R2's higher density as-is. R2 designation takes advantage of proximity to Multnomah Blvd. and Capitol bus transit, Multnomah and SW 45 ${ }^{\text {th }}$ 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.
Mailing: 121 SW Morrison St., Suite 875
Portland, OR 97204
Portland, OR 97219
503-330-3388
don@allentrust.com

From:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Jennifer Andres [jakandres@yahoo.com](mailto:jakandres@yahoo.com)
Tuesday, January 05, 2016 3:38 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan testimony
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

## Arevalo, Nora

From:

## Sent:

To:
Subject:
Follow Up Flag:
Flag Status:

Steve Ritchie [Steve.Ritchie@PACCAR.com](mailto:Steve.Ritchie@PACCAR.com)
Tuesday, January 05, 2016 3:25 PM
BPS Comprehensive Plan Testimony
[User Approved] Stroheckers
Follow up
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.

## Steue Ritchie

3833 SW Greenleaf Dr.
Portland. OR. 97221
Cell (425) 830-8427

## Central ${ }^{\text {Northeast }}$ Neighbors, inc. <br> 4415 NE $87^{\text {th }}$ Ave * Portland, OR 97220-4901 <br> 503-823-3156

December 7, 2015 (Transmitted January 5, 2016)
City of Portland
City Council karla.moore-love@portlandoregon.gov
1221 SW 4th
Portland, OR 97204

CC: Susan Anderson, BPS Director, Susan.Anderson@PortlandOregon.gov
Leah Treat, PBOT Director, Leah.Treat@portlandoregon.gov
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, Chair


# Central NE Neighbors <br> Board of Directors Meeting Minutes (DRAFT) <br> 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* <br> 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 $\mathrm{http}: / / \mathrm{www}$.portlandoregon.gov/bps/67728 Contact Dave at Cullyguy@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. $8^{\text {th }}$ 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 $7^{\text {th. }}$ 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 $28^{\text {th }}$ 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 $4 \cdot 3: 30-7: 30 \mathrm{pm}$ Beaumont Business Association Fremont Holiday Fest with Mr \& Mrs. Claus attending. December $14 \cdot 7: 00-8: 30$ 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 $3^{\text {rd }}$ 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 $12^{\text {th }}$ from $9-2 \mathrm{pm}$, we will have the new SAN Lot Sign dedication on that day.

## 8. New Business

9. Old Business

Support letter for l-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* $8: 30 \mathrm{pm}$

Move to adjourn Bob Ueland, second Doug Fasching and unanimous approval


## Arevalo, Nora

| From: | Margaret Terrall [mterrall@comcast.net](mailto:mterrall@comcast.net) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 2:44 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | 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
Margaret Terrall
503-292-3626
cell 503~784-2560
mterrall@comcast.net

## www.margaretterrall.com

Holiday @ the Oregon coast?
www.vrbo.com Property \#187233

## Arevalo, Nora

| From: | Helen Townes [helen_townes@yahoo.com](mailto:helen_townes@yahoo.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 2:33 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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.

Please add this to the record.
Thank you,
(Your Name) Fred and Claudine Stock
(Your Address) 7035 SW 34 ${ }^{\text {th }}$ 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](mailto:annmarieandrobert@yahoo.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 1:40 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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 |
| Flag Status: | Completed |

## 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

## Arevalo, Nora

| From: | Liz Risch [lizzyrisch@yahoo.com](mailto:lizzyrisch@yahoo.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 1:03 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive Plan Testimony 2855 SW Patton road |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Completed |

1984 is Ordinance No. 155609.
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 the residents of our area would appreciate and back.

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 Taibot Rd
Portland OR 97201

Sent from my iPad


Northrast Coalition of NeIghborhoods

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.

## www.necoalition.org

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

## Arevalo, Nora

From:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Hilary O'Hollaren [oholiaren@comcast.net](mailto:oholiaren@comcast.net)
Tuesday, January 05, 2016 12:34 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony
Foilow up
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

## Arevalo, Nora

| From: | Joan L.Kirsch [joanikirsch@comcast.net](mailto:joanikirsch@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<br>joanlkirsch@comcast.net 4610 S.W.Greenhills Way Portland, Or. 97221<br>503-228-9320

## Arevalo, Nora

| From: | Gabe Schiminovich [Gabriel.Schiminovich@mfin.com](mailto:Gabriel.Schiminovich@mfin.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 11:00 AM |
| To: | BPS Comprehensive Plan Testimony |
| 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

## Arevalo, Nora

| From: | Mary O'Connor [marycaroloconnor@gmail.com](mailto: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

## Ordinance 187832, Vol. 1.3.J, page 7645

## Council Clerk

1221 SW $4^{\text {th }}$ 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 $92^{\text {nd }}$ Ave. Portland, OR 97220

## Council Clerk

1221 SW $4^{\text {th }}$ 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 $1 / 4$ mile of the Max Transit Station area at $162^{\text {nd }}$ 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 ail 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.


[^31]```
From: Robert Synak (US - Advisory) <robert.synak@pwc.com>
Sent: Tuesday, January 05, 2016 9:55 AM
To: BPS Comprehensive Plan Testimony
Subject: Comprehensive Plan Testimony
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 5032412891
Mobile: +19175399423
robert.synak@pwc.com
The information transmitted, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited, and all liability arising therefrom is disclaimed. If you received this in error, please contact the sender and delete the material from any computer. PricewaterhouseCoopers LLP is a Delaware limited liability partnership. This communication may come from PricewaterhouseCoopers LLP or one of its subsidiaries.

| From: | Louisa Neumann [louisa@louisaneumann.com](mailto:louisa@louisaneumann.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 6:08 AM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Ordinance \#155609 Strohecker's Grocery Store SW Portland Heights |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Completed |

To Whom It May Concern,
I understand 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 $3 x$ 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

## Arevalo, Nora

| From: | Dave Preston [david.I.preston@gmail.com](mailto:david.I.preston@gmail.com) |
| :--- | :--- |
| Sent: | Tuesday, January 05, 2016 5:51 AM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | blytheolson@gmail.com |
| Subject: | Comprehensive Plan Testimony Strohecker's property |
| Follow Up Flag: | Follow up |
| Flag Status: | 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

## Arevalo, Nora

| From: | Shriver, Katie |
| :--- | :--- |
| Sent: | Monday, February 01, 2016 12:10 PM |
| To: | 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 [baack@q.com](mailto:baack@q.com)
Cc: Shriver, Katie [Katie.Shriver@portlandoregon.gov](mailto:Katie.Shriver@portlandoregon.gov); Hales, Charlie [Charlie.Hales@portlandoregon.gov](mailto:Charlie.Hales@portlandoregon.gov); Alpert, Josh [Josh.Alpert@portlandoregon.gov](mailto:Josh.Alpert@portlandoregon.gov); Novick Steve [stevenovick96@gmail.com](mailto: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](mailto:Charlie.Hales@portlandoregon.gov); Alpert, Josh [Josh.Alpert@portlandoregon.gov](mailto:Josh.Alpert@portlandoregon.gov); Nebel, Erika [Erika.Nebel@portlandoregon.gov](mailto:Erika.Nebel@portlandoregon.gov); Novick Steve [stevenovick96@gmail.com](mailto: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 201615 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 201615 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 201615 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. 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 201615 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 201615 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 201615 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 1405 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 201615 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

## $\frac{\text { COLUMBIA CORRIDOR }}{\text { AS S O C I A T I O }}$

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


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

## $\frac{\text { COLUMBIA CORRIDOR }}{\text { AS } \mathrm{S}}$

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 4 ${ }^{\text {th }}$ 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 yacant), 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.

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 imappropriate. 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 <br> Change <br> Number | Existing <br> Use | Existing Plan | Proposed <br> Plan | Existing Zoning | Proposed <br> Zoning |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| 907-915 <br> SW Gibbs | 1144 | Retail | Urban <br> Commercial | Mixed Use <br> Dispersed | Commercial <br> Storefront | CMI |
| 825 SE <br> 60 th | 254 | Vacant | Office <br> Commercial | Mixed Use <br> Dispersed | Commercial <br> Office -1 | CM1 |
| $60^{\text {th } \&}$ <br> Belmont | 254 | Vacant | Office <br> Commercial | Mixed Use <br> Dispersed | Residential 5,000 <br> Square foot lots <br> (R-5) | CM1 |

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 indiyidual 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 belieye the properties at $60^{\text {ti }}$ 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 $60^{\text {th }}$ and SE Belmont is comprised of two adjacent properties. The city identifies one as 825 SE $60^{\text {lh }}$ Ayenue and the other as SE $60^{\text {th }}$ 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 desiguation 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
mepmanmandi ve the prati uesghanuit is hat property owners wouta de required to go through the 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 CMI and CE, which allow maximum heights of $35^{\prime}$ and $45^{\prime}$ 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 $60^{\text {th }}$ 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 desiguations, CM 1 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 $60^{\text {th }}$ 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 potentiat 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
wirtopunente mat we have suonhtue to the rannmg commission regarang these same issues, dated
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.


Richard Piacentini
Belmar Properties

## Attachments

Cc: Marty Stiven, Stiven Planning \& Development Services, LLC. Mike Robinson; Perkins Cole

November 16, 2015

City of Portland Bureau of Planning and Sustainabillty
Attn: Mixed Use Zones Project
1900 SW $4^{\text {th }}$ 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 famlly including those in the following ownerships:

- Rosehill Investment, LLC
- Siena Capital, LLC
- John B. Placentini Trust
- Louise Piacentini
- J\&F Investments, LTD

We applaud the city in its effort to revitalize the existing commereial 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 $122^{\text {nd }}$ 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
```

Existing and Proposed Zoning
Drive-Through Allowances

| Address | Existing <br> Zoning | Drive-through <br> Allowed | Proposed <br> Zoning | Drive-Through <br> 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 | CG | Yes | CE | Yes |
| $11030 ~ N W ~ S t . ~ H e l e n s ~$ <br> Road | CG | Yes | CM2 | No |
| 4504 SE 122 nd 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 Potentia! Existing and Proposed Zoning

| Addres5 | Existing <br> Zoning | Proposed <br> Zoning | Requested <br> 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 |
| 1930E Burnside | CS | CM2(d)(m) | CM3 |
| 1206 SE Beimont | 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 belov:

## $60^{\text {th }}$ and Belmont

These two vacant properties are located at the northeast corner of $60^{\text {th }}$ and Belmont. On the nerthwest corner is a single story pharmacy. However, both the southeast and the southvest corners are developed with properties in excess four and flve 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 Dlvision
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 reductlon in development potential and allowed uses. The propertles 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 <br> Existing and Proposed Zoning <br> Design Overlay |
| :--- |
| Address Existing <br> Zoning Proposed <br> Zoning <br> 2038 SE Division CG CM2 (d) <br> 2983 SE Belmont CS CM2 (d) <br> 2730 NE Glisan CN2 CM2(d) <br> 1930 E Burnside CN2 CM2(d) <br> 1206 SE Belmont CN2 CM2(d) <br> 3320 NE Sandy Boulevard CS(d) CM3(d) <br> 9101 N. Lombard CS(d) CM2(d) <br> 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 identifled 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 <br> Zoning | Proposed <br> Zoning | Proposed Plan <br> District | Preferred <br> Zoning |
| :--- | :--- | :--- | :--- | :--- |
| 4904 N Lombard | CS | CM2 | None | CM2 |
| 3506 SE 52nd | CG | CM2 $(\mathrm{m})$ | None | CM2 |
| 16226 SE Division | CG | CM2 $(\mathrm{m})$ | None | CE |
| 7210 SE Milwaukie | CS | CM2 $(\mathrm{m})$ | None | CM2 |
| 3425 SW Multnomah Blvd. | CS | CM2 $(\mathrm{m})$ | None | CM2 |
| 2270 NW Glisan | CS | CM2 $(\mathrm{m})$ | None | CM3 |
| 1930 E Burnside | CS | CM2 $(\mathrm{d})(\mathrm{m})$ | None | CM3 |
| 2730 NE Glisan | CS | CM2 $(\mathrm{m})$ | None | CM2 |
| 2038 SE Division | CS(j) | CM2 | Division Street | CM3 |
| 3320 NE Sandy | CS(j) $)^{*}$ | CM3 | Sandy Boulevard | CM3 |

*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 overlayzone 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 Setbocks

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.

## Plon Olstricts

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 mlxed 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 Revlew. 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 trulysours,

Richard Piacentini
Beimar 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 $4^{\text {th }}$ Avenue, Suite 7100
Portland, OR 97201

Dear Chairman Baugh and Members of the Commission,
My name is Richard Piacentini and I am 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:

- Rosehill investment, LLC
- Siena Capital, LLC
- John B, Piacentini Trust
- Loulse 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 occupled 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-Pfan 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.

```
2001 SIXTH AVENUE-SUlTE 2300
    SEATTLE, WASHINOTON 98121
PH 206.448.1975 1 FX 206.448.197B
richardip oblraarprop, com
```

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 $60^{\text {th }}$ 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 elther a designated center or corridor. That means that for propertles 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 avallability 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 restrictlve CM1.

Specifically, we believe the vacant property at $60^{\text {th }}$ and Belmont and the property at 915 SW Gibbs are suitable for a zone that allows greater development intensity. The site at $60^{\text {th }}$ 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 owner's 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 $60^{\text {th }}$ 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 CM 2 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 Mlxed 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 $60^{\text {th }}$ 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
planung stan as mey reme the zonng concepts that nave been made avallable to the public. We are continuing to work with the neighborhood planners on map designations and design concepts, but belleve 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.


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](mailto:Karla.Moore-Love@portlandoregon.gov)
Cc: Kincaid Maryhelen [jamasu88@msn.com](mailto:jamasu88@msn.com); Molinaro, Michael [molinaroarchitect@gmail.com](mailto:molinaroarchitect@gmail.com); Commissioner Saltzman [dan@portlandoregongov.onmicrosoft.com](mailto:dan@portlandoregongov.onmicrosoft.com); Grumm, Matt [Matt.Grumm@portlandoregon.gov](mailto:Matt.Grumm@portlandoregon.gov); Pellegrino, Martha
[Martha.Pellegrino@portlandoregon.gov](mailto:Martha.Pellegrino@portlandoregon.gov); McCullough, Robert [Robert@mresearch.com](mailto:Robert@mresearch.com); Jordan Tony [twjordan@gmail.com](mailto:twjordan@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 ... Theproperty 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 (http://www.oregonlive.com/portland/index...), 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

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 Richmond20h 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 l'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.

Thank Flag
Andrea and Ben thanked Kelly

## 2

## Nancy Matela from Inner Mount Tabor20h 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 $40^{\prime}$ on my property (and up to $85^{\prime}$ 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 lvy St and to the west across Williams is being mapped as CM 3 , 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.


Rick Michaelson



## WILLIAMS AVENUE ZONING OPTIONS

|  | FAR | HEIGHT | SIDEYARD <br> SETBACK | DESIGN REVIEW/ <br> NEIGHROHOOD CONTACT |
| :--- | :--- | :--- | :--- | :--- |
| RX | 4 to 1 | $85^{\prime}, 65^{\prime}, 40^{\prime}$ PER COUNCIL | $0^{\prime}$ | design review |

## Arevalo, Nora

| From: | Joanne M.Klebba [hljk@pdx.edu](mailto:hljk@pdx.edu) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 10:15 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Stroheckers, Ordinance No. 155609 |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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: klebbaj@pdx.edu
Telephone: 503-827-8575

## Arevalo, Nora

| From: | Danielle Erb [dierb716@gmail.com](mailto:dierb716@gmail.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 8:37 PM |
| To: | 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

| From: | Stephen Effros [stepheneffros@mac.com](mailto:stepheneffros@mac.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 6:29 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | Suzanne Pardington |
| Subject: | Comprehensive Plan Testimony - 60th Ave. Station Area Rezoning |
|  |  |
| 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 shouid 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 NE 58th Ave.

## Arevalo, Nora

| From: | Sue Hatt [suehatt@gmail.com](mailto: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; <br>  <br> Commissioner Fish |
| Subject: | Truth in Zoning |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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 eases, the afternative development options-allowed in single-dwelling residential zones (e.g- duplewes -and-atfaehed houses-on-corner-lots; aeeessory-dwelling units)-mey allow addifional residenfial inits beyondthe general density deseribed 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,

Susan M. Hatt
7037 SW 33rd Place, Portland OR 97219

Ordinance 187832, Vol. 1.3.J, page 7683

## Arevalo, Nora

| From: | Sue Hatt [suehatt@gmail.com](mailto:suehatt@gmail.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 4:34 PM |
| To: | Council Clerk-Testimony; BPS Comprehensive Plan Testimony |
| Cc: | Hales, Mayor; Commissioner Fritz; Commissioner Fish; Commissioner Novick; |
|  | Commissioner Saltzman; City Auditor Griffin-Valade; Anderson, Susan; <br> mnaLandUseCommittee@gmail.com |
| Subject: | Multnomah Village as Neighborhood Corridor |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | Completed |

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 $1 / 2$-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,
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.
Please add this to the record.
Thank you,

Tamara S. Markham
7025 SW 34th Aveniue
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: | Sue Hatt [suehatt@gmail.com](mailto:suehatt@gmail.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 4:29 PM |
| To: | Council Clerk-Testimony; BPS Comprehensive Plan Testimony |
| Cc: | Hales, Mayor; Commissioner Fritz; Commissioner Fish; Commissioner Novick; <br>  <br>  <br> Commissioner Saltzman; City Auditor Griffin-Valade; Anderson, Susan; <br> Subject: |
|  | mnaLandUseCommittee@gmail.com |
| Follow Up Flag: | Multnomah Village CS Zones |
| Flag Status: | Follow up |
|  | Completed |

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Please add this strongly held opinion to the record.
Thank you,

Susan M. Hatt
7037 SW 33rd Place, Portiand OR 97219
cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
Commissioner Amanda Fritz, Amanda@portlandoregon.gov
Commissioner Nick Fish, nick@portlandoregon.gov
Commissioner Steve Novick, nquick innathindoregon.go32, 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

Ordinance 187832 , Vol. 1.3.J, page 7689

| From: | Annie Dolle [dollewood@gmail.com](mailto: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: | Follow up |
| Flag Status: | 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

## 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.

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If the Village were designated a Neighborhood Center with a $1 / 2$-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,

Tamara S. Markham
7025 SW 34th Avenue
Portland, OR 97219
cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov

Ordinance 187832, Vol. 1.3.J, page 7691

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

## 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 optiens allewed in single-dwelling residential zenes (e.g. duplexes and attaehed heuses-en corner lets; accessery dwelling units) may alllow-additional residential units beyend the general density deseribed 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 R.2.5 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, LaVonne@portlandoregon.gov
Susan Anderson, Susan.Anderson@PortlandOregon.gov
MNA Land Use Committee, mnaLandUseCommittee@gmail.com

| From: | Jane Guyn [theguyns@gmail.com](mailto:theguyns@gmail.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 3:45 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Comprehensive Plan Testimony |
| Follow Up Flag: | Follow up |
| Flag Status: | Completed |

To Whom it May Concern,
Our Names: Jim and Jane Guyn
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](mailto:kkolding@gmail.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 3:13 PM |
| To: | 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

## Arevalo, Nora

| 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: | Follow up |
| Flag Status: | 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:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:

Doug Coates [doug.coates@coatesassociates.com](mailto:doug.coates@coatesassociates.com)
Monday, January 04, 2016 2:25 PM
BPS Comprehensive Plan Testimony
Strohecker's Grocery
Follow up
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

## Arevalo, Nora

| From: | WALTER BOHNSTEDT [walterb@teleport.com](mailto:walterb@teleport.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 2:22 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Rezoning of NE Shaver from R3 To R5 |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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

## Arevalo, Nora

| From: | Karen Livingstone [livekaren@gmail.com](mailto:livekaren@gmail.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 2:21 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | Strohs Closing |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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 $1 / 2$-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 Name) Fred and Claudine Stock
(Your Address) 7035 SW 34 $4^{\text {th }}$ Ave. Portland, OR 972.19

[^32]Ordinance 187832, Vol. 1.3.J, page 7701

| From: | Steve Russell [steve@steelbridgerealty.com](mailto:steve@steelbridgerealty.com) |
| :--- | :--- |
| Sent: | Monday, January 04, 2016 12:51 PM |
| To: | BPS Comprehensive Plan Testimony |
| Cc: | Stark, Nan |
| Subject: | Comprehensive Plan Testimony |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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 $18,515 \mathrm{sf}$ 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
2. 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.
3. 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
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. Insome cases, the alternative development options allowed in single-dwelling residential zones (e.g-duplexes and attached houses on cornerlots; 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 $34^{\text {th }}$ 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
Ordinance 187832, Vol. 1.3.J, page 7703

MNA Land Use Committee, mnaLandUseCommittee@gmail.com

Ordinance 187832, Vol. 1.3.J, page 7704

## Arevalo, Nora

| 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 |
| Flag Status: | Completed |

## 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 PattonBroadway 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](mailto: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 Nextdoor Southwest Hills 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 www.portlandoregon.gov/bps/mapapp. 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 cputestimony@portlandoregon.gov 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 $158^{\text {th }}$ 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 contidor would be re-zoned for high density. This has not occurred even though the East side Max line has been operating for more than $25 y$ years.

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 $1 / 4$ mile of the Max Transit Station area at 162 nd 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 tail line such as now exist along the N . Interstate Max line, which is due in large part to the current zoning testrictions. 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

## Arevalo, Nora

| From: | Jennifer Lyons [lyons@easystreet.net](mailto:lyons@easystreet.net) |
| :--- | :--- |
| Sent: | Sunday, January 03, 2016 10:19 PM |
| To: | BPS Comprehensive Plan Testimony |
| Subject: | comprehensive |
|  |  |
| Follow Up Flag: | Follow up |
| Flag Status: | 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

## Arevalo, Nora

From:
Sent:
To:
Subject:
Follow Up Flag:
Flag Status:
A. Rosenfeld [alisonrosenfeld@gmail.com](mailto:alisonrosenfeld@gmail.com)

Sunday, January 03, 2016 10:07 PM
BPS Comprehensive Plan Testimony
Comprehensive Plan Testimony
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

## Arevalo, Nora

| From: | Iffg1@comcast.net |
| :--- | :--- |
| Sent: | Sunday, January 03, 2016 9:19 PM |
| To: | BPS Comprehensive Plan Testimony |
| 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

## Arevalo, Nora

| From: | Christine Yun [cpypdx@gmail.com](mailto: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 CMI |
|  |  |
| 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:
Sent:
To:
Subject:

## Follow Up Flag:

Flag Status:

DONNA HARRIS Owner [donna.harris1900@q.com](mailto:donna.harris1900@q.com)
Friday, January 01, 2016 12:23 PM
BPS Comprehensive Plan Testimony
[User Approved] Rezoning Request to R5 involving East property on NE 122nd Avenue and Shaver - Argay Downs Neighborhood

Follow up
Completed

Please consider rezoning the area East of 122 nd 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


[^0]:    ${ }^{1}$ Monitoring stations do not directly affect air quality but do allow for on-going evaluation of air qualit ithrddnanceols 7832 , Vol. 1.3.J, page 6826

[^1]:    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.)

[^2]:    Portland Freight Committee $\mathbf{1 1 2 0}$ SW Fifth Avenue, Room 800 - Portland OR 97204

[^3]:    Susan Lindsay
    Co-Chair, Buckman Community Association

[^4]:    Stronger Together

[^5]:    ${ }^{1}$ Monitoring stations do not directly affect air quality, but do alloy for on-going eyaluation of air quality mitigation efforts.

[^6]:    ${ }^{1}$ 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.

[^7]:    Denise Hare

[^8]:    ${ }^{1}$ 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.

[^9]:    ' 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 downzoning 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/.

[^10]:    ${ }^{2}$ The Portland Planning and Sustainability Commission is recommending that Eastmoreland not be down zoned from R5 to R7. HLA supporis this recommendation.

[^11]:    (", illey Oehlke | Director $\mid$ Multnomah County Library
    (19 NE 19th. Ave, Portland, OR 97232|503.988.5403
    www.facebook.com/multcolib $1 @ M u l t C o L i b \_D i r$

[^12]:    "Increase effective shade through restoration and protections; Restore natural stream hydrology and cool water refuges and wetlands; Increase natural stream flow." ${ }^{4} 2015$ Climate Action Plan Summary, page 14, https://www.portlandoregon.gov/bps/article/531994
    "Building resilience and improving the health of our natural systems, including urban trees, open spaces, rivers, streams and wetlands, and the fish and wildife that rely on them." Collins View Neighborhood Association letter of support for Riverview Natural Area management plan

[^13]:    ${ }^{1}$ Portland Neighborhood Coalition Directors and Chairs Group's Comments Regarding Community Engagement, Neighborhood Coalition Leaders and Staff, December 10, 2015.

[^14]:    ${ }^{2}$ One two lot corner is zoned R2.5.

[^15]:    ${ }^{3}$ Request for Land Use Zone Change from R5 to R7 for areas within the Eastmoreland Neighborhood Association Boundary, Robert McCullough, December 20, 2013.
    ${ }^{4}$ Re: Request for Comprehensive Plan Map and Zoning Map Changes in Eastmoreland, Eric Enstrom, April 28, 2014.

[^16]:    ${ }^{5}$ Memo to the Planning and Sustainability Commission, Deborah Stein, February 25, 2014, page 19.
    6 "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.
    ${ }^{7}$ 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.

[^17]:    ${ }^{8}$ Ibid., page 5.
    ${ }^{9}$ Ibid., page 17.
    ${ }^{10}$ Ibid., page 37.
    ${ }^{11}$ Ibid., page 24.

[^18]:    ${ }^{1}$ Source: screenshot from Eastside Max Station Community Project Document: http://efiles.portlandoregon.gov/Record/4214856/File/Document/

[^19]:    ${ }^{2}$ Source: Screenshot from PortlandMaps Beta. Distance between structures estimated using Google Earth.
    Page 2 of 3 Comprehensive Plan Comments for 6134 NE Davis

[^20]:    $2 \mid$ ECONorthwest

[^21]:    
    
    nrenow with Kiw in
    Intervicew with Katy Brooks, Port of Vanctouver, Murch $\$ 2015$.

[^22]:    
    
    It interviow with Steve Oakes, Cal omouble Tenco ste's rati cmpazaty. December 13.2013.
    
     plantsorogont.
    'Interview with Tony Flagg. Unied Grain Corporasion, March 16, 2015.
    
    
    

[^23]:    4|ECONorthwest

[^24]:    
    
    
    Interiow with Katy Brooks. Port of Vancouvar. March 5.2015
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[^25]:    Minarview with Joanifor Riddfo, Tid awator 8argo Linas. March 31, 2215: estumstes by ECONorthwest.
    intervow with Tomy Flogg. United Grein Corporation, March 16, 2015,
     mintaniaw with Neil Maunu, Kimder Margen Bulk Toemansl. Mareth to. 2015 .
    
    
    
     post/Sauth-Rivmignto-RaíhYerd-Expansion-Boosta-Flow-ot-Exportmasp

[^26]:    
    
    
    Intionverw with Rob Rach, Shover Tramporization Company. March 31, 2015
    

[^27]:    ${ }^{1}$ Washington Holdings acquires, develops, manages and invests in real estate in the westem United States. Westem Holdings currently owns approximately 1.5 million square feet of real estate in the Portand metropolitan area. http://www.waholdings, com/

[^28]:    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 smoll 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.

[^29]:    Don Forrest Taud
    Cc: Tom Armstrong, BPS
    Eric Engstrom, BPS
    Susan Anderson, Director, BPS
    RTF/ICSC GR Committee

[^30]:    ${ }^{1}$ Monitoring stations do not directly affect air quality, but do allow for on-going evaluation of air quality mitigation
    efforts.

[^31]:    Scott Collins

[^32]:    cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
    Commissioner Amanda Fritz, Amanda@portlandoregon.gov
    Commissioner Nick Fish, nick@portlandoregon.gov
    Commissioner Steve Novick, novick@portiandoregon.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

