

December 31, 2015

Mark D. Whitlow
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VIA EMAIL

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

Re: 2035 Comprehensive Plan Testimony - RTF & ICSC

Dear Mayor Hales and Council Members:

This letter is 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 letter a part of your record of proceedings.

The RTF participated in the City's Zoning Code Rewrite Project from 1989-1991. The RTF was then concerned about the extent of commercial lands appropriate for retail development being subjected to restrictive pedestrian and transit-friendly development standards ahead of the market. The RTF and ICSC have the same concerns with the current proposal. All of the City's commercial lands will become non-conforming, which is a huge problem for property owners and business operators. Non-conformity stifles redevelopment because it jeopardizes the ability to sell and finance non-conforming property. The current retail market needs convenient access and adequate off-street parking, which would not be allowed by the proposed mixed-use zones. Constant planning pressure to eliminate needed off-street parking, especially where inadequate transit services or ridership is in place, is not equitable to retailers and defeats the notion of supporting "local access to healthy food" in neighborhoods. In fact, it will make access to affordable good and services, including healthy food, more difficult.

The RTF and ICSC submit that the root cause of the problem is the lack of any clear retail commercial policy in the City's past, current or proposed comprehensive plans.¹ Without an articulated retail policy to guide the City's planners, the City's zoning code is deficient of zones that allow commercial retail use and development needed to provide affordable daily goods and services to Portland's neighborhoods. This lack of land zoned for retail uses has also been

¹ See attached correspondence from 1989 between the RTF and the Portland Planning Commission regarding the lack of general commercial land needed. See other attached correspondence between then-Commissioner Blumenhauer and then-Planning Director Robert Stacy who agreed with the RTF that a retail zoning study and policy was needed.

recognized by the City through the efforts of the Portland Development Commission to study the problem. See the attached study by Leland Consulting Group.

The RTF and the Oregon GR Committee for ICSC hereby request that the following statement of a clear, commercial retail policy be adopted into Chapter 6: Economic Development of the City's Comprehensive Plan, with appropriate references to it to be added throughout the various other chapters, and that a new discussion draft be issued for comment prior to adoption by the City:

New Policy – Retail Development. Assure competitive sites and a zoning framework that recognizes and supports the diversity of customer, employee and business needs for convenience, comparison and destination retail goods and services throughout the City of Portland, at locations readily accessible and convenient to residents, employment centers, and visitors to Portland. Commercial and mixed use zoning will facilitate the full range of needed retail products and services for all socio-economic groupings, especially in underserved areas of the City:

- a. Day-to-day convenience retailing including grocery, pharmacy, food service, banking, hotel and entertainment uses should be widely dispersed in formats readily accepted by customers, retailers and commercial service providers at locations conducive to multiple travel modes and reduced travel time.*
- b. Comparison retail for goods and services as for apparel, electronics, and home furnishings, are typically purchased on the basis of price and selection, requiring larger trade areas to achieve market thresholds, and should be located in areas and at sites appropriate to industry standards including a range of travel modes suitable for transporting the types of purchases being made.*
- c. Destination trips occur when tourists or residents of the metro region access a particular business or district based on reputation and quality of the shopping, dining, entertainment and/or lodging experience and should be sited at locations with high-frequency transit and/or auto service capability.*
- d. Clustering of commercial retail and service businesses drawing similar groupings of customers for multi-purpose (internal) trips with options for shared parking is to be prioritized wherever feasible.*
- e. Land use planning should promote the availability of affordable healthy food options throughout the City by facilitating development of medium- and high-sales volume grocery options; discount and value-based retail appropriate to resident budgets also is to be encouraged, especially in underserved neighborhoods.*
- f. Both new development and upgrading of existing retail facilities will be accommodated at a cost structure affordable to owners as consistent with neighborhood and trade area land values, supportable sales volumes and building rents.*

- g. Adjust FAR, parking, building design and mixed use standards to market thresholds consistent with existing availability of high-frequency transit and mode share; prioritize market-based incentives for increased FAR and pedestrian/transit orientation rather than mandatory requirements.*
- h. Continue to encourage a range of full- and part-time retail sector employment opportunities fitting the increasingly diverse life-style and work objectives of Portland-area residents.*
- i. Involve the full-range of directly affected commercial/mixed-use stakeholders including property and business owners, developers and public service agencies in the initial determination and future adjustment to commercial/mixed use zoning and development standards.*

The RTF/ICSC GR Committee requests that the above retail policy be adopted as part of the City's economic development policies, with appropriate cross-references in other chapters. We are facilitating the submission of letters of concern from the retail industry. Enclosed is a letter from WinCo Foods, with other letters from owners, users, and their consultants to follow.

Please direct planning staff to issue a new discussion draft including the new retail policy in advance of the next round of public hearings.

Thank you for the opportunity to comment.

Very truly yours,



Mark D. Whitlow

MDW:sv

Enclosures

CCs (with enclosures):

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

WinCo FOODS

An Employee Owned Company

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

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

December 29, 2015

VIA EMAIL

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

Re: 2035 Comprehensive Plan Testimony

Dear Mayor Hales and Council Members:

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

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

Thank you for the opportunity to comment.

Yours truly,



Greg Goins
VP of Real Estate
WinCo Foods, LLC



CITY OF
PORTLAND, OREGON

BUREAU OF PLANNING

Earl Blumenauer, Commissioner
Robert E. Stacey, Jr., Acting Director
1120 S.W. 5th, Room 1002
Portland, Oregon 97204-1966
(503) 796-7700

Current Planning

Housing

Long Range Planning and Urban Design

Land Use Permits

February 9, 1990

Mark Whitlow, Attorney-at-law
c/o Bogle & Gates
1400 Koin Center
222 SW Columbia
Portland, OR 97201

RECEIVED

FEB 14 1990

BOGLE & GATES

Dear Mark:

As you may know, the Portland City Planning Commission finished voting on the Zoning Code Rewrite Project on January 19. As part of their final action, they voted to endorse the proposal of the Retail Task Force to do a commercial rezoning study. We will include this recommendation with the Zoning Code Rewrite package that we will send to the City Council. City Council is tentatively scheduled to begin hearings on the project in June. I would like to thank you and members of the Retail Task Force for your participation and suggestions in this important and multi-faceted project.

Staff agrees that a commercial rezoning study is desirable. As a separately funded work program, the study would be unlikely to be approved in this or the next budget cycle. This is because many other desirable programs previously proposed are still waiting for budget approval. However, I believe that a commercial rezoning study can be incorporated into some of our existing work programs such as the Albina Community Plan and our neighborhood planning studies. Folding the commercial rezoning study into these projects would allow us to begin work immediately.

The Albina Community Plan project covers a large portion of North and Northeast Portland. The project includes a reconsideration of the amount and placement of residential, commercial, employment, and industrial zones and will address the zoning issues raised by the commercial rezoning study.

Our Neighborhood Planning section has already begun working on neighborhood plans for the Buckman and Brooklyn neighborhoods. The staff is working with the Hawthorne, Belmont, and Milwaukie Business Associations. Representatives from these associations will be active participants in the development of the neighborhood plans. The process can include considerations of the amount and placement of commercial zones in these areas. The Neighborhood Planning section will begin new neighborhood plans as they finish with these neighborhoods. Planning for Brentwood-Darlington is scheduled to begin this spring, and a plan for Cully will begin in the summer.

Whitlow/Stacey Letter
February 9, 1990
Page 2

I see this approach as our best bet in getting a commercial rezoning study underway. In order to provide an overall framework for the study and to provide consistency in the approach, I propose that the Planning Bureau develop a white paper containing policy guidelines for commercial rezoning. This white paper could be presented to the City Council along with the Zoning Code Rewrite Project. Once approved, it could be a guiding document that would help provide balance and consistency as rezonings are considered in the different neighborhoods of the City. It may also be desirable to commission an independent market analysis of commercial land demands to guide the study.

I would like to invite your participation and that of members of the Retail Task Force in these Planning Bureau projects. Your insight and suggestions will provide valuable input and balance.

Sincerely,



Robert E. Stacey, Jr.
Acting Planning Director

RES:CP:ls

cc: Mayor Clark
Commissioner Blumenauer
Commissioner Bogle
Commissioner Koch
Commissioner Lindberg
Members of the Retail Task Force
Blanche Schroeder, Chamber of Commerce
Steve Dotterer, Transportation Planning
Michael Harrison, Planning Bureau
Robert Clay, Planning Bureau
Susan Feldman, Planning Bureau
Cary Pinard, Planning Bureau

BOGLE & GATES

LAW OFFICES

MARK D. WHITLOW

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222 S.W. Columbia
Portland, OR 97201

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(503) 222-1515
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Seattle
Anchorage
Bellevue
Tacoma
Washington, D.C.
Yakima

71276/04650

January 19, 1990

Commissioner Earl Blumenauer
1220 SW Fifth
Portland, OR 97204

Re: Retail Task Force
Commercial Zoning Policy Study
Budgetary Information

Dear Earl:

Thank you for your letter of December 21, 1989 regarding the above.

In response to your question, I am guessing that the special study requested by the Retail Task Force would require two staff persons half-time over a term of 18 months to conduct industry and neighborhood workshops, public hearings and the issuance of attendant staff reports. I and other members of the Retail Task Force would be happy to meet with you, Bob Stacey and Austin Chown to discuss the specifics regarding the scope and direction of the study as envisioned by the Retail Task Force.

The Task Force recognizes the budgetary constraints under which the City is now operating with respect to planning matters. However, the Task Force sincerely feels that the production of a more workable zoning map would substantially reduce the number of conflicts which now arise between adjacent commercial and residential uses. Accordingly, the Task Force believes that revising the City's zoning map would ultimately save money over time by reducing Planning Staff and administrative time now spent on processing contested land use hearings and appeals.

Enclosed, again, is a copy of the Task Force's November 17, 1989 letter to the Planning Commission detailing the reasons for the Task Force's request for a further study.

Please let me know if you need further information or the names of Task Force participants willing to meet to further discuss the issues.

Very truly yours,

BOGLE & GATES



Mark D. Whitlow

MDW:rgm

Enclosure

cc: Robert Stacey (w/enc.)

Austin Chown (w/enc.)

Task Force Participants

44/cor2.082

BOGLE & GATES

Ordinance 187832, Vol. 1.3.K, page 7721



CITY OF

PORTLAND, OREGON

DEPARTMENT OF PUBLIC WORKS

Earl Blumenauer, Commissioner
1220 S.W. 5th Avenue, Room 407
Portland, Oregon 97204
(503) 248-5577

December 21, 1989

Dear Mark:

Thank you for your letter regarding the Retail Task Force's position on the remapping issues and the attached materials which you submitted to the Planning Commission. I support the concept of the new study, but as you know the issue is finding adequate funding. My understanding is that the study you have requested will be contained in a budget request proposed at some point in the future.

I am pleased that you are interested in continuing to work in an advisory capacity to the City on issues which affect commercial and retail development. Your idea to dove-tail it with the Development Liaison expansion is an interesting one. I, too, am interested in appointing an advisory committee to work with the expanded work program in an effort to maintain ongoing communication and responsiveness.

Again, thank you Mark for all your help and input into these issues. I look forward to further refining the advisory committee concept with you.

Sincerely,

Earl Blumenauer

cc: T. Austin Chown
Bob Stacey

Mr. Mark Whitlow
222 S.W. Columbia, Suite 1400
Portland, Or. 97201

BOGLE & GATES

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MARK D. WHITLOW

Seattle
Anchorage
Bellevue
Tacoma
Washington, D.C.
Yakima

71276/04456

November 17, 1989

Planning Commission
c/o Code Rewrite Staff
Portland Bureau of Planning
1120 SW Fifth
Portland, OR 97204

Re: Zone Code Rewrite Project
Retail Task Force Code/Map Amendments
Supplemental Position Statement

Dear Commission Members:

The Rewrite Project was not designed to create new zoning policies. The Retail Task Force requests that the City conduct a comprehensive study to develop and implement new zoning policies for controlled future growth within the City.

New policies are critically needed to prevent the continued recurrence of conflicts between residential and commercial uses. These conflicts are inherent due to an archaic zoning map which places strips of commercial property immediately adjacent to low density residential property. The Rewrite Project makes an oblique effort to ameliorate those conflicts by down-zoning large areas of commercial land and imposing new commercial use and development regulations. That approach needs to be recognized as a bandaid that will not stick.

Commercial down-zoning and increased use and development regulations should be minimized pending a comprehensive study to develop new zoning policies and a workable zoning map. The new map and policies should encourage the designation of adequate land for viable commercial uses while encouraging adjacent high density residential development. Specifically, the new policies and map should:

- 1) Emphasize nodal rather strip commercial zoning;

1 - RETAIL TASK FORCE/SUPPLEMENTAL POSITION STATEMENT

(44/DOC.838)

2) Where appropriate, increase the depth of commercial zones from 100 feet to 200 feet or greater by enacting full block commercial zoning (requiring rezoning of property from residential to commercial);

3) Use high density residential and/or mixed use zones as a buffer between high intensity commercial zones and low density residential zones (up-zoning adjacent residential property from low to high density, thus exceeding the number of potential housing units lost by the contemporaneous rezoning from residential to commercial).

The City needs to appropriately plan for controlled future growth by providing for coordinated increases in housing density and the City's stock of commercially zoned property. The City should not continue to promote growth and development while its neighborhoods are encouraged to oppose new high density residential and commercial projects because of an outdated zoning map and policies.

The Retail Task Force, by the signatures appearing below, requests that a comprehensive new study be implemented to effectively plan for appropriately controlled future residential and commercial growth.

Thank you for your additional attention to this important matter.

Very truly yours,

BOGLE & GATES

Mark D. Whitlow -

Mark D. Whitlow

Retail Task Force Participants

Name

Company/Organization

William Wright

Portland Board of Realtors

David R. Rosenberg

BENEFIT FRON DEVELOPMENT

D. D. [unclear]

Schmitzer Investment Corp.

[unclear]

MACKENZIE/SATO/ASSOC. PC.

[unclear]

Richard [unclear]

2 - RETAIL TASK FORCE/SUPPLEMENTAL POSITION STATEMENT
(44/DOC.838)

BOGLE & GATES

Retail Task Force Participants

Name

Company/Organization

Louis Scott

Scott Associates, Inc.

Kenneth E. Winters

*SCOTT ASSOCIATES
Partnership Corporate Architect*

Wm. H. Swers

Swers Construction Co

Will Warr

Redford Properties

Stewart Klein

Three Oaks Development Co.

Trammell Crow Company

TRAMMELL CROW COMPANY

The Southland Corp

The Southland Corp

Hildner Properties Northwest

Arevalo, Nora

From: Mike Mitchoff <mike@portlandhouseworks.com>
Sent: Thursday, December 31, 2015 10:16 AM
To: BPS Comprehensive Plan Testimony
Subject: Comprehensive Plan Testimony
Attachments: Tacoma Street Comprehensive Plan Update.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Bureau of Planning and Sustainability,

As a lifetime resident and land owner of multiple contiguous parcels at Tacoma Street in Westmoreland, I would like to submit my testimony regarding a comprehensive plan zone change from R5 to R2 for the underutilized residential land adjacent to proposed change #1071. Please refer to the attached summary for specific parcels:

Please confirm receipt:

Thank you,
Mike Mitchoff
2211 SE Spokane St.
Portland, Oregon 97202
(503) 891-1999

Arevalo, Nora

From: Ashleigh Norment <ashleighnorment@gmail.com>
Sent: Thursday, December 31, 2015 7:46 AM
To: BPS Comprehensive Plan Testimony
Subject: FW: Zoning of property along Shaver east to Beech Park

Follow Up Flag: Follow up
Flag Status: Completed

From: Ashleigh Norment [mailto:ashleighnorment@gmail.com]
Sent: Tuesday, December 29, 2015 7:22 AM
To: 'cputestimony@portland.oregon.gov'
Subject: Zoning of property along Shaver east to Beech Park

Hello

I have recently purchased a condo at 4012 NE 125th Place in the Riverwood Condos. We love living here and have so enjoyed the livability of this neighborhood along with the convenience of connection to the city. We have heard that a part of the 2035 Comprehensive Plan calls for zoning the property along Shaver east to Beech Park as R3. In light of the number of people who call this area home, we ask that this area instead be reclassified as R5. We ask that priority be given to the current and future residents need for Argay Terrace to remain livable.

Thank you,
Ashleigh Norment and Tama October
4012 NE 125th Place
Portland, OR 97230

December 30, 2015

VIA ELECTRONIC MAIL
karla.moore-love@portlandoregon.gov

Portland City Council
1221 SW Fourth Avenue, #110
Portland, Oregon 97204

Re: Bureau of Planning and Sustainability's "Employment Zoning Project, Proposed Draft - September 15"

Proposed Amendments to Prime Industrial Overlay map and regulations for a 3.5 acre site on Hayden Island needed for a future regional boat ramp facility

Our File No.: 094452.0003

Dear City Council:

This firm represents Inland Sea Maritime Group LLC in the above matter.

In support of proposed amendments to facilitate a regional boat launch facility on Hayden Island, please enter the following documents in the record in these proceedings:

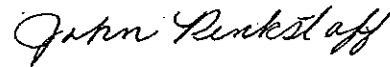
1. Lane Powell letter (with memorandum) to City Planning and Sustainability Commission dated 12/1/15;
2. Oregon State Marine Board (OSMB) letter dated 12/16/15 to City Planning and Sustainability Commission [Note**: this is new testimony received after the City P&S Commission's 12/8 meeting"].

Portland City Council
December 30, 2015
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Thank you for your consideration.

Very truly yours,

LANE POWELL PC



John C. Pinkstaff *mg*

JCP:mag
Attachments
cc: Client

094452.0003/6522498.1

December 1, 2015

VIA ELECTRONIC MAIL

Planning and Sustainability Commission
City of Portland
Attn: Steve Kountz
1900 SW Fourth Avenue,
Suite 7100
Portland, Oregon 97201

Re: Bureau of Planning and Sustainability's "Employment Zoning Project, Proposed Draft - September 15"

Proposed Amendments to Prime Industrial Overlay map and regulations to remove a 3.5 acre site at the northwest end of the city limits of Hayden Island needed for a future regional boat ramp facility

File No.: 094452.0003

Dear Commissioners:

This firm represents Inland Sea Maritime Group LLC with regard to the City of Portland's Bureau of Planning and Sustainability's proposed Prime Industrial Overlay map and regulation which are the subject of the "Employment Zoning Project, Proposed Draft-September 2015" (the "proposed Overlay").

Please enter this into the record in the above matter which is scheduled for a meeting on December 8, 2015.

Our client, along with two adjacent property owners, owns property which is the site of a proposed future 6-acre regional boat ramp facility on West Hayden Island at the northwest end of the city limits. The proposed regional boat ramp facility would be adversely affected by the City's proposed Overlay regulations.

Portland Planning and Sustainability Commission
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Attached please find a Memorandum which proposes amendments to the Overlay to remove a portion of the boat ramp facility site from the Overlay map or, in the alternative, to create a special provision to allow a regional boat launch facility approved by the Oregon State Marine Board (OSMB) as a permitted use in the Overlay zone.

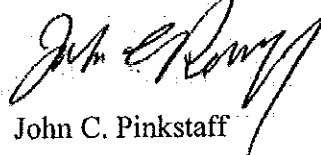
These amendments are warranted because the proposed regulations will substantially restrict and impede the ability to develop a public boat launch facility to meet the regional needs of the boating public, and the planned regional boat launch facilities on this area of Hayden Island will not conflict with development of Hayden Island's prime industrial land.

Please let me know if you have any questions or need anything further.

Thank you for your consideration.

Very truly yours,

LANE POWELL PC



John C. Pinkstaff

JCP:mag
Attachments
cc: Client

094452.0003/6497412.2

December 1, 2015

VIA EMAIL: psc@portlandoregon.gov
Steve.kountz@portlandoregon.gov

TO: Portland Planning and Sustainability Commission
Attn: Steve Kountz

FROM: John C. Pinkstaff

RE: Bureau of Planning and Sustainability's "Employment Zoning Project,
Proposed Draft- September 2015"

Proposed Amendments to Prime Industrial Overlay map and regulations to
remove a 3.5 acre site at the northwest end of the city limits of Hayden Island
needed for a future regional public boat ramp facility

FILE NO: 094452.0003

BACKGROUND: The City of Portland is currently proposing changes to the existing zoning regulations and zoning maps that, if adopted as currently written, would impose a "Prime Industrial Overlay" intended to protect industrial development capacity in Portland's freight hub districts by prohibiting and restricting certain types of non-industrial uses. The Bureau of Planning and Sustainability's "Employment Zoning Project, Proposed Draft- September 2015" (www.portlandoregon.gov/bps/employmentzoning) seeks to protect prime industrial land from siting for parks, among other non-industrial land uses, with a Prime Industrial Overlay map and regulations in order to plan for adequate developable land capacity to accommodate expected employment needs. (hereinafter "Prime Industrial Overlay") (See Proposed Prime Industrial Overlay Map and excerpts from City staff Memo re Employment Zoning Project dated November 6, 2015 Attachment 1).¹

The Prime Industrial Overlay map and regulations would apply to 3.5 acres owned by Inland Sea Maritime Group and Mr. James D. Liston needed for a proposed future regional boat ramp facility and park (hereinafter the "Property" or the "Site") (See maps of proposed Overlay boundary,

¹ Proposed 33.475.080 would allow recreational trails and boat launching areas not exceeding 2 acres, and those over 2 acres may be allowed through a conditional use review set forth in proposed 33.815.150.

Portland Planning and Sustainability Commission
Attn: Steve Kountz
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affected parcels, and proposed boat launch facility, Attachment 2).² The plan for the Site shows a proposed public park/public boat ramp and accessory facilities, trailhead access, restroom and interpretive center, and parking for cars and boat trailers and a realigned segment of Hayden Island Drive (hereinafter the "Plan", See Attachment 3).³ The boat launch facilities will serve the regional needs of the boating public.⁴ The Plan was

² The proposed future regional boat launch Site includes three ownerships:

(1) The property at 3255 N. Hayden Island Dr. in Portland. Approximately half of this property (Section 33 2N 1E TL 1400, 3.5 acres) is owned by Inland Sea Maritime Group (ISMG) and is developed with Schooner Creek Boat Works which is a boat building and repair facility. The remainder of this property is undeveloped (TL 1500 2.78 acres) and a small portion of TL 1500 is needed for the proposed boat launch facility. Both of these tax lots are owned by Inland Sea Maritime Group LLC. This has a base zone IG2, General Industrial. Both TL 1500 and 1400 are inside the proposed Prime Industrial Overlay (hereinafter "TL 1400" and "TL 1500" or the "ISMG Property").

(2) The adjacent property to the north (Section 28 2N 1E TL 100, 2.57 acres). This property is undeveloped and has a base zone of R2, Multi-dwelling Residential and is owned by SDP LLC & Canoe Bay LLC. The adopted Hayden Island Plan identifies this property as a new park for recreational opportunities for both residents and visitors to the island (See excerpt from Hayden Island Plan, Attachment 4). Due to its R2 zoning, Section 28 TL 100 is outside the proposed Prime Industrial Overlay (hereinafter "Sec. 28 TL 100" or the "SDP LLC & Canoe Bay LLC Property").

(3) A portion of the property across Hayden Island Dr. (Section 33 2N 1E TL 100, 3.79 acres) owned by James D. Liston, which is a portion of the site needed for the boat ramp facility plan). This parcel has a base zone IG2, General Industrial. Section 33 TL 100 is inside the proposed Prime Industrial Overlay (hereinafter "Sec. 33 TL 100" or the "Liston Property").

³ The Plan will occupy six acres of the approximately ten total acres in TL's 1500, Sec. 28 TL 100 and Sec. 33 TL 100. As such, the regional boat launch facility would exceed the 2 acre maximum for an allowed use in Proposed 33.475.080 and therefore would not be allowed unless it obtained a conditional use approval under proposed 33.815.150.

⁴ This is a boat ramp deficient area. City police and fire boat access at this location would help current and future safety concerns on Hayden Island. The OSMB has indicated that a boat ramp on the island would be regionally significant because of the lack of river access in this location and the extreme demand. Hayden Island is currently park deficient and this Plan benefits the island park demand. A ramp at this location benefits safety because fire and police boats can use it for quick access to this part of the river. The ramp can be used by both motorized and non-motorized boats. A second bridge to Marine Drive for all island users is also a needed addition for island access and would allow ramp users an additional way to access the island. Finally, the ramp would allow businesses to launch and retrieve boats too big for the travelifts on the island.

Portland Planning and Sustainability Commission
Attn: Steve Kountz
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previously endorsed by Oregon State Marine Board's ("OSMB") Wayne Shuyler, Boating Facilities Program Manager/Deputy Director (retired).⁵

PROPOSED AMENDMENTS. As applied to the Boat Launch Property, the Prime Industrial Overlay regulations would generally restrict and impede the ability to use the Property for a regional boat launch facility to meet the regional needs of the boating public, and specifically, would not allow the Plan for the site. Consequently, for the reasons discussed below, we would propose amendments to the Prime Industrial Overlay map and regulations to do the following:

(A) Remove the Prime Industrial Overlay from the Property so that the Property is outside the draft Overlay boundary; or

(B) Add a new provision to the draft text of the Prime Industrial Overlay regulations which (assuming the Property is not removed from the Overlay) will allow, as a permitted use, the specific use of the Property for a regional boat launch facility within a park approved by the OSMB.

A. Remove the Prime Industrial Overlay from the Property.

Removal of the Prime Industrial Overlay from the Property is warranted because the proposed regulations will substantially restrict and impede the ability to implement the Plan for a regional boat launch facility to meet the regional needs of the boating public, and the planned regional boat launch facilities on this area of Hayden Island will not conflict with development of Hayden Island's prime industrial land.

The Plan will occupy six acres of the approximately ten total acres in TL's 1500, Sec. 28 TL 100 and Sec. 33 TL 100. As such, the regional boat launch facility would exceed the 2 acre maximum for an allowed use in Proposed 33.475.080 and therefore would not be allowed unless it obtained a conditional use approval under highly subjective approval criteria set forth in proposed 33.815.150.⁶ Thus, the proposed Overlay will for all practical purposes make establishment of the proposed regional public boat launch facility unfeasible.

⁵ The Plan was previously endorsed by Kathleen Wadden, Portland Parks and Recreation Senior Management Analyst. The three property owners of the proposed park site support the Plan and are willing sellers. Also, 100% of the boat sales and boat-related sales and boat owners on Hayden Island support the Plan.

⁶ Highly subjective conditional use approval criteria contained in proposed 33.815.150 include requirements that the proposed use will not have "significant adverse effects," will have a capable transportation system based on certain evaluation factors, will not "significantly alter the overall industrial character of the area" based on "existing proportion of industrial and non-industrial uses and effects of incremental changes", and will

Portland Planning and Sustainability Commission
Attn: Steve Kountz
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Page 4

Three of the four tax lots are defined by the City to be prime industrial land and within the proposed Overlay. But Sec. 28 TL 100, the SDP LLC & Canoe Bay LLC property which is zoned R2 and outside the proposed Overlay, is only 2.57 acres and therefore is not large enough to serve as a neighborhood park and boat ramp facility. While we understand and support planning for jobs, the Site is not appropriate for the proposed zoning changes for several reasons. The Site has no rail access, has limited truck access, and can be accessed by only a single bridge --- all factors that make development for only intense industrial development limited.

Additionally, the land owned by Inland Sea Maritime Group is leased by Schooner Creek Boat Works, which is an allowed use in the current and proposed zones. Schooner Creek has 24 employees. A dedicated regionally significant river access is envisioned. An adjacent park with a boat launching facility would be a complimentary land use. Importantly, the site is a valuable riverfront opportunity with an existing beach, which is rare in Portland.

Finally, the boat ramp park will occupy about 6 acres, 3.5 acres of which is inside the proposed Overlay (the Liston Property and ISMG Property) while the remainder (SDP LLC & Canoe Bay LLC property) will be outside the proposed Overlay. Thus, the small amount of land (3.5 acres) to be removed from the Overlay by this proposed amendment is insignificant compared to the total amount of land the City seeks to rezone (10,000 acres) and would not prevent the City from meeting its land capacity to accommodate future employment needs.

For the foregoing reasons, the Property should be removed from the Prime Industrial Overlay.

B. Allow as a permitted use the specific use of the Property for a regional boat launch facility approved by the OSMB

Given the identified need for a regional boat launch facility approved by the Oregon State Marine Board, in the event the City declines to remove the Property from the draft Prime Industrial Overlay as requested above, then the draft regulations should be amended to add a new provision which will allow, as a permitted use, the specific use of the Property for a regional boat launch facility approved by the OSMB under ORS 830.150 and related administrative rules.⁷

⁷ "preserve city-designated scenic resources". These subjective requirements would provide virtually unlimited grounds for appeals which would make development of such a regional boat launch facility unfeasible.
⁷ The State Marine Board Marine Facility Program Rules are found in OAR Chapter 250 Division 14. The Board administers the Boating Facility Grant Program contained in Oregon Revised Statute 830.150. The Board

Portland Planning and Sustainability Commission

Attn: Steve Kountz

Attn: Steve Kountz

December 1, 2015

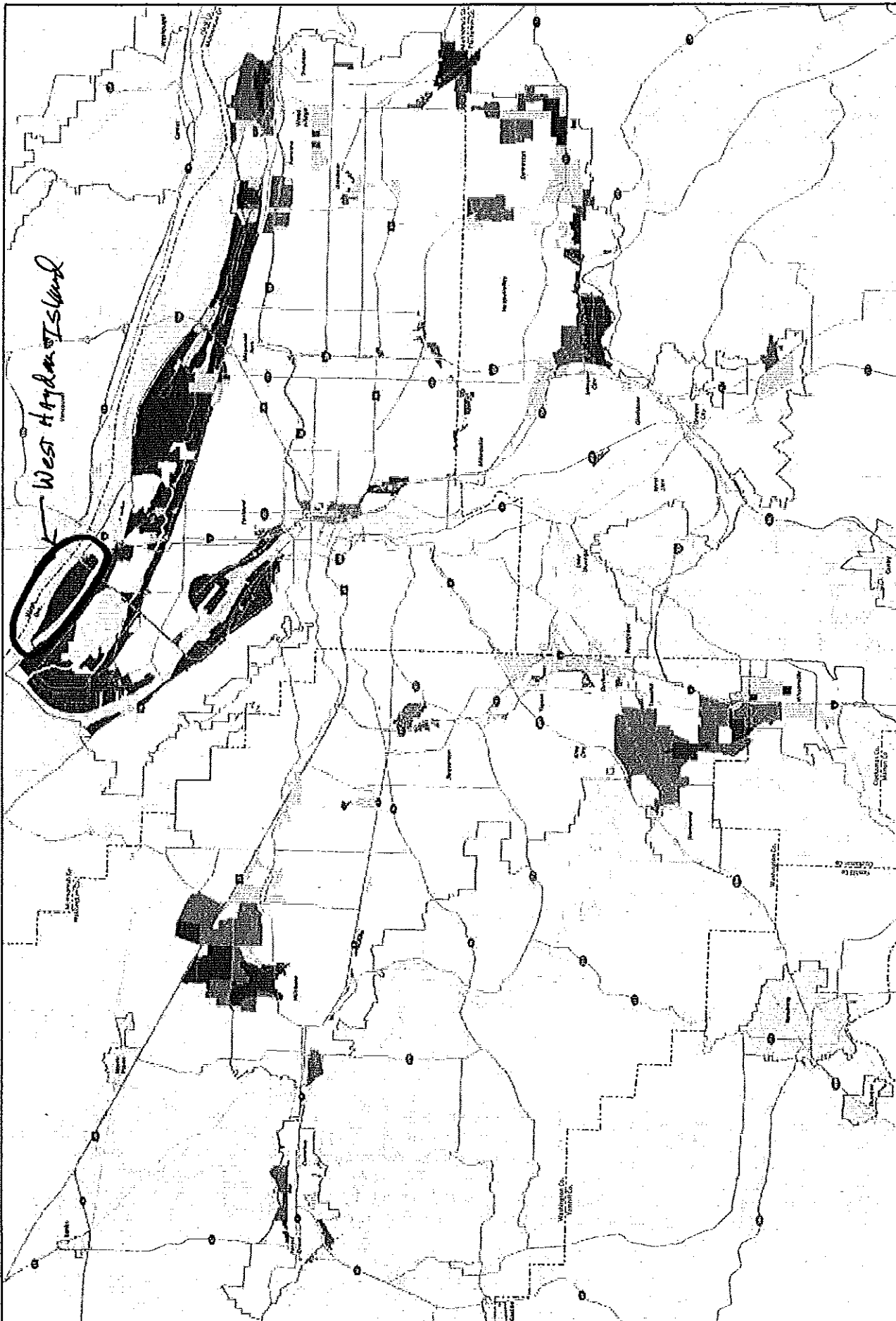
Page 5

Such an amendment to the text of the Overlay zone would provide as follows:

“Notwithstanding the Prime Industrial overlay zone regulations and any other provision of Chapter 33, a public boating facility, located on West Hayden Island, including launch ramps, parking, sanitation, docks and other facilities for the convenience and safety of recreational boaters, pursuant to a plan approved or endorsed by the Oregon State Marine Board subject the provisions of ORS 830.150 and OAR 250-014-0001 et seq., shall be an outright permitted use.”

For the same reasons supporting removal of the affected tax lots from the Prime Industrial Overlay from the Property, this alternative amendment, allowing a specific permitted use for a regionally significant public boating facility on a small area at the edge of the Overlay which lacks rail and has limited truck access, will not conflict with development of Hayden Island's prime industrial land, and, in fact, will complement the existing use of the adjacent boat works with its 24 employees.

has also adopted administrative rules to further implement the Statute. These rules can be found in Chapter 250, Division 14, of Oregon Administrative Rules. The Board does not own or operate any boating sites or facilities and instead, relies on willing partners to apply for grants to make needed improvements. Boating Facility Grants are available to help the providers of public boating access sites around the state to acquire, improve, and maintain facilities that serve recreational boaters. Typical boating improvements include launch ramps, boarding floats, parking lots, restrooms, transient moorage, and other items needed by boaters.



West Hayden Island

Title 4, Industrial and Other Employment Areas

January 2013



- Employment areas
- Industrial areas
- Regionally significant industrial areas
- Proposed main railway routes
- Proposed road connectors
- Mainline freight
- Branch line freight
- Rail yards
- County boundaries
- Urban growth boundaries
- Neighbor cities





Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

MEMO

DATE: November 6, 2015
TO: Planning and Sustainability Commission
FROM: Tom Armstrong, Supervising Planner
Steve Kountz, Senior Economic Planner
SUBJECT: Employment Zoning Project

A number of different policy issues were raised at the October 27, 2015, PSC public hearing for the Employment Zoning Project. The purpose of this memo is to provide additional information for each issue to help inform the PSC in making their recommendation. The key issues are:

1. Environmental Overlay Zones Compatibility with Prime Industrial Overlay
2. Parks and Open Areas Prohibition
3. E-zone Update Timing
4. Self-Service Storage
5. Golf Course Landscaping Standards
6. EG zone office uses at 3:1 FAR and Guild's Lake Industrial Sanctuary Plan District Limits
7. Residential Non-Conforming Uses in EG Zones
8. Industrial Office
9. Air Quality

This memo includes page references to the code language in the September Proposed Draft of the Employment Zoning Project.

The Map Issues section begins on page 10.



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
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1. *Environmental Overlay Zones Compatibility with Prime Industrial Overlay*

Simply, environmental overlay zones (e-zones) restrict the location and scale of development, while the prime industrial overlay restricts the types of uses. Two different elements of development. They can overlap and be compatible. For example, a warehouse can be built in an environmental conservation-zone (with mitigation) but it cannot be used for self-service storage if it is in the prime industrial overlay zone.

The Basics:

The Zoning Code establishes the rules that control the use, development standards, and review procedures for land development in Portland.

Primary Uses - different categories of uses (residential, retail, industrial services, parks) have different allowances (allowed, limited, conditional, prohibited). See the use table on page 27 of the Proposed Draft.

Development standards - clear and objective standards control the size, shape and location of the development.

Review procedures - different levels of process and public review depending on the type of land use decision.

The Zoning Map has a number of different overlapping elements that determine which parts of the Zoning Code apply to a specific parcel.

Base Zones - broad categories (residential, commercial, industrial) provide the basic regulations on use and development standards. Only one base zone can apply. These zones are designated with capital letters and numbers - IG1, CN2, R5, EX

Overlay Zones - apply supplemental, more specific regulations. More than one overlay zone can apply to a parcel. These overlay zones are designated with lower case letters (p, c, d, l)

Plan Districts - add special regulations based on a specific location. The plan district regulations supersede or augment the other regulations in the base and overlay zones. Only one plan district can apply. These districts are designated by lines on the map.

The attached diagram shows how all three elements can layer on top of each other to define the regulations that apply to a given site.

Environmental Overlay Zones (e-zones) protect natural resources and functional values. The environmental regulations discourage encroachment into significant natural resource areas, encourage flexibility in site planning, and provide for development that avoids adversely impacting the site's natural resources.

There are two types of environmental zones: protection (p zones) and conservation (c zones). Simply, the environmental protection zone severely restricts development, while the environmental conservation zone allows some development with mitigation. The e-zones

apply to significant natural resource area, which is typically a portion of the site, and regulates development in that that area.

The Prime Industrial Overlay Zone is proposed to protect the industrial development capacity of land in Portland's freight-hub districts. It does this by:

- prohibiting non-industrial uses (self-service storage, commercial outdoor recreation, major event entertainment, and parks)
- prohibiting quasi-judicial comprehensive plan map amendments to convert industrial land to non-industrial map designations

The e-zones control the size and shape of the development. The Prime Industrial overlay controls what the development can be used for. If the two overlay zones do not overlap, then someone could build a warehouse for self-service storage in the c-zone portion of a site.

2. Parks and Open Areas Prohibition

Metro Title 4 says local jurisdictions shall prohibit parks intended to serve people other than those working or residing in Regionally Significant Industrial Areas (RSIAs). The Prime Industrial overlay zone boundary corresponds to the RSIAs. Where the overlay does not correspond to the RSIA map, the City will need to ask Metro to amend the RSIA map. The Metro Title 4 map is attached.

Metro does not define "parks", but the Zoning Code use category is defined as Park and Open Areas. This category addresses land uses that consist of natural areas, large areas consisting mostly of vegetative landscaping or outdoor recreation, community gardens, or public squares. Examples include parks, golf courses, cemeteries, public squares, plazas, recreational trails, botanical gardens, boat launching areas, nature preserves, community gardens, and land used for grazing that is not part of a farm or ranch.

The Metro Title 4 provisions make specific allowances for parks intended to serve people working or residing in the RSIA. It is not intended to prohibit trails and trailhead amenities, which the proposed code specifically allows for up to 2 acres.

Testimony from the Parks Bureau, the Parks Commission, Metro, and the Audubon Society of Portland object to this prohibition.

Metro Title 4 is clear in that recreational, developed parks are prohibited. Metro's direction is that if a recreational park needs to be in a RSIA, then there should be a comprehensive plan map amendment and a Metro map amendment to change the RSIA designation. If the City does not include this prohibition, then it is likely that Metro will find the City is out of compliance with the regional planning requirements.

Metro Title 4 is not clear with respect to natural preserves. The proposed code treats natural areas as open areas and prohibits them as a use, unless the area qualifies as a stormwater facility, as determined by BES. Metro's testimony says that natural areas are primarily habitat with limited public access (trails), and therefore should not be defined as parks.

The Parks Bureau has suggested that parks up to 10 acres in size should be considered local serving. The two-acre limit is based on a standard in Statewide Planning Goal 9. An

alternative would be to consider parks greater than two acres as a conditional use with the approval criteria to demonstrate that the size is appropriate to serve the local area. The following table summarizes the proposed code along with options to address issues raised in testimony

	Recreational Developed Parks	Nature Preserves	Stormwater Facilities
Proposed Code	Prohibited except for local serving parks (less than 2 acres)	Prohibited	Allowed as a public utility. (BES determination)
Options	1. Allow larger local serving parks as a conditional use	2. Allow. Habitat areas with public access/trails as an incidental accessory use	

33.475.080 Parks and Open Areas

Parks and Open Areas uses are prohibited in the Prime Industrial overlay zone except for the following:

- A. Recreational trails and boat launching areas are allowed. Trailheads, parking areas, bathroom facilities, educational kiosks and other development or facilities that are accessory to a recreational trail and boat launching areas are limited to 2 acres per site;
- B. Nature preserves are allowed;
- C. Off-site mitigation is allowed if the mitigation is for impacts that occur in the Prime Industrial overlay zone; and
- D. Other Parks and Open Areas uses that are 2 acres or less in size are allowed. Parks and Open Areas over 2 acres in size may be allowed if approved through a conditional use review.

33.815.150 Parks And Open Areas Uses in the Prime Industrial Overlay Zone

These approval criteria apply to Parks And Open Areas uses in the Prime Industrial overlay zone that require a conditional use review as specified in 33.475.080.D. The approval criteria promote preservation of land for industry while allowing Parks And Open Areas uses when they are supportive of the industrial area and not detrimental to the character of the industrial area. The approval criteria are:

- A. The proposed use will not have significant adverse effects on nearby industrial firms, or on truck and freight movement;
- B. The transportation system is capable of supporting the proposed use in addition to the existing uses in the area. Evaluation factors include street designations and capacity, level of service; on-street parking impacts; access restrictions; connectivity; neighborhood impacts; impacts on pedestrian, bicycle, and transit circulation; safety for all modes; and adequate transportation demand management strategies;

C. The proposed use will not significantly alter the overall industrial character of the area, based on the existing proportion of industrial and non-industrial uses and the effects of incremental changes;

D. City-designated scenic resources are preserved; and

E. The proposed use needs to be located in an industrial area because industrial area residents or employees constitute the primary market of the proposed use.

3. E-zone Update Timing

Testimony by the Bureau of Environmental Services and the Audubon Society of Portland request an update to the environmental overlay zones along the Columbia Corridor and Portland Harbor. About 400 acres of high- and medium-ranked natural resources lack protection under environmental overlay zones (see attached map).

In particular, they note that the Airport Futures Land Use Plan identified e-zone updates with an ESEE (Economic, Social, Environmental and Energy) analysis and request that these e-zone updates be included in the Task 5/Early Implementation phase.

These updates are on the BPS work program, but are not part of the Periodic Review (Task 5) work program. The proposed Airport Future e-zone changes on private land were not without controversy. In order to resurrect them at this time, it would take:

- additional analysis to update the ESEE to be consistent with the 2012 Natural Resources Inventory
- analysis of the specific impacts on the industrial land capacity and subsequent adjustments to the EOA
- considerable public outreach and process

The testimony requests that if the e-zones are not updated, then the prohibitions on natural areas on properties with NRI-ranked resources should be suspended or waived. In general, waiving or suspending code is not good planning practice. It is too complicated to administer.

Most of the e-zone updates for High and Medium unprotected resources are along the sloughs and probably qualify as a stormwater facility, and are therefore not subject to the prohibition (see map).

The natural area prohibition really impacts the low value and SHA (grassland) areas - which are the areas with the most industrial capacity. Therefore, it is appropriate to have these potential nature preserves (that do not qualify as a stormwater facility) go through a Comp Plan Map amendment process.

In response to testimony regarding the need for e-zone updates, the PSC has two options:

1. Keep the proposed code as written (*as amended above*).
2. Add the Airport Futures e-zone changes to the proposed zoning map.
3. Delete the prohibition on nature preserves until the e-zones are updated.



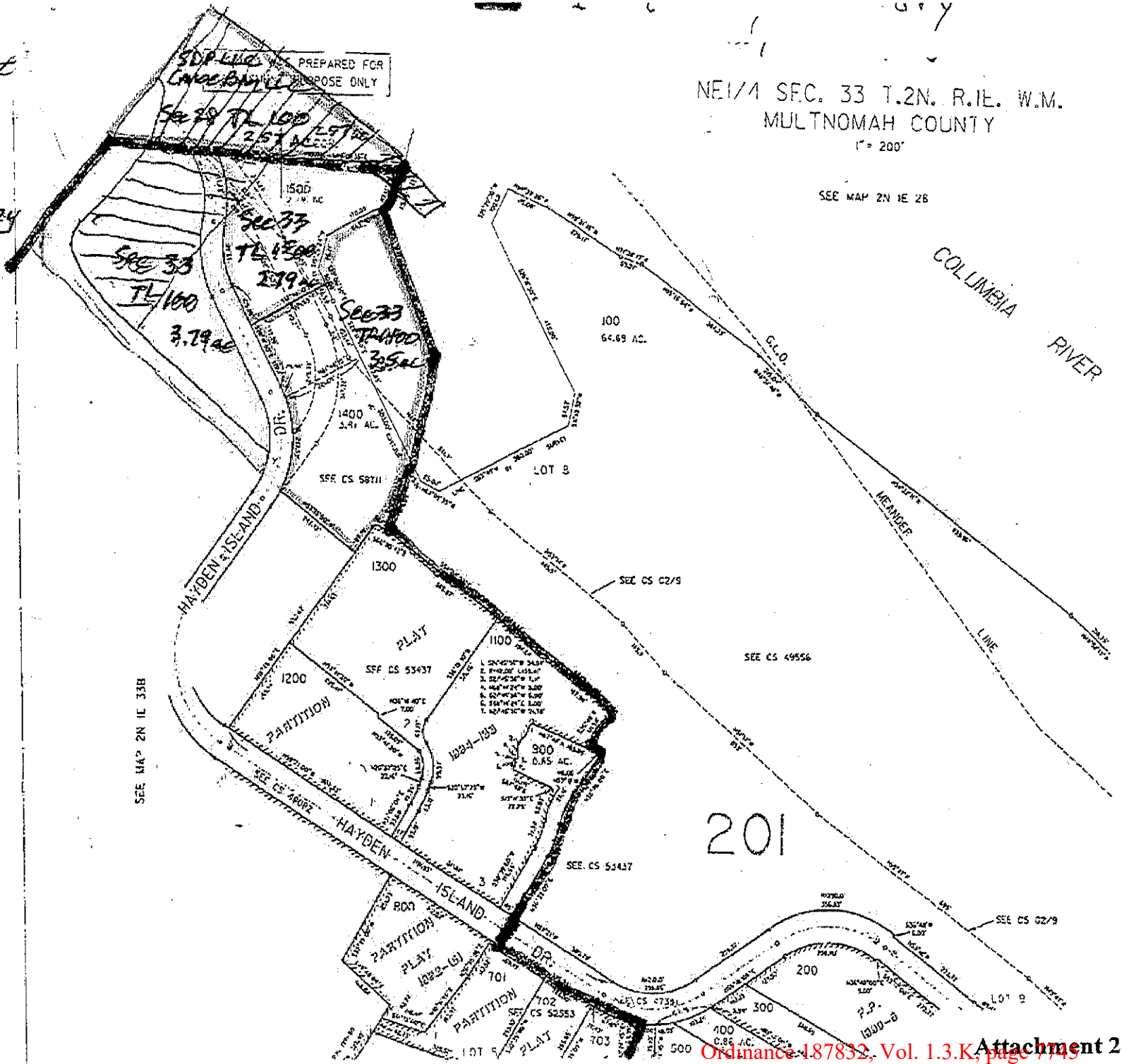
Proposed Boat Ramp Plan

Proposed Prime Industrial Overlay Boundary

p.2

SCBW

Nov 24 15 10:48a



NE 1/4 SEC. 33 T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 200'

SEE MAP 2N 1E 26

COLUMBIA RIVER

201

THIS MAP WAS PREPARED FOR
ASSESSMENT PURPOSE ONLY

NE 1/4 SEC. 33 T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 200'

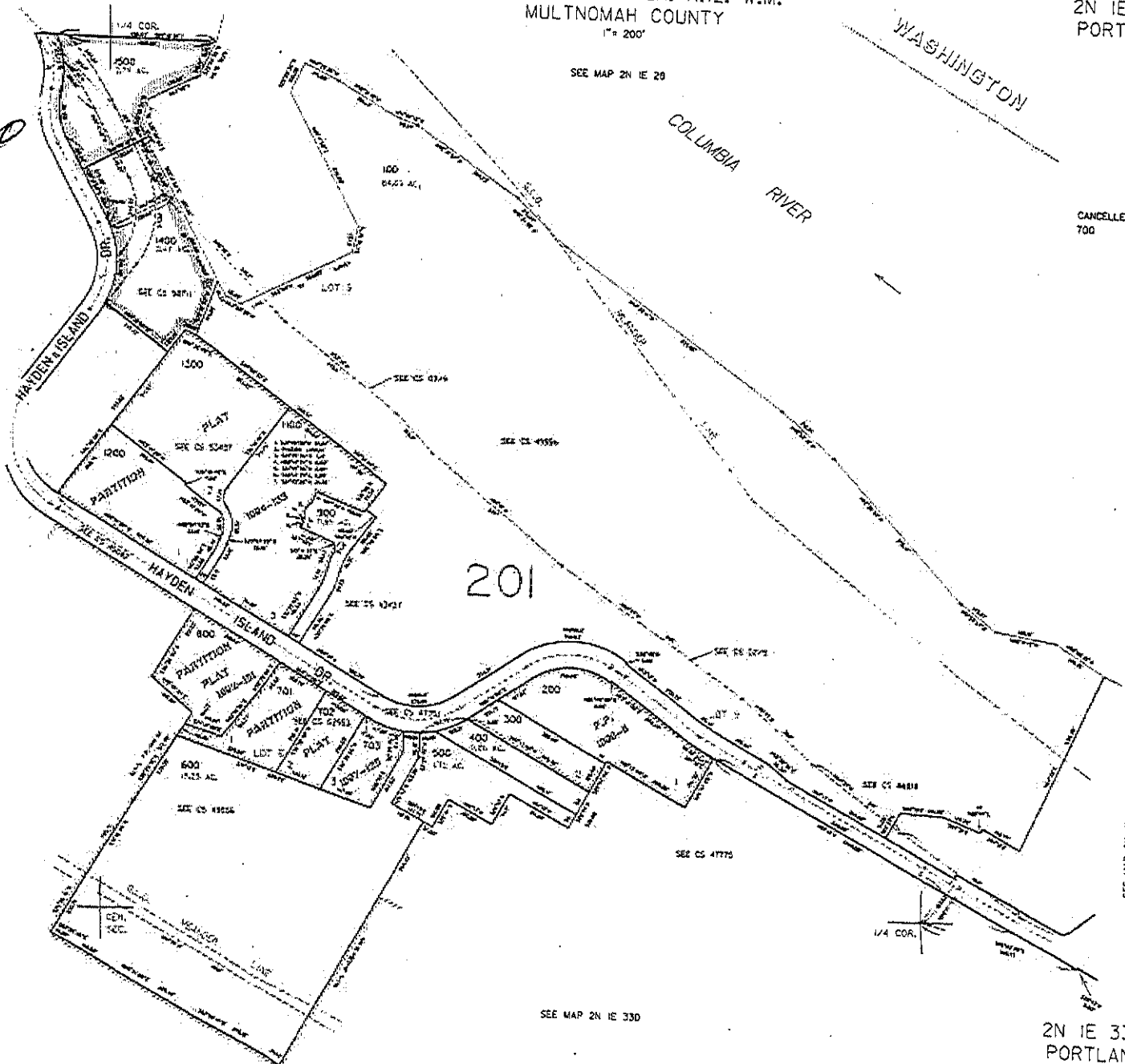
2N 1E 33A
PORTLAND

TLs 1500 + 1400
(ISMG)

SEE MAP 2N 1E 33B

SEE MAP 2N 1E 29

CANCELLED NO.
700



201

1/4 COR.

SEE MAP 2N 1E 34B

SEE MAP 2N 1E 33D

2N 1E 33A
PORTLAND

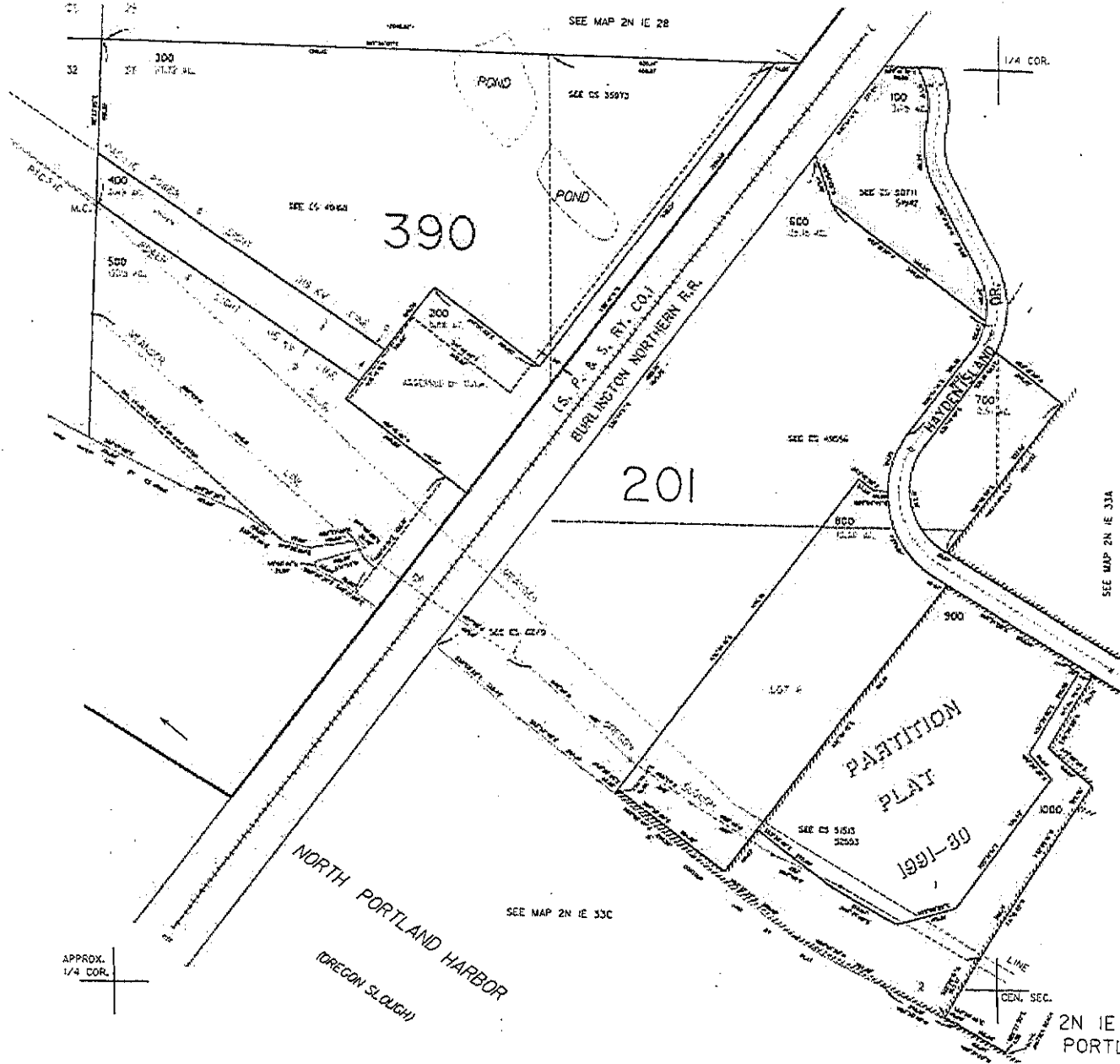
THIS MAP WAS PREPARED FOR
ASSESSMENT PURPOSE ONLY

NW1/4 SEC. 33. T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 200'

2N 1E 33B
PORTLAND

See 33 TL 100
(LIXTON)

SEE MAP 2N 1E 32A



SEE MAP 2N 1E 33A

SEE MAP 2N 1E 33C

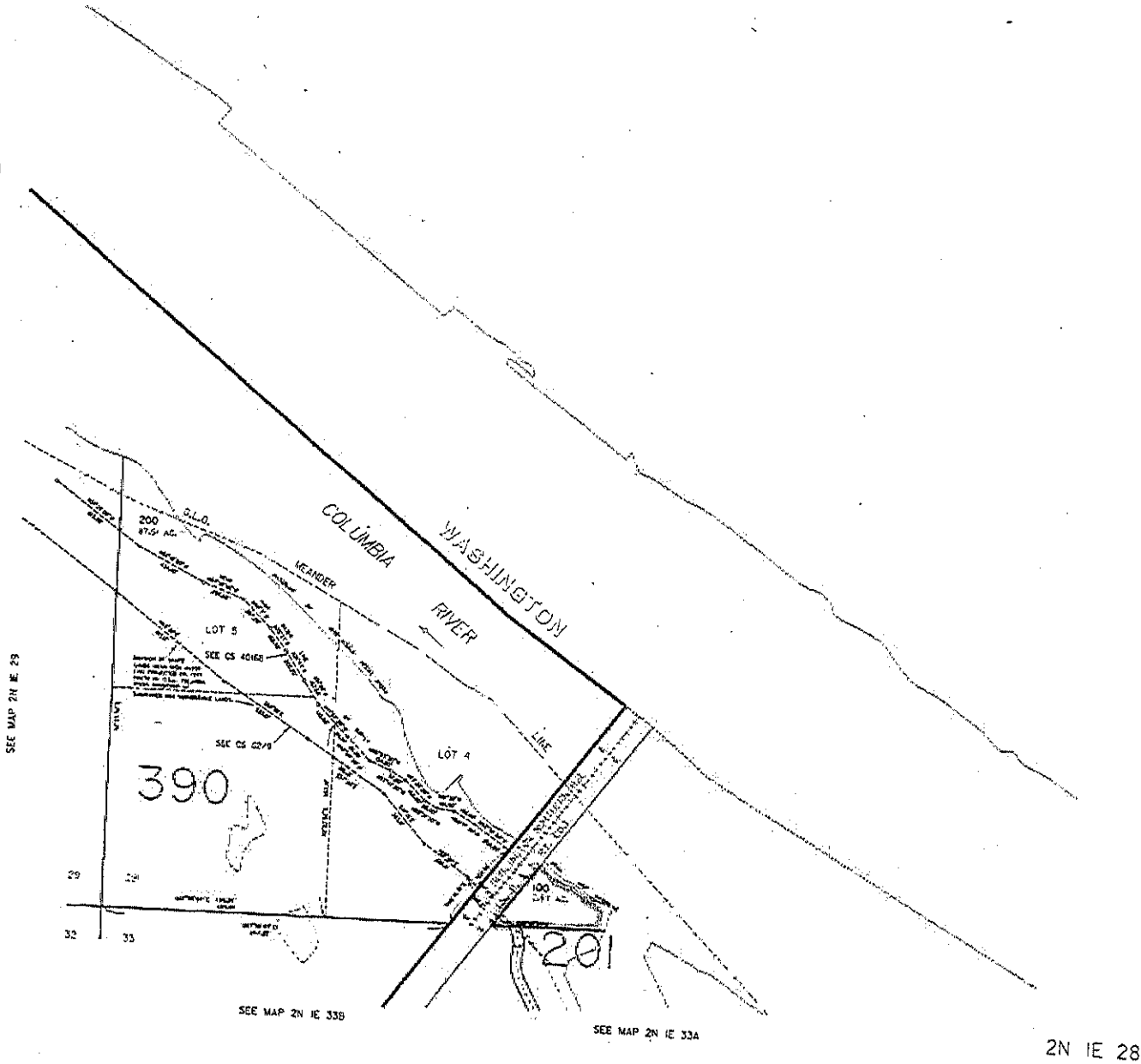
2N 1E 33B
PORTLAND

THIS MAP WAS PREPARED FOR
ASSESSMENT PURPOSE ONLY

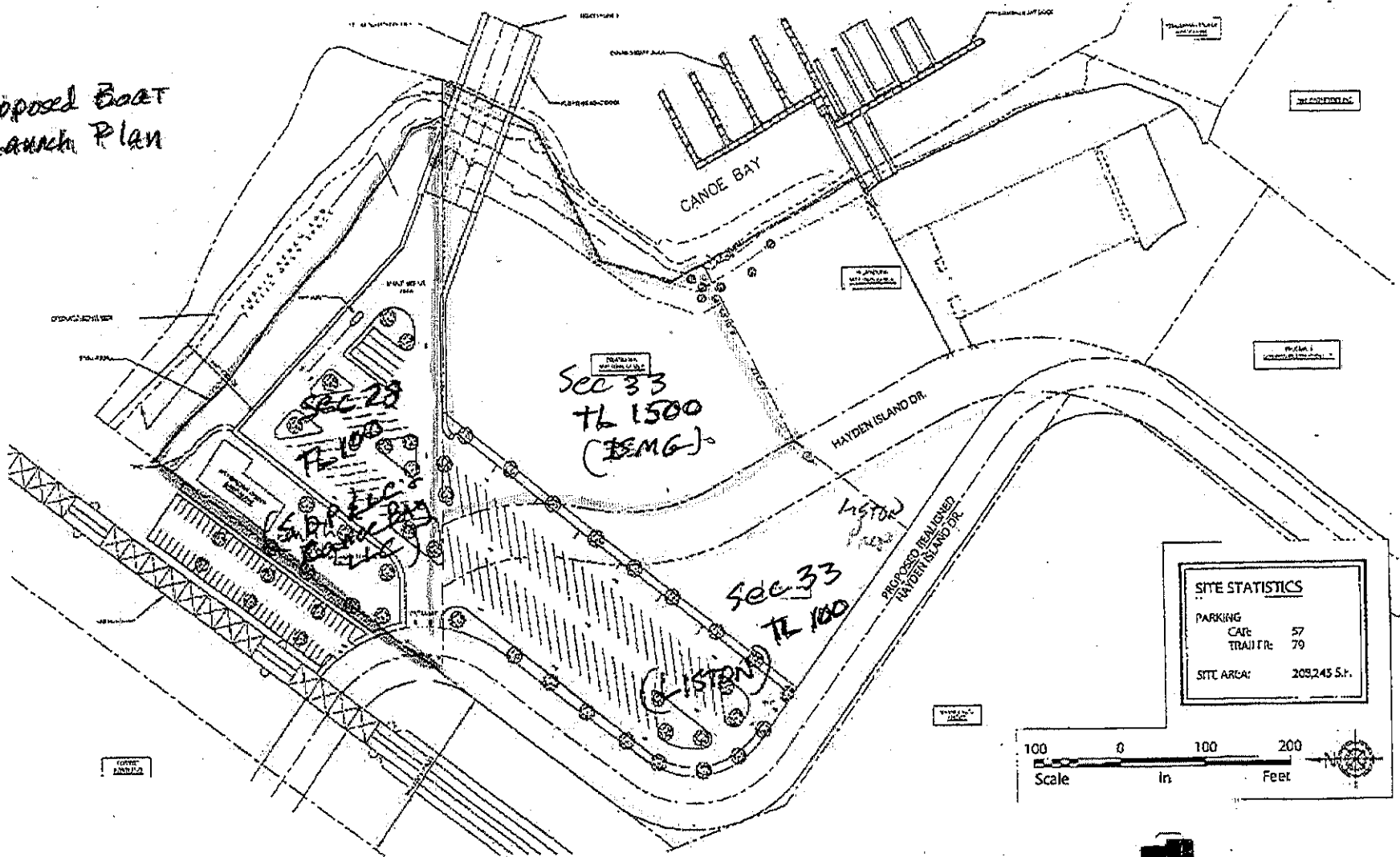
SECTION 28 T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 400'

2N 1E 28

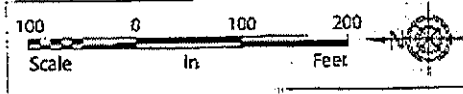
SEC 28 TL 100
(SDP LLC &
CANNON BAY LLC)



Proposed Boat Launch Plan



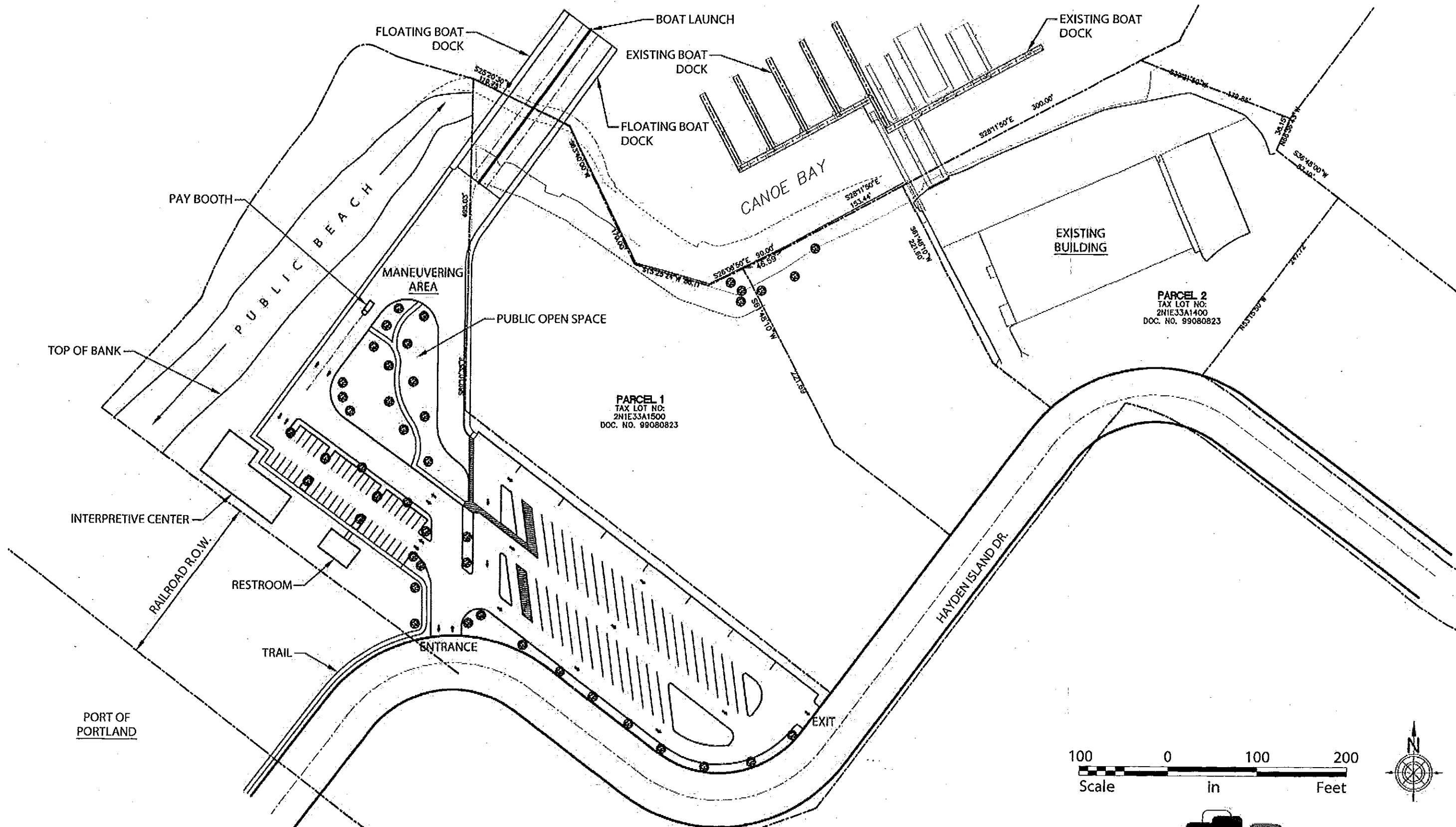
SITE STATISTICS	
PARKING	
CARE	57
TRAIL TR	79
SITE AREA:	208,245 S.F.



MAY 14, 2012 DRAFT CONCEPTUAL PUBLIC BOAT LAUNCH, OPEN SPACE AND PUBLIC TRAILHEAD



ARCHITECTURAL DESIGN INTERIOR DESIGN MASTER PLANNING LAND USE PLANNING



APRIL 5, 2012
DRAFT CONCEPTUAL PUBLIC BOAT LAUNCH, OPEN SPACE AND PUBLIC TRAILHEAD

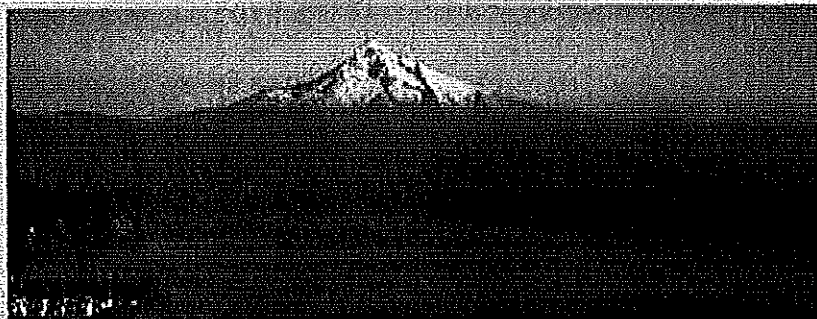
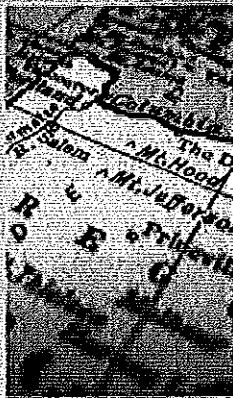




Hayden Island Plan

HAYDEN ISLAND

Portland's Only Island Community



Adopted by Portland City Council
August 19, 2009
Ordinance No. 183124

An Island Community Concept

New Parks

The community desires access to the river for viewing, swimming and boating. To the west, adjacent to Grandma's or Canoe Bay and the railroad tracks, a park with beach access to the Columbia River could be developed.

A new park should be developed west of the highway on the Columbia River. This new park should be designed to provide for a diversity of unstructured and structured recreational opportunities for both residents and visitors to the island. To enhance the park's potential recreational attractions and to limit some of the costs, park planners should consider developing a restaurant/café or similar visitor-related commercial enterprise that makes the park active year-round. The new park could extend eastward under the new bridge, if the crossing allows adequate air and light, and is not too noisy.

Facilities for docking motorized and nonmotorized boats (kayaks and canoes) could be provided at new parks. These facilities could provide residents and nonresidents with opportunities to access the island's marine-related businesses. These facilities would need to obtain the proper permits.

On Hayden Island, there are private walkways that are not part of a connected system and that also do not connect to the public roads. The plan recommends that these walkways be connected into a system of trails providing viewpoints of the Columbia River and the Cascades. Connecting these walkways would be accomplished with easements as land redevelops for the Hayden Island community. Although some of these paths currently exist, some of the land owners were concerned about expanding this system, and others were interested in having such a system. Path systems provide a means of active recreation that is convenient and sustainable for communities.

GETTING AROUND

Getting to and from Hayden Island could change dramatically in the next several years. The only access to the island is via I-5, which is congested for a large part of the day. New bridges across North Portland Harbor and the Columbia River, along with a new interchange for I-5 at Hayden Island, are proposed as part of the CRC project. The Hayden Island Plan's proposals for new development on the island take into account the additional traffic that future development on Hayden Island could generate. Transportation modeling indicates that the additional traffic will meet ODOT standards and will not congest the interchange.

CRC-Related Changes

The CRC bridge as currently proposed would include access for Hayden Island residents to Marine Drive without having to get on the highway, an option that is not currently available. The CRC project also includes a light rail connection from the Expo Center in the south to Vancouver in the north that will offer greater flexibility in how Hayden Island residents and visitors travel. The new light rail bridge will also provide for shared pedestrian and bike paths from Marine Drive to Vancouver, Washington. The CRC plan also proposes improvements to the existing path system that include expanded pedestrian and bicycle connections to Bridgeton and the 40-Mile Loop trail.

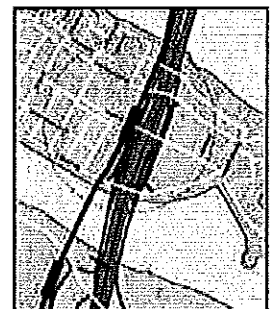
An "Enhanced Local Green Street" Network

The plan proposes a network of local streets that would have sidewalks and bike paths. Many streets would have on-street parking. Each of the streets would be designed to be an *enhanced green street*, which would provide for stormwater runoff into planters to protect the Columbia River, landscaped settings for walking and new habitat areas. This design would enhance the local connectivity and the Hayden Island environment. It would make it possible for residents to walk to local businesses, thereby reducing car trips, promoting exercise and reducing fuel use—all elements of the community's vision for making Hayden Island more sustainable.

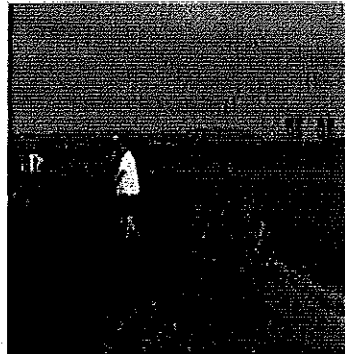
Connections to Light Rail

A major part of the CRC project is the extension of light rail from the Expo Center to Vancouver, with a new station on Hayden Island. The design workshops in October 2007 originally explored three future light rail alignments. Public input, the community design workshops and CRC analysis identified the alignment adjacent to I-5 and a station at Tomahawk Island Drive as the preferred alternatives. This station location would best serve the near-term and long-term needs of the island, is the most central to the island's resident population, and would require displacement of fewer floating homes than the other alternatives.

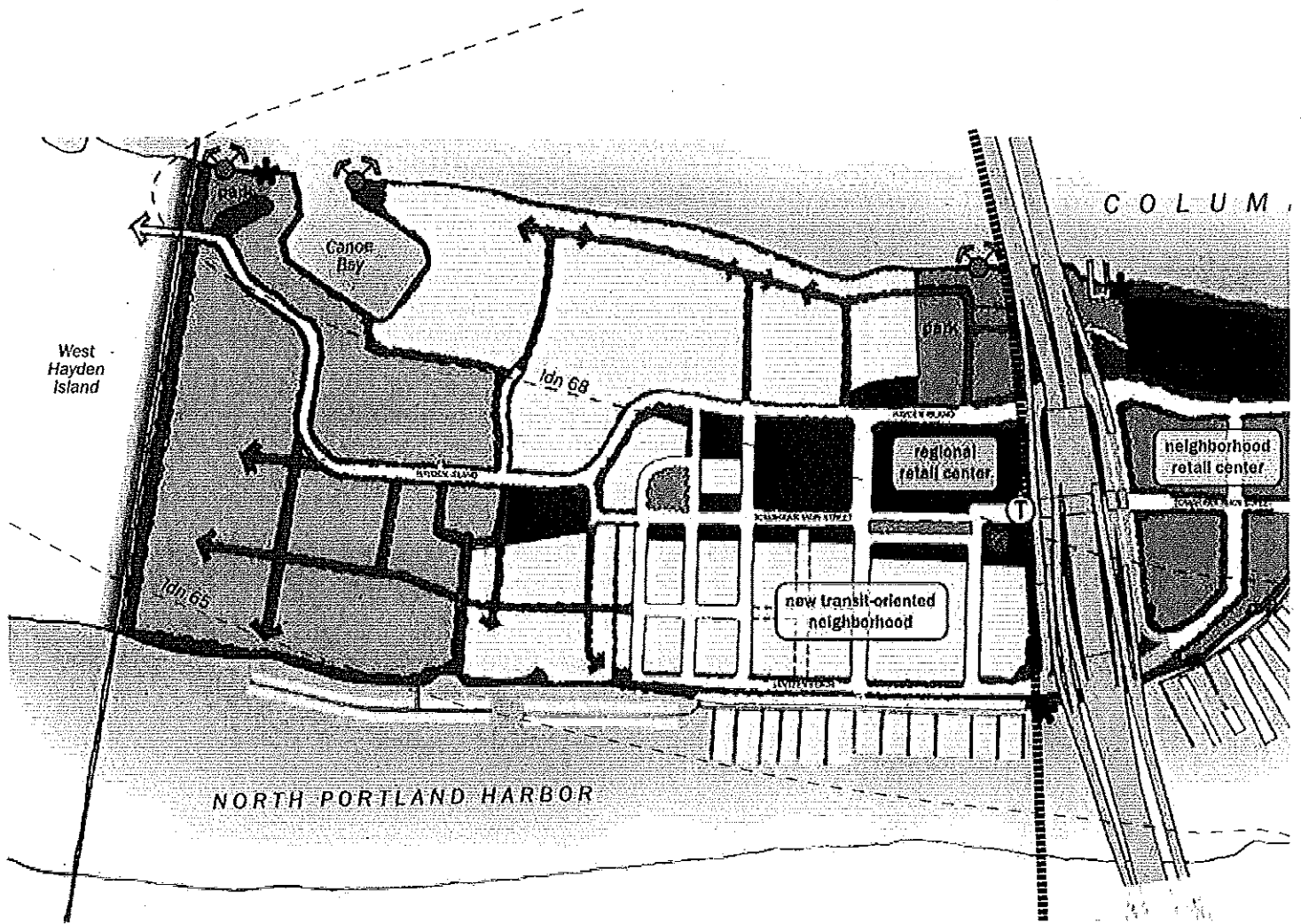
As already described, this station location would support transit-oriented redevelopment of the shopping center in the long term and station-related improvements in the near term. The plan includes a new open space and a collection of shops integrated into the Jantzen Beach SuperCenter as part of the design for the light rail station.



Preferred location for the light rail.



Concept Plan Map



Comprehensive Plan and Zoning Code Amendments

SUMMARY OF THE PROPOSED ZONING

The proposed zoning embraces the Hayden Island Plan's overall concept for the island as an island community with a range of housing choices and commercial and industrial areas to support residents and the marine industries, while creating a walkable community to support the proposed extension of light rail. The following are summaries of the proposed zoning.

General Commercial (CG) is the most prevalent zone on Hayden Island, because it provides for the flexibility to develop residential units supporting transit-oriented development and to build a sizable residential community to support local commercial enterprises. This plan proposes to change the eastern half of the manufactured home park from CG to R2 to reflect the residential nature of the existing development and to protect an affordable housing choice on the island. There are no changes proposed for the zoning of Jantzen Beach and Lotus Isle floating home moorages. The moorage is considered a multi-dwelling use and is permitted in the CG zone.

Neighborhood Commercial (CN2) is proposed for the area east of I-5 north of North Tomahawk Island Drive, currently zoned CG, to encourage neighborhood commercial uses within walking distance of a large portion of Hayden Island's residential community and within the pedestrian district.

General Industrial (IG2) is the most typical industrial zone on Hayden Island. The only proposed change to industrial zoning is on sites proposed for residential development where there are existing residential development rights under the x-overlay provisions. These sites are small and isolated for industrial use and facilitate more appropriate waterfront development. Some of the floating home moorages are zoned IG2, which allows for floating homes as a conditional use. At this time, no changes for the zoning of West Hayden Island and Tomahawk Bay moorages are proposed.

Open Space (OS) is proposed for Lotus Isle Park and the tennis court park on North Fir Avenue adjacent to the manufactured home park.

Medium-density, Multi-dwelling, Residential (R1) remains on the Columbia Point condominiums property. Columbia Point West Condominiums is proposed to be zoned R2 to reflect its current development density.

Low-density, Multi-dwelling, Residential (R2) remains for the western half of the manufactured home park and the lot at the northwest corner of the island at the end of North Hayden Island Drive. The R2 zone is proposed for the eastern half of the park, as described in the CG description. Columbia Point West, Waterside, Jantzen Beach Village, Riverhouse and Riverhouse East Condominiums are proposed to be zoned R2 to reflect the current development density of 5 to 20 dwelling units per acre.

Low-density, Multi-dwelling, Residential (R3) remains on the southern portion of the manufactured home park and is proposed for the Hayden Bay Condominiums.

Single-dwelling, Residential (R7) remains for the Lotus Isles Homes.

Single-dwelling, Residential (R10) is proposed for the Hayden Bay Marina homes. This is a change from R3 and is being proposed to reflect the current development density.

Residential Farm/Forest (RF) remains for the eastern tip of island and along the railroad corridor.

Changes in Land Use >

The table at right indicates the changes in land use from what is the existing land use pattern on Hayden Island to the proposed changes in the Comprehensive Plan and Zoning Map.

Zoning Classification	Existing Zoning Total Area (square feet/ acres)	Existing Zoning Total Area (acres rounded)	Proposed Zoning (square feet)	Proposed Zoning (acres rounded)
CG	14,323,999	328	14,310,695	328
CN2			476,091	11
IG2	8,390,218	192	4,835,865	111
R1	202,347	5	68,176	2
R2	905,416	21	3,112,510	71
R3	1,851,883	43	1,991,171	46
R7	300,713	7	300,713	7
R10		0	839,367	19
RF	432,229	10	432,229	10
OS			40,097	1
TOTAL	26,406,805	606	26,406,804	606



LANE POWELL
ATTORNEYS & COUNSELORS

JOHN C. PINKSTAFF
503.778.2186
pinkstaffj@lanepowell.com

November 24, 2015

VIA ELECTRONIC MAIL

Janine Belleque
Boating Facilities Program Manager/Deputy
Director
Oregon State Marine Board

Re: Bureau of Planning and Sustainability's "Employment Zoning Project, Proposed Draft - September 15"

Proposed Amendments to Prime Industrial Overlay map and regulations to remove a 3.5 acre site at the northwest end of the city limits of Hayden Island needed for a future regional boat ramp facility
File No.: 094452.0003

Dear Ms. Belleque:

This firm represents Inland Sea Maritime Group LLC with regard to the City of Portland's Bureau of Planning and Sustainability's proposed Prime Industrial Overlay map and regulation which are the subject of the "Employment Zoning Project, Proposed Draft-September 2015." (the "proposed Overlay")

Our client, along with two adjacent property owners, own property which is the site of a future 6-acre regional boat ramp facility on West Hayden Island at the northwest end of the city limits. The proposed regional boat ramp facility would be adversely affected by the City's proposed Overlay regulations.

Attached please find a Memorandum which proposes amendments to the Overlay to remove a portion of the boat ramp facility site from the Overlay map or, in the alternative, to create a special provision to allow a regional boat launch facility approved by OSMB as a permitted use in the Overlay zone.

Laurie Wall, a consultant for our client, recently contacted you regarding this matter. For the reasons stated in the Memorandum, we ask that you email the Portland Planning and Sustainability Commission at psc@portlandoregon.gov and copy Steve Kountz at

Janine Belleque
November 24, 2015
Page 2

steve.kountz@portlandoregon.gov by Friday, December 4, 2015, in advance of their Tuesday, December 8, 2015 meeting on the Employment Zoning Project, asking for identification of this site as a potential park and boat ramp, and removal of the site from the Overlay, or in the alternative, adoption of a special provision to allow a regional boat launch facility approved by OSMB as a permitted use in the Overlay zone, which would allow it to someday be developed as such.

Please let me know if you have any questions or need anything further.

Very truly yours,

LANE POWELL PC



John C. Pinkstaff

JCP:mag
Attachments
cc: Client

094452.0003/6495721.1

November 24, 2015

CORRECTED

VIA EMAIL: janine.belleque@state.or.us

TO: Ms. Janine R. Belleque
Boating Facilities Program Manager/Deputy Director
Oregon State Marine Board

FROM: John C. Pinkstaff

RE: Bureau of Planning and Sustainability's "Employment Zoning Project,
Proposed Draft- September 2015"

Proposed Amendments to Prime Industrial Overlay map and regulations to remove a 3.5 acre site at the northwest end of the city limits of Hayden Island needed for a future regional public boat ramp facility

FILE NO: 094452.0003

BACKGROUND: The City of Portland is currently proposing changes to the existing zoning regulations and zoning maps that, if adopted as currently written, would impose a "Prime Industrial Overlay" intended to protect industrial development capacity in Portland's freight hub districts by prohibiting and restricting certain types of non-industrial uses. The Bureau of Planning and Sustainability's "Employment Zoning Project, Proposed Draft-September 2015" (www.portlandoregon.gov/bps/employmentzoning) seeks to protect prime industrial land from siting for parks, among other non-industrial land uses, with a Prime Industrial Overlay map and regulations in order to plan for adequate developable land capacity to accommodate expected employment needs. (hereinafter "Prime Industrial Overlay") (See Proposed Prime Industrial Overlay Map and excerpts from City staff Memo re Employment Zoning Project dated November 6, 2015 Attachment 1.)

The Prime Industrial Overlay map and regulations would apply to 3.5 acres owned by Inland Sea Maritime Group and Mr. Liston needed for a future regional boat ramp facility and park (hereinafter the "Property" or the "Site") (See Maps of proposed Overlay boundary, affected

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Boating Facilities Program Manager/Deputy Director
Oregon State Marine Board
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parcels, and proposed boat launch facility plan, **Attachment 2**).¹ The plan for the Site shows a proposed public park/public boat ramp and accessory facilities, trailhead access, restroom and interpretive center, and parking for cars and boat trailers and a realigned segment of Hayden Island Drive (hereinafter the "Plan").² (See Plan, **Attachment 3**) The boat launch facilities will serve the regional needs of the boating public.³ The Plan was previously

¹ The future regional boat launch Site includes three ownerships:

(1) The property at 3255 N. Hayden Island Dr. in Portland. Approximately half of this property (Section 33 2N 1E TL 1400, 3.5 acres) is owned by Inland Sea Maritime Group (ISMG) and is developed with Schooner Creek Boat Works which is a boat building and repair facility. The remainder of this property is undeveloped (TL 1500 2.78 acres) and a small portion of TL 1500 is needed for the proposed boat launch facility. Both of these tax lots are owned by Inland Sea Maritime Group LLC. This has a base zone IG2, General Industrial. Both TL 1500 and 1400 are inside the proposed Prime Industrial Overlay. (hereinafter "TL 1400" and "TL 1500" or the "ISMG Property")

(2) The adjacent property to the north (Section 28 2N 1E TL 100, 2.57 acres). This property is undeveloped and has a base zone of R2, Multi-dwelling Residential and is owned by Smith. The adopted Hayden Island Plan identifies this property as a new park for recreational opportunities for both residents and visitors to the island (See excerpt from Hayden Island Plan, **Attachment 4**). Due to its R2 zoning, Section 28 TL 100 is outside the proposed Prime Industrial Overlay (hereinafter "Sec. 28 TL 100" or the "Smith Property").

(3) A portion of the property across Hayden Island Dr. (Section 33 2N 1E TL 100, 3.79 acres) owned by Liston, which is a portion of the site needed for the boat ramp facility plan). This parcel has a base zone IG2, General Industrial. Section 33 TL 100 is inside the proposed Prime Industrial Overlay (hereinafter "Sec. 33 TL 100" or the "Liston Property").

² The Plan will occupy six acres of the approximately ten total acres in TL's 1500, Sec. 28 TL 100 and Sec. 33 TL 100.

³ This is a boat ramp deficient area. City police and fire boat access at this location would help current and future safety concerns on Hayden Island. The OSMB has indicated that a boat ramp on the island would be regionally significant because of the lack of river access in this location and the extreme demand. Hayden Island is currently park deficient and this plan benefits the island park demand. A ramp at this location benefits safety because fire and police boats can use it for quick access to this part of the river. The ramp can be used by both motorized and non-motorized boats. A second bridge to Marine Drive for all island users is also a needed addition for island access and would allow ramp users an additional way to

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endorsed by Oregon State Marine Board's ("OSMB") Wayne Shuyler, Boating Facilities Program Manager/Deputy Director (retired).⁴

PROPOSED AMENDMENTS. As applied to the Boat Launch Property, the Prime Industrial Overlay regulations would generally restrict and impede the ability to use the Property for a regional boat launch facility to meet the regional needs of the boating public, and specifically, would not allow the Plan for the site. Consequently, for the reasons discussed below, we would propose amendments to the Prime Industrial Overlay map and regulations to do the following:

(A) Remove the Prime Industrial Overlay from the Property so that the Property is outside the draft Overlay boundary; or

(B) Add a new provision to the draft text of the Prime Industrial Overlay regulations which (assuming the Property is not removed from the Overlay) will allow, as a permitted use, the specific use of the Property for a regional boat launch facility within a park approved by the OSMB.

A. Remove the Prime Industrial Overlay from the Property.

Removal of the Prime Industrial Overlay from the Property is warranted because the proposed regulations will substantially restrict and impede the ability to implement the Plan for a regional boat launch facility to meet the regional needs of the boating public and the planned regional boat launch facilities on this area of Hayden Island are insignificant with the industrial capacity of Hayden Island.

Three of the four tax lots are defined by the City to be prime industrial land and within the proposed Overlay. But Sec. 28 TL 100, the Smith property which is zoned R2 and outside the proposed Overlay, is only 2.57 acres and therefore is not large enough to serve as a neighborhood park and boat ramp facility. While we understand and support planning for jobs, the Site is not appropriate for the proposed zoning changes for several reasons. The

access the island. Finally, the ramp would allow businesses to launch and retrieve boats too big for the travelifts on the island.

⁴ The Plan was previously endorsed by Kathleen Wadden, Portland Parks and Recreation Senior Management Analyst. The three property owners of the proposed park site support the plan and are willing sellers. And 100% of the boat sales and boat-related sales businesses on Hayden Island support the plan.

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Site has no rail access, has limited truck access, and can be accessed by only a single bridge - all factors that make development for only intense industrial development limited.

Additionally, the land owned by Inland Sea Maritime Group is leased by Schooner Creek Boat Works, which is an allowed use in the current and proposed zones. Schooner Creek has 24 employees. A dedicated regionally significant river access is envisioned. An adjacent park with a boat launching facility would be a complimentary land use. Importantly, the site is a valuable riverfront opportunity with an existing beach, which is rare in Portland.

Finally, the boat ramp park will occupy about 6 acres, 3.5 acres of which is inside the proposed Overlay (the Liston Property and ISMG Property) while the remainder (Smith property) will be outside the proposed Overlay. Thus, the small amount of land (3.5 acres) to be removed from the Overlay by this proposed amendment is insignificant compared to the total amount of land the City seeks to rezone (10,000 acres) and would not prevent the City from meeting its land capacity to accommodate future employment needs.

For the foregoing reasons, the Property should be removed from the Prime Industrial Overlay area on the map.

B. Allow as a permitted use the specific use of the Property for a regional boat launch facility approved by the OSMB

Given the identified need for a regional boat launch facility approved by the Oregon State Marine Board, in the event the City declines to remove the Property from the draft Prime Industrial Overlay as requested above, then the draft regulations should be amended to add a new provision which will allow, as a permitted use, the specific use of the Property for a regional boat launch facility approved by the OSMB under ORS 830.150 and related administrative rules.⁵

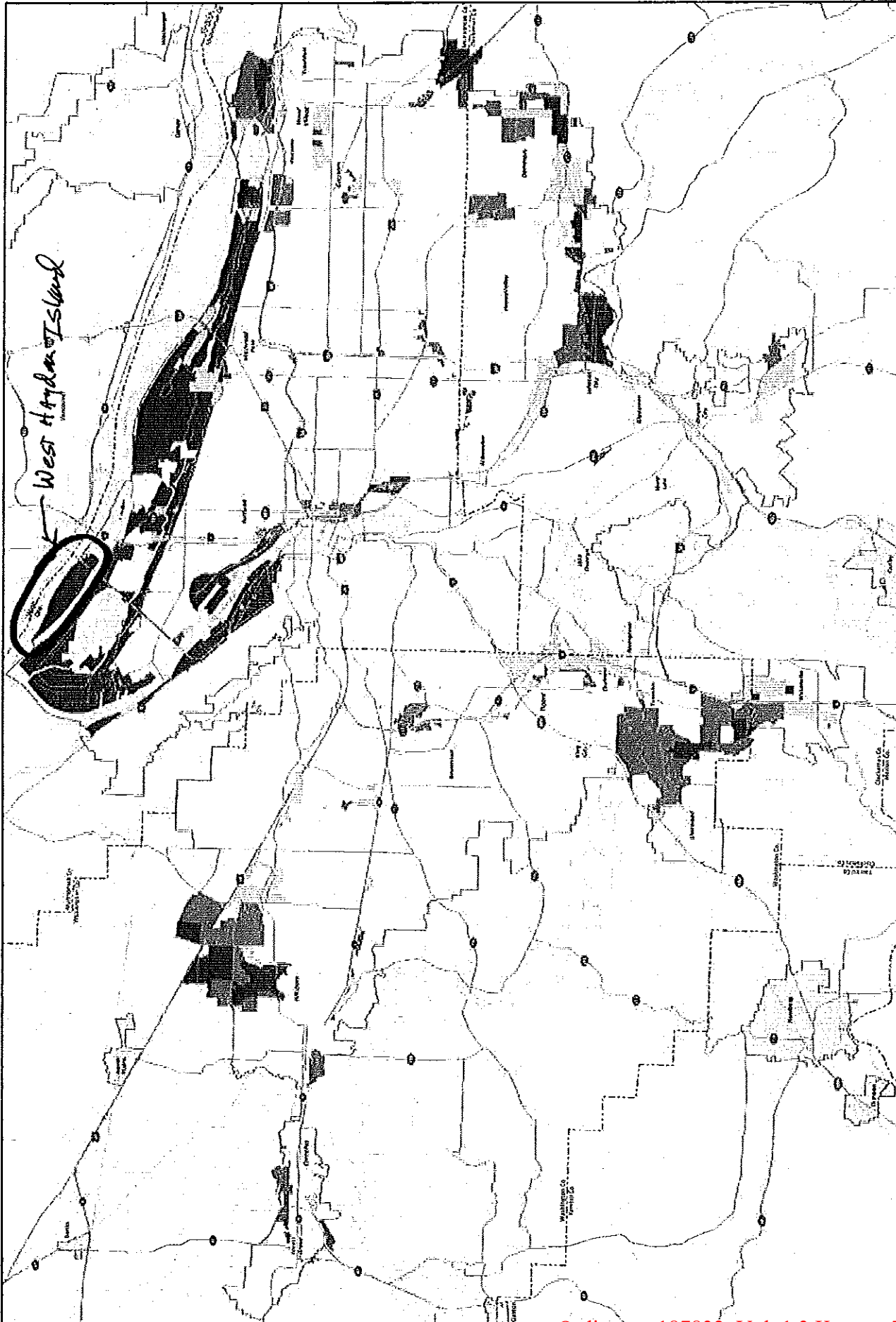
⁵ The State Marine Board Marine Facility Program Rules are found in OAR Chapter 250 Division 14. The Board administers the Boating Facility Grant Program contained in Oregon Revised Statute 830.150. The Board has also adopted administrative rules to further implement the Statute. These rules can be found in Chapter 250, Division 14, of Oregon Administrative Rules. The Board does not own or operate any boating sites or facilities and instead, relies on willing partners to apply for grants to make needed improvements. Boating Facility Grants are available to help the providers of public boating access sites around the state to acquire, improve, and maintain facilities that serve recreational boaters. Typical boating improvements include launch ramps, boarding floats, parking lots, restrooms, transient moorage, and other items needed by boaters.

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Such an amendment to the text of the Overlay zone would provide as follows:

“Notwithstanding the Prime Industrial overlay zone regulations and any other provision of Chapter 33, a public boating facility, located on West Hayden Island, including launch ramps, parking, sanitation, docks and other facilities for the convenience and safety of recreational boaters, pursuant to a plan approved or endorsed by the Oregon State Marine Board subject the provisions of ORS 830.150 and OAR 250-014-0001 et seq., shall be an outright permitted use.”

For the same reasons supporting removal of the affected tax lots from the Prime Industrial Overlay from the Property, this alternative amendment, allowing a specific permitted use for a regionally significant public boating facility on a small area at the edge of the Overlay which lacks rail and has limited truck access, would not conflict with development of Hayden Island’s prime industrial land, and in fact, would complement the existing use of the adjacent boat works with its 24 employees.



Title 4, Industrial and Other Employment Areas

January 2013

0 1 2 3 4 miles

Metro
Making a great place

Employment areas
 Industrial area
 Highly significant industrial area

Proposed main railway routes
 Proposed road connectors
 Maritime freight
 Branch line freight

Rail yards
 County boundaries
 Urban growth boundaries
 Neighbor cities



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

MEMO

DATE: November 6, 2015
TO: Planning and Sustainability Commission
FROM: Tom Armstrong, Supervising Planner
Steve Kountz, Senior Economic Planner
SUBJECT: Employment Zoning Project

A number of different policy issues were raised at the October 27, 2015, PSC public hearing for the Employment Zoning Project. The purpose of this memo is to provide additional information for each issue to help inform the PSC in making their recommendation. The key issues are:

1. Environmental Overlay Zones Compatibility with Prime Industrial Overlay
2. Parks and Open Areas Prohibition
3. E-zone Update Timing
4. Self-Service Storage
5. Golf Course Landscaping Standards
6. EG zone office uses at 3:1 FAR and Guild's Lake Industrial Sanctuary Plan District Limits
7. Residential Non-Conforming Uses in EG Zones
8. Industrial Office
9. Air Quality

This memo includes page references to the code language in the September Proposed Draft of the Employment Zoning Project.

The Map Issues section begins on page 10.



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
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1. Environmental Overlay Zones Compatibility with Prime Industrial Overlay

Simply, environmental overlay zones (e-zones) restrict the location and scale of development, while the prime industrial overlay restricts the types of uses. Two different elements of development. They can overlap and be compatible. For example, a warehouse can be built in an environmental conservation-zone (with mitigation) but it cannot be used for self-service storage if it is in the prime industrial overlay zone.

The Basics:

The Zoning Code establishes the rules that control the use, development standards, and review procedures for land development in Portland.

Primary Uses - different categories of uses (residential, retail, industrial services, parks) have different allowances (allowed, limited, conditional, prohibited). See the use table on page 27 of the Proposed Draft.

Development standards - clear and objective standards control the size, shape and location of the development.

Review procedures - different levels of process and public review depending on the type of land use decision.

The Zoning Map has a number of different overlapping elements that determine which parts of the Zoning Code apply to a specific parcel.

Base Zones - broad categories (residential, commercial, industrial) provide the basic regulations on use and development standards. Only one base zone can apply. These zones are designated with capital letters and numbers - IG1, CN2, R5, EX

Overlay Zones - apply supplemental, more specific regulations. More than one overlay zone can apply to a parcel. These overlay zones are designated with lower case letters (p, c, d, l)

Plan Districts - add special regulations based on a specific location. The plan district regulations supersede or augment the other regulations in the base and overlay zones. Only one plan district can apply. These districts are designated by lines on the map.

The attached diagram shows how all three elements can layer on top of each other to define the regulations that apply to a given site.

Environmental Overlay Zones (e-zones) protect natural resources and functional values. The environmental regulations discourage encroachment into significant natural resource areas, encourage flexibility in site planning, and provide for development that avoids adversely impacting the site's natural resources.

There are two types of environmental zones: protection (p zones) and conservation (c zones). Simply, the environmental protection zone severely restricts development, while the environmental conservation zone allows some development with mitigation. The e-zones

apply to significant natural resource area, which is typically a portion of the site, and regulates development in that that area.

The Prime Industrial Overlay Zone is proposed to protect the industrial development capacity of land in Portland's freight-hub districts. It does this by:

- prohibiting non-industrial uses (self-service storage, commercial outdoor recreation, major event entertainment, and parks)
- prohibiting quasi-judicial comprehensive plan map amendments to convert industrial land to non-industrial map designations

The e-zones control the size and shape of the development. The Prime Industrial overlay controls what the development can be used for. If the two overlay zones do not overlap, then someone could build a warehouse for self-service storage in the c-zone portion of a site.

2. Parks and Open Areas Prohibition

Metro Title 4 says local jurisdictions shall prohibit parks intended to serve people other than those working or residing in Regionally Significant Industrial Areas (RSIAs). The Prime Industrial overlay zone boundary corresponds to the RSIAs. Where the overlay does not correspond to the RSIA map, the City will need to ask Metro to amend the RSIA map. The Metro Title 4 map is attached.

Metro does not define "parks", but the Zoning Code use category is defined as Park and Open Areas. This category addresses land uses that consist of natural areas, large areas consisting mostly of vegetative landscaping or outdoor recreation, community gardens, or public squares. Examples include parks, golf courses, cemeteries, public squares, plazas, recreational trails, botanical gardens, boat launching areas, nature preserves, community gardens, and land used for grazing that is not part of a farm or ranch.

The Metro Title 4 provisions make specific allowances for parks intended to serve people working or residing in the RSIA. It is not intended to prohibit trails and trailhead amenities, which the proposed code specifically allows for up to 2 acres.

Testimony from the Parks Bureau, the Parks Commission, Metro, and the Audubon Society of Portland object to this prohibition.

Metro Title 4 is clear in that recreational, developed parks are prohibited. Metro's direction is that if a recreational park needs to be in a RSIA, then there should be a comprehensive plan map amendment and a Metro map amendment to change the RSIA designation. If the City does not include this prohibition, then it is likely that Metro will find the City is out of compliance with the regional planning requirements.

Metro Title 4 is not clear with respect to natural preserves. The proposed code treats natural areas as open areas and prohibits them as a use, unless the area qualifies as a stormwater facility, as determined by BES. Metro's testimony says that natural areas are primarily habitat with limited public access (trails), and therefore should not be defined as parks.

The Parks Bureau has suggested that parks up to 10 acres in size should be considered local serving. The two-acre limit is based on a standard in Statewide Planning Goal 9. An

alternative would be to consider parks greater than two acres as a conditional use with the approval criteria to demonstrate that the size is appropriate to serve the local area. The following table summarizes the proposed code along with options to address issues raised in testimony

	Recreational Developed Parks	Nature Preserves	Stormwater Facilities
Proposed Code	Prohibited except for local serving parks (less than 2 acres)	Prohibited	Allowed as a public utility (BES determination)
Options	1. Allow larger local serving parks as a conditional use	2. Allow. Habitat areas with public access/trails as an incidental accessory use	

33.475.080 Parks and Open Areas

Parks and Open Areas uses are prohibited in the Prime Industrial overlay zone except for the following:

- A. Recreational trails and boat launching areas are allowed. Trailheads, parking areas, bathroom facilities, educational kiosks and other development or facilities that are accessory to a recreational trail and boat launching areas are limited to 2 acres per site;
- B. Nature preserves are allowed;
- C. Off-site mitigation is allowed if the mitigation is for impacts that occur in the Prime Industrial overlay zone; and
- D. Other Parks and Open Areas uses that are 2 acres or less in size are allowed. Parks and Open Areas over 2 acres in size may be allowed if approved through a conditional use review.

33.815.150 Parks And Open Areas Uses in the Prime Industrial Overlay Zone

These approval criteria apply to Parks And Open Areas uses in the Prime Industrial overlay zone that require a conditional use review as specified in 33.475.080.D. The approval criteria promote preservation of land for industry while allowing Parks And Open Areas uses when they are supportive of the industrial area and not detrimental to the character of the industrial area. The approval criteria are:

- A. The proposed use will not have significant adverse effects on nearby industrial firms, or on truck and freight movement;
- B. The transportation system is capable of supporting the proposed use in addition to the existing uses in the area. Evaluation factors include street designations and capacity, level of service; on-street parking impacts; access restrictions; connectivity; neighborhood impacts; impacts on pedestrian, bicycle, and transit circulation; safety for all modes; and adequate transportation demand management strategies;

C. The proposed use will not significantly alter the overall industrial character of the area, based on the existing proportion of industrial and non-industrial uses and the effects of incremental changes;

D. City-designated scenic resources are preserved; and

E. The proposed use needs to be located in an industrial area because industrial area residents or employees constitute the primary market of the proposed use.

3. E-zone Update Timing

Testimony by the Bureau of Environmental Services and the Audubon Society of Portland request an update to the environmental overlay zones along the Columbia Corridor and Portland Harbor. About 400 acres of high- and medium-ranked natural resources lack protection under environmental overlay zones (see attached map).

In particular, they note that the Airport Futures Land Use Plan identified e-zone updates with an ESEE (Economic, Social, Environmental and Energy) analysis and request that these e-zone updates be included in the Task 5/Early Implementation phase.

These updates are on the BPS work program, but are not part of the Periodic Review (Task 5) work program. The proposed Airport Future e-zone changes on private land were not without controversy. In order to resurrect them at this time, it would take:

- additional analysis to update the ESEE to be consistent with the 2012 Natural Resources Inventory
- analysis of the specific impacts on the industrial land capacity and subsequent adjustments to the EOA
- considerable public outreach and process

The testimony requests that if the e-zones are not updated, then the prohibitions on natural areas on properties with NRI-ranked resources should be suspended or waived. In general, waiving or suspending code is not good planning practice. It is too complicated to administer.

Most of the e-zone updates for High and Medium unprotected resources are along the sloughs and probably qualify as a stormwater facility, and are therefore not subject to the prohibition (see map).

The natural area prohibition really impacts the low value and SHA (grassland) areas - which are the areas with the most industrial capacity. Therefore, it is appropriate to have these potential nature preserves (that do not qualify as a stormwater facility) go through a Comp Plan Map amendment process.

In response to testimony regarding the need for e-zone updates, the PSC has two options:

1. Keep the proposed code as written (*as amended above*).
2. Add the Airport Futures e-zone changes to the proposed zoning map.
3. Delete the prohibition on nature preserves until the e-zones are updated.

THIS MAP WAS PREPARED FOR
ASSESSMENT PURPOSE ONLY

NE 1/4 SEC. 33 T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 200'

2N 1E 33A
PORTLAND

TLs 1500 + 1400
(ISMG)

SEE MAP 2N 1E 33B

SEE MAP 2N 1E 28

WASHINGTON

CANCELLED NO.
700

COLUMBIA RIVER

100
64.69 AC.

LOT 8

SEE CS 5671

1300

SEE CS 6279

SEE CS 46584

201

SEE CS 53437

SEE CS 6279

800

1000

700

600

15.71 AC.

SEE CS 47534

SEE CS 47534

SEE CS 52953

SEE CS 52953

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SEE CS 52953

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SEE CS 52953

SEE CS 52953

SEE CS 47775

SEE CS 46618

SEE MAP 2N 1E 31B

SEE MAP 2N 1E 33D

1/4 COR.

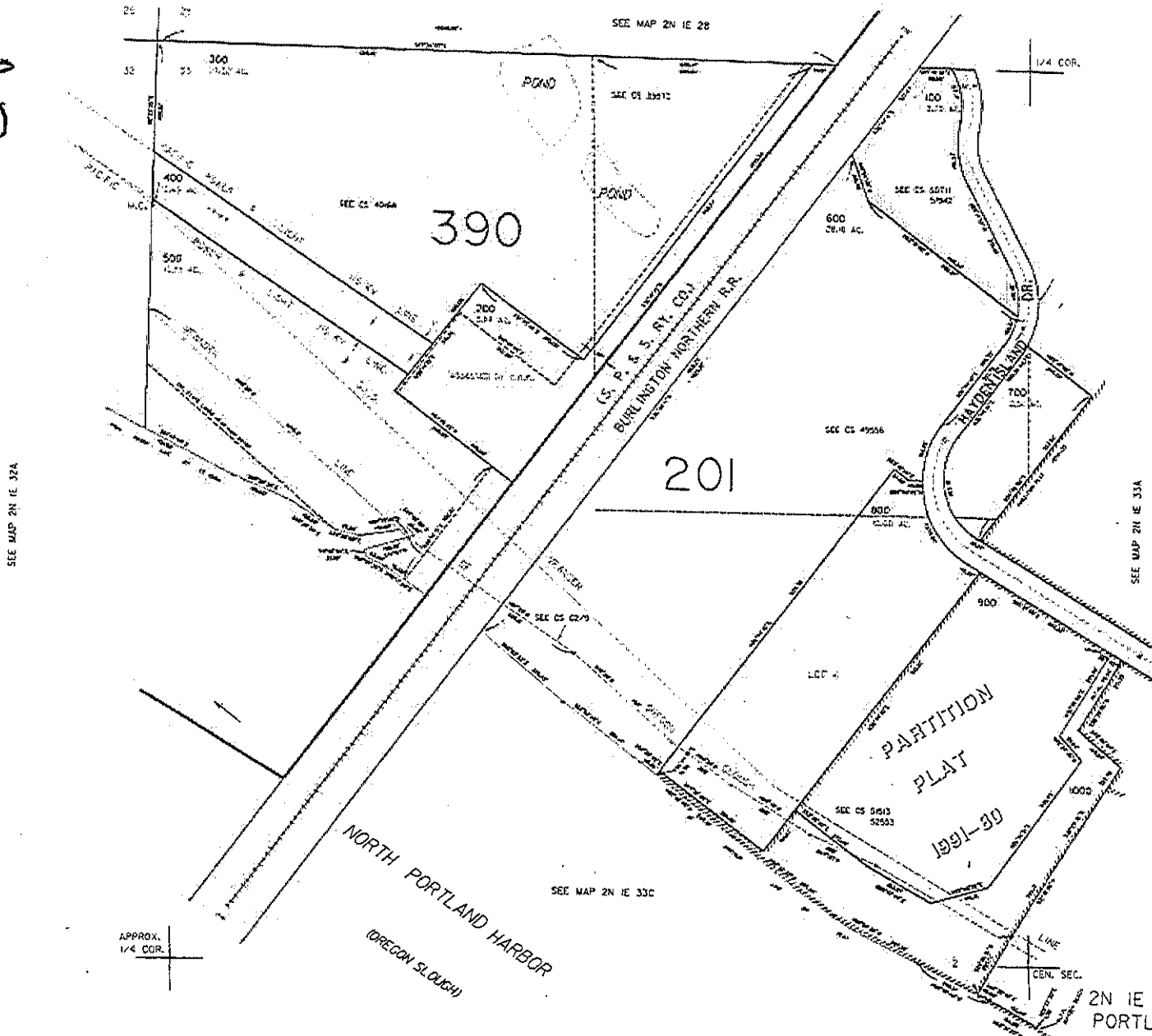
2N 1E 33A
PORTLAND

THIS MAP WAS PREPARED FOR
ASSESSMENT PURPOSE ONLY

NW1/4 SEC. 33. T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 200'

2N 1E 33B
PORTLAND

Sec 33 TL 100
(LISTON)



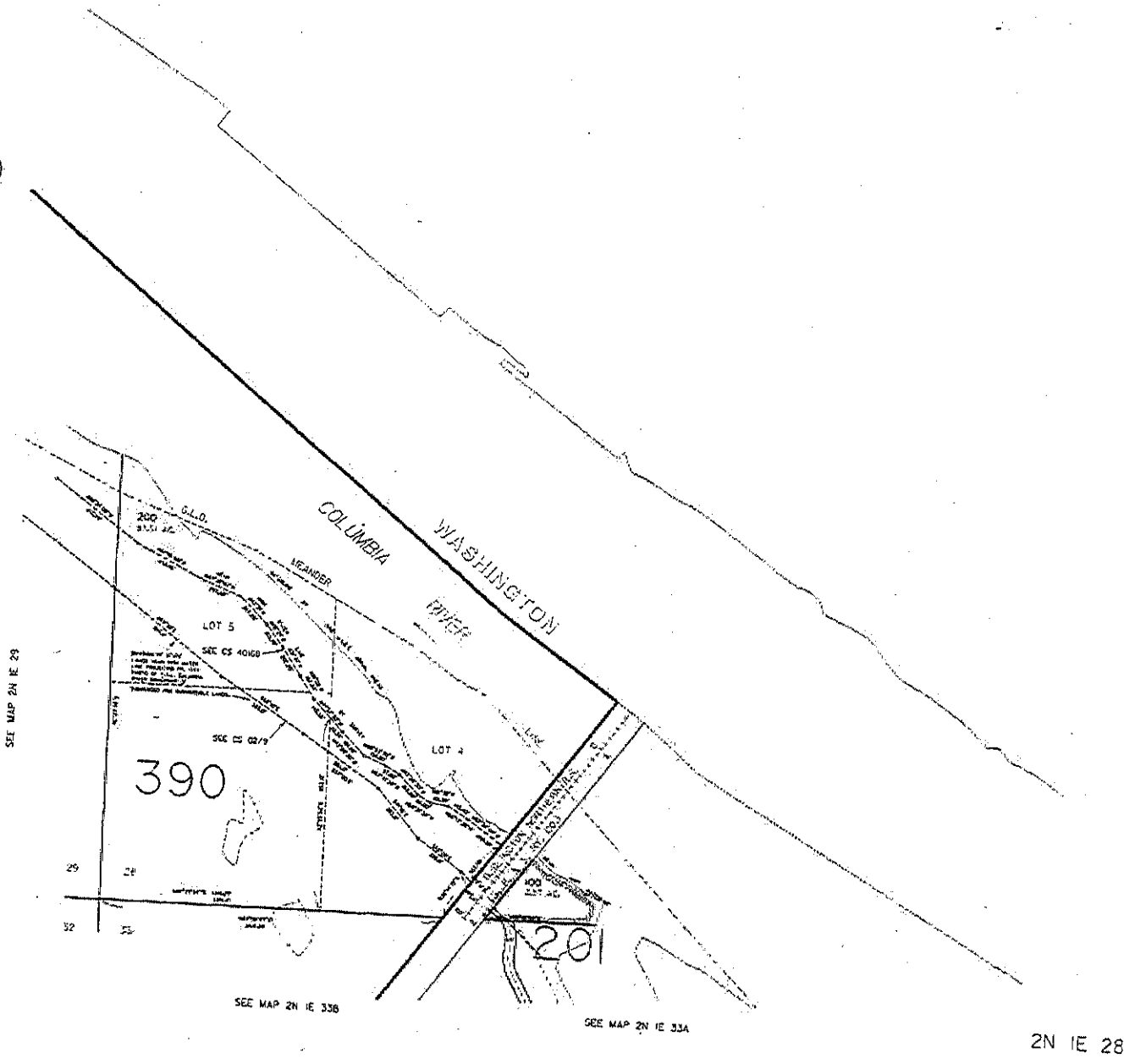
2N 1E 33B
PORTLAND

THIS MAP WAS PREPARED FOR
ASSESSMENT PURPOSE ONLY

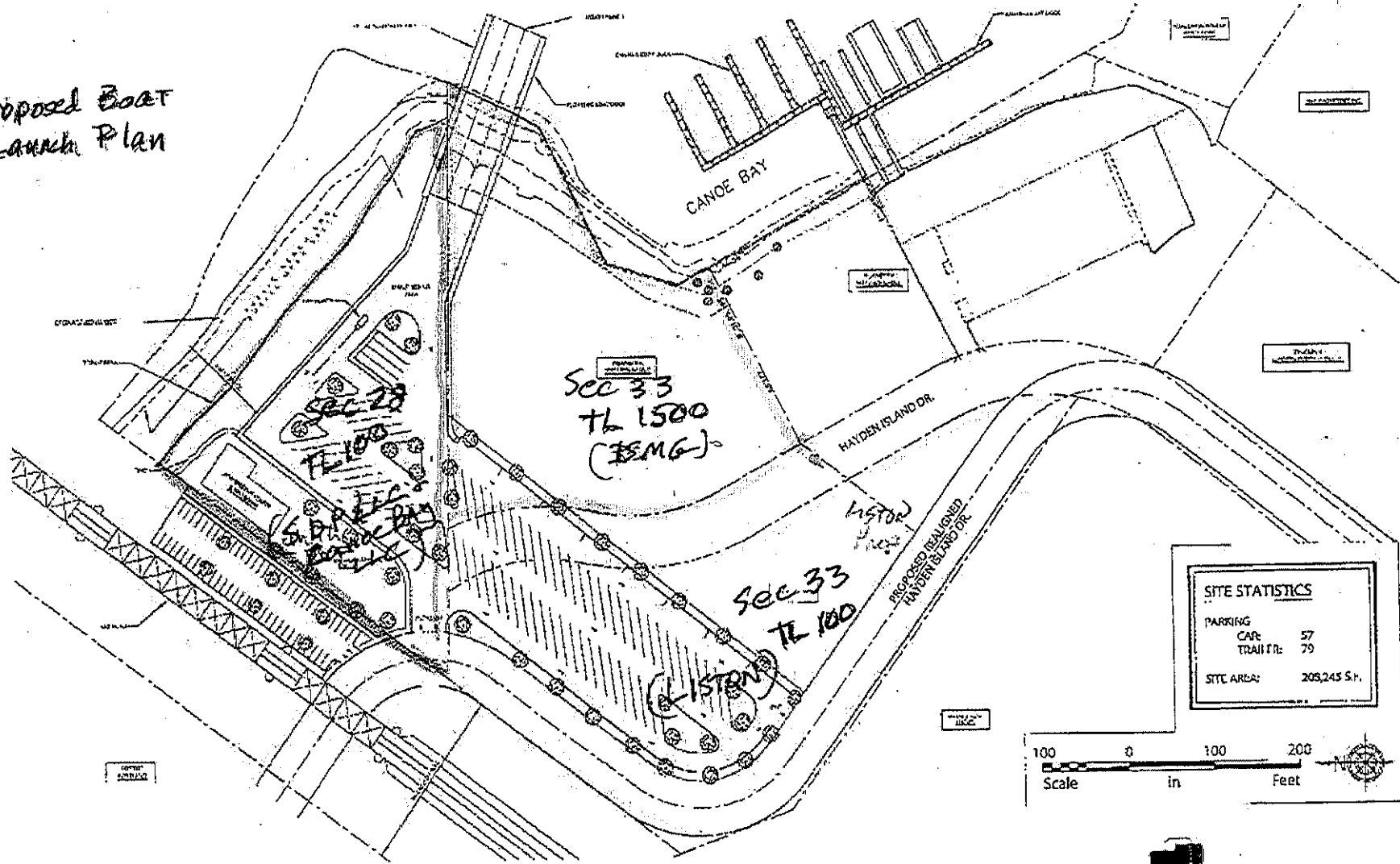
SECTION 28 T.2N. R.1E. W.M.
MULTNOMAH COUNTY
1" = 400'

2N 1E 28

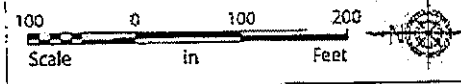
SEC 28 TL 100
(SDP LLC &
CANYON BAY LLC)



Proposed Boat Launch Plan



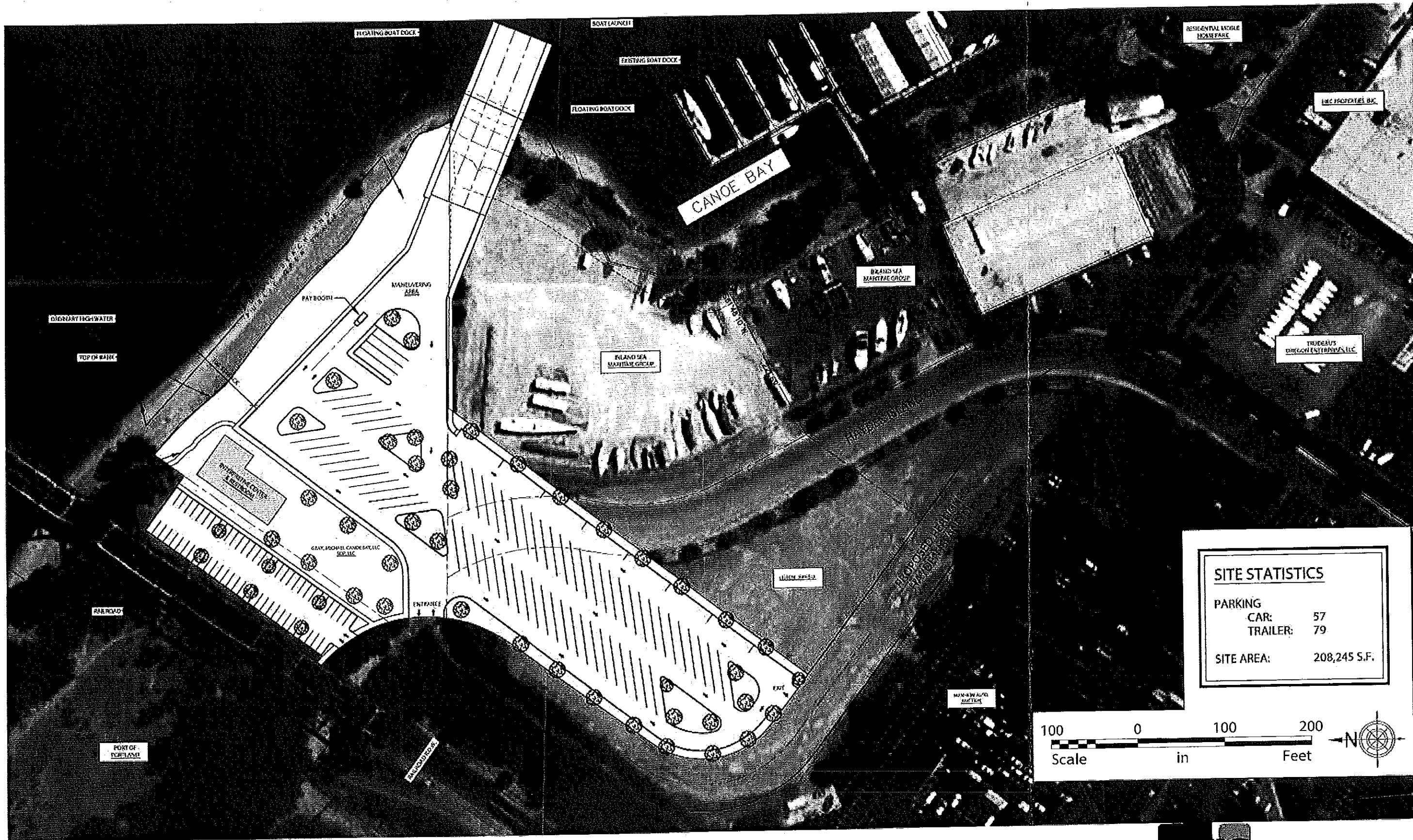
SITE STATISTICS	
PARKING	
CAR:	57
TRAILER:	79
SITE AREA:	203,245 S.F.



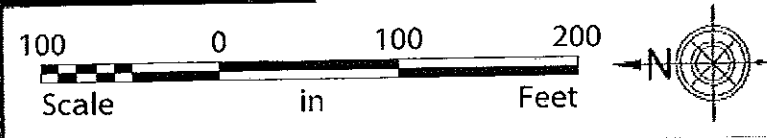
MAY 14, 2012 DRAFT CONCEPTUAL PUBLIC BOAT LAUNCH, OPEN SPACE AND PUBLIC TRAILHEAD



ARCHITECTURAL DESIGN INTERIOR DESIGN MASTER PLANNING LAND USE PLANNING



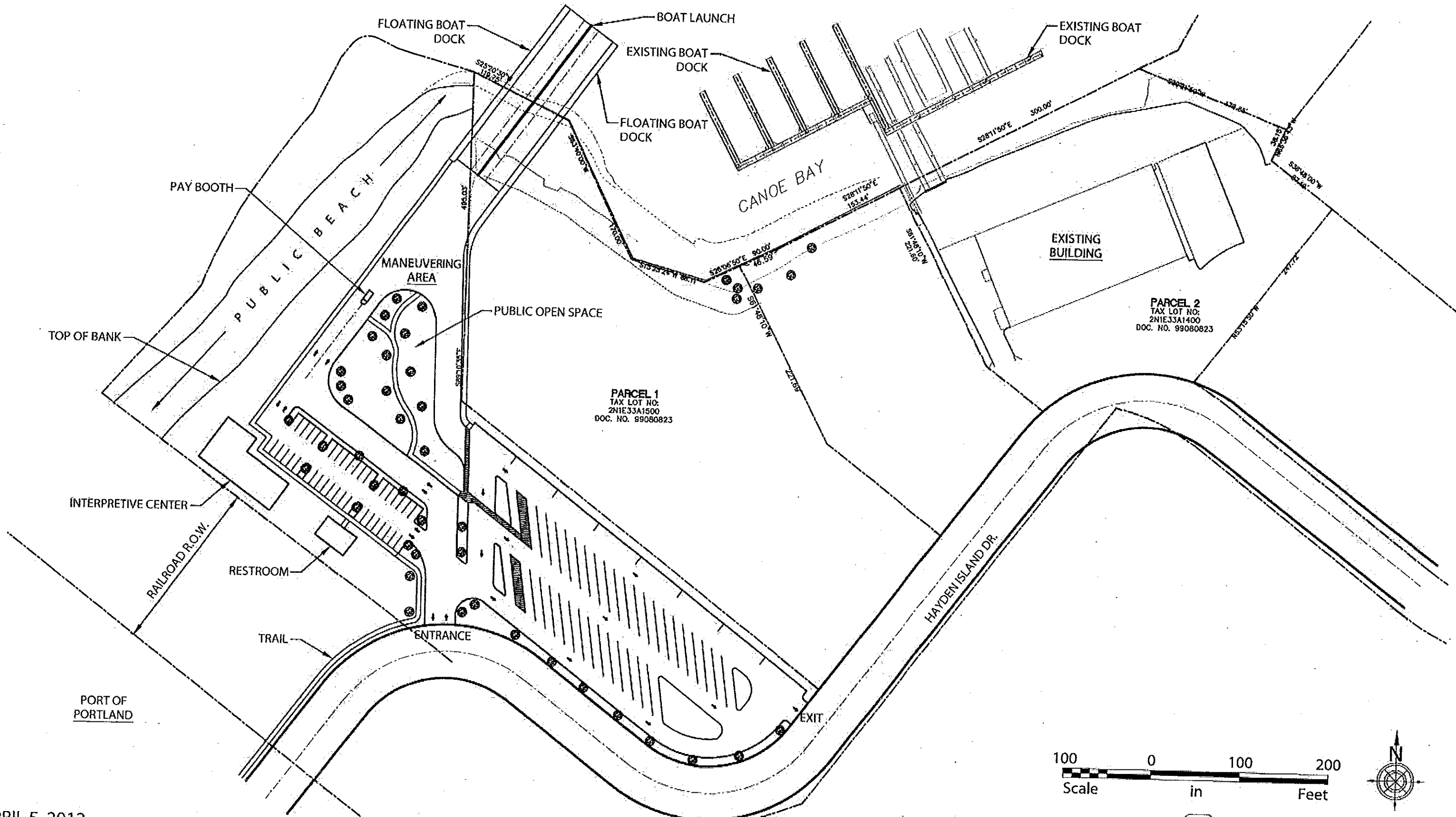
SITE STATISTICS	
PARKING	
CAR:	57
TRAILER:	79
SITE AREA:	208,245 S.F.



MAY 14, 2012
DRAFT CONCEPTUAL PUBLIC BOAT LAUNCH, OPEN SPACE AND PUBLIC TRAILHEAD



ARCHITECTURAL DESIGN INTERIOR DESIGN MASTER PLANNING LAND USE PLANNING



APRIL 5, 2012
DRAFT CONCEPTUAL PUBLIC BOAT LAUNCH, OPEN SPACE AND PUBLIC TRAILHEAD



An Island Community Concept

New Parks

The community desires access to the river for viewing, swimming and boating. To the west, adjacent to Grandma's or Canoe Bay and the railroad tracks, a park with beach access to the Columbia River could be developed.

A new park should be developed west of the highway on the Columbia River. This new park should be designed to provide for a diversity of unstructured and structured recreational opportunities for both residents and visitors to the island. To enhance the park's potential recreational attractions and to limit some of the costs, park planners should consider developing a restaurant/café or similar visitor-related commercial enterprise that makes the park active year-round. The new park could extend eastward under the new bridge, if the crossing allows adequate air and light, and is not too noisy.

Facilities for docking motorized and nonmotorized boats (kayaks and canoes) could be provided at new parks. These facilities could provide residents and nonresidents with opportunities to access the island's marine-related businesses. These facilities would need to obtain the proper permits.

On Hayden Island, there are private walkways that are not part of a connected system and that also do not connect to the public roads. The plan recommends that these walkways be connected into a system of trails providing viewpoints of the Columbia River and the Cascades. Connecting these walkways would be accomplished with easements as land redevelops for the Hayden Island community. Although some of these paths currently exist, some of the land owners were concerned about expanding this system, and others were interested in having such a system. Path systems provide a means of active recreation that is convenient and sustainable for communities.

GETTING AROUND

Getting to and from Hayden Island could change dramatically in the next several years. The only access to the island is via I-5, which is congested for a large part of the day. New bridges across North Portland Harbor and the Columbia River, along with a new interchange for I-5 at Hayden Island, are proposed as part of the CRC project. The Hayden Island Plan's proposals for new development on the island take into account the additional traffic that future development on Hayden Island could generate. Transportation modeling indicates that the additional traffic will meet ODOT standards and will not congest the interchange.

CRC-Related Changes

The CRC bridge as currently proposed would include access for Hayden Island residents to Marine Drive without having to get on the highway, an option that is not currently available. The CRC project also includes a light rail connection from the Expo Center in the south to Vancouver in the north that will offer greater flexibility in how Hayden Island residents and visitors travel. The new light rail bridge will also provide for shared pedestrian and bike paths from Marine Drive to Vancouver, Washington. The CRC plan also proposes improvements to the existing path system that include expanded pedestrian and bicycle connections to Bridgeton and the 40-Mile Loop trail.

An "Enhanced Local Green Street" Network

The plan proposes a network of local streets that would have sidewalks and bike paths. Many streets would have on-street parking. Each of the streets would be designed to be an *enhanced green street*, which would provide for stormwater runoff into planters to protect the Columbia River, landscaped settings for walking and new habitat areas. This design would enhance the local connectivity and the

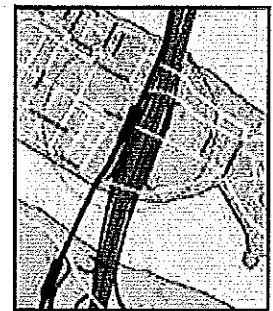
Hayden Island environment. It would make it possible for residents to walk to local businesses, thereby reducing car trips, promoting exercise and reducing fuel use—all elements of the community's vision for making Hayden Island more sustainable.

Connections to Light Rail

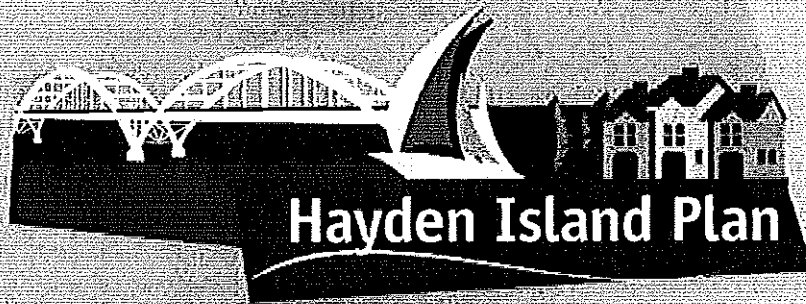
A major part of the CRC project is the extension of light rail from the Expo Center to Vancouver, with a new station on Hayden Island. The design

workshops in October 2007 originally explored three future light rail alignments. Public input, the community design workshops and CRC analysis identified the alignment adjacent to I-5 and a station at Tomahawk Island Drive as the preferred alternatives. This station location would best serve the near-term and long-term needs of the island, is the most central to the island's resident population, and would require displacement of fewer floating homes than the other alternatives.

As already described, this station location would support transit-oriented redevelopment of the shopping center in the long term and station-related improvements in the near term. The plan includes a new open space and a collection of shops integrated into the Jantzen Beach SuperCenter as part of the design for the light rail station.

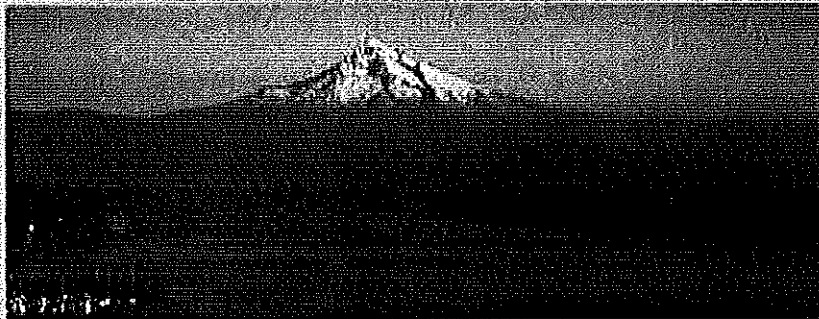
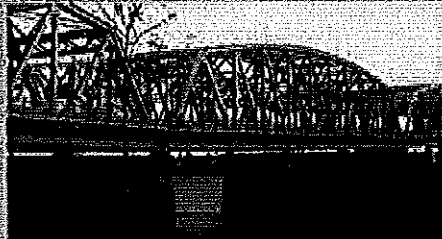


Preferred location for the light rail.



HAYDEN ISLAND

Portland's Only Island Community



Adopted by Portland City Council
August 19, 2009
Ordinance No. 183124

Ordinance 187832, Vol. 1.3.K, page 7778

Attachment 4

Comprehensive Plan and Zoning Code Amendments

SUMMARY OF THE PROPOSED ZONING

The proposed zoning embraces the Hayden Island Plan's overall concept for the island as an island community with a range of housing choices and commercial and industrial areas to support residents and the marine industries, while creating a walkable community to support the proposed extension of light rail. The following are summaries of the proposed zoning.

General Commercial (CG) is the most prevalent zone on Hayden Island, because it provides for the flexibility to develop residential units supporting transit-oriented development and to build a sizable residential community to support local commercial enterprises. This plan proposes to change the eastern half of the manufactured home park from CG to R2 to reflect the residential nature of the existing development and to protect an affordable housing choice on the island. There are no changes proposed for the zoning of Jantzen Beach and Lotus Isle floating home moorages. The moorage is considered a multi-dwelling use and is permitted in the CG zone.

Neighborhood Commercial (CN2) is proposed for the area east of I-5 north of North Tomahawk Island Drive, currently zoned CG, to encourage neighborhood commercial uses within walking distance of a large portion of Hayden Island's residential community and within the pedestrian district.

General Industrial (IG2) is the most typical industrial zone on Hayden Island. The only proposed change to industrial zoning is on sites proposed for residential development where there are existing residential development rights under the x-overlay provisions. These sites are small and isolated for industrial use and facilitate more appropriate waterfront development. Some of the floating home moorages are zoned IG2, which allows for floating homes as a conditional use. At this time, no changes for the zoning of West Hayden Island and Tomahawk Bay moorages are proposed.

Open Space (OS) is proposed for Lotus Isle Park and the tennis court park on North Fir Avenue adjacent to the manufactured home park.

Medium-density, Multi-dwelling, Residential (R1) remains on the Columbia Point condominiums property. Columbia Point West Condominiums is proposed to be zoned R2 to reflect its current development density.

Low-density, Multi-dwelling, Residential (R2) remains for the western half of the manufactured home park and the lot at the northwest corner of the island at the end of North Hayden Island Drive. The R2 zone is proposed for the eastern half of the park, as described in the CG description. Columbia Point West, Waterside, Jantzen Beach Village, Riverhouse and Riverhouse East Condominiums are proposed to be zoned R2 to reflect the current development density of 5 to 20 dwelling units per acre.

Low-density, Multi-dwelling, Residential (R3) remains on the southern portion of the manufactured home park and is proposed for the Hayden Bay Condominiums.

Single-dwelling, Residential (R7) remains for the Lotus Isles Homes.

Single-dwelling, Residential (R10) is proposed for the Hayden Bay Marina homes. This is a change from R3 and is being proposed to reflect the current development density.

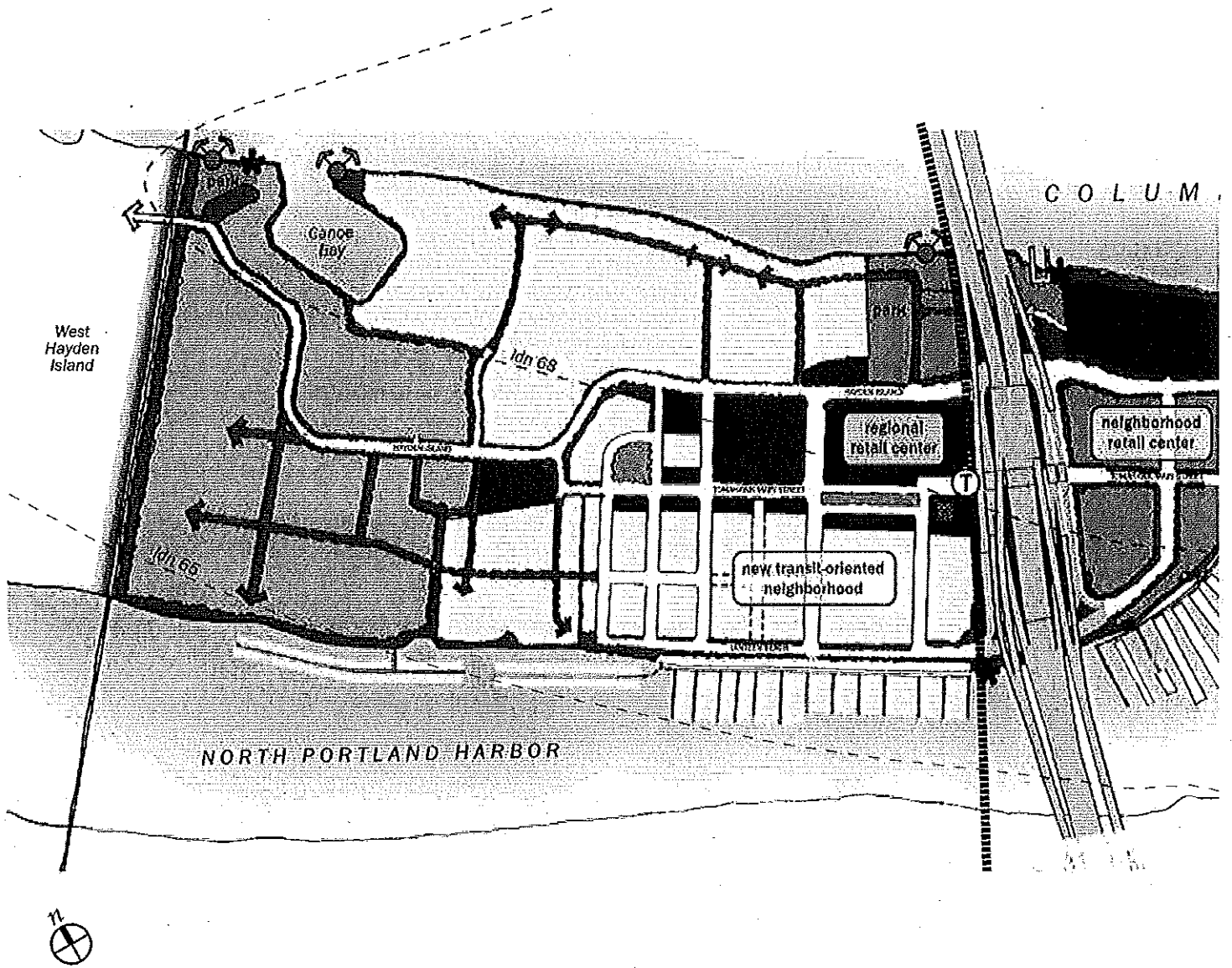
Residential Farm/Forest (RF) remains for the eastern tip of island and along the railroad corridor.

Changes in Land Use >

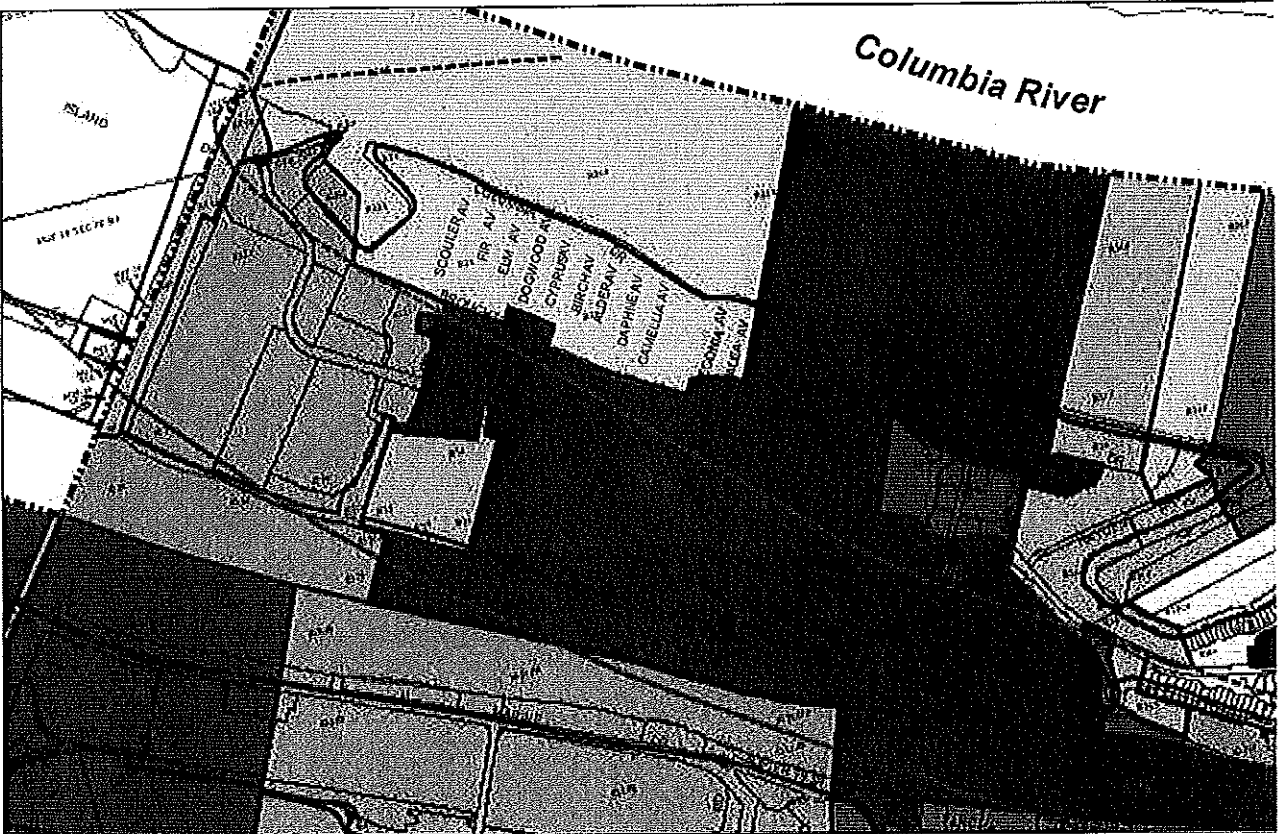
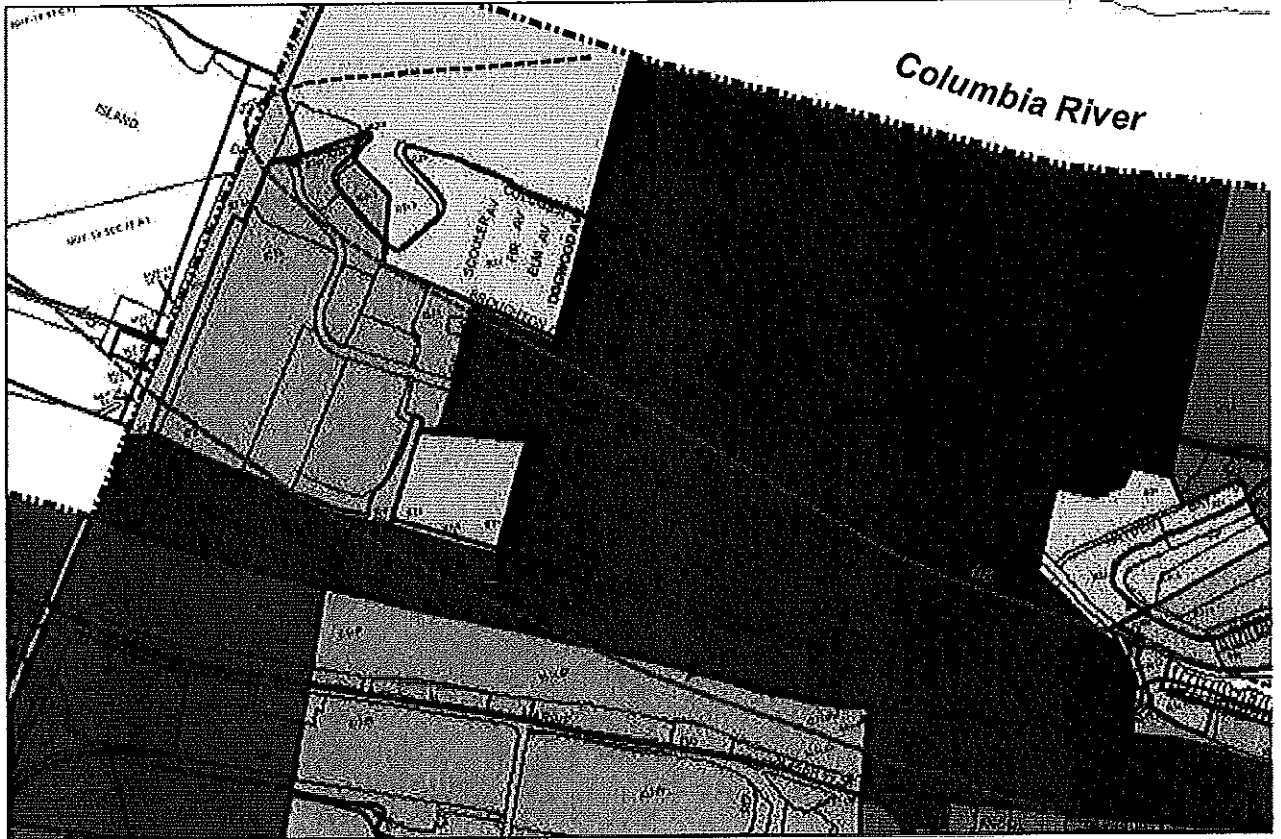
The table at right indicates the changes in land use from what is the existing land use pattern on Hayden Island to the proposed changes in the Comprehensive Plan and Zoning Map

Zoning Classification	Existing Zoning Total Area (square feet/acres)	Existing Zoning Total Area (acres rounded)	Proposed Zoning (square feet)	Proposed Zoning (acres rounded)
CG	14,323,999	328	14,310,695	328
CN2			476,091	11
IG2	8,390,218	192	4,836,865	111
R1	202,347	5	68,176	2
R2	905,416	21	3,112,510	71
R3	1,851,883	43	1,091,171	46
R7	300,713	7	300,713	7
R10		0	839,357	19
RF	432,229	10	432,229	10
OS			40,097	1
TOTAL	26,406,805	606	26,406,804	606

Concept Plan Map



Zoning Map



G:\area_neigh\hayden_island\ecst_prop_zone_17x11.mxd

Arevalo, Nora

From: A. Johnson <ajohn8443@comcast.net>
Sent: Wednesday, December 30, 2015 8:49 AM
To: BPS Comprehensive Plan Testimony
Subject: Zoning

Follow Up Flag: Follow up
Flag Status: Completed

Greetings:

As a resident of Argay terrace I respectfully request a change of zoning code for the area between Beech and Shaver, 122nd and the proposed Beech Park. Commercial is fine for 122nd and Shaver street-side. But the interior should be zoned for single-family housing, or at least R-5, to be in keeping with the rest of Argay. This will also enhance the new park.

Thank you.

Allan Johnson
3717 NE 126th Ave.
Portland, OR 97230

Arevalo, Nora

From: Katherine Astala <astakath@gmail.com>
Sent: Tuesday, December 29, 2015 10:17 PM
To: BPS Comprehensive Plan Testimony
Subject: 2035 Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

I have resided in the Argay neighborhood for almost 20 years. One of the pleasures for me is that what is currently farmland has been a wonderful "lung" of fresh air for all of the neighbors. If this land is sometime in the future to be rezoned, I sincerely hope that it will **remain available for single family housing (R5)** and some minor commercial development only along NE 122 Avenue. Introducing commercial and mixed employment would disrupt the tenor of life for residents and probably make the new park to be built on the east side of this area less accessible or attractive to the children and adults who look forward to enjoying it.

Please **do not rezone this area to become R3**. Let it remain a place where families can enjoy living without increased traffic, noise and confusion.

Katherine M. Astala
4312 NE 125th Place
Portland, OR 97230

December 29, 2015

Good Afternoon members of the City Council

My name is Leonard Waggoner, my address is 33951 S.E. Oakview Dr., Scappoose, Or. 97056

I am a Real Estate Development Consultant for commercial and multifamily properties.

Fact # 1: The city council is the presiding political body for the City of Portland and any comprehensive plan map change must be approved by your majority and subsequently approved by the state of Oregon.

Fact # 2: Approval of the comprehensive plan in question will be followed by a zone change to Institutional Campus IC, since the comp. plan change and the zone change are interrelated.

Fact #3: My client, Jovenco, owns a parcel of land, 6,000 Square feet with a 9 unit, 2 story apartment building 8000 Square feet in size.

Fact #5: The client's property, located at 2244 N.W. Overton is zoned RH (residential high density).

Fact #6: The property at 2244 NW Overton has a FAR factor of 4:1 thus allowing a remodel or new construction up to 24,000 Square feet under the current zoning codes.

Fact #7: When the comprehensive plan and subsequent zone change are applied to my client's property as proposed the only use my client will have for the property is to operate it in its current function under the "grandfather" rules.

Fact #8: Since the action of this political body will result in eliminating any increase in value currently allowed under the RH and the 4:1 FAR it can be determined that the comprehensive plan map

change and subsequent zone change are in fact a condemnation of my client's property.

Fact #9: The power of condemnation by a political body such as this comes from the 5th Amendment to the U.S. Constitution, defined in the "Eminent Domain" authority, an have defined:

Elements of Eminent Domain

To exercise the power of eminent domain, the government must prove that the four elements set forth in the Fifth Amendment are present: (1) private property (2) must be taken (3) **for public use** (4) and with just compensation.

Legacy hospitals (Is not a public entity)

Legacy Health, a nonprofit, locally owned organization based in Portland, Oregon, and serving Oregon and Southwest Washington, is well-known for its hospitals, the only health system covering the Portland-Vancouver area with multiple hospitals and a specialized children's hospital.

Taking: The second element refers to the taking of physical property, or a portion thereof, as well **as the taking of property by reducing its value.**

Fact #10: The notice from the City of Portland, Bureau of Planning and Sustainability, of October 13, 2015 states **“These changes may affect the value of your property”**

Fact #11: In order to seek redress against this process, the client’s only course of action is to bring suit against the City of Portland for condemnation and loss of potential value.

Fact #12: My client is a reasonable individual and seeks only to have his property removed for the comprehensive plan map change and subsequent zone change herein discussed, and further to be assured by the City of Portland that the current RH zone and 4:1 FAR factor will be protected now and into the future.

Fact: The responsibility for resolution is yours!

Arevalo, Nora

From: tmcgorge@gmail.com
Sent: Tuesday, December 29, 2015 5:26 PM
To: BPS Comprehensive Plan Testimony
Subject: Grange zone change

Follow Up Flag: Follow up
Flag Status: Completed

To the City Council- I manage the Parkrose Grange which is in a resident zone. We already pay commercial utility rates, please consider changing the zone and designation to commercial. Thank you.

Dominic Moran
Russellville Grange 353
12105 NE Prescott St.
Portland, OR 97220

Arevalo, Nora

From: Hales, Mayor
Sent: Tuesday, December 29, 2015 3:11 PM
To: Julia Hutchinson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Please Prevent Industrial Development in Wildlife Habitat

Follow Up Flag: Follow up
Flag Status: Completed

Dear Julia,

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

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

Sincerely

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

From: Julia Hutchinson [mailto:juliahut6@gmail.com]
Sent: Tuesday, December 15, 2015 3:19 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Please Prevent Industrial Development in Wildlife Habitat

Dear Mayor Hales,

I'm writing to show my support for the approach taken on industrial lands in the recommended draft of the Comprehensive Plan. I feel strongly that West Hayden Island should not be included in the industrial lands inventory.

I moved to Portland last year for school. Though I am now across the country living in New York State, I still care about the PNW's environmental health. I heard about this current issue through the Portland Audubon Society's newsletter.

I hope that you and the City Council continue to make decisions based on protecting wildlife and the environment.

Thanks for your time,

Julia Hutchinson



Suite 2400
1300 SW Fifth Avenue
Portland, OR 97201-5610

Chrys A. Martin
503.778.5357 tel
503.778.5299 fax

chrysmartin@dwt.com

R
15 DE 58

December 23, 2015

Mayor Charlie Hales
1221 SW 4th Avenue
Room 110
Portland, OR 97204

Re: **Portland 2035 Comprehensive Plan-Riverside Golf Club**

Dear Mayor Hales:

I am writing opposing Riverside Golf & Country Club's proposed designation as a future Industrial Sanctuary instead of its current designation as Open Space. I have been a member for over 15 years and am a former board member and served as President of Riverside in 2014. Riverside is important to me and my family and the immediate area in particular, as it is an affordable, family-oriented resource for the neighborhood. Many other private courses charge exorbitant fees and serve an exclusive clientele. Riverside has always been considered a "blue collar" club that welcomes a diverse set of members.

Our Long Range Plan reflects that membership diversity in our Mission Statement: "Creating a premiere golf and social experience in the most inclusive and family-friendly atmosphere." We have had great success in serving single women, the gay and lesbian golfing population, as well as families. We are known for our outstanding junior golf program, our employment of diverse youth for summer jobs, our support of the youth scholarship program and other worthwhile community commitments. We host many charity golf tournaments and donate prizes at those events to support fundraising for those organizations. Riverside is an important recreational resource for all of Portland, as our members come from all quadrants.

Golf is a game that instills discipline, fairness and professionalism to youth who today more than ever need to learn those traits. We urge continuation of Riverside's current designation as Open Space in the 2035 Plan. Thank you for your consideration. I would be pleased to answer any questions or provide further information.

Very truly yours,

Davis Wright Tremaine LLP

Chrys A. Martin

CAM:klc

cc: Riverside Golf & Country Club

DWT 28596352v2 0200420-000100

Anchorage	New York	Seattle
Bellevue	Portland	Shanghai
Los Angeles	San Francisco	Washington, D.C.



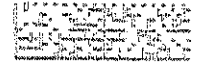
Davis Wright
Tremaine LLP

1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201-5610

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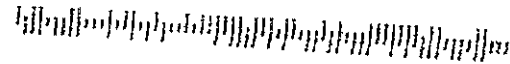


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Mayor Charlie Hales
1221 SW 4th Avenue
Room 110
Portland, OR 97204

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Portland City Council

Council Clerk

cctestimony@portlandoregon.gov

cputestimony@portlandoregon.gov

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

Re: Multnomah Village as Neighborhood Corridor

I request City Council change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the 2035 Comprehensive Plan.

Multnomah Village is classified as a Mainstreet in the current Comprehensive Plan. The Mainstreet designation had a prescribed depth of 180 feet which is consistent with the definition of a Neighborhood Corridor. The Village is more linear in nature and thus the characteristics are better defined by the Neighborhood Corridor designation. The change would make the business district of the Village contained within the Neighborhood Corridor designations of the intersection of Multnomah Boulevard and Capitol Highway.

If the Village were designated a Neighborhood Center with a ½-mile radius, it would overlap with the boundaries of the two adjacent town centers (Hillsdale and West Portland) and the Barbur Boulevard Civic Corridor. The higher-density development in these designations, overlapping with Multnomah, would leave little room for existing single-family zoning as redevelopment continues to occur. The Neighborhood Corridor designation better fits the design and character of the Village.

Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted requests to change the designation to Neighborhood Corridor.

Please add this to the record.

Thank you,

(Your Name)

Lynne Schaefer

(Your Address)

4040 SW MARIGOLD ST., PDX 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

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Please add this to the record.

Thank you,

(Your Name)

Rainna Preisner

(Your Address)

9039 SW 39th 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
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Please add this to the record.

Thank you,

(Your Name) Nita J. Pettigrew (Nita G. Pettigrew)

(Your Address) 7416 SW Capitol Hwy. 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
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Please add this to the record.

Thank you,

(Your Name)

 Serrin Yesilada

(Your Address)

7312 SW 28th 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
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cpctestimony@portlandoregon.gov

1221 SW Fourth Avenue, Room 130

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Thank you,

(Your Name)

Tom Pagonstecker

(Your Address)

8939 SW 40th Ave 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
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Thank you,

(Your Name) Nauff Pond

(Your Address) 7420 SW Capitol Hwy, Portland, OR 97219

cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
Commissioner Amanda Fritz, Amanda@portlandoregon.gov
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Please add this to the record.

Thank you,

(Your Name) Irina N Pond

(Your Address) 7420 SW Capitol Hwy, 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
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Please add this to the record.

Thank you,

(Your Name)

Maria Marija Hiller

(Your Address)

4048 SW Vermont St. 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
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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) MICHAEL P. ROCHE & BREIDA PETRIS

(Your Address) 3920 SW 40th Av. Portland, OR

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

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) Mita J. Pettigrew (Mita J. Pettigrew)

(Your Address) 7416 SW Capitol Hwy PdL 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
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Please add this to the record.

Thank you,

(Your Name) Tom Pagenstecher

(Your Address) 8936 SW 40th Ave 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
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Please add this to the record.

Thank you,

(Your Name)

Romana Preisner

(Your Address)

9039 SW 38th Ave Portland OR

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
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97219

Portland City Council
Council Clerk
cctestimony@portlandoregon.gov
cputestimony@portlandoregon.gov
1221 SW Fourth Avenue, Room 130
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Re: Truth in Zoning

I request specific language shown below be removed from the general description of land use designations on page GP10-3 the 2035 Comprehensive Plan. This would preserve neighborhood character and would reduce the number of demolitions. This would remove the exceptions that allow land divisions less than the base zone. A Comprehensive map amendment would then be required for a land division less than the base zone.

Land use designations - Amendment

The Comprehensive Plan is one of the Comprehensive Plan's implementation tools. The Map includes land use designations, which are used to carry out the Comprehensive Plan. The land use designation that best implements the plan is applied to each area of the city. This section contains descriptions of the land use designations. Each designation generally includes:

- Type of place or Pattern Area for which the designation is intended.
- General use and intensity expected within the area. ~~In some cases, the alternative development options allowed in single-dwelling residential zones (e.g. duplexes and attached houses on corner lots; accessory dwelling units) may allow additional residential units beyond the general density described below.~~
- Level of public services provided or planned.
- Level of constraint.

I also request Section 33.110.240.E of the zoning code, allowing corner lots zoned R5 or R7 to be rezoned to R2.5 if they are larger than 50 feet by 100 feet, be removed from the zoning code in the 2035 Comprehensive Plan.

Please add these to the record.

Thank you,

(Your Name)

MICHAEL P. ROCHE & BRENDA PETRIS

(Your Address)

8920 S.W. 40th Ave Port, OR

cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
Commissioner Amanda Fritz, Amanda@portlandoregon.gov
Commissioner Nick Fish, nick@portlandoregon.gov
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Please add these to the record.

Thank you,

(Your Name)

Tom Sawyer

(Your Address)

8936 SW 48TH Ave 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
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Please add these to the record.

Thank you,

(Your Name)

(Your Address)

Walter J. Pellegrini (Nita G. Pettigrew)
7416 SW Capitol Hwy 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
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Please add these to the record.

Thank you,

(Your Name) Mary J. Pond
(Your Address) 7420 S.W. Capitol Hwy., 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
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Thank you,

(Your Name) IVINA N POND

(Your Address) 7420 SW Capitol Hwy, 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
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Please add these to the record.

Thank you,

(Your Name)

Heidi Maaga Hillier

(Your Address)

4048 SW Vermont St - 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
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Thank you,

(Your Name)

(Your Address)

Rouanna Preisner
9039 SW 38th 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
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Thank you,

(Your Name)

(Your Address)

Jayne Schroeder
4040 SW MARIGOLD ST - PDX 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

Arevalo, Nora

From: Evy Bishop <evybishop@ipns.com>
Sent: Monday, December 28, 2015 3:31 PM
To: BPS Comprehensive Plan Testimony
Subject: [User Approved] Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

I am a resident of the Argay Terrace neighborhood - A neighborhood of single family homes sitting on average to large lots. The current farm property on NE 122nd and Shaver St. that is proposed for mixed employment and would remain zoned R3 should be reclassified as R5 for single family development. This would be in keeping with my neighborhood. I hope you consider the effect the proposed changes would make to my neighborhood and the livability for me and my neighbors. It seems that mid east and east county residents do not receive the same amount of consideration in these matters as the inner city and west side residents. Please do the right thing for our neighborhood!

Thank you,
Evelyn Bishop
13932 N.E. Beech Street
Portland, OR 97230
503.253.2144

Doug Klotz
1908 SE 35th Place
Portland, OR 97214
December 28, 2015

Mayor Hales and Council
1221 SW Fourth Ave.
Portland, OR 97204
Re: Comprehensive Plan Recommended Draft and Mapping

Mayor Hales and Commissioners:

I thank you for all the work you and staff have done to develop the 2035 Comprehensive Plan Recommended Draft. I have been following these issues for 20 years as Land Use Chair of the Richmond Neighborhood, as a co-founder of Oregon Walks, and as a member of the City's Pedestrian Advisory Committee, but the views expressed here are my own.

I wholeheartedly support the Recommended Draft, and the accompanying mapping, as a minimum requirement that will go a long way toward achieving the goals set forth in the Growth Scenarios Report.

Allowing and encouraging greater density in the Central City, in Centers, and along Corridors is critical to this plan. While some neighborhood groups are understandably concerned about the impacts on their neighborhoods, I believe that Council should and must keep in mind the greater good that the city is trying to achieve:

Reduction in Carbon Emissions. This is crucial to the survival of the planet that we live on. Portland's, Multnomah County's and Oregon's leadership in addressing Climate Change must continue and become bolder. Our leadership on this issue is looked to by many American cities, and we must not waver in that leadership. Concentrating new housing units in the Central City and in Centers and Corridors is the best way to reduce carbon emissions due to transportation, and multifamily and attached structures additionally help reduce emissions from heating and cooling by having less exterior wall area per unit.

While the plan encourages development downtown, and in Centers distributed throughout the city, there should be increased focus on those Centers and Corridors that are within 3 miles of the Central City. Because of the high employment in the Central City, and the complete grid available near the Central City, these close-in neighborhoods already are responsible for less Transportation carbon emissions per person than outer neighborhoods. This is not attributable solely to transit use. Bicycling and walking for commute and other trips are feasible and practical alternatives in these neighborhoods much more so than in locations near the outer Centers like Gateway or St. Johns.

The Cool Climate Project at UC Berkeley publishes a map of household carbon emissions per zip code, broken down by sector. <http://coolclimate.berkeley.edu/maps> Their map shows transportation emissions of Downtown residents at 4-6 metric tons/year. Those in inner SE neighborhoods of 97214 and 97232 average 10 tons. But in any zip code further east, for instance, transportation emissions are at least 13 tons/year. So, a household in East Portland, for instance averages 3 tons more transportation emissions than one in Buckman or parts of Richmond. We hope to reduce all these numbers, but the starting points and tendencies should be recognized as well.

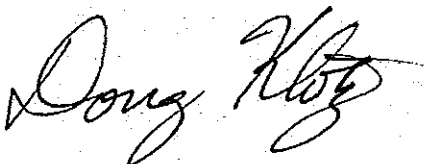
It should also be pointed out that in evaluating shadowing that taller buildings on corridors may cause on neighboring houses, the reduction in solar access to those individual houses, should balance the potential ~1-4 tons reduction each house could achieve with solar panels, against the 30 tons of increased emissions that would result from, say, 10 apartments being removed from the taller building to reduce shading, and those apartment residents displaced to a neighborhood further out (at 3 tons increase per household).

Affordable Housing. I support the concept of incentivizing the inclusion of affordable units proposed in the upcoming Mixed Use Zones proposal, including the allowance of a partial, stepped-back fifth floor in CM-2 to accommodate these units. This more attractive incentive (beyond just increased FAR) should be allowed beyond the Urban Center designations, or the Urban Center designation should be applied more broadly, such as east of SE 44th, and south of SE Powell.

But, as well, the building of more housing units will, by itself, help mitigate the rising housing prices in our region, and I urge the loosening of FAR limits and other restrictions that exacerbate the problem. The City should rethink the inner neighborhood Multifamily Zones (a project now being planned), so that R-1 is not the densest zone available there. Multifamily Residential zoning along Corridors and in Centers should allow at least the same density as is being achieved in Mixed Use zones that are in many cases directly adjacent to them along Corridors and in Centers. While “Affordable Housing” units help a certain lower income group, increasing the overall housing supply (especially in close-in, transit-served areas) helps a broader group of workforce and mid-level households.

While there are many other details that I have and will comment on, these are the most important issues facing our city today, and I hope you will consider these comments in that light.

Sincerely,



Doug Klotz

Arevalo, Nora

From: deloresgradin@comcast.net
Sent: Monday, December 28, 2015 10:07 PM
To: BPS Comprehensive Plan Testimony
Subject: Zoning Farm Property at NE 122nd and Shaver Street

Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern:

The current farm property on NE 122nd and Shaver St. that is proposed for mixed employment and would remain zoned R3 should be reclassified as R5 for single family development.

Wesley E Gradin

12604 NE Prescott Dr.

Portland, OR 97230

Arevalo, Nora

From: Natalia Alexandra <natalia2241@live.com>
Sent: Monday, December 28, 2015 10:04 PM
To: BPS Comprehensive Plan Testimony
Subject: Argay Terrace Neighborhood

Follow Up Flag: Follow up
Flag Status: Completed

Hello,

My name is Natalie A. Myers. I live on the corner of 125th Pl and NE Shaver St. I am worry about future of our neighborhood.

Our neighborhood was built as a single family development. It is hard to imagine as commercial and mixed employment according 2035 Comprehensive Plan.

It is difficult to be on the final hearing on January 7th or any other meeting like this when people have a job, so; this is my voice for the future of Argay Terrace Neighborhood: please just keep the current farm property on 122nd and Shaver St. as at least as R5 for single family development not as R3 as it proposed.

This will at least help to Parkrose School to keep their number of students normal. If that property will use for apartments or multi-family units there will be need for a new school again.

I hope my voice could be heard.

Thank you.

Sincerely,

Natalie A Myers

4126 NE 125th PL.

Portland, OR 97230

971-201-6561



Dec. 28th, 2015 (Transmitted this day via e-mail to the following)

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
Joe Zehnder, Long Range Planning Manager, Joe.Zehnder@portlandoregon.gov
Nan Stark, BPS NE District Liaison, nan.stark@portlandoregon.gov
Alison Stoll, Executive Director Central NE Neighbors, alisons@cnncoalition.org

Subject: Recommended Comprehensive Plan Map - RCPNA Supports Rezone from Medium Density Residential to Mixed Use for Mark R. Stromme located at 2537 NE 56th Ave. and propose the City includes Fire Station 28 at 5540 NE Sandy in this zone change.

Honorable Mayor Hales and City Commissioners:

Thank you for the opportunity to testify on the Recommended Comprehensive Plan Map. On Tuesday December 1st, 2015 the Rose City Park Neighborhood Association Board accepted their Land Use and Transportation Committee's recommendation to up-zone one property located at 2537 NE 56th Ave. from Medium Density Residential to Mixed Use Commercial. The property currently contains the maximum number of residential units, 13 units on 13,000 square feet. Yet, only one-half of the property is developed. Given the proximity of the site to Sandy Blvd., the site has the possibility of increased residential use if zoned Mixed Use. Nonetheless, concern was raised as to the substandard right-of-way for NE 56th that provides sole access to the site and the need for off-street parking for additional units. Property owner Stromme shared that he lives in the area and any future development will be completed with the needs of the neighbors in mind.

The majority of the RCPNA Board voted to support the rezone on 2537 NE 56th Ave. from Medium Density to Mixed Use Commercial based on the following supportive facts include:

1. The subject property abuts a commercial property (MUC) to the west and a Fire Station to the north (MDR), which both front on NE Sandy Blvd. The southerly property line abuts the Sandy Crest Terrace Apartments (MDR);
2. The subject property is flat and located on NE 56th Ave. within 200 feet of NE Sandy Blvd.;

3. The subject property has been developed to the maximum density of 13 units on 13,000 in the RI zone;
4. Only the northern ½ of the property contains the apartments leaving the remaining area primarily covered with grass, offering possible space for more apartments if zoned Mixed Use Commercial.

Thank you again for the opportunity to provide input on the Recommended Comprehensive Plan Map.

My best,



Tamara DeRidder, AICP
Chair, RCPNA
1707 NE 52nd Ave.
Portland, OR 97213

Exhibits:

- A. Letter to the Neighbors, Mark Stromme
- B. Request to City Council for zone change, Mark Stromme
- C. Applicant site map – Zoning Map
- D. Recommended Comp. Plan Map

The following information was received from property owner Mark Stromme via e-mail, SustainableDesign@tdridder.users.panix.com, on November 25th, 2015. Signed Tamara DeRidder, 11/29/2015

Thank you Tamara. Below please find the letter I sent to neighbors last night, after stopping to visit with John and Kate Robinson who live across the street and I know I am driving now and hope that Andrew will forward that to you, but I will do so if I do not see soon. Thank you again for your consideration on this.

Letter to neighbors delivered last night.

John and Kate, thank you for having me in your home to chat about my apartment across the street.

Delani and Tyler, I am the owner of the Vista Villa Apts across the street from your homes on 56th.

John and Kate provided me your emails in order to communicate with you about this subject.

I wanted to let you know that I met with the Hollywood area planning committee this evening in order to talk about having my property included in the MU 1 zone with the comprehensive plan changes upcoming. They suggested I let the neighbors know, in the event you would like to attend a discussion of this at the board meeting upcoming on December 1 at 7 pm, next week.

In a nutshell, I would like for the long range plan to allow for some additional residential construction on the vacant portion of my property at some point in the future. If not done now and allowed for through the comprehensive plan adoption now in the works, then it will likely not be up for discussion again for another 30 years or so, and I aint gonna be around then. :) I have owned this property for 28 years, and all of the density allowed on the site is contained within the one building, leaving the 70 x 100 foot sideyard just idle. We are on a transportation corridor where the city is encouraging more density, so from that standpoint it makes sense.

This is only the first of several steps that would need to be taken for it to even be included in the comp plan changes. Any development on the site would be a period of years away, and I would envision providing off street parking so as to not negatively impact the street. I have no intentions of selling the apartment property.

If you have any feedback for me, I would appreciate hearing it. I wanted you to be aware of the process I am working through, and would appreciate having either your support or neutrality on the issue.

Thanks so much, and Happy Thanksgiving.

Mark Stromme
mstromme@aol.com
503-314-4412

2537 NE 56th Rezone

Letter to City Council

Exhibit B

Portland City Council
c/o Council Clerk
1221 SW 4th Ave, Room 130
Portland, OR 97204

RE: **City of Portland Draft Comprehensive Plan**
2537 NE 56th 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 56th 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.

Existing and Future (Draft Comprehensive Plan) Zoning Designation of property:

The property at 2537 NE 56th Avenue consists of approximately 12,800SF (100' x 128') of land located on the west side of 56th Avenue just south of NE Sandy Blvd. The property includes a 13-unit apartment building which is 2-stories, plus a partially depressed first level. The building is situated on the northern 40% of the site. The current zoning designation for the property, and those immediately around it on both sides of Sandy Blvd., is Multi-Dwelling Residential – R1, a medium-density multi-dwelling zone that allows 43 units per acre or more depending on amenity bonuses. Based on this zoning, the property already contains the maximum number of allowable units, leaving the southern 60% of the site undevelopable.

The existing R1 zone is an anomaly in the context of NE Sandy Blvd. For many blocks in both directions, the properties along Sandy Blvd. are currently zoned Commercial, generally CS – Storefront Commercial to the southwest, and CG – General Commercial to the northeast. Also, the R1 zone exists in this area despite that several of the properties in the zone are not residential. These properties include the restaurant directly adjacent to the west of my property, the fire station directly adjacent to the north, the bank across 56th Ave. to the northeast, and the dental office across 56th Ave. to the northeast.

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

PAGE 1 OF 2

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 56th Ave., along with the restaurant, fire station, bank, and dental office mentioned above, be included in the new Mixed Use – Civic Corridor (MU-CC) Comprehensive Plan designation. This MU-CC designation encourages mixed-use, pedestrian focused, transit oriented, and medium density development. My intention for the property is to allow for additional residential units on what is now an underutilized site – not to develop commercial use on the site.

Explanation in Support of Proposal:

The Mixed Use – Civic Corridor Comprehensive Plan designation I propose for my site is the same mixed-use designation that is currently proposed for properties to the southwest and northeast of my site. The inclusion of the above-referenced properties in the MU-CC will provide a more contiguous mixed-use zone along Sandy Blvd.

MU-CC seems a very appropriate designation for the Sandy Blvd. Corridor given its frequent transit service and medium-density commercial nature. According to the Draft Comprehensive Plan, "as the city grows, these corridors also need to become places that can succeed as attractive locations for more intense, mixed-use development." This is a prescription for higher density residential use along and just adjacent to Sandy Blvd. My property is a prime candidate for such development, as it is already a multi-family apartment building with an adjacent 7,500SF of currently undevelopable land that could easily support greater residential density near the NE Sandy Blvd. Transit Corridor.

Although there is a need for higher density residential, I am sensitive to the desire for commercial space not to push into lower density residential zones. Just to the south of my property, 56th Ave. offsets to the east before intersecting NE Sandycrest Terrace. This offset creates a natural break between the commercial- and transit-oriented Sandy Corridor, and the lower density neighborhood to the south.

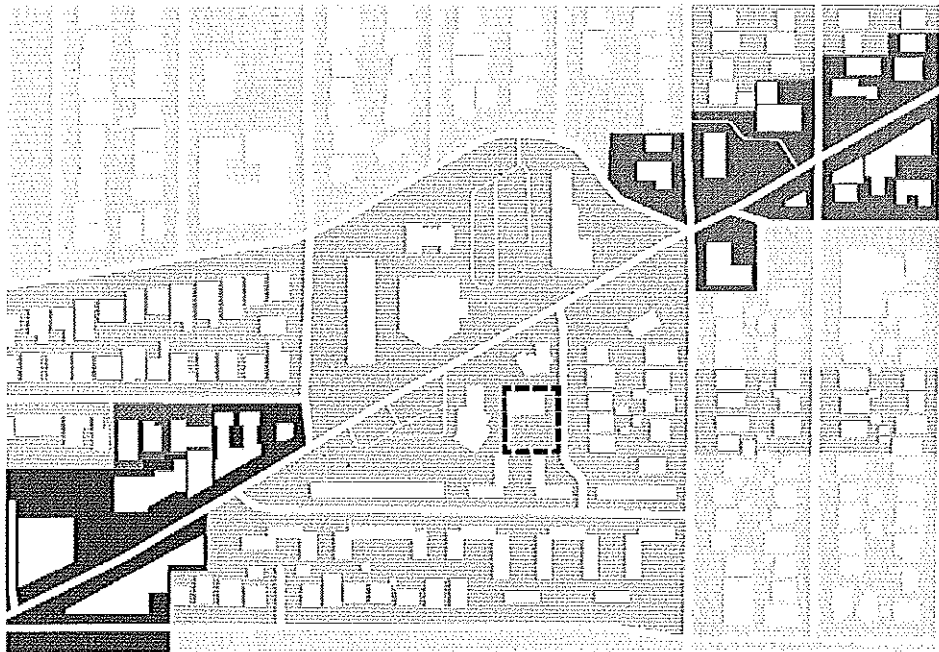
Thank you very much for considering my proposal. Please keep me informed of opportunities to continue to participate in the conversation regarding the future of my site and neighborhood.








Sincerely,

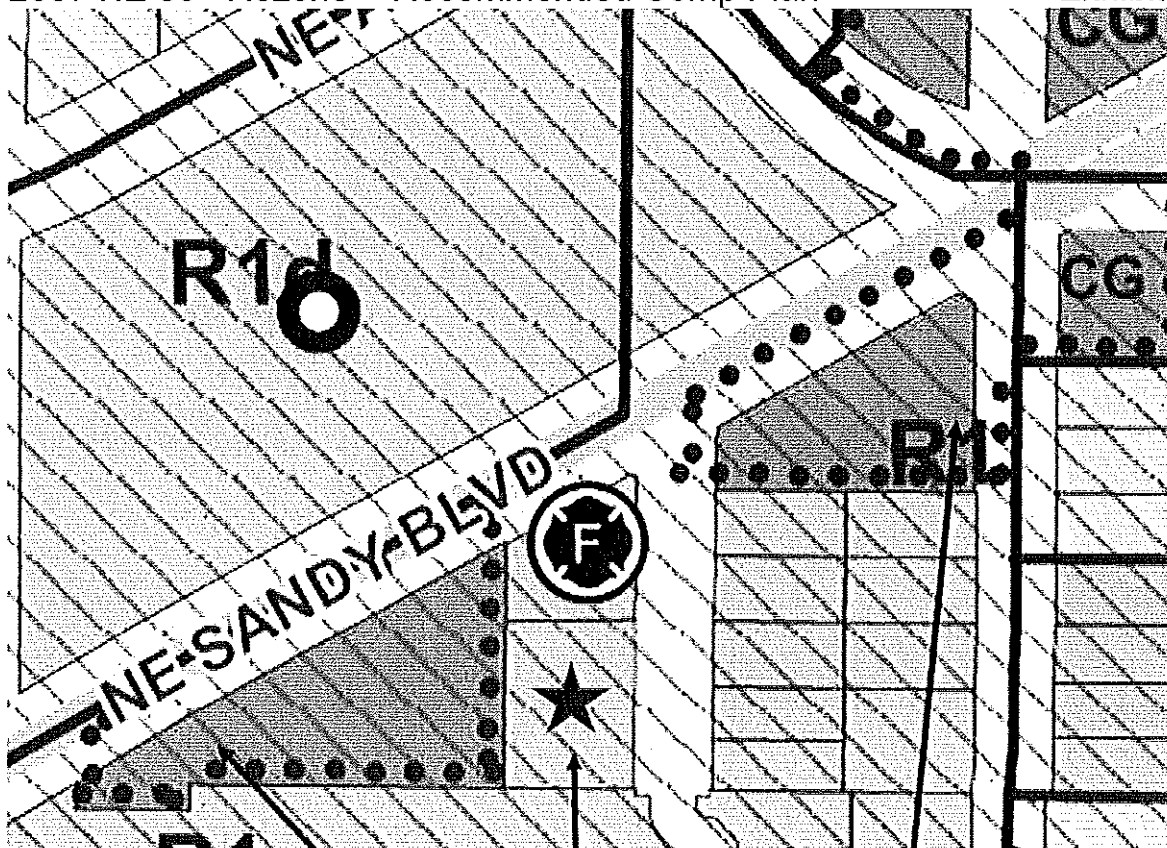
Mark R. Stromme

Enclosures: Exhibit A
cc: Nan Stark, City Planner / Northeast District Liaison
Tamara DeRidder, Chair, RCPNA
Hennebery Eddy Architects

Existing Zoning



-  CS
-  CG
-  R1
-  R2
-  R2.5
-  R5
-  Subject Property
2537 NE 56th Ave



Subject Site: 2537 NE 56th Ave.

Mixed Use Commercial

Arevalo, Nora

From: S E <eikrems@gmail.com>
Sent: Monday, December 28, 2015 3:17 PM
To: BPS Comprehensive Plan Testimony
Subject: 2035 Comprehensive Plan Argay Neighborhood

Follow Up Flag: Follow up
Flag Status: Completed

I am a resident of the Argay Neighborhood in East Portland.

I am among those residents who are requesting that all the vacant or undeveloped current farm property on NE 122nd and Shaver R-3 zoned land in the Argay Neighborhood be reclassified to R-5 single-family residential.

I want to keep Argay a family friendly neighborhood.

Name:
Scarlet, Seth & Elsa Eikrem
Address:
14304 NE Fremont St
Portland, OR 97230

Email Address:
eikrems@gmail.com

Arevalo, Nora

From: Anna Perry <bandap@comcast.net>
Sent: Monday, December 28, 2015 3:06 PM
To: BPS Comprehensive Plan Testimony
Subject: 2035 Comp. Plan/ Resident request

Follow Up Flag: Follow up
Flag Status: Completed

To the Planning Committee:

It is with love for our Argay neighborhood, that we are please, please, requesting that the zoning of farmland on 122nd and Shaver be R-5 --thus preserving the integrity of livability and single family development. We have lived in Argay since 2001 and enjoy its many benefits, and endure , as all of our fellow neighbors do, the over development of apartments that has taken place throughout the years.

Thank you for listening,
anna and Bill Perry
14409 NE Morris Court
Portland, Oregon 97230
503-281-6437

December 28, 2015



Mayor Hales and Members of the City Council
1221 SW Fourth Ave., Room 240
Portland OR 97204

Mayor and Council Members:

The Elders in Action Commission is a senior advocacy council that advises the City of Portland, and Multnomah County Aging, Disabilities and Veterans Services on issues affecting older adults in Multnomah County. As such, we support affordable, high quality health care, housing, nutrition and transportation services for older adults and adults with disabilities.

The Elders in Action Commission has followed the development of the Comprehensive Plan update and we concur with the testimony and comments that have been provided by many of our partners. Specifically, we would like to reinforce the following:

- **Age Friendly Advisory Council comments submitted on October 21, 2014:**
 - Additional Analysis of the Projected Household Growth by Age of Householders Is Needed.
 - The Strategies Outlined in the Portland, Comprehensive, and Age-Friendly Plans Should be Integrated.
 - Examples of Age-Friendly Policies and Approaches that Should be Utilized Moving Forward.
 - Specific Recommendations pertaining to the seven key directions.

- **Ride Connection's suggestion that the Transportation Strategies for People Movement listed in Policy 9.6 be reordered to move Transit above Bicycling.**

- **Anti-Displacement Policies proposed by a coalition of the following partners:** Asian Pacific American Network of Oregon, Center for Intercultural Organizing, Community Alliance of Tenants, Community of Practice, Groundwork Portland, Housing Land Advocates, Living Cully, N/NE Neighbors for Housing Affordability, OPAL, Environmental Justice Oregon Oregon Opportunity Network, Portland African American Leadership Forum, Portland Burn Survivors, Portland Harbor Community Coalition, Right 2 Survive, Right 2 Dream Too, Rose Community Development Corporation, Upstream Public Health, Urban League of Portland, and 1000 Friends of Oregon.

We commend the City for the efforts you put into public outreach on this update. It was an enormous effort requiring hours of staff time and community input. All involved deserve a great deal of praise.

Thank you for the opportunity to submit testimony on this important effort.

Sincerely,

Suzanne Hansche

Suzanne Hansche
Chair, Elders in Action Commission

Arevalo, Nora

From: Laura Johnson <ldr89@outlook.com>
Sent: Monday, December 28, 2015 1:49 PM
To: BPS Comprehensive Plan Testimony
Cc: craigt51@centurylink.net
Subject: Keep Argay Neighborhood a Neighborhood

Follow Up Flag: Follow up
Flag Status: Completed

To Whom it may Concern:

Please keep the property from NE 122nd and along NE Shaver St east to new Beech park family housing or keep it the existing farmland (which we so enjoy!). Do not make it commercial or mixed employment as it is not conducive to the livability for the families that take a lot of pride in living in Argay. This area of NE Portland is a community that has become more close and vigilant of our neighborhood as we hear about break ins, gunfire, gangs, and other misconduct that we as a community are gathering together to get rid of and keep Argay Terrace the quaint, quiet, safe, and beautiful neighborhood that it as been and should be for years to come.

There are other abandoned/for lease buildings and office complexes that should be considered for updating and making home to businesses that want to enjoy this part of Portland as much as we do.

Thank you for reading.

Don and Laura Johnson
14325 NE Beech St.
Portland, OR 97230

Laura Johnson
hm: 503-889-0851
cell: 949-413-4264
ldr89@hotmail.com

Arevalo, Nora

From: Stephanie Noll <stephanie@btaoregon.org>
Sent: Monday, December 28, 2015 1:45 PM
To: BPS Comprehensive Plan Testimony
Subject: Powell Blvd. designation

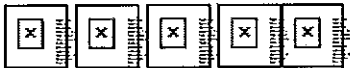
Follow Up Flag: Follow up
Flag Status: Completed

The City of Portland needs a designation for Powell Blvd that aligns with the City's goals to improve safety on our high crash corridors and implement Vision Zero goals of eliminating crashes and fatalities on our roadways by 2025. SE Powell has been the site of a dozen fatal crashes in the last ten years, eight of them pedestrian crashes. SE Powell Boulevard should be designated as Mixed Use - Urban Center or similar, a designation that acknowledges the reality that Powell is a street that serves schools, a frequent service bus line, residential neighborhoods, and neighborhood businesses.

A designation of Civic Corridor is not in line with the City's goals to increase safety on this corridor. Please re-designate all relevant portions of SE Powell Blvd. to Mixed Use - Urban Center, or a similar designation that is compatible with the neighborhoods, schools, and transit riders it serves.

Stephanie Noll | Deputy Director
tel: 503-226-0676 x23 | fax: 503-226-0498

Bicycle Transportation Alliance | btaoregon.org
618 NW Glisan Street, Suite 401
Portland, OR 97209



December 28, 2015

TO: Mayor Hales and City Commissioners

FROM: NWDA Transportation Committee

RE: Transportation-Related Comprehensive Plan Policies, Projects and Programs

Thank you for the opportunity to comment on the Recommended Draft of the 2035 Comprehensive Plan. Some of our previous comments on the Staff Recommendation have been incorporated into the Recommended Draft, but we also continue to have some concerns.

Policies

We support the added emphasis on transportation demand management (Policies 9.52 – 9.54), but we understand that the actual regulatory elements are not yet fully developed. It is hard to support policies without the accompanying code and ordinances. For transportation demand management to be fully effective, new regulations should apply to all development, not only to new development.

We also support the increased emphasis on parking management, particularly Policies 9.58, Share space and resources, and 9.59, Cost and Price. While we support “Discourage employee and resident parking subsidies,” we are interested in how the City will implement this statement.

Policy 9.60, Bicycle Parking, has improved, but we continue to be concerned that adequate bicycle storage for residents is not reflected in current code language. As we said earlier, “The bicycle parking requirements need to be updated to require adequate space for on-site bicycle storage that is not in residential units and accommodates larger bicycles and bicycle trailers. This is particularly important as new residential units are often quite small and a bicycle is not easily accommodated.”

Concerns

Under Campus Institutions, Policy 6.57, Development Impacts, calls for protecting the livability of neighborhoods through adequate infrastructure. In Northwest Portland, there is very little ability to increase capacity to address institutional growth. This policy, or a new one, should address the need of institutions to have rigorous transportation demand management programs to reduce the impacts of growth.

Goal 8.D, Public rights-of-way, talks about public functions and uses as does Policy 8.38. Policy 8.43, Commercial Uses, seems to contradict them by talking about allowing commercial uses to enhance commercial vitality in the public right-of-way. This opens the door for even more structures (street seats) in the roadway and on sidewalks (outside display, including attention-getting devices) that interfere with needed on-street parking in commercial areas and interferes with pedestrian movement.

We suggest that the language of Policy 8.43 be changed to: Limit allowed commercial uses of the right-of-way to those that support pedestrian vitality and do not conflict with through pedestrian movement or the need for on-street parking.

Policy 9.25, Transit equity, should include the term, "Inner Ring Neighborhoods," in the list of where frequent transit service should be provided. These neighborhoods, including Northwest Portland, support some of the highest-density EXISTING neighborhoods in the City. High-quality transit service is crucial to these areas.

Projects

Missing

Northwest Portland will need additional streetcar service before 2035. A project to extend streetcar in Northwest Portland was dropped from the Recommended Draft. Add a streetcar project in NW Portland that will serve Con-way (now XPO Logistics) master plan area and Montgomery Park. This project was in the staff recommendation – Project 113190 but was moved to the Refinement Plans.

New Projects

We support the following new projects:

20111 - Bike Share

20116 - I-405 Safety & Operational Improvements 15th/16th/Burnside/Couch. Project 20116 has been funded by ODOT and is scheduled to be done in the 2016-18 time frame.

60008 NW Everett/Glisan Corridor Improvements (Broadway to 23rd). This is not a new project, but it has been revised/expanded to include Glisan. This project appears to be in lieu of Project 60010 – Everett/Glisan Decouple, which was deleted.

60027 – Con-way Access Improvements (23rd/Vaughn Access Improvements in current TSP). This has been expanded in scope to include the extension of NW 20th from Upshur to Raleigh. This is a funded project now underway.

60030 - NW/SW 20th Neighborhood Greenway (Raleigh to Mill). This project is from the Bicycle Master Plan, but is duplicated in other places (see below under Programs).

We have concerns about the following projects that have removed from the Transportation System Plan (Comprehensive Plan List of Significant Projects).

20064 - NW 14th/16th Connections. Has it been incorporated into 20002?

60002 - NW 18th/19th Decouple. No replacement is shown for this project. If decoupling is off the table, it should be added as a new project similar to 60010 for the Everett/Glisan couplet as traffic calming is needed.

60014 - NW Pedestrian District. This should have been moved to the Programs List, but wasn't. Some of the improvements have been done, but not all of them. Additional improvements are needed to increase capacity for pedestrians and to improve pedestrian safety.

60021 - NW Bikeways. This was a small project; was it done or is it replaced with the larger NW Greenways project?

Programs

The following projects are listed in the various Program Lists. Some of these projects may not be needed and NEW projects should be considered. We hope that City staff will include the community in updating these lists through the Transportation System Plan update process. Since the sources for many of these projects are ten or more years old, other needs have arisen at the neighborhood level that should replace or be added to the existing lists. The NWDA Transportation Committee is in the process of updating and prioritizing projects and would like

the opportunity to work with PBOT staff to include many of these projects into the Program areas.

Pedestrian Network Completion

Stairs from NW Thurman at Gordon to Aspen connection

Bikeway Network Completion

NW Marshall from NW 22nd to NW Station Way

NW 18th from SW Alder to NW Everett

NW 19th from Burnside to NW Hoyt

NW 24th from NW Flanders to NW Glisan

NW/SW 20th from NW Raleigh to SW Mill [does this duplicate 60030?]

Safe Routes to School

Long list of small projects including a mini-roundabout at NW Lovejoy & 25th to improve access to Chapman School that may not be supported by adjacent property owners. There are no projects for the Metropolitan Learning Center other than 60030.

High Crash Corridor

Burnside & W 20th Place – signal and curb extensions [Included in 20014 – W Burnside Improvements]

Burnside & 24th to Skyline –reduce speed, post signage, speed reader board

Burnside corridor – many small projects

Neighborhood Greenways

NW 20th Raleigh to Jefferson [how is this different from 60030 & the project under Bikeway Network Completion?]

NW 24th Nicolai to Westover

Jeanne Harrison

Chair, NWDA Transportation Committee

Arevalo, Nora

From: Adam Herstein <aherstein@gmail.com>
Sent: Sunday, December 27, 2015 11:42 PM
To: BPS Comprehensive Plan Testimony
Cc: mary.stockton@portlandoregon.gov
Subject: SE Caruthers Zoning

Follow Up Flag: Follow up
Flag Status: Completed

Adam Herstein
3115 SE 52nd Av
Portland OR 97206
2015-12-27

Re: Retain designations on Caruthers and 38th

Mayor Hales and Commissioners:

I would like to support the proposed Comprehensive Plan mapping along the south side of SE Caruthers between SE 35th and 38th, and four properties on 38th. These properties currently have UCb Comprehensive Plan designations, as well as R-5 zoning. I support keeping the Comp. Plan designations as Commercial, which would be proposed to be Mixed Use - Urban Center (MU_UC) in the mapping.

This block and a half section already has three commercially-zoned properties at the intersection of Caruthers and 37th, with a mixed use building on one corner, and a second mixed use building planned for another corner. It is also abutting the Cesar Chavez and Division commercial "node", where two major transit routes and traffic streets intersect. It makes sense for these properties to retain the Commercial Comp Plan designations, but keep the R-5 zoning for now. The neighbors have concerns about the appearance of Commercial uses on the south side of the street, but current and proposed zoning requirements will ensure that there is a landscaped buffer along the sidewalk in front of any commercial that abuts Caruthers.

The properties in question are:

3616, 3720, 3728, 3736, 3746, and 3754 SE Caruthers St., and 2405, 2406, 2414 and 2415 SE 38th Ave.

Thank you.

Erik Matthews

2712 SE 47th Avenue • portland, oregon 97206
Phone: 503.544.7210 • E-Mail: erikmatthews@me.com

Date: December 26, 2015

City Commissioners
CITY OF PORTLAND
Portland, OR

Mayor Hales + Commissioners:

I trust this letter finds you well- thank you in advance for your time and consideration. While it's true I am a Richmond Neighborhood Association board member the views expressed in this letter are my own.

I wanted to personally thank you for all the hard work each of you do to help keep our City of Portland the great place it is to live, work and play. Please keep doing that hard work- we need it to continue to make a difference where we can- locally and globally on issues that affect us all, **especially major changes occurring in our atmosphere.**

The best thing we can do as a city and indeed each of us as citizens- both of the City of Portland and of the World- is to reduce our output of carbon dioxide in to the atmosphere. Fortunately, creating a city that allows us to be more sustainable is easily achieved with simple planning. We need to continue to allow for and create more and more mixed-use structures with greater and greater capacity for residents to live close in to the city-center in order to reduce and ideally eliminate our output of carbon dioxide.

I am referring specifically to your role in the Comprehensive Plan and the Zoning Code- I would encourage each of you to support the Proposed Comprehensive Plan and push for continued refinement of that Plan and our Zoning Code that prioritizes the creation of as much mixed-use space within about 3 to 4 miles of our city center as possible. This means up-designating + up-zoning, increasing current building height + story limits, limiting the space for storage of cars and perhaps limiting the access of cars into our Central City, while increasing capacity in our public transit system.

Please support changes that will limit our city's output of carbon dioxide in to our atmosphere. In addition to helping ensure our air is breathable in to the future, supporting these changes will continue to make our city a more desirable place to live, work and play.

Please contact me anytime to discuss any questions or comments.

Sincerely,

Erik Matthews Architect, AIA
RNA Board Member

Arevalo, Nora

From: Council Clerk – Testimony
Sent: Thursday, December 24, 2015 10:05 AM
To: BPS Comprehensive Plan Testimony
Subject: FW: Add Anti-Displacement Measures into the Comp Plan

Follow Up Flag: Follow up
Flag Status: Completed

From: 350PDX [mailto:webmaster@350pdx.org]
Sent: Wednesday, December 23, 2015 9:04 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Kim Fortin
Email: fortinkim@gmail.com

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Kim Fortin

Arevalo, Nora

From: Council Clerk – Testimony
Sent: Wednesday, December 23, 2015 3:10 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Add Anti-Displacement Measures into the Comp Plan

Follow Up Flag: Follow up
Flag Status: Completed

Susan Parsons
Assistant Council Clerk
City of Portland

susan.parsons@portlandoregon.gov
503.823.4085

From: 350PDX [mailto:webmaster@350pdx.org]

Sent: Monday, December 21, 2015 8:29 PM

To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>;
Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman
<dan@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Council Clerk –
Testimony <CCTestimony@portlandoregon.gov>

Subject: Add Anti-Displacement Measures into the Comp Plan

From: Linda De Sitter

Email: desitter@gorge.net

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Linda De Sitter



Suite 2400
1300 SW Fifth Avenue
Portland, OR 97201-5610

Chrys A. Martin
503.778.5357 tel
503.778.5299 fax

chrysmartin@dwt.com

December 23, 2015

Commissioner Dan Saltzman
1221 SW 4th Avenue
Room 110
Portland, OR 97204

Re: **Portland 2035 Comprehensive Plan**

Dear Dan:

Dan, I rarely petition City Hall, but am urging you to oppose Riverside Golf & Country Club's proposed designation as a future Industrial Sanctuary instead of its current designation as Open Space. I have been a member for over 15 years and am a former board member and served as President of Riverside in 2014. Riverside is important to me and my family and the immediate area in particular, as it is an affordable, family-oriented resource for the neighborhood. Many other private courses charge exorbitant fees and serve an exclusive clientele. Riverside has always been considered a "blue collar" club that welcomes a diverse set of members.

Our Long Range Plan reflects that membership diversity in our Mission Statement: "Creating a premiere golf and social experience in the most inclusive and family-friendly atmosphere." We have had great success in serving single women, the gay and lesbian golfing population, as well as families. We are known for our outstanding junior golf program, our employment of diverse youth for summer jobs, our support of the youth scholarship program and other worthwhile community commitments. We host many charity golf tournaments and donate prizes at those events to support fundraising for those organizations. Riverside is an important recreational resource for all of Portland, as our members come from all quadrants.

Golf is a game that instills discipline, fairness and professionalism to youth who today more than ever need to learn those traits. We urge continuation of Riverside's current designation as Open Space in the 2035 Plan. Thank you for your consideration. I would be pleased to answer any questions or provide further information.

Very truly yours,

Davis Wright/Tremaine LLP

Chrys A. Martin

CAM:klc

cc: **Riverside Golf & Country Club**

DWT 28596447v1 0200420-000100

Anchorage
Bellevue
Los Angeles

New York
Portland
San Francisco

Seattle
Shanghai
Washington, D.C.

www.dwt.com

December 22, 2015

Portland City Council:

My name is Matt Brischetto and I am a homeowner of a few early 1900's era properties in Portland. I am here today to propose amendments to the Comp plan for two of them. The first is 822 SE 15th (cross street SE Belmont St.) and second is 2717 SE 15th (cross street SE Clinton St.).

Both properties had been designated for mixed use zoning in the Proposed Draft of 2014, and subsequently had this designation retracted in the Recommended Plan of 2015. I have provided you with maps of the proposed vs. recommended for comparison. In both cases, the subject was one of a few properties that was retracted from the original proposed zone change on these corridors.

In discussions with BPS, this retraction between 2014 and 2015 was a result of neighborhood testimony on the broader blanket mixed use zoning proposal on their corridors (Belmont, Clinton) and concern about protecting original structures on these corridors, rather than commentary on these specific properties.

Over the past 12-18 months I have had ongoing communication with BPS, the neighborhood associations, immediate neighbors, and Council Staff to show *that given the unique natures of these properties, a change in zoning actually *supports* preservation in one case, and may support it in another.*

1. 822 SE 15th Ave: Alfred Webb Property – SE 15th and Belmont – Registered National Historic Landmark (1989)

I am proposing a change from R1 to CM for this 10,000 sqft parcel which includes four identical Queen Anne Victorian homes built in 1893.

When I purchased this property, three of the four homes were uninhabitable and as one Code Compliance City official put it, "had the longest list of code violations he'd ever seen". I put capital into cleaning them up and making them habitable. They now are homes to young, working class Buckman residents. However, there is significant structural work to be done – especially to the aging foundations and retaining wall– to assure the homes are standing when the next comp plan revision occurs.

Utilizing Portland's Historic Zoning Incentives program, CM density would provide marketable transfer development rights (TDRs) to the properties which could draw private funding for preservation activities. If this funding can be secured, my intent would be to lift the homes and redo the foundations, among other structural improvements. As a National Landmark, the structures are protected from demolition – the incremental density would not add development pressure. Pouring capital into the historic structures adds an additional demolition buffer.

Support: included is a petition of 40 signatures of Buckman residents, a number of which have submitted formal comp plan testimony. I have also included a hyperlocal map of residents along 15th and Belmont who have signed the petition, including homeowners of my immediate neighbors.

After a number of open discussions with the BCA (of which I am a board member), the association has elected to not take a formal position on the matter.

Opponents: As the buildings are protected, and my plan is consistent with most folks' desire to protect historic resources, opponents have struggled to articulate a real reason *not* to do this. Quotes that I've quietly observed are "greedy land grab", "bait and switch plot", or "we can't do this with our house, why should you?" With the incentives of owning a historic property come a plethora of restrictions alongside. Those familiar with Historic Zoning Incentives understand a cost/benefit analysis of new density allocation (which many would not actually view as a "cost" given our housing state of emergency) and "benefit" to neighborhood and all who treasure historic resources is a revitalized landmark.

2. 2717 SE 15th Ave. – Amato Four Square Homes

I am proposing a change from R2 to CM for this 10,000 sqft parcel which houses four identical American Four Square homes built in 1906.

The property was owned for nearly a century by the Amatos, that, like many other early Italian settlers to inner SE Portland, made their name in the produce distribution industry. The Amato descendants continued to flourish and grow throughout SE during the first half of the 20th century. Joe Amato (the original owner of the property) was one of the early family members to arrive from Italy. He passed the homes to his daughter Augusta who ultimately sold them in the final years of her life nearly 100 years after her father first owned them.

CM zoning would allow flexibility for the following paths:

1. Similar preservation strategy to Alfred Webb via pursuit of National Landmark Status
2. Bring commercial services to a critical corner 3 blocks from Orange Line Max stop along Clinton bike corridor

An existing comp plan designation of R1 on a 100x100 corner parcel will undoubtedly bring luxury townhomes in the coming decades with none of the green, public plaza or affordable housing incentives provided by mixed use zones. Path 2 could either utilize a) the existing structures, or b) bring new low density neighborhood commercial development consistent with the adjacent block on 16th and Clinton. In either path 1, 2a or 2b, mixed use zoning would bring flexibility to allow preservation and/or public benefit – that R1 luxury townhomes would not.

Support: I have included a similar petition which has 20 signatures from hyper local neighbors, a number of which have submitted comp plan testimony.

The HAND neighborhood association elected to not take a formal position.

Opposition: A group of neighbors oppose my initiative, the primary concerns being commercial development, and shortage of housing in the Clinton triangle. I believe that a petition was circulated to neighbors around the idea of existing zoning "keeping things the same" – which is far from the reality of what will transpire with R1. The irony is that our interests are aligned – my proposal provides a path for preservation; and if not, an avenue for more housing units, green incentives, and public benefit that luxury townhomes would not provide.

Alfred Webb Property SE 15th and Belmont

Preserving Historic Landmarks through TDRs



Property

- 10,000 tax lot, on SW corner of SE 15th and Belmont
 - 1503-1517 SE Belmont; 822 SE 15th
 - zoned R1
- Four identical Queen Anne Victorian homes built 1893
 - 3 face Belmont, 1 faces 15th
- Affordable Housing
 - Typical tenant: 25 – 30 y.o.; \$600-\$700/month per person (3 people)
- National Registered Historic Landmark (1989)
- 1150 square feet of living space per home; unfinished attics and basements
- Adjacent to CM zone on West and North faces

Matt

- 35 years old, Portland native
- Classic Portland/historic properties
 - Own five properties all pre-1920 construction (two are National Historic Landmarks)
 - Hobby, not a career
- Long-term ownership perspective
 - Have never sold a property
 - Owned (lived in), maintain, remodel, rent
- Interested in preserving Portland's neighborhood culture
 - What makes Portland, "Portland"
 - Green, thoughtful density planning for future population growth

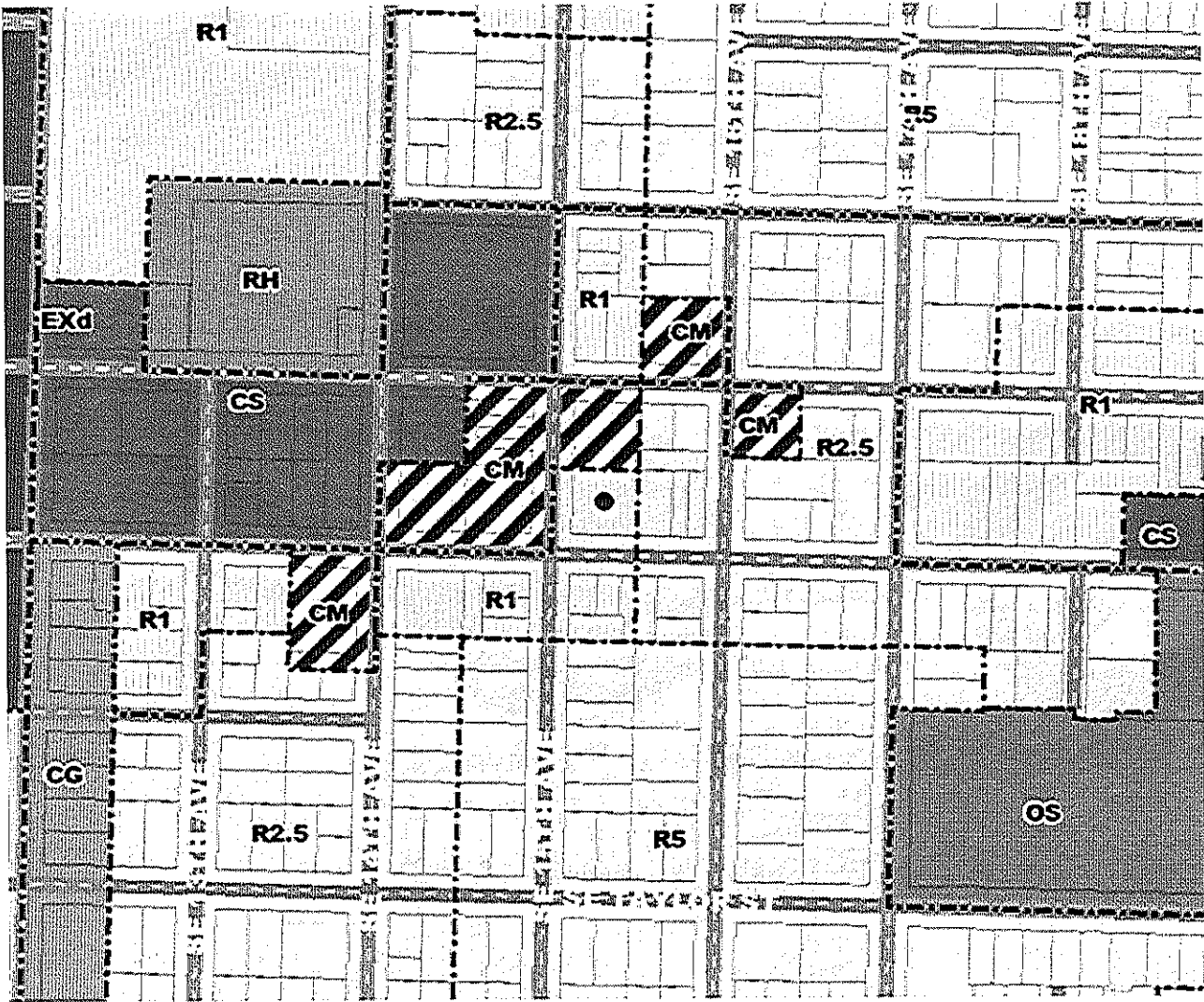
Alfred Webb Quartet



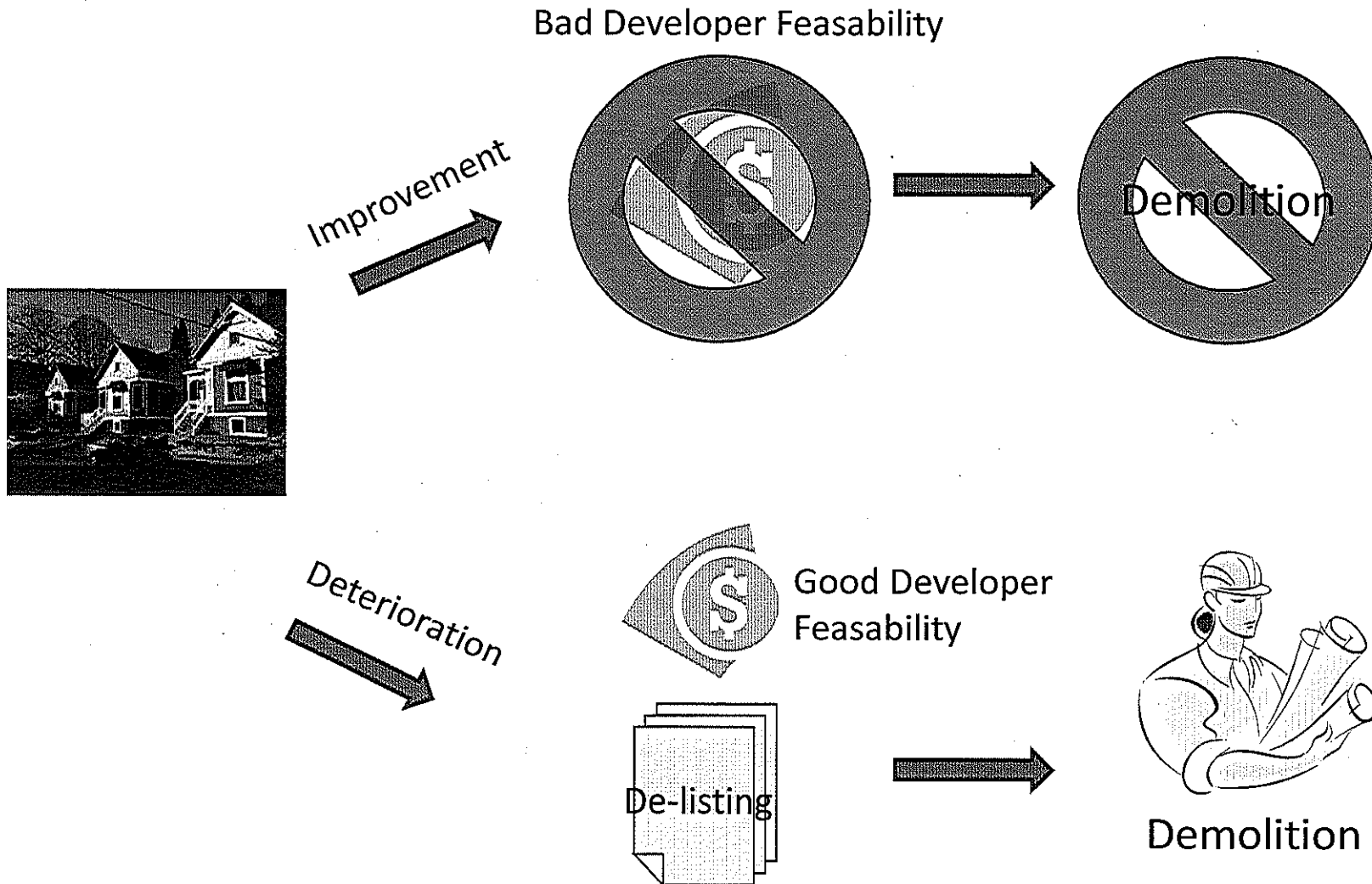
SE 15th and Belmont

Alfred Webb Investment Properties	
U.S. National Register of Historic Places	
Portland Historic Landmark ¹⁴¹	
The three Webb investment Properties along Belmont Street in 2011	
Location	822 SE 15th Avenue 1503-1517 SE Belmont Street Portland, Oregon
Coordinates	45°31'00"N122°39'01"W ordinates: 45°31'00"N 122°39'01"W
Built	1891
Architectural style	Queen Anne
Governing body	Private
MPS	Portland Eastside
NRHP Reference #	89000100
Added to NRHP	March 8, 1989

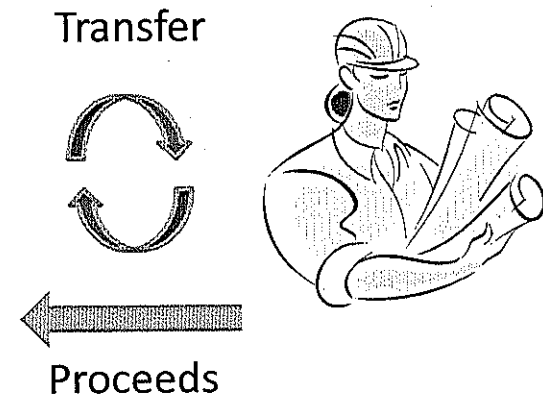
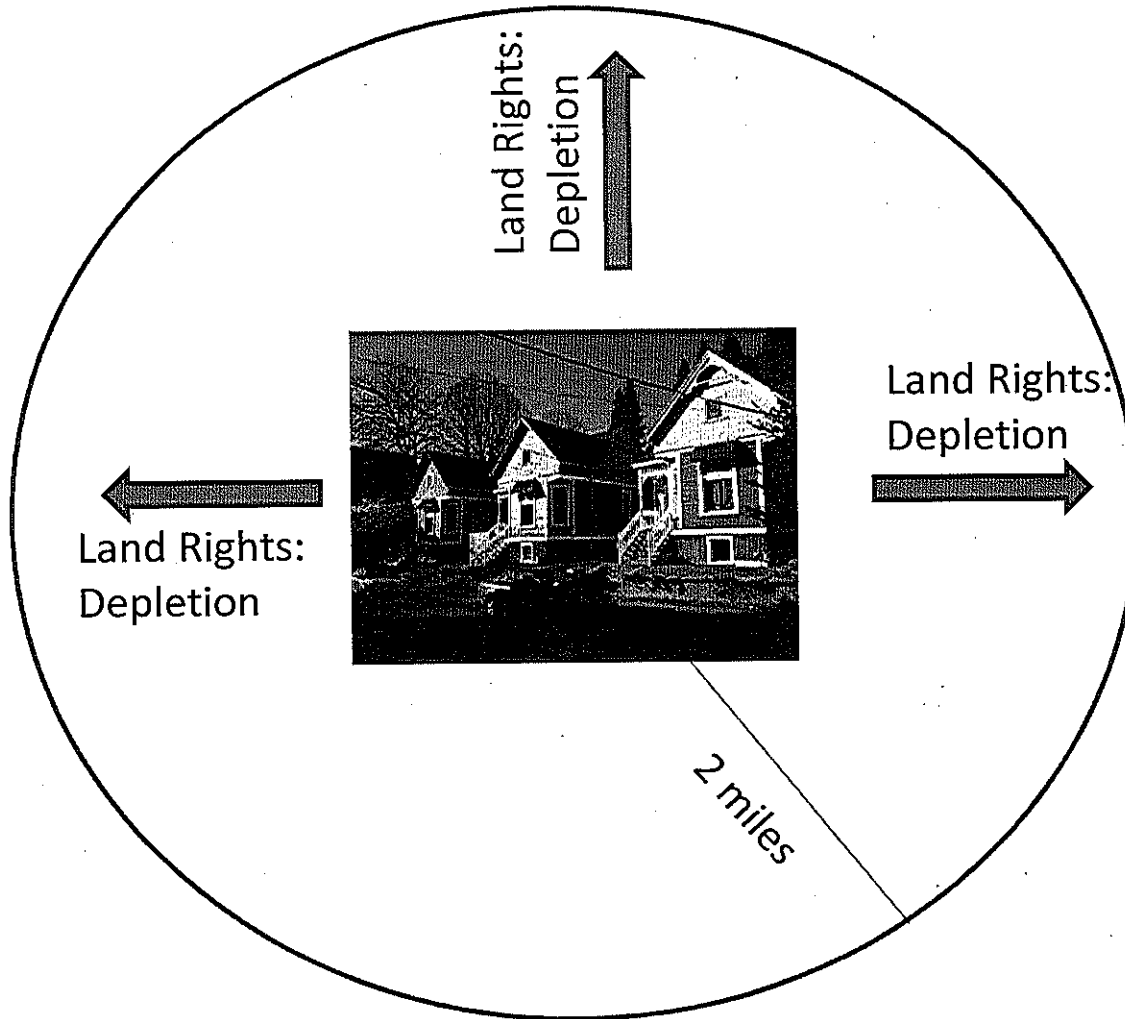
Current Zoning



The Two Paths



Funding Preservation Through Depletion



Encouraging Preservation, Discouraging Demolition

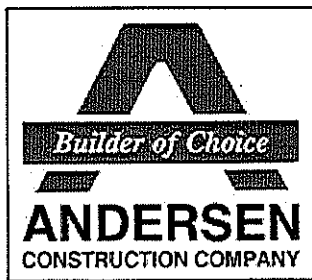
3 Ways:

- 1) More valuable Historic Landmark structures decrease economic feasibility for future demolition/development
- 2) Depleted Land Rights further decrease economic feasibility for future demolition/development
- 3) Improved historic structures are less likely to be de-listed from National Registry

Affordable Housing

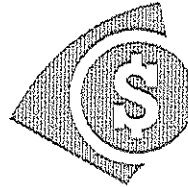
Properties typically shared by 3-4 young adults
(\$500-\$700/month pp)

Source

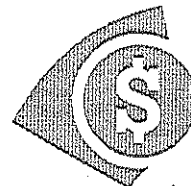


Homeowner

Rehab



TDRs



Savings

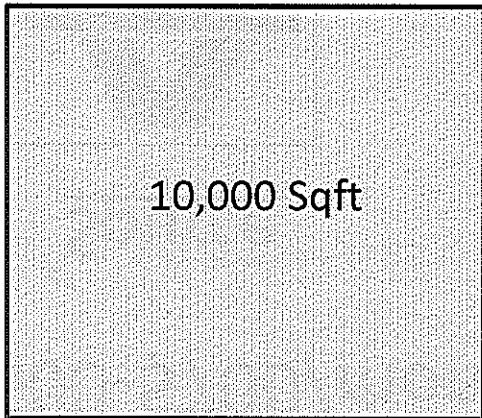
Rent

-



Land Use: R vs. FAR

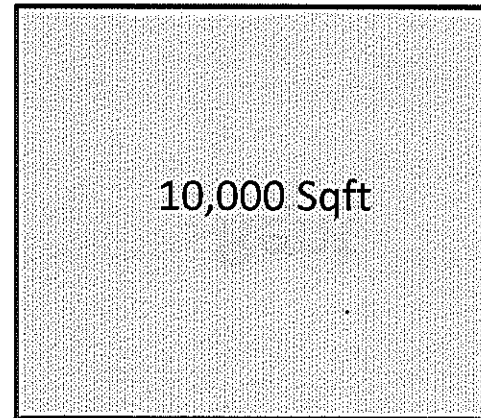
- R1 = 1 Unit/1,000 sqft



10 units

Little to No Market Demand

- FAR = Floor-to-Area Ratio



10,000 x FAR ratio

Strong Market Demand

Key Principles

- 1) National Historic Landmark structures are protected from demolition
 - Only once in the City's history has City Council approved the Type IV land use review for demolition of a historic landmark (Dirty Duck Tavern, 2010)
- 2) National Historic Landmarks can already be used for either residential or commercial use, as provided by Portland's Historic zoning incentives

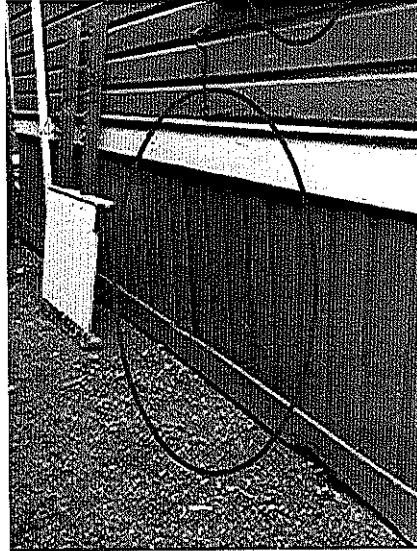
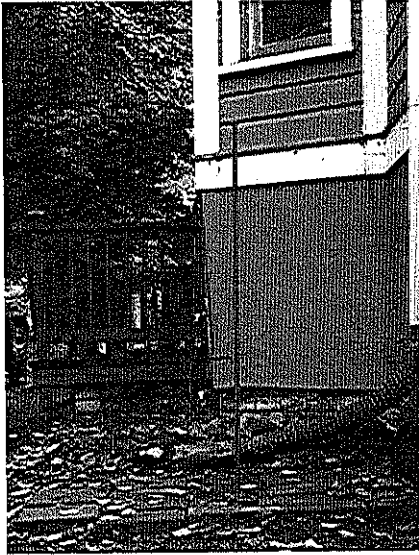
Case Study: Carman House

- Lake Oswego's oldest home, built in 1850s
- Owners have tried to sell home for many years to no avail due to National Landmark historic status
- Let property fall into disrepair – dryrot, mold, rodents
- Fall 2014, LO City Council supports owners request to have Landmark designation removed from property: paves way for demolition and development



**Letting Historic
Properties fall into
disrepair promotes
their destruction**

Rehab Needs/Plan



- Foundation Replacements
- Roofs
- New systems (plumbing, HVAC, electrical)
- Party line sewer conversion to individual lines
- Deteriorating retaining concrete wall
- Basement/attic finish

Total: ~\$500,000

Open Conversations:

- BCA
 - April '15: Draft letter request
 - August '15: Public Viewing
 - 25 attendees
- Neighbors
 - Online Petition
- City: Bureau of Planning and Sustainability
 - Using as Case Study for TDR Use
- Historians
 - Restore Oregon
 - Bosco Miligan Foundation/Architectural Heritage Center
- City Council
 - Chief of Staff meetings

Online Petition

Preserve Buckman Neighborhood Landmark



Signatures

40 Signatures.

Opened on August 16, 2015

The Alfred Webb property, a National Historic Landmark in Portland's Buckman neighborhood, is in dire need of repair. The City of Portland's 2015 Comprehensive Plan Update offers the public a unique opportunity once every 20 years to shape the evolution of the city by commenting proposed new density allocation. Portland City Council hearings will occur in Fall 2015.

Matt Brischetto, the owner of the Alfred Webb Queen Anne quartet, is seeking Buckman's support to change the historic property's zoning from R1 to mixed-use commercial. Doing so will provide the property with incremental density which can be used as transferable development rights (TDRs). Under Portland's Historic Zoning Incentives, TDRs benefit historic properties by generating outside capital to fund the restoration and preservation of the historic structures. In addition, they can relieve development pressure on the sites. Portland's zoning code contains more information: <https://www.portlandoregon.gov/ops/article/150295>

A change from R1 to CM could generate proceeds to redo the 100+ year old foundations and ensure future decades of appreciating one of SE Portland's most unique properties.

Please sign this petition in support of a zoning change from R1 to CM for the Alfred Webb National Historic Landmark at SE 15th and Belmont.

Sign this petition

Full Name*

Location:

Email:
(not displayed publicly)

Notes:

Sign Petition ▶

Already
checked
your inbox?

Then why not
try to save?

Considerations: The Big One



Probably



Maybe



100%

Considerations: R1 vs CM2

	CM2	R1
Max Height	45'	45'
Uses	Residential and Retail (limited)	Residential Only
Floor Area	Base FAR 2.5: 1 (25,000 sqft) Max FAR 4.0: 1 (40,000 sqft)	Unlimited, within height/setback guidelines
Units	Unlimited	10
Setbacks	90% site coverage max	3 ft (=94.1% coverage)
Appx Bldg Volume	405,000 ft ³	425,000 ft ³
Height Bonuses	<ul style="list-style-type: none"> - Affordable Housing - Publicly Available Plaza - Historic Preservations / TDRs - Green Features 	None

CM2



R1

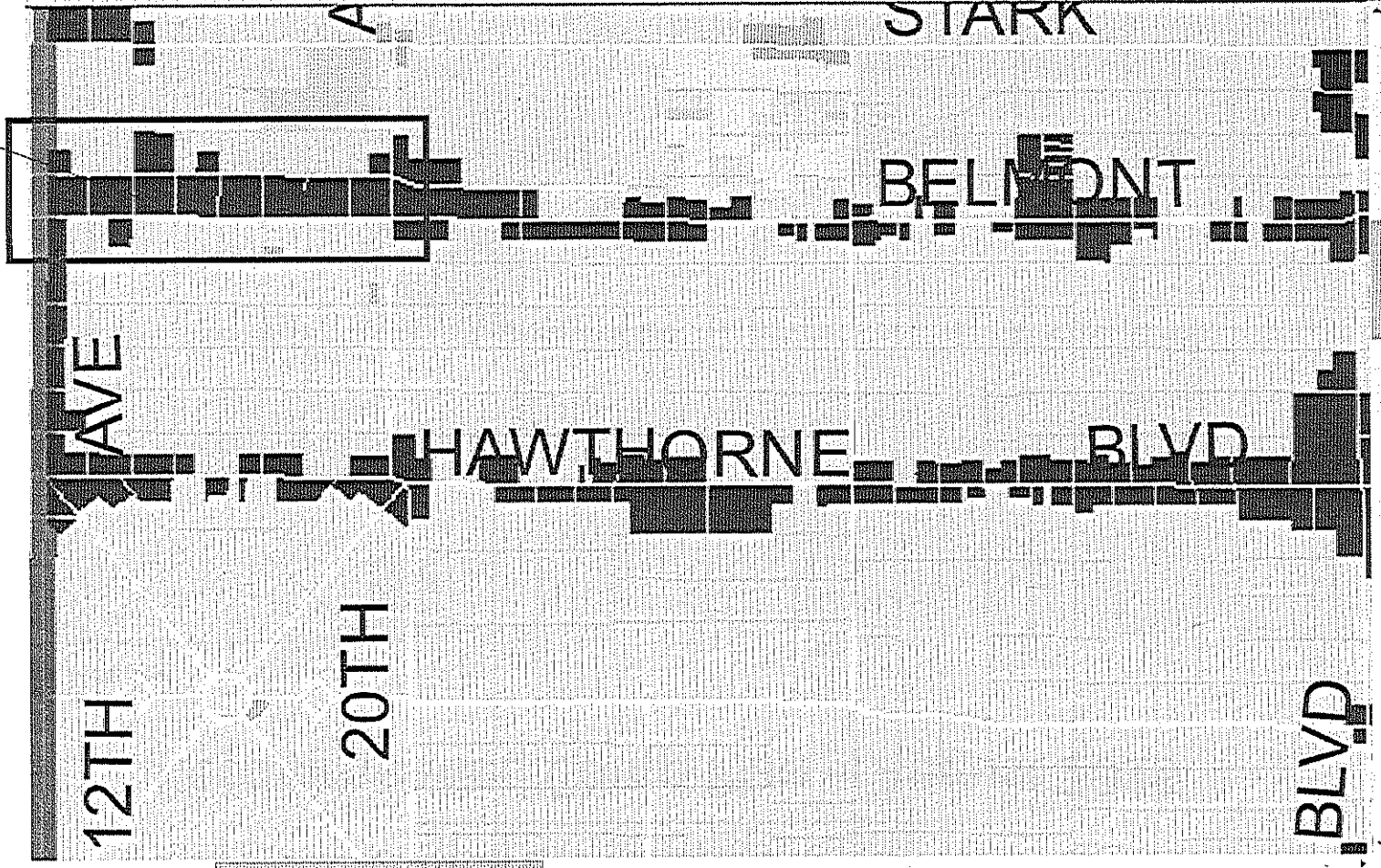


SE 15th and Belmont Proposed Comp Plan – July 2014

ops/article/497636



AW



= Alfred Webb Property

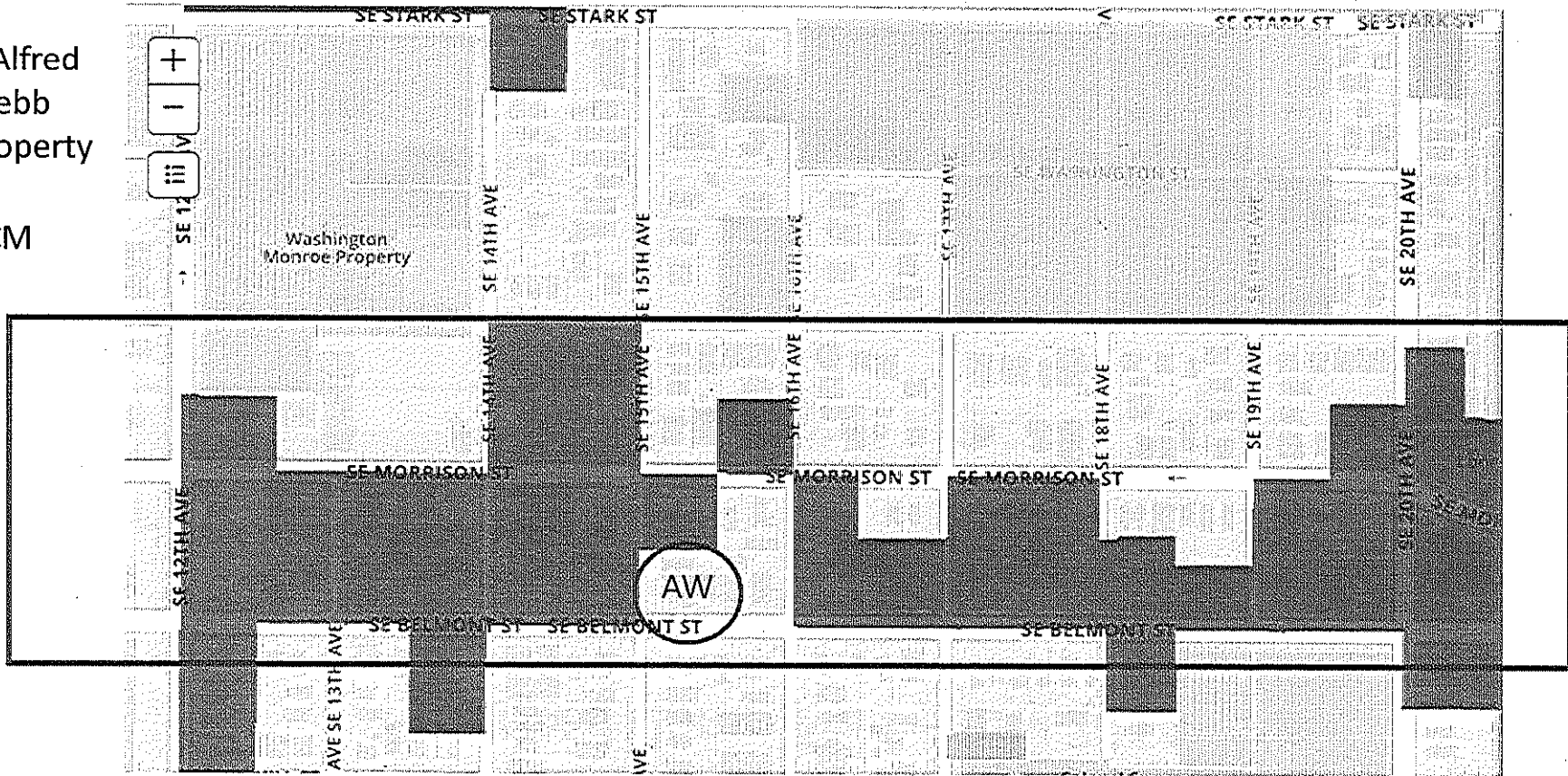
= CM

SE 15th and Belmont Recommended Comp Plan – August 2015

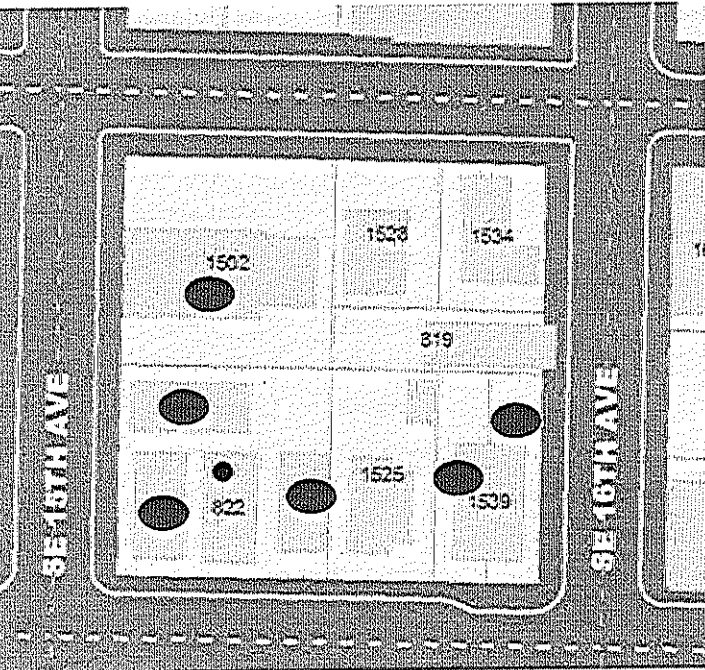
Map App

W
= Alfred
Webb
Property

= CM



SE 15th and Belmont: Neighbor Support



Preserve Buckman Neighborhood Landmark



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40 Signatures.

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Please sign this petition in support of a zoning change from R1 to CM for the Alfred Webb National Historic Landmark at SE 15th and Belmont.

Sign this petition

Full Name:*

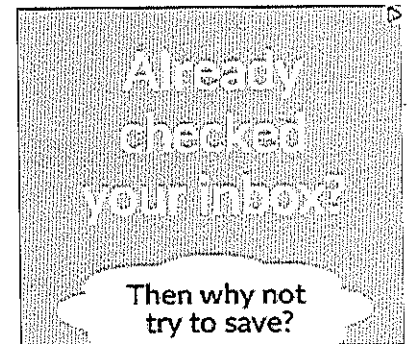
Location:

Email:
(not @company or .public)

Notes:

Sign Petition ▶

● Signed Petition



SE 15th and Belmont: Neighbor Support

Comments (0)

Signatures (40)

Name	Location	Notes
howard durand	1502 SE Morrison	a badly needed step in the right direction
Kara Ford	-	-
Kim Kauzlarich	SE 15th and Morrison	As a nearby resident I love seeing these very old properties everyday. Inner SE has so much charm with the architecture and industrial aspect - I'd hate to see it change into another 23rd ave. Portland needs to persevere it's unique old homes and neighborhood charm!
Judy blankenship	2020 SE Ash Street	-
Elaine Cohen	Buckman	-
drake hawton	portland oregon	-
cole farris	822 SE 15th Ave. Portland, OR 97214	-
Emily Ordas	Portland, OR	-
Trisha Weistad	213 SE 26th Ave	-
Dale Davis	1007 SE 15th	-
James Wood	2336 SE Pine St, 97214	-
Matt Feldmar	929 se 16th, #2	-
Helen Burlingham	2536 SE Morrison St	A change from R1 to CM makes sense.
Margaret Suydam	Buckman neighborhood	-
nancy hagensick	buckman portland or	-
Stephen Fisher	1539 SE Belmont St	I also think the entire block, from 15th to 16th should be rezoned to CM.
Kelly F.	SE 22nd & SE Pine St	-

Stephen Fisher	1539 SE Belmont St	I also think the entire block, from 15th to 16th should be rezoned to CM.
Kelly F.	SE 22nd & SE Pine St	-
Mary Francillon	303 NE 16TH AVE, PDX	I admire those buildings and want them to be protected as part of the city's history.
Debra Hanson	2121 SE Belmont St, Portland, OR	-
Alberta Mayo	Buckman neighborhood	-
Irina Truman	SE Ankeny	-
Michael L. Truman	SE Ankeny St	Need more of this sort of thing and fewer/nope demolitions
Christine Yun	1915 SE Alder St.	I am in favor provided there can be an ironclad covenant established between the current future owners and the city on preserving the property.
Yomari cruz	30th Ave and SE Main St	-
Price Crozer	1823 SE Washington	-
Eric Swedberg	1633 SE Main	I lived there in 1990.
Elizabeth Rohloff	1323 Se 15th	I have lived in this neighborhood near the homes for 27 yrs. I own one similar and know their value to the community.
Ron Knapp	1823 SE Washington	-
Michael Molinaro	4007 SE Taylor	The transfer of development rights is one of the few methods of preserving Portland's historic past. I agree with this proposal
Harriet Jean Blaske	United States	-

Pages: 1 | 2

mgid

SE 15th and Clinton Proposed Comp Plan – July 2014

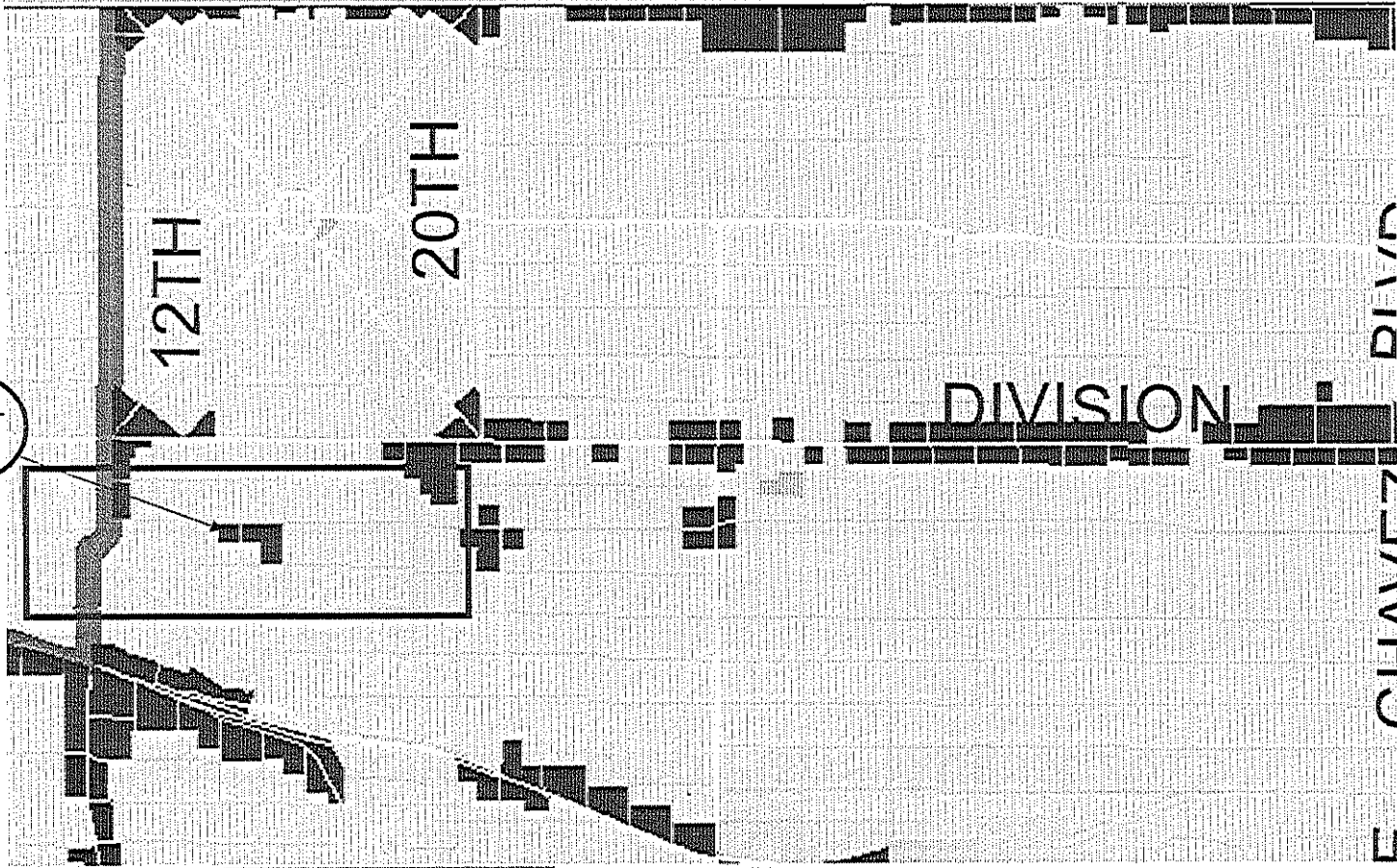
gov/bps/article/497636

Q ☆ ☰

AMT
= Amato
Property

■
= CM

AMT



SE 15th and Clinton: Neighbor Support

Zoning Change - SE 15th and Clinton



Signatures

20 Signatures.

Opened on August 19, 2015

Matt Brischetto, the owner of the unique four building, four unit property at SE 15th and Clinton, is requesting a zone change for the property from R2 to CMI in Portland's Comprehensive Plan Update.

Located at the crossroads of residential and industrial SE Portland, along the Clinton bike thoroughfare, and 3 blocks from the SE 12th and Clinton Orange Line MAX stop, the property is situated at an ideal location for flexible use over the next several decades until the next Comp Plan revision.

Matt views three possible paths and wants to work with neighborhood to determine best use:

- 1) Seek National Historic Landmark status - a zone change would provide valuable transfer development rights (TDRs) to restore the existing property and prevent in-fill
- 2) Use the existing structures for commercial use, providing convenient services to the local neighborhood
- 3) explore longer term compatible low-density new development consistent with neighboring buildings and goals - similar to 16th, 21st and 26th and SE Clinton

Please sign the petition link (and include home address) to support this initiative as he prepares to present during the City Council public hearing period during Fall 2015.

 Share on Facebook

» Contact Petition's Author

Sign this petition

Full Name:

Location:

Email:

(not displayed publicly)

Sign Petition ▶



Stay one night and the next is 40% off.

Cleveland, Ohio

BOOK NOW ▶

Signed
Petition in
Support

SE 15th and Clinton: Neighbor Support

Comments (0)

Signatures (20)

Name	Location
Scott McAuslan	2717 SE 15th Ave, Portland, OR 97202
Georgia Gootee	1420 SE Clinton St.
Devin Benware	2717 SE 15th ave
Alexander Friedman	1430 SE Clinton St.
Christopher Otero	2717 SE15th
Mike Wieteki	portland
Justin leach	2818 SE 15th ave
Diana Talcott	2806 SE 15th Ave
Susan LeMaster	1540 Clinton St
Melody christianson	2815 SE woodward
Melody Cgr	-
Jen moody	1532 SE Clinton st
Pam wagner	2714 SE 15th
Walle kraln	1431 SE Clinton
Bridgette Preston	2825 SE 16th Avenue Portland, Or 97202
Bridgette Preston	2825 SE 16th AvsE
Devin Benware	2717 se 15th ave
Judi Powell	2813 SE 16th.
Robert Conrad Ppwell	2813 SE 16th Ave, Portland, Oregon 97202
Kristin Williams	2837 SE 16th Ave

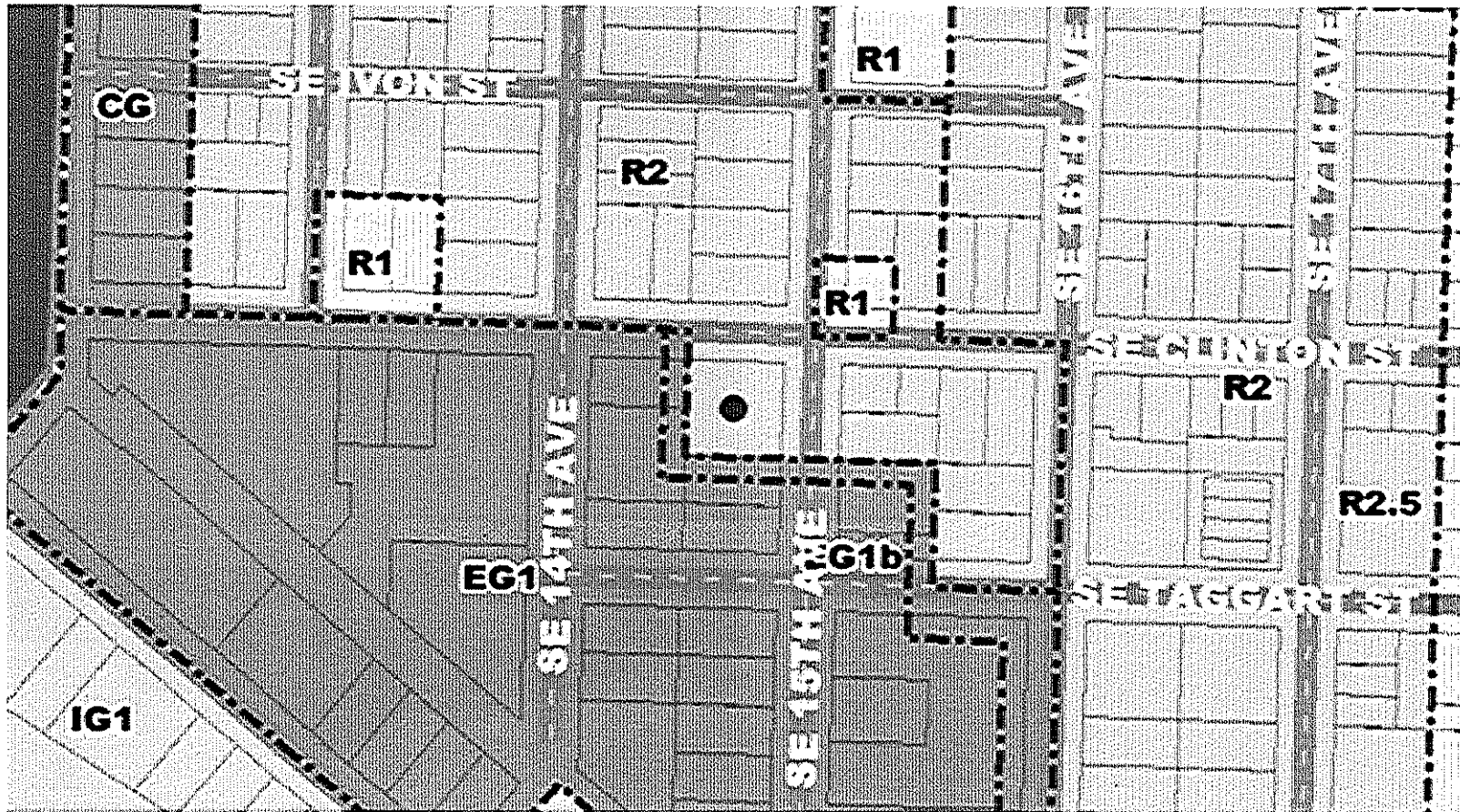
2717 SE 15th Ave Rezoning Request



Property

- 10,000 tax lot, on SW corner of SE 15th and Clinton
 - 1420-1436 SE Clinton; 2717 SE 15th
 - zoned R2
- Four identical Sears Robuck homes built 1906
 - 3 face Clinton, 1 faces 15th
- Affordable Housing
 - Typical tenant: 25 – 30 y.o.; \$500-\$600/month per person (4 people)
- Owned and maintained for nearly 100 years by the Amatos one of the early Italian families which prospered in SE Portland in the fruit distribution industry
- 1660 square feet of living space per home; unfinished attics and basements
- Adjacent to ExD industrial on South and West faces

Property

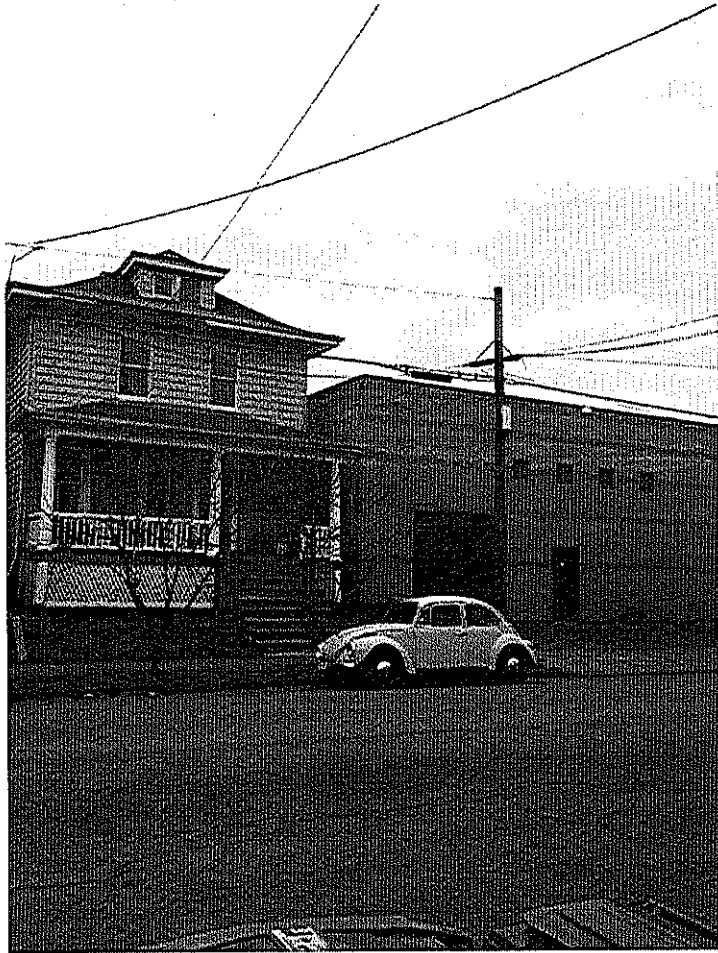




View from across street, NE corner.



Neighbor to South



Neighbor to West



View from my front porch, across the street. Plumbing business.

Matt

- 35 years old, Portland native
- Classic Portland/historic properties
 - Own five properties all pre-1920 construction (two are National Historic Landmarks)
 - Hobby, not a career
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 - What makes Portland, "Portland"
 - Green, thoughtful density planning for future population growth

Idea #1: National Historic Nomination

- In touch with Ian Johnson at SHPO beginning late '13/early '14
 - Began investigating whether “story” was present for nomination
 - Amato descendant interview
- Landmarks are protected structures
 - Restrictions on modification
 - Incentives for rehabilitation
 - Transfer Development Rights (“TDR”)
- Dispose land rights up to 2 mi = generate funding for preservation and rehabilitation, and relieve development pressure
 - Use sale proceeds to improve existing structures

Mixed Use zoning could provide marketable FAR-based TDRs that property does not currently have

Idea #2: Existing Structures, Alternative Use

- Maintain existing Sears Roebuck houses and adapt to commercial or retail use
 - Restaurant
 - Coffee shop
 - Neighborhood retail

- Property's unique location at the intersection of residential, industrial and thoroughfare to MAX stop at 12th/Clinton are ideal for neighborhood amenities

Mixed Use zoning provides the flexibility to allow for commercial or residential use

Idea #3: New structures, compatible

- Replace existing structures in favor of new construction mixed use development
- Bring new amenities in walking distance
 - hardware store, pharmacy, neighborhood grocery
- Harmonious with neighborhood in both size and design
 - Existing mixed use on SE 16th, 21st or 26th and Clinton is perfect example
 - Residential AND retail -> no envelope apt buildings
 - Neighborhood feel, not Walmart or Pearl District
 - Parking



Mixed Use zoning provides the flexibility to allow for new construction that bring services to the Clinton triangle

Idea #4: New structures, Big Bucks

- Sell property to a developer
 - “make a quick buck”
- Likely outcome is demolition of existing structures in favor of maximum density residential
 - high rise “envelope” construction
 - No retail services
 - No parking



Open Conversations:

- HAND
 - April '15: Draft letter request
 - August '15: Backyard patio night
 - 5 attendees
- Neighbors
 - Online Petition
- City: Bureau of Planning and Sustainability
 - Using as Case Study for TDR Use
- Historians
 - Restore Oregon
 - Bosco Miligan Foundation/Architectural Heritage Center
- City Council
 - Chief of Staff meetings

Comparable: Can This Be A Landmark?



SE 15th and Belmont

Alfred Webb Investment Properties	
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Portland Historic Landmark ¹¹	
The three Webb Investment Properties along Belmont Street in 2011	
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Sign this petition

Full Name:*

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(not displayed publicly)

Sign Petition ▶



Stay one night and the next is 40% off.

Cleveland, Ohio

BOOK NOW ▶

Neighbor Support



● Signed
Petition in
Support

Property Deficiencies

- Plumbing, Electrical and HVAC (x3)
 - \$90,000
- Party line Sewer
 - \$20,000
- Roofs (x 4)
 - \$40,000
- Windows (x 4)
 - \$30,000
- Synthetic siding removal and organic siding repair (x 3)
 - \$15,000
- Misc. wood repair
 - \$10,000
- Interior Historic Restoration (walls, woodwork, flooring)
 - ???

Progress

2013



2015



Considerations

CM

- Flexibility of use:
Residential or
Commercial
- Invest/restore
original structures
– preserve for next
several decades
- Opportunity –
NOT NECESSITY –
for retail use

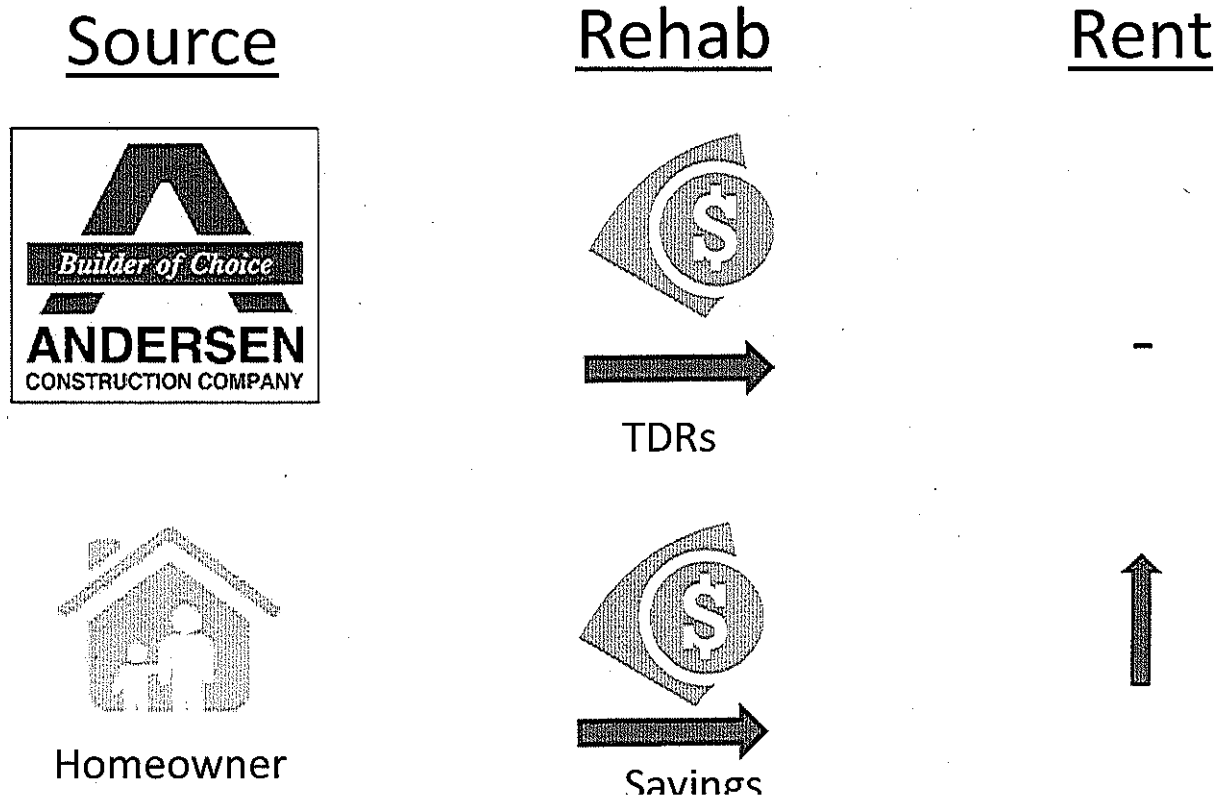
Status Quo

- Changes to R1
- Land can
accommodate 10
residential units



Affordable Housing

Properties typically shared by 3-4 young adults
(\$500-\$700/month pp)



Considerations: 2025



95%



5%



100%

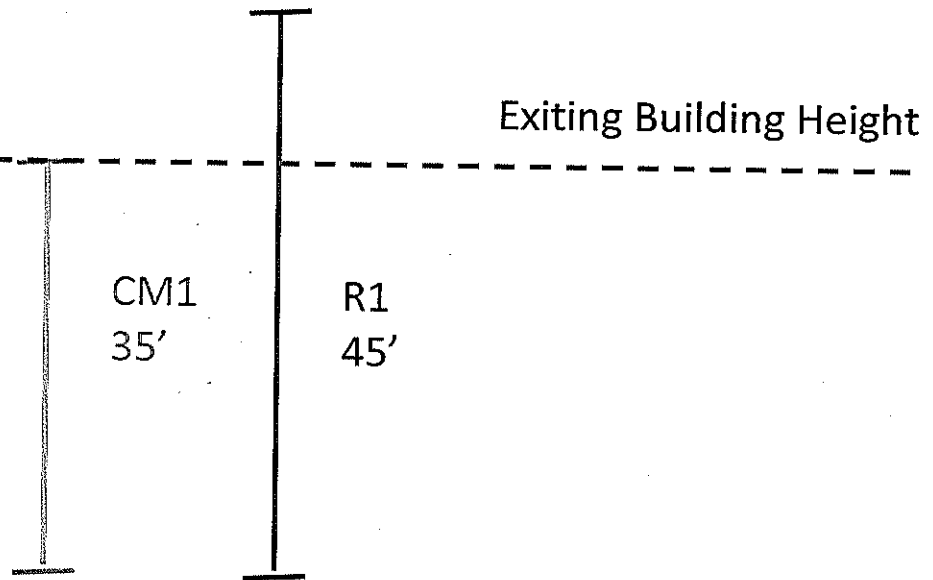
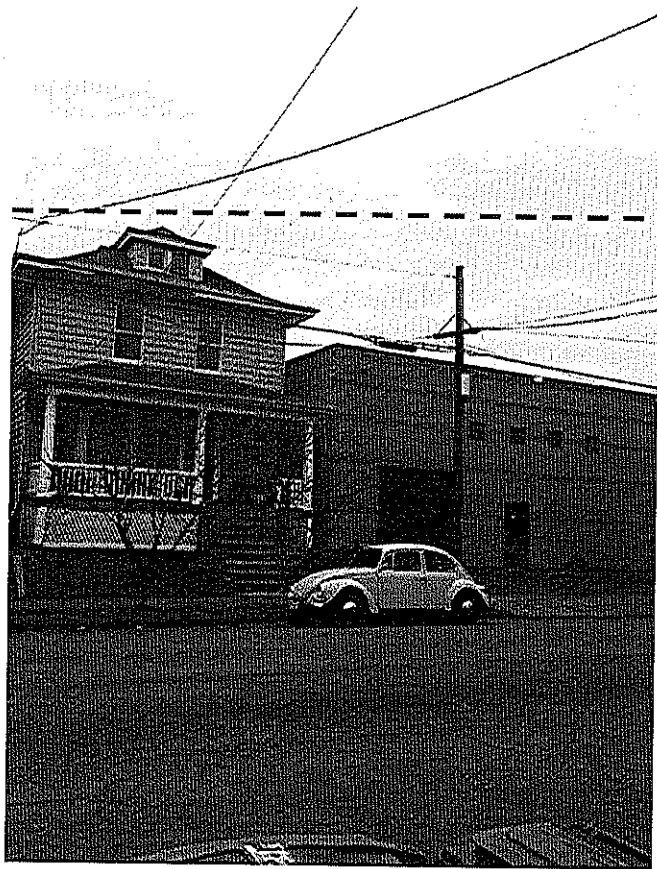
Summary

- Long term view
- Comp plan revision presents unique opportunity once every 30 years
- Landmark TDRs presents cost effective way to rehab affordable housing
- Work collaboratively with the neighborhood to determine the best path forward in property use

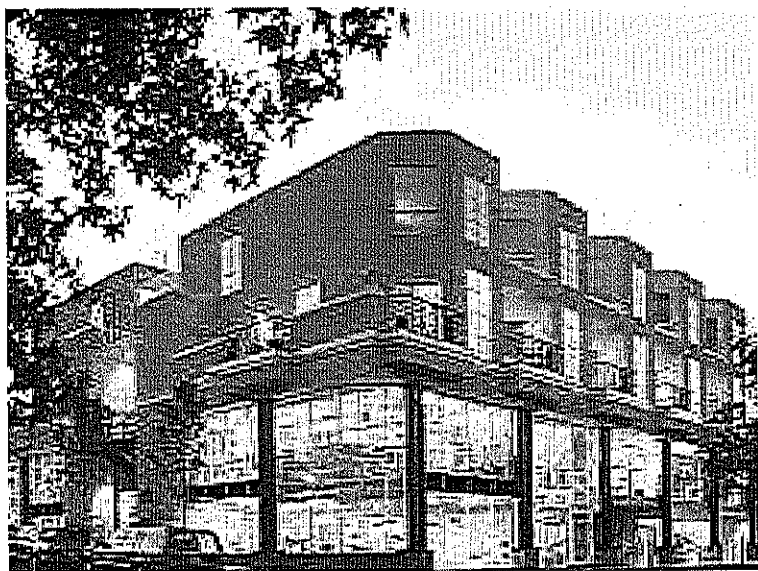
Considerations: R1 vs CM1

	CM1	R1
Max Height	35'	45'
Uses	Residential and Retail (limited)	Residential Only
Floor Area	Base FAR 1.5: 1 (15,000 sqft) Max FAR 2:5: 1 (25,000 sqft)	Unlimited, within height/setback guidelines
Units	Unlimited	10
Setbacks	90% site coverage max	3 ft (=94.1% coverage)
Appx Bldg Volume	Base: 150,000 ft ³ Max: 250,000 ft ³	425,000 ft ³
Height Bonuses	<ul style="list-style-type: none"> - Affordable Housing - Publicly Available Plaza - Historic Preservations / TDRs - Green Features 	None

Height Considerations



CM1



R1



Arevalo, Nora

From: Council Clerk – Testimony
Sent: Monday, December 21, 2015 9:12 AM
To: BPS Comprehensive Plan Testimony
Subject: FW: Add Anti-Displacement Measures into the Comp Plan

Follow Up Flag: Follow up
Flag Status: Completed

Susan Parsons
Assistant Council Clerk
City of Portland
susan.parsons@portlandoregon.gov
503.823.4085

From: 350PDX [mailto:webmaster@350pdx.org]
Sent: Friday, December 18, 2015 4:58 PM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Alan Smith
Email: a23smith@yahoo.com

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Alan Smith

Arevalo, Nora

From: Tim Brunner <TimB@axisdesigngroup.com>
Sent: Tuesday, December 22, 2015 10:41 AM
To: BPS Comprehensive Plan Testimony
Cc: Scarzello, Christina
Subject: Comprehensive Plan Update Testimony
Attachments: Toyota Comp Zone change map.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Hello

I represent the property owner located at 750 SE 122nd Ave, Portland, OR 97233. They own Lot 1800 which fronts SE 122nd Avenue. It was brought to our attention that the lot comprehensive zone designation must be changed. It is currently designated residential. This does not align with the current or past use of the site.

We request the city to change the designation to Mixed Use/Urban Commercial to match the current and past uses of the site.

If you have any questions please feel free to contact me.

Thanks,

TIMOTHYBRUNNER | PRESIDENT – PRINCIPAL ARCHITECT, AIA
DIRECT: 971.533.8734 | OFFICE: 503.284.0988 | FAX: 503.546.9276
11104 S.E. STARK STREET, PORTLAND, OR 97216

EMAIL: TimB@axisdesigngroup.com
WEBSITE: www.axisdesigngroup.com | Like us on [Facebook!](#)



CONFIDENTIALITY NOTICE

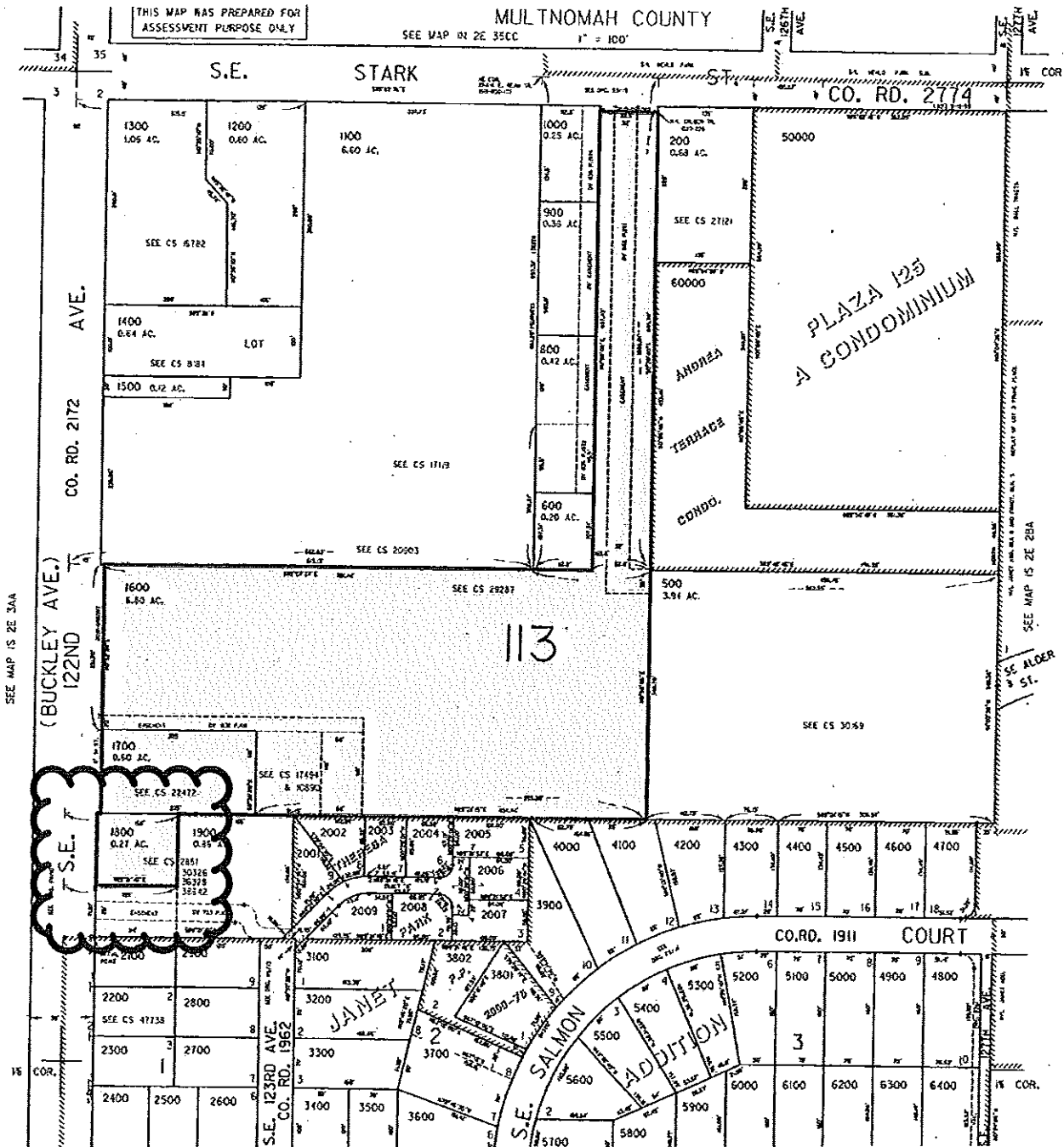
This e-mail may contain information that is confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.

Property Use:

TONKIN TOYOTA / MAZDA
AUTO DEALERSHIP

Current Zone:
Proposed Zone:
Desired Zoning:

CG (General Commercial)
CM2 (Commercial Mixed Use 2)
CE (Commercial Employment)



Address 750 SE 122nd Ave
Property ID R331950
State ID 1S2E02BB 1600
Alt Account # R992021730
Map Number 3143 OLD
Tax Roll SECTION 02 1S 2E, TL 1600 6.80 ACRES
Lot TL 1600

Address 750 SE 122nd Ave
Property ID R331915
State ID 1S2E02BB 1800
Alt Account # R992021110
Map Number 3143 OLD
Tax Roll SECTION 02 1S 2E, TL 1800 0.27 ACRES
Lot TL 1800

Address 750 SE 122nd Ave
Property ID R331949
State ID 1S2E02BB 1700
Alt Account # R992021700
Map Number 3143 OLD
Tax Roll SECTION 02 1S 2E, TL 1700 0.60 ACRES
Lot TL 1700

Arevalo, Nora

From: Chris Yeagers <cyeagers@yahoo.com>
Sent: Tuesday, December 22, 2015 9:50 AM
To: BPS Comprehensive Plan Testimony
Subject: Proposed Re-zoning of Eliot neighborhood

Follow Up Flag: Follow up
Flag Status: Completed

Hello,

I am sending this letter to voice my opposition to the rezoning of Eliot neighborhood.

The rezoning will almost certainly trigger a large tax increase for many residents. Many of the residents have lived here a long time and cannot afford a tax increase. You will effectively drive them out of their homes.

Unless you can guarantee in writing that the rezoning will not trigger an increase, you should not do it.

Please send me information on how best to oppose this change and who to communicate with directly.

Chris Yeagers
19 NE Monroe St.
Portland, OR 97212
503 847 9463

Arevalo, Nora

From: Christine Yun <cpypdx@gmail.com>
Sent: Monday, December 21, 2015 3:40 PM
To: Stockton, Marty; BPS Comprehensive Plan Testimony
Cc: Cathy Galbraith; vballestrem; Valerie Garrett; ken Diener; Susan Lindsay; Starin, Nicholas; Tim Askin; Joe Meyer; Windy Lyle; jsheuer@easystreet.net; Rick Michaelson; Sheila Baraga; Colombe Jodar; Nettekoven, Linda
Subject: Upzoning in Buckman puts contributing buildings at risk
Attachments: 151221_UpzoningEffectsOnHistoricBldgsBuckman.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Hi, Marty,

My name is Christine Yun and I live at 1915 SE Alder. I was active in the effort to make part of the Buckman neighborhood a National Register historic district a couple of years ago.

I am concerned about the upzoning of part of this neighborhood to R2.5 and R1 from R5. It looks like from the map app that no other part of Buckman is being targeted for this kind of upzoning.

The map I have attached is the most recent historic district boundary map, and was submitted to the National Park Service. The black buildings are contributing structures. I have outlined the area proposed to be upzoned in red. In green I have outlined those contributing properties that are at risk of being torn down because they are on larger lots that would support double the density under the proposed upzoning.

We have a Determination of Eligibility from the Park Service and would have been a qualified historic district, if the neighbors had agreed. This part of Portland is the oldest settled area east of downtown, and we would be losing much history by continuing not to value these structures. As you can see, the neighborhood is already largely built to the density of R2.5. I ask that you take into consideration preservation of beautiful and historic homes that have the misfortune to be on larger R5 lots and remove this area of Buckman from the proposed upzoning.

Thanks,
Christine Yun





900 S.W. Fifth Avenue, Suite 2600
Portland, Oregon 97204
main 503.224.3380
fax 503.270.2480
www.stoel.com

December 21, 2015

STEVEN W. ABEL,
Direct (503) 294-9599
steve.abel@stoel.com

BY EMAIL (CPUTESTIMONY@PORTLANDOREGON.GOV) AND U.S. MAIL

Portland City Council
c/o Council Clerk
1221 SW Fourth Ave, Room 130
Portland, Oregon 97204

Re: Comprehensive Plan Testimony - College Coalition

Dear Commissioners:

We appreciate the opportunity to comment on the Recommended Comprehensive Plan Map ("Recommended Map"). This office represents Lewis & Clark College, Reed College, Concordia University, and the University of Western States. This letter is written for those institutions as well as other members of a coalition.

Throughout the Comprehensive Plan Update process, the City of Portland ("City") has recognized the economic importance of campus institutions to the future of the City and the region. The City has also recognized the fact that lands available for institutional growth are currently deficient.¹ Indeed, due to the importance of campus institutions to the City's economic health and the desire to provide for growth of those campuses as major employers, the Bureau of Planning and Sustainability is currently revising those portions of the Portland Zoning Code applicable to campus institutions as part of the Campus Institutional Zoning Project. The institutions listed above have spent countless hours working with the City to develop zoning code standards that will allow institutions more flexibility to develop their campuses.

Unfortunately, the Recommended Map falls short of addressing the City's employment needs and the overarching goals of the Campus Institutional Zoning Project in that it does not yet provide adequate expansion opportunities for campus institutions to meet the demonstrated need

¹ To meet institutional employment demand, the City forecasts the need for an additional 380 acres of campus institutional land by 2035. Portland Economic Opportunities Analysis (2012). The City estimates that "[m]ore than one third of the forecast [sic] 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 19 large college and hospital campuses dispersed throughout the city." Campus Institutional Zoning Project - Proposed Draft at 5.



Portland Planning and Sustainability, Campus Institutional Zoning Testimony

December 21, 2015

Page 2

for additional institutional employment land. As we have discussed with planning staff, the Institutional Campus designation proposed for the above-mentioned campuses would effectively lock or restrict the institution to the campus boundary approved in the existing conditional use master plans ("CUMP") or impact mitigation plans ("IMP"). This is the case despite the fact that these institutions own a number of properties outside and adjacent to the CUMP/IMP boundaries that are reasonable and obvious expansion lands for the institutional campus. Thus, if the Council adopts the Recommended Map, any future expansion of a campus boundary would require a comprehensive plan map amendment and corresponding zoning change, processes that are not well-suited to evaluating deliberate and orderly campus institutional expansion, and certainly do not encourage the necessary expansion of institutions to meet the identified need for institutional employment land. The practical effect of the proposed Institutional Campus designations in the Recommended Draft would be to hinder the growth of institutions that are contributing significantly to the employment base and economic health of the City.

To meet the objective for institutions to expand to meet the demonstrated need for additional institutional employment land, we recommend that all land owned by an institution adjacent to the current CUMP/IMP boundary also be given an Institutional Campus designation. This would help provide for the orderly expansion of the institution over the next several decades, allowing these important institutions to continue to grow as a service provider, center of innovation, and major employer. The properties the institutions recommend that the City include within the Institutional Campus designation are all properties that are owned by the institution including those presently outside any CUMP or IMP boundary.

With these additional lands included we support the changes to the Comprehensive Plan Map, but with one important qualification.

The process, which calls for approving the map designations before the zoning provisions applicable to the CI zone have been approved, presents us with a possible new map designation but without the zoning regulations necessary to understand what the designation means. It is somewhat like buying a house without looking at the inside. We ask that the City Council consider this timing issue as it moves forward with comprehensive planning. While current drafts of the CI zone regulations are promising, we believe a longer, optional phase in period would provide certainty for institutions operating under recently approved CUMP's.

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 the proposed revisions to the Proposed Draft.



Portland Planning and Sustainability, Campus Institutional Zoning Testimony
December 21, 2015
Page 3

Very truly yours,

A handwritten signature in black ink, appearing to read 'S. Abel', written over the printed name 'Steven W. Abel'.

Steven W. Abel

Arevalo, Nora

From: Sheila Baraga <sheilabaraga@gmail.com>
Sent: Sunday, December 20, 2015 9:52 AM
To: BPS Comprehensive Plan Testimony
Subject: Support of Historic Landmark in Buckman-822 SE 15th Avenue

Follow Up Flag: Follow up
Flag Status: Completed

Dear City of Portland,

I am writing in regard to the historic little victorians located on the corner of SE 15th Ave & Belmont. I have been a Buckman resident and Southeast Portland business owner for over 25 years. Times, as you know, have been very challenging in Portland if you've been around awhile to watch the change. The demolition of so many old houses and beautiful trees has been a hard pill to swallow.

I am worrying about the same end, demolition and building to the lot line, happening to the sweet victorians at 822 SE 15th Avenue. As I understand it, a change from R1 to CM zoning would allow for the preservation of these homes, rather than their continuing decay which may led to eventual demolition. I am in support of the change to CM zoning as this is a designated Historic Landmark property that we really should try and save from the wrecking ball.

Thank you so much for your time and consideration. And thank you for the work you do to keep Portland livable.

Respectfully,
Sheila Baraga

Baraga Design & Consulting
423 SE 15th Avenue
Portland, Oregon 97214
503.318.8338

sheilabaraga.com

Arevalo, Nora

From: Washington, Mustafa
Sent: Friday, December 18, 2015 2:51 PM
To: William Risser
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Planning and Sustainability Commission's draft Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear William and 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 comprehensive plan testimony email inbox. They will review your testimony.

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

Sincerely

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

From: William Risser [mailto:wrisser@gmail.com]
Sent: Thursday, December 10, 2015 10:19 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Planning and Sustainability Commission's draft Comprehensive Plan

My wife Jan and I support the Planning and Sustainability Commission's draft Comprehensive Plan that was recently forwarded to you. It takes the right approach to industrial development. Will Risser, Portland

December 18, 2015

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

Re: Portland 2035 Comprehensive Plan

I am writing regarding the proposed Riverside Golf & Country Club's designation as future "Industrial" land for Portland. While I testified in person at the hearing on November 19, I was only allowed to speak for two minutes. I have several additional comments that I would like to be part of the public record and that I would like addressed in the plan.

Need for Industrial Land

The reason for adding additional "industrial" land to the 2035 Comprehensive plan is merely to meet an "economic development" objective. Nowhere in the plan is there a discussion or analysis of what Portland's industrial and economic development needs might be in next 20 years! With the recent announcement from ESCO that it is closing its Portland operation, it is apparent to me that "hard" industry is not Portland's future. With the tremendous growth of our high technology industry and our small entrepreneurial business sector, we need different types of "industrial" facilities, ones located much nearer to the population base that allow for collaboration and access to local markets. Riverside's property does not meet this criteria. Secondly, there is a need for an in depth analysis of how Portland's current industrial land is being used. Right now, a drive down Columbia Blvd is a drive by heavy equipment parking lots, not by active industrial activity. And this is so true of other so called "industrial" areas of the City. Let's evaluate what we have first before we start grabbing for more!

Riverside Golf & Country Club is a Unique Asset to Portland

Riverside Golf & Country Club is celebrating its 90th anniversary this year. 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. Why? Because of its strong membership base from throughout the Portland metropolitan area. Riverside has developed its own unique "culture" as most organizations and groups do. Riverside is often referred to as "The friendliest game in town!"; "Riverside, the golfers golf club!" and "The working man's golf club!"

Each of the four private golf clubs in Portland has its unique culture. Columbia Edgewater is known as the club with the "lowest handicap club membership in the US", which means if you don't have a low handicap, you likely can't join the Club. Portland Golf Club and Waverly Golf Club are both "income" exclusive clubs, where periodic assessments in excess of \$10,000 are not uncommon. If you can't pay, don't join!

Riverside is welcoming and open to all! Initiation fees and monthly dues are lower than that at other clubs. Riverside is NOT an exclusive golf club. In addition, with the new "First Tee" program at Colwood Golf Club just down Columbia Blvd, there is an opportunity for Riverside to develop a greater partnership with "First Tee". "First Tee" is an international program that reaches out to disadvantaged youth and uses the game of golf to teach valuable life skills! The need for such a program in northeast Portland is so desperately needed!!!

In closing, just because everyone does not play golf, does not mean there is not a need for an asset like Riverside Golf & Country Club in Portland! We have survived 90 years because THERE IS A NEED FOR RIVERSIDE GOLF & COUNTRY CLUB IN PORTLAND! DO NOT TAKE AWAY OUR ABILITY TO GROW AND THRIVE BY IRRATIONALLY CHANGING OUR LAND USE DESIGNATION FROM "OPEN SPACE" to "INDUSTRIAL SANCTUARY"!!

Thank you!
Sincerely,



El Shelden
3070 NE Dunckley St
Portland, OR 97212

Commissioner Fish,

I was President of the Oregon Film & Video Foundation when we purchased The Hollywood Theatre, which is also a very valued community asset, celebrating its 90th anniversary in 2016!! I will always be grateful for your assistance in purchasing the theatre from Act III!!





Hathaway Koback
Connors LLP

520 SW Yamhill St.
Suite 235
Portland, OR 97204

Christopher P. Koback
503-205-8400 main
503-205-8404 direct

chriskoback@hkcilp.com

December 18, 2015

AUDITOR 12/21/15 AM 9:58

FIRST CLASS MAIL

Portland City Council
Attn: Comprehensive Plan Testimony
1221 SW Fourth Avenue, Room 130
Portland, OR 97204

Re: *Comprehensive Plan Change affecting 2626 NE Dekum*

Dear Councilmembers:

This firm represents Robert Foglio, owner of the property located at 2626 NE Dekum Street in Portland. Mr. Foglio acquired the property on June 26, 2015 and did not receive notices of the proposed comprehensive plan amendments until the final notice was issued on or about October 13, 2015. Mr. Foglio testified before Council on this matter at its November 19, 2015 meeting. We are writing on Mr. Foglio's behalf to reinforce and exemplify the points he made in his brief testimony.

Mr. Foglio's property is adjacent to the Concordia University campus one lot west of the corner of NE Dekum and NE 26th Avenue. It has approximately 5,000 square feet with 50 feet of frontage on NE Dekum. Currently, the property is improved with a neighborhood market. However, under the current zoning, it has significant development potential, which is the sole reason Mr. Foglio acquired it.

The property is zoned Neighborhood Commercial 2 ("CN2"). That zone is intended for small sites in or near less dense or developing residential neighborhoods. The permitted uses include household living, retail (with limitations), schools, colleges, medical center and religious institutions. PCC Chapter 130, Table 130-1. Density is determined by FAR and the maximum is .75 to 1 FAR. That density combined with a 65% maximum building coverage and limited setbacks (10 feet for transit street or pedestrian district) allows for a viable residential development on a small site.

Under the proposed amendments Mr. Foglio's property will be designated Campus Institutional ("CI") in the comprehensive plan. While Mr. Foglio supports policies designed to promote and enhance the City's educational and medical campuses, he has legitimate concerns that the

proposed amendment, if followed by a rezoning of his property to CI, will significantly impact his ability to make viable economic use of the property. We note that the City has already begun work on its Campus Institutional Zoning Project which will rezone some properties that receive the CI designation in the amended comprehensive plan. The proposed new CI zoning provisions will create two new CI zones: CI1 and CI2.

At this time, it appears that the City is not proposing to rezone Mr. Foglio's property to either CI1 or CI2. Mr. Foglio believes that this is the correct decision and urges Council to instruct BDS staff to leave the CN2 zoning on his property.

If Mr. Foglio's property were to be rezoned to either CI1 or CI2, it will significantly impact his use of the property and defeat the purpose for which he acquired it. His property may become unsuitable for any allowed use as a stand-alone property and would therefore be devalued. The proposed code amendments reveal that the neither CI1 nor the CI2 zone will permit feasible development of small sites such as Mr. Foglio. The proposed development standards appear geared towards promoting larger scale development that is more suitable on large parcels of property.

As we read the proposed code sections for the CI1, CI2 and IR zones set forth in the August 6, 2015 draft, at Table 150-1, the permitted uses will be further restricted than in the CN2 zone. The most significant restriction is that household living is listed as a prohibited use in both the CI1 and CI2 zones. Retail uses are still allowed with limitations. The other permitted uses are colleges, medical centers and daycare. It is not possible to develop a college or medical center on a stand-alone-site that is less than 10,000 square feet. Retail uses appear to be limited to 5,000 feet without obtaining a conditional use permit.

The elimination of household living removes the most economically viable redevelopment option for the property. As noted above, with the development standards applicable to the CN2 zone permit a viable residential development on a smaller site. Additionally, even for permitted uses, assuming an owner could develop one of the permitted uses on a 5,000 square foot site, the development standards for the CI zones make developing the property significantly more challenging. For example, in the CI1 zone the density for allowed used the density is reduced to an FAR of .50 to 1. The maximum building coverage is reduced to 50%. In both CI zones there are setbacks not applicable in the CN2 zone.

The proposed designation, if accompanied by a rezoning of Mr. Foglio's property, will ultimately render it economically infeasible for him to develop anything on his property. Its only real value will be as part of a larger campus development consistent with the proposed zoning provisions. Thus, the likely impact of the proposed changes is that his property will only have value if Concordia University owns it and since his options will be severely limited, the university will end up with unequal bargaining power.

Retaining the existing zoning does not defeat the purpose behind the proposed amendments. The current code permits the same institutional uses in the CN2 zone. The property can still be developed as part of a college or medical center. It would simply have other options that make sense for smaller properties and that allow owners to obtain the expected return on their

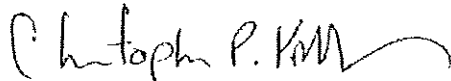
Page 3
December 18, 2015

investment. Mr. Foglio's preferred outcome is that his property not be designated CI on the new comprehensive plan map. However, as long as his property retains its CN2 zoning, he does not have strong opposition to the proposed designation.

Thank you in advance for your consideration of this request.

Very truly yours,

HATHAWAY KOBACK CONNORS LLP

A handwritten signature in black ink, appearing to read "Christopher P. Koback", with a stylized flourish at the end.

Christopher P. Koback

CPK/pl

cc: John Cole, Senior City Planner
Robert Foglio

December 18, 2015

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

AUDITOR 12/21/15 AM 9:58

Re: Portland 2035 Comprehensive Plan

I am writing regarding the proposed Riverside Golf & Country Club's designation as future "Industrial" land for Portland. While I testified in person at the hearing on November 19, I was only allowed to speak for two minutes. I have several additional comments that I would like to be part of the public record and that I would like addressed in the plan.

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The reason for adding additional "industrial" land to the 2035 Comprehensive plan is merely to meet an "economic development" objective. Nowhere in the plan is there a discussion or analysis of what Portland's industrial and economic development needs might be in next 20 years! With the recent announcement from ESCO that it is closing its Portland operation, it is apparent to me that "hard" industry is not Portland's future. With the tremendous growth of our high technology industry and our small entrepreneurial business sector, we need different types of "industrial" facilities, ones located much nearer to the population base that allow for collaboration and access to local markets. Riverside's property does not meet this criteria. Secondly, there is a need for an in depth analysis of how Portland's current industrial land is being used. Right now, a drive down Columbia Blvd is a drive by heavy equipment parking lots, not by active industrial activity. And this is so true of other so called "industrial" areas of the City. Let's evaluate what we have first before we start grabbing for more!

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In closing, just because everyone does not play golf, does not mean there is not a need for an asset like Riverside Golf & Country Club in Portland! We have survived 90 years because THERE IS A NEED FOR RIVERSIDE GOLF & COUNTRY CLUB IN PORTLAND!
DO NOT TAKE AWAY OUR ABILITY TO GROW AND THRIVE BY IRRATIONALLY CHANGING OUR LAND USE DESIGNATION FROM "OPEN SPACE" to "INDUSTRIAL SANCTUARY"!!

Thank you!

Sincerely,



El Shelden
3070 NE Dunckley St
Portland, OR 97212

S *Ms. Eleanor Shelden
3070 NE Dunckley St.
Portland, OR 97212-1728*

Arevalo, Nora

From: Craig Tolonen <craigt51@centurylink.net>
Sent: Friday, December 18, 2015 2:31 PM
To: BPS Comprehensive Plan Testimony
Subject: 2035 Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

I'm writing in regards to the 2035 Comprehensive Plan regarding zoning of the property to the east bordered by NE 122nd Ave and Shaver streets. The plan for this area calls for commercial and mixed employment zoning, while leaving the remaining property zoned as R3. The Argay Terrace neighborhood is at this time is comprised of approximately 42% multi unit housing (apartment buildings). Leaving this area zoned as R3 would push that number to nearly 50% or more. Commercial, mixed employment and R3 zoning of this area I believe would compromise the safety and livability of our neighborhood. I would like to see this property zoning reclassified as R5 for single family dwellings. Doing so would make this area comparable to the existing neighborhood and help maintain the livability of Argay Terrace.

Thank you for your consideration,
Craig Tolonen
14359 NE Morris Ct
Portland, OR 97230

Please accept the following suggestions on improving the Comprehensive Plan as it relates to access to healthy food, socially engaged and connected communities around central business districts for walkability/health and economic vitality.

Thanks to the UGB (and other factors) we have an abundance of nearby farms that can provide a robust source of locally grown fruits and vegetables year-round. Sound planning and a focus on permanent infrastructure in centers for farmers' markets to sell this product and thereby further healthy, connected communities that the Plan envisions, is critical.

The agricultural businesses (farms, ranches, creameries, etc.) who sell their product at farmers' markets are mature businesses who may also sell their products to grocery store chains, restaurants, etc; have been selling at farmers' markets for 10 years or more. They are savvy, established businesses. The current plan puts farmers' markets in a category where they are equivalent to flea markets, and consequently destined to be replaced by permanent development and uses (6.69).

The plan rightfully calls out Involuntary Commercial Displacement (6.68), however, currently the Plan seems to suggest that farmers' markets may well be/should be replaced by more permanent developments. Farmers' markets have an established and potentially growing role in providing access to healthy food, social connectivity, and neighborhood business hubs, and have earned a more permanent role within the Plan.

In order to enable farmers' markets to fulfill their potential as key components of several tenets of the Plan (Human Health, Resilience, Environmental Health, Equity) I suggest that safe, clean, permanent and sheltered venues for farmers' markets must be part of a plan for a livable Portland.

Suggested specific changes to plan:

Healthy Food

Access to healthy food is important for many reasons. A nourishing diet is critical to maintaining good health and avoiding chronic disease later in life. This leads to better long-term public health outcomes and lower healthcare costs. A diet rich in grains, legumes, fresh fruits and vegetables is also clearly linked to good academic performance and a pattern of healthy exercise.

Goal 3 of Oregon's Land Use Program, along with Urban Growth Boundaries, preserves land for commercial farming close to the state's urban centers, including Portland. With farms close to the city, fresh, locally grown food is more than an aspiration, it is a reality and potentially a factor in Portland's overall livability, and the health of its citizens.

Oregon's farmers are experienced growers and business people who produce fresh fruits and vegetables year-round, along with dairy products, minimally processed foods and meats. Portland has 21 farmers' markets. **These markets developed outside of a formal plan, have no permanent location and a correspondingly limited investment in the quality and safety of the venue. The lack of permanence and a formal role in the structure of the city's development limits farmers' investment in growing for the local markets.**

Too many Portlanders do not have good access to healthy food, especially the high quality fruits and vegetables growing just miles away from the city. These policies promote a range of approaches for improving access to healthy food through buying and growing. The policies help meet the Portland Plan goal for 90 percent of Portlanders to live within a half-mile of a store or farmers' market that sells healthy food.

Policy 4.8X Local fruit and vegetable access. Plan for safe, clean and sheltered venues for neighborhood farmers' markets throughout the city.

For 6.69, the flea markets should be completely disengaged from farmers' markets:

Policy 6.69 Temporary and informal markets and structures. Acknowledge and support the role that temporary markets (farmers' markets, craft markets, flea markets, etc.) and other temporary or mobile vending structures play in enabling startup business activity. Also acknowledge that temporary uses may ultimately be replaced by more permanent development and uses.

Policy 6.XX Farmers' markets. Farmers markets are an efficient means of augmenting the flow of healthy fruits and vegetables directly from local farms to the neighborhoods. Plan for a city-wide network of safe, clean and sheltered farmers' markets in neighborhood centers. When not in use for the principle purpose of selling fresh fruits and vegetables, these venues are available for other neighborhood and civic functions.

Katherine Deumling
2233 SE Main Street,
Portland, OR 97214
503.715.7697

Arevalo, Nora

From: Washington, Mustafa
Sent: Friday, December 18, 2015 11:35 AM
To: Laura Carlson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Completed

Dear Laura,

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 comprehensive plan testimony email inbox. They will review your testimony.

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

Sincerely

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

From: Laura Carlson [mailto:lauraanncarlson@comcast.net]
Sent: Wednesday, December 09, 2015 10:05 PM
To: Commissioner Fish <nick@portlandoregon.gov>
Cc: Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan

I fully support the approach to industrial lands outlined in the current draft of the Comprehensive Plan 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. Do not let short-sighted interests undermine the source of our wealth and existence.

Thank you.
Laura Carlson

Arevalo, Nora

From: Washington, Mustafa
Sent: Friday, December 18, 2015 10:56 AM
To: Kimber Nelson
Cc: BPS Comprehensive Plan Testimony
Subject: RE: Comprehensive Plan on industrial lands

Follow Up Flag: Follow up
Flag Status: Completed

Dear Kimber,

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 comprehensive plan testimony email box. They will review your testimony.

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

Sincerely

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

From: Kimber Nelson [mailto:kimber_nelson@hotmail.com]
Sent: Friday, December 11, 2015 7:35 AM
To: Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Hales, Mayor <mayorcharliehales@portlandoregon.gov>
Subject: Comprehensive Plan on industrial lands

Dear City Council,

I support the approach taken on industrial lands in the recommended draft of the Comprehensive Plan.

Portland has over 900 acres of contaminated sites. The Draft Comprehensive Plan takes the right approach in focusing on cleaning up these contaminated sites and restoring them to productive use rather than converting natural areas to meet industrial land demand. It also takes the right approach in focusing on intensification of use of the existing industrial land base rather than converting natural areas to meet industrial land demand. I also appreciate that it limits conversion of industrial lands for non-industrial uses rather than destroying the last remaining natural areas along our rivers. Industrial interests should not be allowed to cash out their industrial land holdings and then turn around and demand cheap new industrial acres in critical natural areas.

West Hayden Island should not be included in the industrial lands inventory. It should be a natural area.

Environmental regulations on industrial lands should not be restricted or rolled back. Industrial lands along our rivers are also some of our most important and degraded natural resource lands and industrial landowners should not be exempted from protecting our rivers.

Thank you for your continued attention to these important issues.

Kimber Nelson
SE Portland

D. J. Richardson Properties L.P.

*Mailing Address: PAM 230 • 3 Monroe Parkway, Suite P • Lake Oswego, OR 97035
503-246-5696 telephone • 503-245-3233 fax*

December 18, 2015

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

CC:

Susan Anderson, Director, BPS;
Marty Stockton, SE District Liaison, BPS;
Joe Zehnder, Chief Planner, BPS;
Deborah Stein, Principal Planner, BPS
Eric Engstrom, Principal Planner, BPS.
Tom Armstrong, Supervising Planner, BPS;
Barry Manning, Senior Planner, BPS

RE: Comprehensive Plan Testimony

Dear Council Clerk:

I am writing to formally request a designation and mixed use zoning change to my properties located at the Sellwood bridgehead. I believe that the following changes will allow for a better neighborhood bridgehead, positively impact the Sellwood Community and support the City's goals as envisioned in the Recommended Comprehensive Plan.

I am requesting that the two full blocks north and south of SE Tacoma St and located between SE 6th Ave and SE Grand Ave, as well as the half block located at the SW corner of SE Tenino St and SE 7th Ave be changed to the Mixed Use – Civic Corridor designation. Additionally, I am requesting that this half block at the SW corner of SE Tenino St and SE 7th Ave be changed to the Commercial Mixed Use 3 zone. Lastly, I am requesting that the "d" overlay be applied to these three locations.

My family has called Sellwood home for several generations and it is the neighborhood that I grew up in. My grandfather was an entrepreneur who temporarily left Portland in his early twenties during the Alaska gold rush of 1897. There he started an eating house that fed and sheltered people and later would sell supplies and equipment to the gold miners. When he returned to Portland, he bought properties in Sellwood, including the properties that are the subject of this testimony. My father continued the family business developing some of the properties which my brother and I later inherited. I plan to develop the bridgehead properties I own, and have put development plans on hold due to the construction of the new Sellwood bridge. This delay has allowed me additional time to evaluate how the properties could contribute to a vibrant and memorable bridgehead development

and I believe that the requested changes are a step in the right direction. The requested designation and zoning changes are in-line with a long-term growth vision and also would allow development flexibility that I believe will help create a better overall approach to the bridgehead.

I. Requested Comprehensive Plan Changes Summary

Property Address	Designation as Currently Shown	Requested Designation
535 SE Tacoma St	Mixed Use - Neighborhood Corridor	Mixed Use - Civic Corridor
536 SE Tacoma St	Mixed Use - Neighborhood Corridor	Mixed Use - Civic Corridor
545 SE Tacoma St	Mixed Use - Neighborhood Corridor	Mixed Use - Civic Corridor
8145 SE 6 th Ave	Mixed Use - Neighborhood Corridor	Mixed Use - Civic Corridor
8207 SE 7 th Ave	Mixed Use - Neighborhood Corridor	Mixed Use - Civic Corridor
8225 SE 7 th Ave	Mixed Use - Neighborhood Corridor	Mixed Use - Civic Corridor

Property Address	Overlay as Currently Shown	Requested Overlay
535 SE Tacoma St	none	"d" Overlay
536 SE Tacoma St	none	"d" Overlay
545 SE Tacoma St	none	"d" Overlay
8145 SE 6 th Ave	none	"d" Overlay
8207 SE 7 th Ave	none	"d" Overlay
8225 SE 7 th Ave	none	"d" Overlay

Property Address	Zone as Currently Shown	Requested Zone
535 SE Tacoma St	Commercial Mixed Use 2	No change
536 SE Tacoma St	Commercial Mixed Use 2	No change
545 SE Tacoma St	Commercial Mixed Use 2	No change
8145 SE 6 th Ave	Commercial Mixed Use 2	No change
8207 SE 7 th Ave	Commercial Mixed Use 2	Commercial Mixed Use 3
8225 SE 7 th Ave	Commercial Mixed Use 2	Commercial Mixed Use 3

The attached maps illustrate our proposed changes to the Portland Bureau of Planning and Sustainability Recommended Comprehensive Plan. The following is a summary of the requested changes and contextual considerations:

1. **Establish a vibrant and significant neighborhood bridgehead.** The bridgehead will serve as the western gateway to Sellwood as well as provide a significant new neighborhood activity node. With ownership of both full bridgehead blocks, this is a unique placemaking opportunity. The

additional flexibility provided by the Mixed Use – Civic Corridor designation would allow for more plaza and courtyard space, more porosity and connectivity throughout the sites and a more appropriate urban form. With proximity to Sellwood Park, the river, Oaks Amusement Park, Oaks Bottom Wildlife Refuge and the Springwater Trail, this is a great location to create a new and vibrant neighborhood node. The final result would be a vibrant, high-density and cohesive place for the community to enjoy and which would also mark the passage into Sellwood.

2. **Add “d” overlay at bridgehead blocks.** The design overlay in combination with the Mixed Use – Civic Corridor designation would allow for the additional 10’ height bonus in CM2 zones. The location of the bridgehead blocks and the immediate context is compatible for the additional density and height. Allowing the height bonus also helps to achieve city goals by providing affordable retail/ housing, public space and sustainable building features.
3. **Context Height –** Allowing additional height at the bridgehead blocks is compatible within the current context. The EX zone allows for 65’ height, and the RH to the west allows for 75’ height. Preserving the Mixed Use – Neighborhood Corridor designation at the two full blocks to the east and north of our sites, with a maximum height of 45’, would allow for a gradual stepdown into the neighborhood.
4. **Grade change –** There is a 25 feet grade change between the intersection of SE 13th Ave and the middle of the bridgehead blocks on Tacoma St. This 2.5 story drop makes any additional height more compatible with the surrounding single family neighborhoods.
5. **An extension of Hwy 43 / SW Macadam Ave –** The Comprehensive Plan designated the Hwy 32/ Macadam corridor as Mixed Use – Civic corridor. This designation stops in the middle of the Sellwood bridge in the current draft. My request extends this designation to the Sellwood bridgehead blocks. Macadam also has the “d” overlay which I am also requesting to extend east over the bridge to the bridgehead blocks.
6. **Opportunity to Gain Back Density –** The properties located at SE Tenino St and SE 7th Ave are currently in an EX zone but will be down-zoned to Commercial Mixed Use 2 when the Comprehensive Plan Update takes effect. This down-zoning is a significant loss of development potential on my properties. Typically, CM3 replaces EX, however, CM3 is not allowed in the Mixed Use - Neighborhood designation. I believe that the Mixed Use – Civic Corridor designation is a more appropriate designation for these bridgehead blocks and also provides an opportunity to gain back density in a more balanced and community minded way.

II. Community Considerations

The following is a list of how the proposed changes could bring positive community improvements to the Sellwood bridgehead:

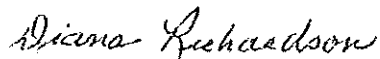
1. **Ensure that the design fits the context and that the neighborhood is involved –** This information was presented to the Sellwood Moreland Improvement League (SMILE) land use committee meeting on December 2nd. That dialogue will continue.

2. **Memorable bridgehead** – provide vibrancy, neighborhood amenities and a legacy for our family and the Sellwood community.
3. **Density where it makes sense** – area that is well suited for additional capacity, has close amenities, and options for multi-modal transportation.
4. **Commercial uses, plazas & public amenities** – provide active ground floor uses and encourage neighborhood-oriented gathering places.
5. **Emphasis on transit & bike commuting** – with close proximity to bus routes (35,36, 70, 99) and the Springwater Trail, this location is ideal for bicycle and transit commuting, especially once the new Sellwood bridge is completed.
6. **Car storage** – additional density makes providing underground parking more feasible, reducing the burden of parking on the surrounding neighborhood and allowing for active ground floor uses.
7. **Sustainable features** – are among the requirements to achieve additional density/height.

The Sellwood bridgehead blocks are currently largely undeveloped and with the new bridge nearing completion, the opportunity to redevelop these blocks is getting closer. I see the included recommendations to the Portland Bureau of Planning and Sustainability Recommended Comprehensive Plan as an opportunity to achieve a strong Sellwood bridgehead that is in line with city goals. I am committed to being a responsible community member and am interested in developing a bridgehead that the community can be proud of for years to come.

Thank you for your time and attention



Sincerely,



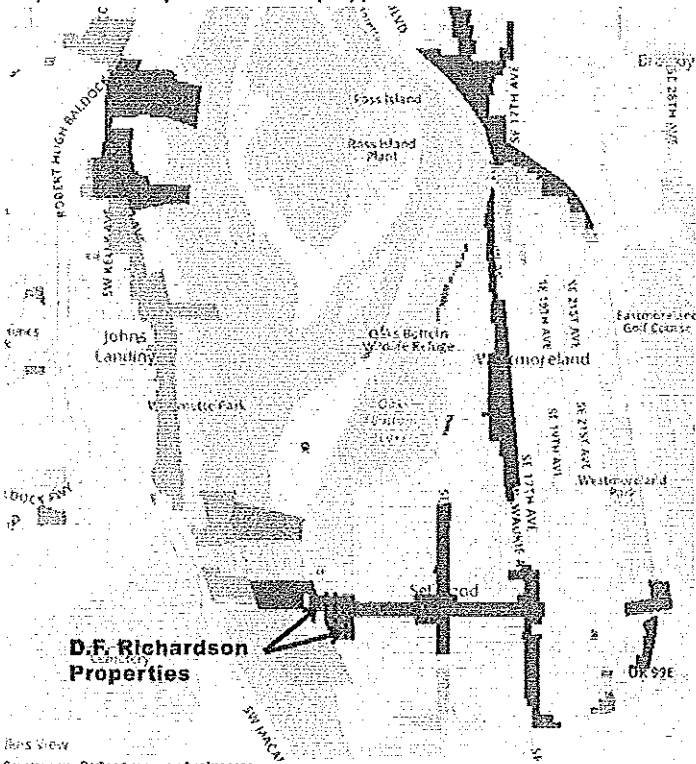
Diana Richardson

cc. Marty Stockton, Joe Zehnder, Susan Anderson, Deborah Stein, Tom Armstrong, Eric Engstrom, Barry Manning

REQUESTED COMPREHENSIVE PLAN DESIGNATION CHANGE

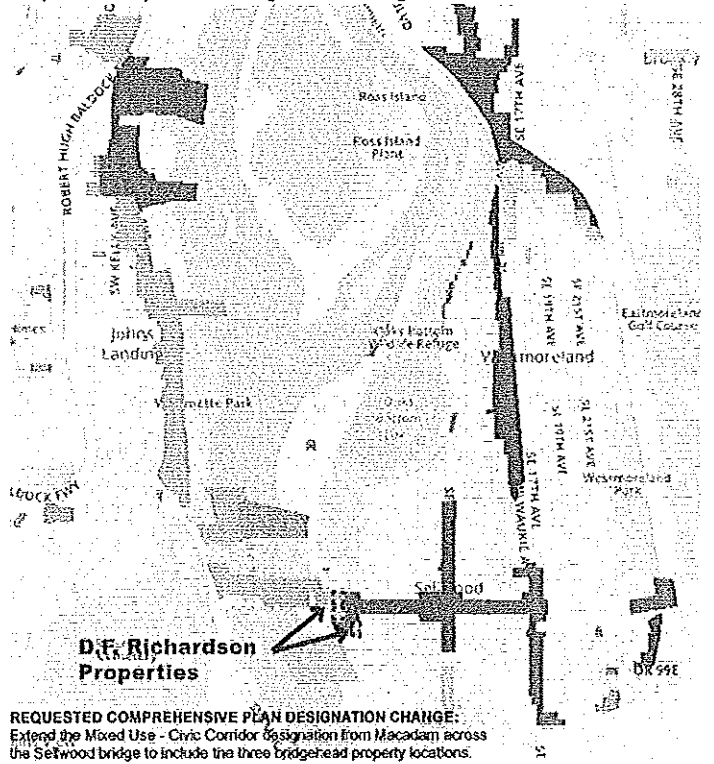
- LAND USE DESIGNATIONS**
-  Mixed Use - Civic Corridor
 -  Mixed Use - Neighborhood

Map as Currently Shown on Map App



Map Show
Source: www.Portlandmaps.com/tps/napapp



Map with Requested Designation Change



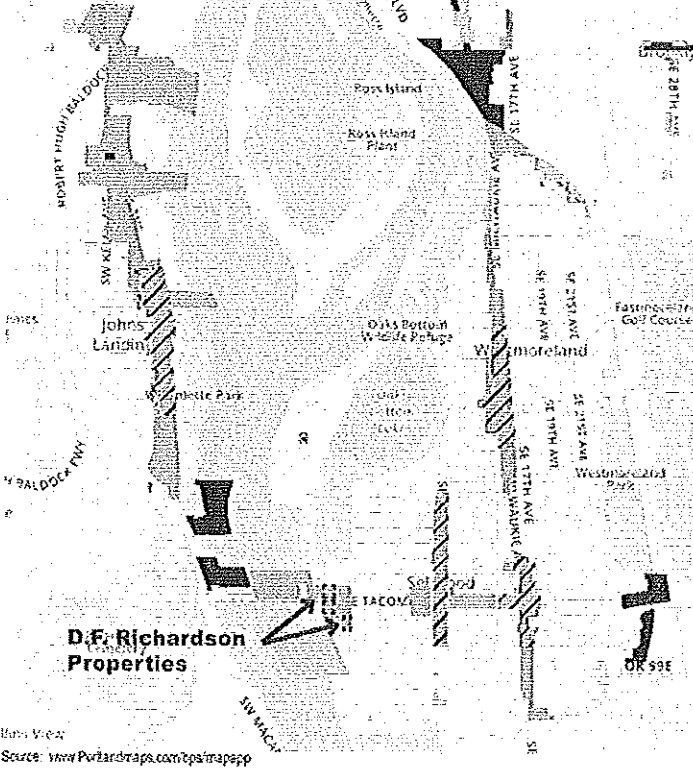
REQUESTED COMPREHENSIVE PLAN DESIGNATION CHANGE:
Extend the Mixed Use - Civic Corridor designation from Macadam across the Setwood bridge to include the three bridgehead property locations.

REQUESTED COMPREHENSIVE PLAN ZONE CHANGE

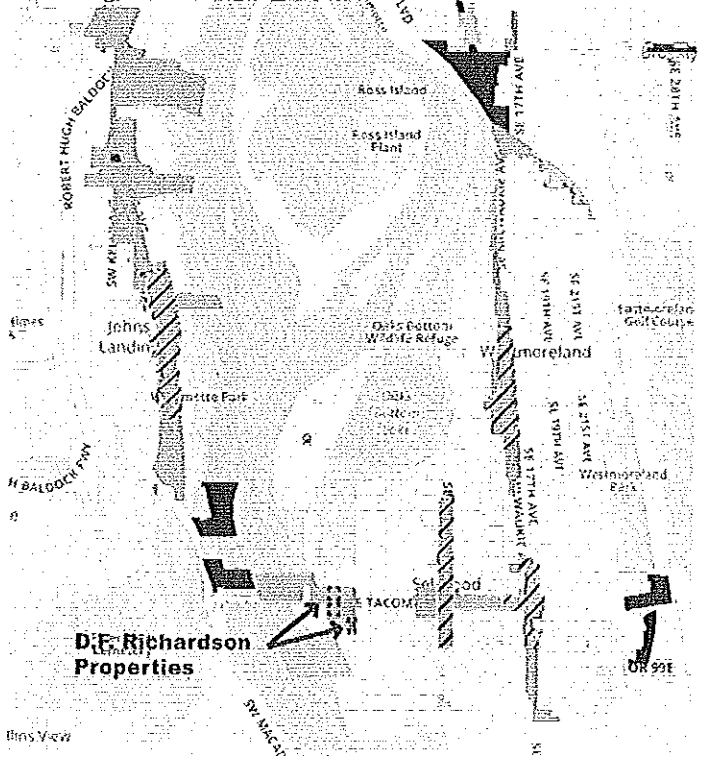
MIXED USE ZONES

-  Commercial Mixed Use 2
-  Commercial Mixed Use 3

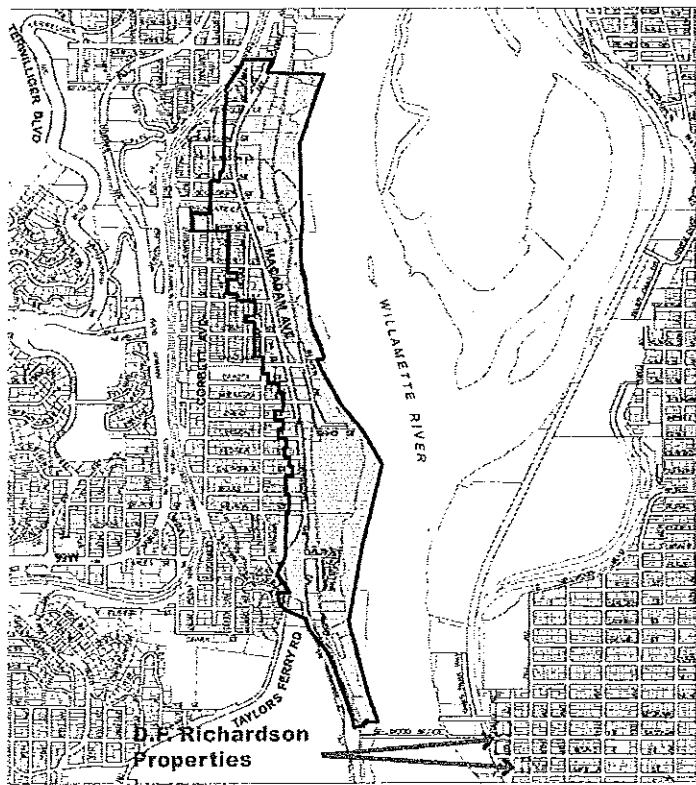
Map as Currently Shown on Map App



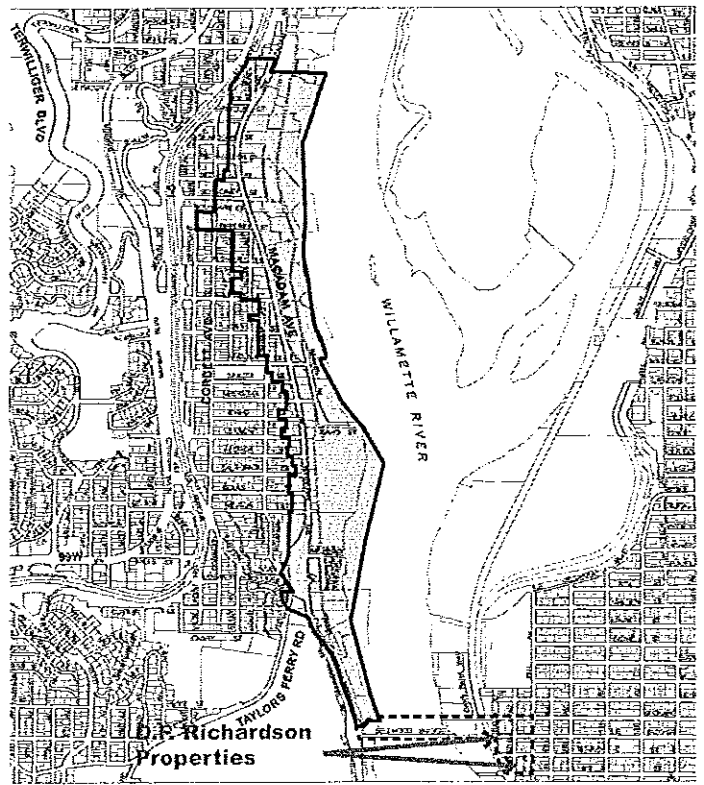
Map with Requested Zone Change



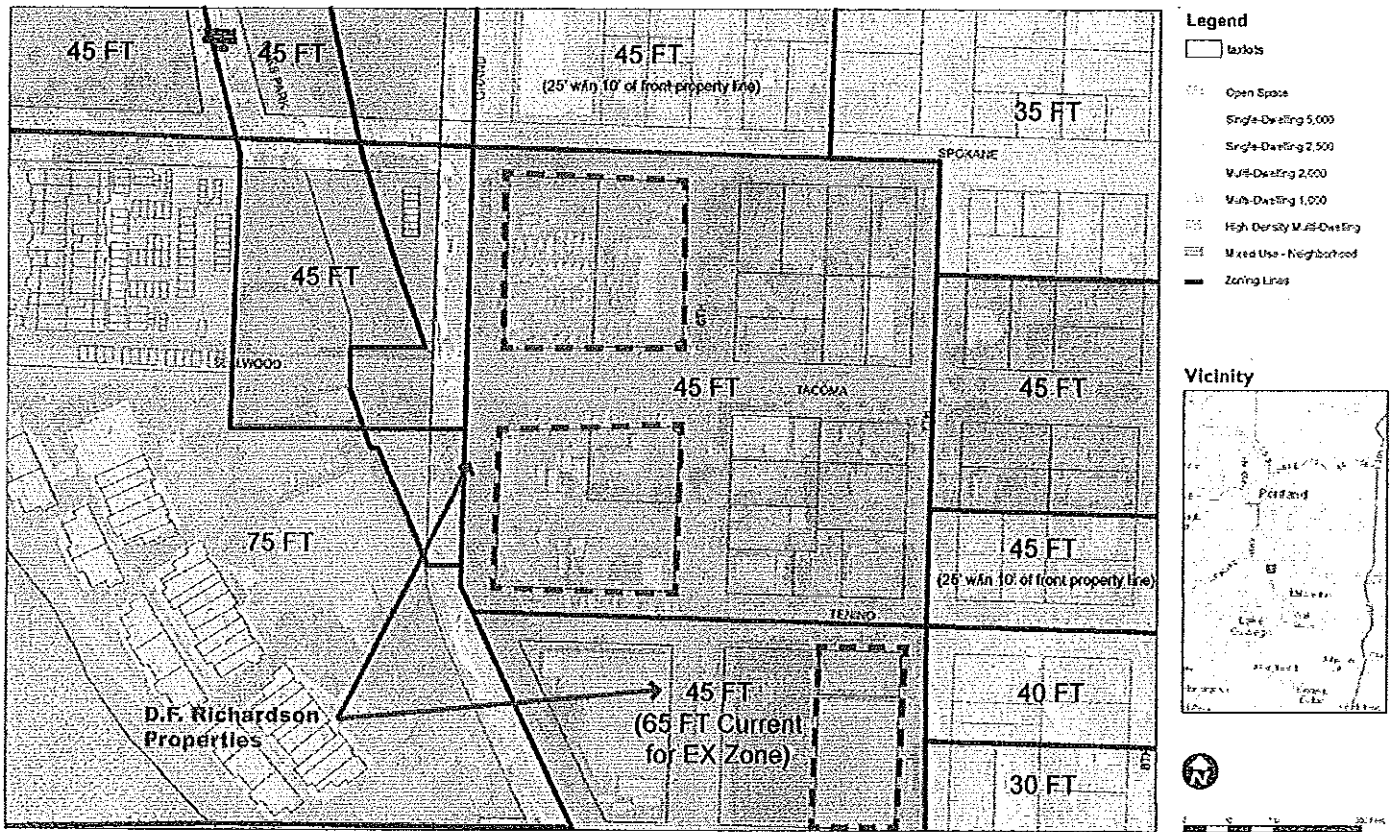
REQUESTED COMPREHENSIVE PLAN DESIGN OVERLAY CHANGE



Source: <http://www.portlandoregon.gov/tpa/artciv/83342>

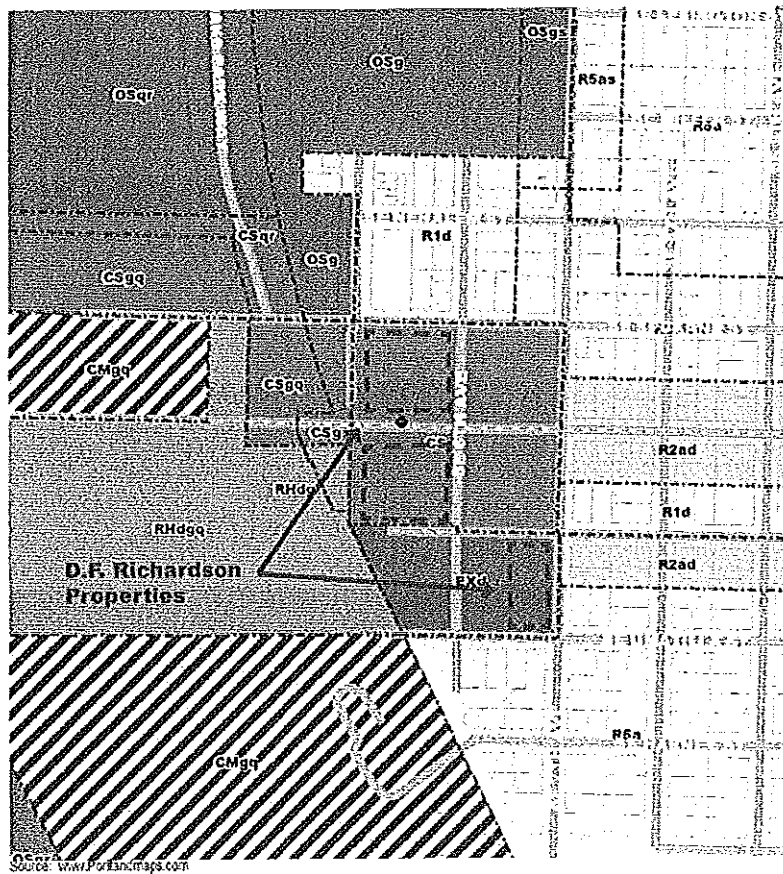


DESIGNATIONS & ALLOWED HEIGHTS AS INDICATED BY COMPREHENSIVE PLAN

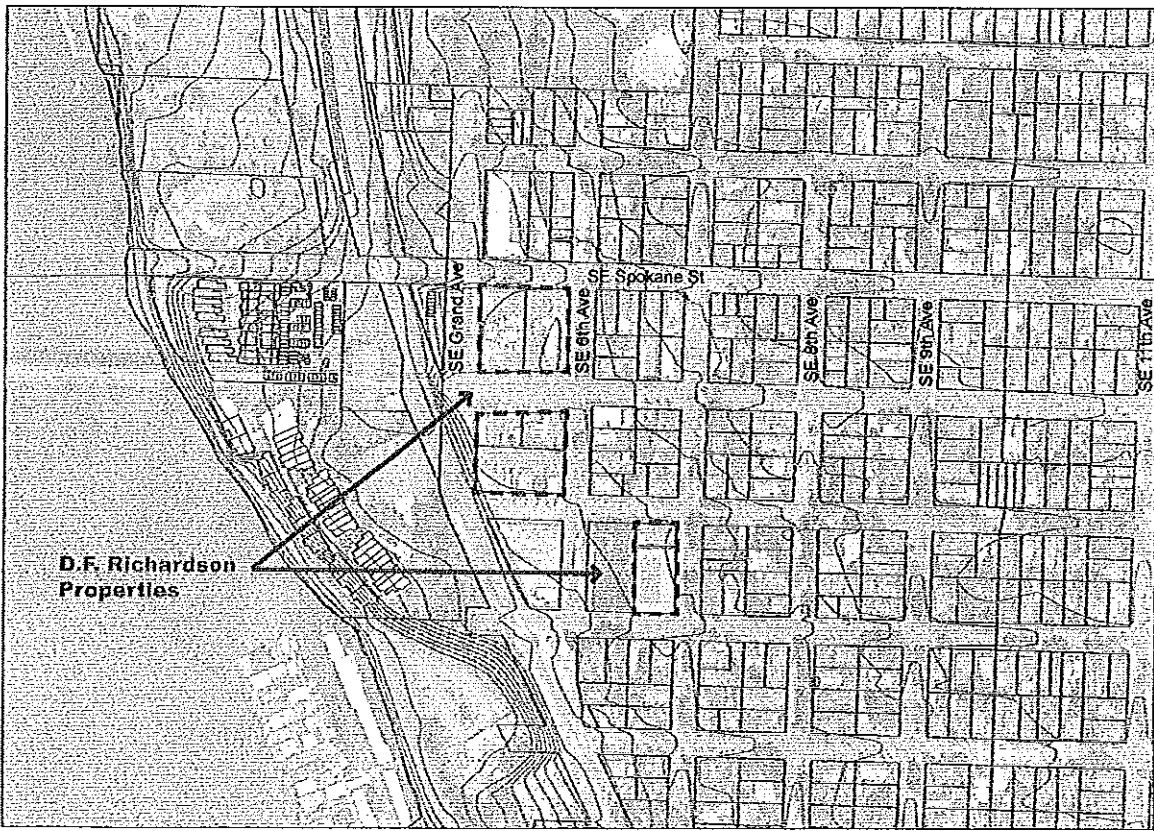


D.F. Richardson Properties - Sellwood Bridgehead

PORTLAND MAPS | CURRENT ZONING



GRADE CHANGE

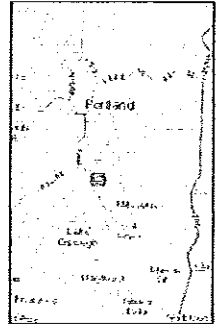


Legend

- S' contours
- blocks

25 FT ELEVATION DIFFERENCE FROM SE 13TH AVE

Vicinity



0 10 20 30 Feet

D.F. Richardson Properties - Sellwood Bridgehead

Arevalo, Nora

From: C <cbvorhies@msn.com>
Sent: Thursday, December 17, 2015 8:29 PM
To: BPS Comprehensive Plan Testimony
Cc: Jortner, Roberta
Subject: 1S1E06DC 4200

Follow Up Flag: Follow up
Flag Status: Completed

Re: 1S1E06DC 4200 / SW Humphrey Blvd

I am writing to request that Lot 4200 be excluded from the change proposed by the 2035 Comprehensive Plan and remain R 10,000.

We own this lot and the adjacent lot, 1S1E06DC 4300/5240 SW Humphrey Blvd.. Our home is on Lot 4300. These lots were deeded separately prior to 1979 and when we purchased the properties in 1988 we opted to keep them separate. It is currently zoned R 10,000 and is a buildable lot. Changing it to R 20,000 would eliminate that possibility and significantly devalue our property.

Leaving this lot at R 10,000 would allow us to maintain our options and the value of our property and could mean the addition of another taxpaying homeowner.

Carl & Cathy Vorhies
5240 SW Humphrey Blvd.
Portland, OR 97221

503-292-0442

Arevalo, Nora

From: 350PDX <webmaster@350pdx.org>
Sent: Thursday, December 17, 2015 4:53 PM
To: Hales, Mayor; Commissioner Fish; Commissioner Novick; Commissioner Saltzman;
Commissioner Fritz; Council Clerk – Testimony
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Jack Herbert
Email: please.no@email.com

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Jack Herbert

Arevalo, Nora

From: 350PDX <webmaster@350pdx.org>
Sent: Thursday, December 17, 2015 3:10 PM
To: Hales, Mayor; Commissioner Fish; Commissioner Novick; Commissioner Saltzman;
Commissioner Fritz; Council Clerk – Testimony
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Jynx Houston
Email: jynxcd@gmail.com

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Jynx Houston

Arevalo, Nora

From: 350PDX <webmaster@350pdx.org>
Sent: Thursday, December 17, 2015 1:24 PM
To: Hales, Mayor; Commissioner Fish; Commissioner Novick; Commissioner Saltzman; Commissioner Fritz; Council Clerk -- Testimony
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Jen Baye
Email: jenbaye@gmail.com

Displacement is a societal and climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan. Please help ensure that living in Portland is an option for not just the wealthy, but everyone.

Your constituent,

Jen Baye

Arevalo, Nora

From: Council Clerk – Testimony
Sent: Thursday, December 17, 2015 1:18 PM
To: BPS Comprehensive Plan Testimony
Subject: FW: Add Anti-Displacement Measures into the Comp Plan

Follow Up Flag: Follow up
Flag Status: Completed

From: 350PDX [mailto:webmaster@350pdx.org]
Sent: Thursday, December 17, 2015 11:34 AM
To: Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregongov.onmicrosoft.com>; Commissioner Fritz <amanda@portlandoregon.gov>; Council Clerk – Testimony <CCTestimony@portlandoregon.gov>
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Adam Brunelle
Email: brunelleadam@gmail.com

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Adam Brunelle

Arevalo, Nora

From: Jim Valluzzi <jvalluzz@easystreet.net>
Sent: Thursday, December 17, 2015 12:43 PM
To: BPS Comprehensive Plan Testimony
Subject: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Completed

The new restaurants, bars and shops came to Hawthorne and Division before the new apartment complexes did. Their coming may have been slow but come they did. Yes these new businesses created a parking issue but mostly in the evenings, mostly for the patrons of those businesses and the problem was limited to the hours those businesses were open not 24 hours a day.

The apartment complex developers choose to build in areas that are popular. It is these new restaurants, bars and shops that made the area popular.

The new apartment complexes only make the area crowded. When I hear people talk about what a nice area Hawthorne and Division are they talk about the restaurants, bars, shops and houses. I have never heard anyone talk about what a nice area they are and comment about the nice new apartment complexes.

If apartment complex developers don't build parking into their developments they should at least be made to pay for the parking problem they create. After all they are the ones making a profit, the area residents, new or old, aren't.

If the rents for the new apartment dwellers need to be higher to pay for parking so be it. The developers aren't building low income apartments. If the rents are too high people won't rent them and the developers will be forced to lower their rates. If we want to talk about affordable housing that's a whole other conversation as I don't believe any of these new apartment complexes could be considered low or affordable housing.

My concern is not the amount of profit these developers make it isn't even for the increase in the area's property values even thou the value of my house has increased a lot. My concern is for the livability of the neighborhood for families, kids and seniors. I can't say I see the increase of these new apartment complexes adding to that livability.

Jim Valluzzi
3277 SE Lincoln St.
Portland, OR. 97214

Sent from my mobile device - please excuse any typos.

Arevalo, Nora

From: 350PDX <webmaster@350pdx.org>
Sent: Thursday, December 17, 2015 11:34 AM
To: Hales, Mayor; Commissioner Fish; Commissioner Novick; Commissioner Saltzman; Commissioner Fritz; Council Clerk – Testimony
Subject: Add Anti-Displacement Measures into the Comp Plan

From: Adam Brunelle
Email: brunelleadam@gmail.com

Displacement is a climate justice issue and I support the city taking extraordinary action to ensure stability and livability in communities most vulnerable to displacement and climate change. Doing so is in line with the equity principles in the Climate Action Plan.

I encourage you to adopt all of Anti-Displacement PDX's 28 measures in the Comprehensive Plan.

Your constituent,

Adam Brunelle

Arevalo, Nora

From: Adam Herstein <aherstein@gmail.com>
Sent: Wednesday, December 16, 2015 8:02 PM
To: BPS Comprehensive Plan Testimony
Subject: Powell for Pedestrians

Follow Up Flag: Follow up
Flag Status: Completed

To the Mayor, City Council, and BPS Staff:

SE Powell Boulevard should be designated as Mixed Use - Urban Center or similar. Not as Civic Corridor.

I [say something about yourself relevant to yourself and your desire for a safer Powell corridor.] .

I understand that the initial draft comprehensive plans specify Civic Corridor designation for SE Powell Boulevard. I also understand that a motivation for this designation is ODOT's desire to maintain the auto-focused character of that highway.

I believe that in order to stem the loss of life and limb along Powell Boulevard there must be a massive shift in the urban design on that corridor. Please do not preserve the devastating status quo by designating Powell as a Civic Corridor. ODOT admits that the neighborhood streets are too close together for the design of that highway. SE Powell should be put on a road diet, and auto-focused businesses should be discouraged.

Please re-designate all relevant portions of SE Powell Blvd. to Mixed Use - Urban Center, or a similar designation that is compatible with the neighborhoods and schools along that corridor.

Sincerely,

Adam Herstein
3115 SE 52nd Av
Portland OR 97206

Arevalo, Nora

From: Tony Jordan <twjordan@gmail.com>
Sent: Wednesday, December 16, 2015 1:42 PM
To: BPS Comprehensive Plan Testimony
Subject: Powell Blvd. Comprehensive Plan Designation

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mayor and City Council,
Please amend the comprehensive plan draft to designate Powell Boulevard as "Mixed Use - Urban Center." Please do not succumb to ODOT's demand to maintain Powell as an urban freeway.
Best Regards,
Tony Jordan
4540 SE Yamhill St.
Portland, OR
97215

Arevalo, Nora

From: Brian <bhoch@teleport.com>
Sent: Wednesday, December 16, 2015 9:36 AM
To: BPS Comprehensive Plan Testimony
Subject: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Completed

Dear City of Portland,

I live in the Richmond neighborhood between SE Division and Hawthorne. The scale and design of the development, particularly on SE Division has been very disappointing.

Most of the neighbors I speak with see the Comprehensive Plan as it stands as a fait accompli, and damage control is our only resort. Even damage control in the form of imposing a design overlay on development, comes at a cost (incentives to build even higher) to the public.

Why should the threat of more uninspired, Big Box Apartments be allowed to be held over the public's head in order to realize even more concessions to developers?

The public feels powerless to turn the ship around at this point and that is very unfortunate in my view. Many that I speak with feel that the public hearings on the Comprehensive Plan are just a way to let the public vent and that the plan is written in stone, and that we are wasting our breath.

I have been following online discussions regarding development of Portland's East side and one local resident proposed redirection. He articulated this so well I hope that the powers that be in Portland give it consideration. Here is what he wrote:

Here's a Plan: Part One

"We'll pare back the proposed densities for our neighborhoods and say no to four and five story big box apartments on our historic corridors. We'll welcome more residential units on a gentler scale, through two & three story apartment buildings and ADUs. We'll emphasize mixing new density with amenities to maintain our quality of life. That means a garden court of carefully scaled apartments or more affordable condominiums with room for a large tree or two. If these are spread evenly among our neighborhoods we'll avoid the headaches that occur when we build the way we just did on Division."

"We'll just say no to development that destroys the essential nature of our neighborhoods, whether it be our residential streets or our neighborhood business districts. Just like good folks said no to the Mt. Hood Freeway decades ago."

And the Plan: Part Two

"By restricting the amount of new residential growth in our complete and viable neighborhoods we can instead direct development energy and investment to the parts of Portland that actually need it, like Gateway. Imagine taking some of the best elements of Sunnyside and The Pearl and creating a vibrant new center whose radius would serve East Portland with new amenities and services."

"Let's direct more growth into the "incomplete" neighborhoods. Let's think of supply and demand not in terms of residential units alone, but in terms of creating a greater quantity of livable neighborhoods. Let's build more Sunnysides and Richmonds instead of overbuilding the gems we already have."

There are so many problems with the planned re-zoning of the corridors that rather than pick on one or two issues (parking, no new open space to go-along with increased density, solar access, maintaining the character of the neighborhood, etc.) I have kept this plea general in scope.

Please listen to the public calls for change. The Richmond Neighborhood Association has offered up the Division Design Initiative, which in my opinion represents damage control only. It does not address the core issue, the re-zoning plans themselves.

Please acknowledge the mistakes made on SE Division and consider re-directing the density efforts. We are not opposed to density, but want smart density that respects the "complete" neighborhoods character.

Thank you for your consideration,

Brian Hochhalter
2133 SE 32nd Ave
Portland, OR 97214
503-349-4159

S • M • I • L • E

SELLWOOD MORELAND IMPROVEMENT LEAGUE
8210 SE 13TH AVENUE • PORTLAND, OR 97202
STATION (503) 234-3570 • CHURCH (503) 233-1497

December 16, 2015

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

Honorable Mayor and City Commissioners:

The property owner at 5505 SE 17th, Jeff Bachrach, is proposing retention of two areas of North Westmoreland with a high-density RH designation. As we have submitted in previous testimony, SMILE supports the changes to these two areas, (Map proposals 366 and 260 to less dense R2.5 and R1) as presented on the PSC approved Comprehensive Plan Land Use Map. We oppose retaining the high density RH designation in these areas. We will reiterate the rationale from our previous testimony here and document involvement of the neighbors. If adopted, this last-minute proposal to retain the RH designation would circumvent the extensive public process that has taken place.

In early 2014, Bureau of Planning and Sustainability staff approached the SMILE neighborhood association to initiate a conversation primarily to address downzoning of the earlier 1998 upzoning meant to create more density to support a proposed light rail station at the north end of our neighborhood. The stop was initially planned for a location along McLoughlin between 17th Avenue and Reedway Street as part of the South-North Light Rail project in the 1990s, and later refined to the intersection of Harold and McLoughlin during the planning of Portland-Milwaukie Light Rail (PMLR). We have included a map of the 2 proposal areas as well as the adjacent area (Figure 1).

The public process for the proposed changes was extensive as is illustrated in the timeline of SMILE Neighborhood Association meetings below:

- Prior to any public meetings, BPS mailed postcards to each property owner in the impacted area alerting them to the coming conversation with SMILE.
- 2/5/14 - SMILE General Meeting with BPS's Marty Stockton and Deborah Stein. Trimet staff was also present. Neighbors submitted comment cards.
- 3/3/14 - neighborhood walk

- 3/19/14 - SMILE Board Meeting w/ BPS's Marty Stockton & Deborah Stein to present draft Comprehensive Plan proposal.
- 4/11/14 - comment deadline to Marty Stockton or Ellen Burr (SMILE Land Use Committee chair at the time)
- Property owners received a M56 notice from BPS for both the draft Comprehensive Plan (PSC) and the proposed Comprehensive Plan before you now.

Each meeting was announced and subsequently summarized in the *Sellwood Bee* Land Use Report submitted each month by the SMILE land use chair, as well as emailed to the SMILE land use listserve, and an email list gathered from each meeting. Phone calls were also made to a property owner who did not have email access.

As you are aware, the light rail has now been running since September 12, 2015 and as you also know, the Harold Street Station was not built nor is it anticipated to be built in the next 20 years. We want to preserve this area as a place where we still have affordable single family homes as well as some lower-density apartment buildings and townhomes along and near Milwaukie Avenue and 17th Avenue. To encourage use of the PMLR, TriMet has eliminated multiple bus lines adjacent to this area which used to travel along McLoughlin into the City. Thus, the nexus of providing high density development to support transit has been reduced. It is about a 0.54 mile walk across very busy McLoughlin Blvd./Hwy 99E from 5505 SE 17th Avenue to the Holgate-Orange line station.

There are two buildings in North Westmoreland, one just leased and one under construction which are built to the existing RH density. We have surveyed the area property by property and have attached a summary of the existing dwelling types (Figure 2). We would be happy to provide more information on the survey if necessary.

This is the Comprehensive Plan definition of High Density Multi-Dwelling (RH):

This designation allows high density multi-dwelling structures and structures of an intense scale. It is intended for areas with good public services including transit, no development constraints, and a close proximity to commercial areas. Maximum density is based on a floor area ration, not on a units per square foot basis. Densities will range from 80 to 125 units per acre.

In the Proposed Comprehensive Plan Land Use Map there is no RH proposed anywhere in the neighborhood. The only RH in our neighborhood is specifically for higher rise condominiums on the Willamette Riverfront, one senior apartment adjacent to McLoughlin Blvd, and one section 8 housing apartment. When you look at areas around the city where RH is prevalent they are adjacent to the Central City such as Terwilliger Plaza, or on major corridors like Martin Luther King Blvd. and Vancouver/Williams. We are at the south end of close-in SE Portland, where the RH scale is not in any way the norm. The designations proposed for N. Westmoreland provide a

density which is an appropriate buffer to the adjacent lower density Residential 5000 and Residential 2500 as well as our proposed Mixed Use – Neighborhood commercial designation.

This testimony was approved by the SMILE Board of Directors by a vote of 11-0 on December 16, 2015.

Sincerely,

A handwritten signature in cursive script that reads "Corinne Stefanick".

Corinne Stefanick, President
Sellwood-Moreland Improvement League

S • M • I • L • E

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December 16, 2015

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

Honorable Mayor and City Commissioners:

The purpose of this testimony is to inform the Council that the Sellwood Moreland Improvement League (SMILE) cannot endorse or oppose designation changes proposed by Brummell Enterprises in our neighborhood. We believe a public process is needed for us to properly evaluate the proposals. We are submitting this testimony so Council does not infer indifference, endorsement, or opposition from a lack of comment from the neighborhood association. We encourage Brummell to continue to strive for the community improvements they envision. Despite the deadlines for the Comprehensive Plan testimony, we want to work with Brummell and other developers to cultivate and advance neighborhood-supported developments in SMILE, especially at the gateways to our neighborhood.

At this late date for public testimony, we cannot assess opinions of our membership on new and complex proposals to change comprehensive plan designations and thus we are unable to provide definitive testimony. The SMILE Land Use Committee makes recommendations to our Board of Directors on what Comprehensive Plan testimony to submit, and the Board decides. The purpose of our Land Use Committee is *'to express opinions on behalf of the membership in order to safeguard the character and livability of the Sellwood Moreland area. Members of the Committee participate in long term public planning efforts which may affect the Sellwood Moreland neighborhood.'*

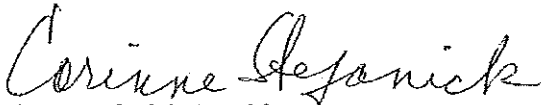
Brummell Enterprises has submitted four proposed designation changes for the Comprehensive Plan in our neighborhood along SE 17th Avenue and Milwaukie Avenue. Brummell voluntarily met with our Land Use Committee in November and December to present and discuss the proposals. We greatly appreciate their transparency, willingness to communicate with us, and responsiveness to our concerns.

At this time, SMILE cannot endorse or oppose the proposed changes. Some of the proposed changes are complex and SMILE would have to engage in a public process with the neighborhood before deciding whether to endorse or oppose the proposals. We especially need input from neighbors whose properties would get a new designation or who are adjacent to the

proposed changes. The proposals may provide significant benefits to our neighborhood, especially the possibility of a gateway development at SE 17th and Sherrett where Brummell owns all four corners. Some of the proposals also increase the allowable density on some residential streets, which we expect would be controversial. As previously stated, we want to work with Brummell and other developers to cultivate and advance neighborhood-supported developments in SMILE, especially at our gateways.

This testimony was approved by the SMILE Board of Directors by a vote of 11-0 on December 16, 2015.

Sincerely,

A handwritten signature in cursive script that reads "Corinne Stefanick". The signature is written in black ink and is positioned above the printed name and title.

Corinne Stefanick, President
Sellwood-Moreland Improvement League

S • M • I • L • E

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December 16, 2015

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

Honorable Mayor and City Commissioners:

The purpose of this testimony is to inform the Council that the Sellwood Moreland Improvement League (SMILE) opposes changing the designation of properties east of the Sellwood Bridge from mixed use – neighborhood center to mixed use – civic corridor. We support retaining the Mixed Use – Neighborhood Center designation presently in the Draft Comprehensive Plan. The owner of these properties, known as the Sellwood Bridgehead (535 SE Tacoma, 545 SE Tacoma, 536 SE Tacoma, and 8145 Se 6th Ave), voluntarily met with our Land Use Committee on December 2 to present and discuss their proposed change which they are submitting as testimony to City Council. We greatly appreciate their transparency and willingness to meet with us.

The Mixed Use – Civic Corridor and Mixed Use - Neighborhood center definitions are in an appendix to this letter. SMILE opposes a civic corridor designation at the Sellwood Bridgehead because

- SMILE has no Civic Corridor designations and this designation would allow an additional 10 feet of building height that is not compatible with the rest of the mixed use properties in SMILE. Our neighborhood corridors, Milwaukie, 13th, 17th, and Tacoma are all designated Mixed Use – Neighborhood in the Comprehensive Plan Land Use Map. The neighborhood center designation is compatible with our neighborhood.
- Public comments at our Land Use Committee meeting where this was discussed clearly opposed '*More intense, mixed-use development*' intended by this designation. Our neighbors are generally dissatisfied with existing zoned density and oppose increasing allowable density.
- This west end of Tacoma Street does not have access to '*high-capacity transit, frequent bus service, or streetcar service*' nor are we aware that any is planned in the future. The Tacoma Street MAX Orange Line station is 1.2 miles to the east of the bridgehead. Bus line 99 is a weekday rush hour only express bus that will cross the new Bridge and TriMet says they will add one stop somewhere west of SE 13th Avenue. TriMet plans to

change bus line 43 to cross the bridge but present service is only on weekdays and no more frequent than 49 minutes.

- Tacoma Street is a 2-lane street in the proposed corridor, it is not one of the city's 'widest' streets.

These properties offer a tremendous opportunity for a gateway development to our neighborhood which would provide significant public benefit and create a destination that would appeal to commercial tenants. SMILE would like to work with the property owner and our neighborhood to develop such a plan for the Sellwood Bridgehead.

This testimony was approved by the SMILE Board of Directors by a vote of 10-1 on December 16, 2015.

Sincerely,



Corinne Stefanick, President
Sellwood-Moreland Improvement League

Appendix: Definitions of Comprehensive Plan designations from the Mixed Use Zones Project Discussion Draft Report

Present Comprehensive Plan designation of the Sellwood Bridgehead:

Mixed Use — Neighborhood. This designation promotes mixed-use development in neighborhood centers and along neighborhood corridors to preserve or cultivate locally serving commercial areas with a storefront character. This designation is intended for areas where urban public services, generally including complete local street networks and access to frequent transit, are available or planned, and development constraints do not exist. Areas within this designation are generally pedestrian-oriented and are predominantly built at low- to mid-rise scale, often with buildings close to and oriented towards the sidewalk. The corresponding zones are Commercial Mixed Use 1 (CM1), Commercial Mixed Use 2 (CM2), and Commercial Employment (CE).

Proposed Comprehensive Plan designation of the Sellwood Bridgehead opposed by SMILE:

Mixed Use — Civic Corridor. This designation allows for transit-supportive densities of commercial, residential, and employment uses, including a full range of housing, retail, and service businesses with a local or regional market. This designation is intended for areas along major corridors where urban public services are available or planned including access to high-capacity transit, frequent bus service, or streetcar service. The Civic Corridor designation is applied along some of the City's busiest, widest, and most prominent streets. As the city grows, these corridors also need to become places that can succeed as attractive locations for more intense, mixed-use development. They need to become places that are attractive and safe for pedestrians while continuing to play a major role in the City's transportation system. Civic Corridors, as redevelopment occurs, are also expected to achieve a high level of environmental performance and design. The corresponding zones are Commercial Mixed Use 1 (CM1), Commercial Mixed Use 2 (CM2), Commercial Mixed Use 3 (CM3), Commercial Employment (CE).

S • M • I • L • E

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December 16, 2015

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

Honorable Mayor and City Commissioners:

The Sellwood-Moreland Improvement League (SMILE) is submitting the following testimony to be entered into the record as part of the Proposed Comprehensive Plan:

Here is the background from our testimony previously submitted to the Planning and Sustainability Commission: Originally the draft Portland Comprehensive Plan designated this area at the southern end of SE 13th Avenue as Mixed Use – Neighborhood. Through work with BPS staff and our testimony submitted to the Planning and Sustainability Commission, the proposal was revised and approved by the PSC to reflect what is in the Proposed Comprehensive Plan Map before you now.

The definition of MU-Neighborhood: This designation promotes mixed-use development in neighborhood centers and along neighborhood corridors to preserve or cultivate locally serving commercial areas with a storefront character. This designation is intended for areas where urban public services, generally including complete local street networks and access to frequent transit, are available or planned, and development constraints do not exist.

This portion of SE 13th Ave. failed to meet this definition for several reasons:

It is not in a neighborhood center, nor along a neighborhood corridor.

It is not in a commercial area. 17 of the 19 buildings along the street are residences — two apartment buildings and 15 single family homes. Of the two buildings which are not residential in use, one is a machine shop and the other is a small storefront type building which was reportedly once a neighborhood grocery store, and is currently a store.

All of the surrounding properties are single or multi-family residences except for the PGE substation at SE Linn and 13th.

The primary street through the designated area, SE 13th Avenue, ends one block south of Linn Street. It does not intersect any other commercial street, only residential streets primarily lined with single family homes. There is a bus line (70) which runs *only* north (southbound takes a different route) along the street about once every 40 minutes; it is not a frequent transit line.

This is not where commercial growth should be centered. Sellwood-Moreland is unlike other close-in SE neighborhoods in that it has more than one commercial street. There are about 2.7 miles of commercial corridor in Sellwood-Moreland. In addition to the two neighborhood centers, Sellwood and Westmoreland, this includes the north entrance to the neighborhood at SE Millwaukie Avenue, the neighborhood's most affordable area, where most neighbors would welcome a more vibrant commercial presence than currently exists; SE Tacoma, which heads east to the Tacoma light rail station (and is currently seeing some development at the node of SE 17th Avenue) and west to the Sellwood Bridgehead near 6th also seeing some residential apartment development; and SE 17th Avenue primarily south of Tacoma, which has some commercial use and is also slowly becoming more developed.

Except for cut-through traffic, the streets in the southern strip of 13th are primarily used by local residents heading from their homes to the centers of the neighborhood or elsewhere. The existing commercial corridors have quite enough room for commercial development to serve the increase in density projected for the neighborhood. These existing commercial centers and corridors are where most of our growth should be focused.

This are the proposal numbers which are included in the group we are labeling SE 13th.

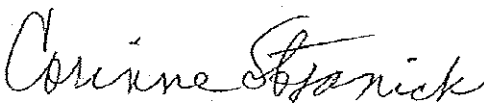
Proposal No.	Existing Designation	Proposed Designation
371	Central employment	Mixed Employment
372 (four properties in group)	2 Central employment, 2 Urban Commercial	Mixed use - Dispersed
887	Urban commercial	Multi-dwelling 1000
888	Low density multi-dwelling	Single dwelling 5000
889	Urban commercial	Single dwelling 5000
371 (PGE substation)	Central Emp, Attached Res.	Mixed Employment

Resolution. The Board of Directors of the Sellwood Moreland Improvement League resolves that the designations in the Proposed Portland Comprehensive Plan Land Use Map of the area along SE 13th Avenue between SE Sherrett and SE Linn Streets be designated primarily for medium density residential use (R1). There are two properties proposed Multi-Dwelling-5000 to reflect their current uses. Four properties, two corner properties on SE 13th Avenue on the north side of Linn Street (1237 SE Linn and 1309 SE Linn), one on the southwest corner of Marion and 13th, and one at the northwest corner of SE 13th Avenue and Clatsop are proposed as Mixed Use – Dispersed. The PGE Substation is proposed to change from Central Employment to Mixed Employment, a more appropriate designation for properties adjacent to residential.

Approved at the SMILE Board meeting, December 16, 2015.

Our neighborhood has been actively involved in these land issues and we are looking forward to seeing them implemented.

Sincerely,



Corinne Stefanick, President
Sellwood-Moreland Improvement League



Southeast Uplift
3534 SE Main St
Portland, OR 97214

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MEMORANDUM

Date: December 15, 2015

To: Mayor Hales
Commissioner Fritz
Commissioner Fish
Commissioner Novick
Commissioner Saltzman

From: Neighborhood Coalition Directors and Chairs Group.

Subject: Public Involvement and Comprehensive Planning Process

On November 15, 2015 the Directors and Chairs group held a three hour meeting to review the progress of the Comprehensive Plan. The meeting was noticed and well attended, but it should be made clear that the attached summary represents the observations of the Directors and Chairs of the city's neighborhood coalitions.

Given the rapid timeline before us, we have not had time to get approval of this statement from all our 95 Portland neighborhood associations, so we present it to you, as we have heard it, from all quarters of yours, ours, and everyone's Portland.

Please read the attached summary of our findings carefully since we hold, collectively, many concerns about the level of public involvement in the draft plan before you for approval.

Yours,

A handwritten signature in black ink, appearing to read "R. McCullough". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert McCullough
President
Southeast Uplift

Portland Neighborhood Coalition Directors and Chairs Group

Portland Comp Plan Update

COMMENTS REGARDING COMMUNITY ENGAGEMENT

12/10/15

TO: Portland City Council
FROM: Neighborhood Coalition Leaders and Staff
RE: **COMMUNITY ENGAGEMENT IN THE COMP PLAN**

Neighborhood coalition leaders and staff, from all seven of Portland's neighborhood coalitions, want to share with you some important concerns about the community engagement in the update of Portland's Comprehensive Plan (Comp Plan).

Our group held a special three-hour meeting on November 12, 2015 to discuss community concerns about how BPS engaged the community in the update of the Comp Plan.

We recognize that lots of process took place, but we also are hearing strong concerns in the community about the quality of these processes, who was heard, and what impact community member input has had on the development of the recommended draft.

A key message is that both planning staff and community members need more time, and that the process needs to have enough resources and realistic timelines to ensure that the community effectively is involved in shaping the final products.

As leaders and staff for Portland's seven neighborhood coalitions, we want to share with you below what we are hearing and what we believe to be accurate.

SUMMARY OF KEY THEMES

Process did not follow Proposed "Chapter 2—Community Engagement" goals and policies

- We recognize that the recommended "Chapter 2: Community Engagement" language includes goals and policies that set strong expectations for good community engagement. We find it ironic and disturbing that the process used to engage the community in the Comp Plan Update did not follow these recommended goals and policies.

Community input appears to have had little effect

- We found many instances in which community members and neighborhood and community organizations provided extensive and detailed input but did not see that their input had any effect on the final product.

- Neighborhood and community groups and community members often did not receive a formal acknowledgement that their input was received, and often received no feedback on what was done with their input.
- In some cases, more savvy neighborhood and community activists who really understood the system and had good inside relationships were able to move some of their priorities forward. However, community members, in general, appear to have had little effect on the outcomes.

Decision making processes were not transparent

- Rather than a transparent, “additive,” process by which community members could see how different products and documents evolved, community input seemed to go into a BPS “black box” in which decisions were made without any explanation of how community input was or was not used and why. Community members complain that they are not able to “reverse engineer” BPS decisions to understand how these decisions were made.
- Community members want to know: What was the decision making logic? Were decisions just made by senior planners? What criteria did they use and what level of understanding of the prior community input and existing plans did they bring to their decisions?
- Recommendations in this process often appear to have gone forward without support of the groups that had been involved in helping develop the recommendations.

Lack of Community Access to Planning Commission

- Many community members feel that the Planning and Sustainability Commission (PSC) was not accessible to the community during the process. Community input to the PSC was filtered through the staff. Community members do not feel confident that PSC members adequately were aware of and understood community concerns and recommendations.

Disconnect with prior, existing plans and earlier products

- The Comp Plan Recommended Draft proposals and recommendations do not appear to reflect earlier aspirational goal and policy language—e.g. visionPDX, Portland Plan, earlier Comp Plan aspirations, goals for specific zoning, Zoning Code density standards, existing plan districts, etc. For instance, the Comp Plan map and zoning updates and changes being proposed do not seem to correlate with the aspirational language in the Comp Plan goals and policies.
- The Comp Plan Recommended Draft does not appear to incorporate and reflect other existing plans that often were developed with significant community input: e.g. District Plans, Parks Vision 2020, Climate Action Plan, Age-Friendly City Plan, etc.

Community engagement processes were not designed to be appropriate to different audiences

- Community engagement should focus on helping community members understand how a project or proposed policies will affect them and their community and how they can have an effect on the issues that are most relevant to them.
- Many community members and organizations did not have the capacity to get themselves up to the level at which planning staff were working.
- Much of the community outreach and engagement was done in language and formats that many community people could not understand. Outreach and engagement also was not designed to be accessible to many different groups of people in our community and often was not tailored adequately to the needs and context and communication styles of different cultural communities.
- Outreach also was not tailored adequately to different areas of the city. Too many presentations had a general city-wide focus and were not relevant or useful to community members—community members could not see how the issues and processes would affect them and what they could do to affect outcomes that mattered to them.
- Outreach also needed to be staged and tailored to audiences with different levels of interest and expertise. Too much of the information came all at once. Processes needed to make sure that the right people were in the room for the content being presented—e.g. “101” sessions for people who are very new to planning, and more advanced sessions for more experienced people.

Multiple Projects were underway in parallel without being clearly integrated

- Too many different planning projects were underway at the same time. It was not clear to most community members how they all fit together. Even the most savvy and experienced neighborhood and community activists had trouble following and understanding what was happening.
- BPS staff also often were overwhelmed and said they did not understand how all the pieces fit together. This made it difficult for them to help the community engage effectively.
- The Comp Plan is about much more than just land use, including transportation, bikes, parks, etc. This process affects so many different areas important to the community that it 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.



Oregon

Department of Transportation

Region 1 Headquarters
123 NW Flanders Street
Portland, Oregon 97209
(503) 731.8200
FAX (503) 731.8531

December 15, 2015

Portland City Council
Attention: Council Clerk
1221 SW 4th Avenue, Room 130
Portland, OR 972014

SUBJECT: ODOT testimony on Portland Transportation System Plan and Comprehensive Plan

The Oregon Department of Transportation has been pleased to participate in the development of the City of Portland's Comprehensive Plan and Transportation System Plan over the last several years. We have participated in numerous PEG, TEG and Agency Coordination meetings. We commend City staff for their responsiveness to our comments and those of the many other participants.

Per the Oregon Transportation Planning Rule (TPR), the City's TSP must be consistent with the Oregon Transportation Plan and adopted state modal plans. This includes the Oregon Highway Plan and its highway mobility targets. In addition, any amendments to the Comprehensive Plan, such as those you are contemplating now, must comply with section -0060 of the TPR. That means that the City must determine if the amendments would have a significant effect on planned transportation facilities, including state highways. If it does, the City must propose TSP projects or other mitigation measures to rebalance planned land uses and the planned transportation system. Failing to comply with Oregon Highway Plan mobility targets or adding congestion to places that already fail to meet the OHP mobility targets either constitutes a significant effect that must be mitigated (in the case of Comp. Plan amendments), or is an unmet need that must be addressed (in the case of the TSP).

As part of the development of the City's Comprehensive Plan changes and TSP update, the City, Metro, ODOT and DLCDC staffs have collaboratively developed a methodology for addressing these state requirements efficiently. The modeling results showed that there are several segments of State highways that fail to meet OHP mobility targets under current or proposed Comp. Plan designations. The analysis is based on the regional traffic demand model, which is not a fine tool for identifying localized congestion issues, so the exact locations and nature of the problem may vary based on more detailed analysis. An additional concern is the fact that some of these locations have experienced high crash rates. (i.e. they are high on the list of Safety Priority Index System = SPIS locations). The attached spreadsheet identifies the locations of concern.

The Transportation Planning Rule and the Oregon Highway Plan allow deferring unresolved transportation system plan issues to a refinement plan (TPR: OAR 660-0012-0025(3); OHP: Action 1F3). The Discussion Draft of the TSP update before you includes such a refinement plan

in section 12, page 69, labeled "Projected ODOT 'Hot Spots' Locations". ODOT is satisfied with the proposed approach but suggests the following clarifying language changes:

Projected ODOT "Hot Spot" Locations Refinement Plan

This analysis ~~would~~ will identify plan level solutions for locations with safety and/or current or projected capacity (congestion) problems on or near State Highways. The ~~study refinement plan~~ will also develop and evaluate alternative performance measures, including alternative mobility targets, for State Highways, consistent with Action 1F3 of the Oregon Highway Plan, in collaboration with the Oregon Department of Transportation.

Through modeling and analysis, PBOT and ODOT have identified multiple locations with ~~potential safety and/or projected capacity~~ problems. The agencies have agreed that PBOT will identify feasible actions for addressing these safety and/or capacity problems along with a financially feasible implementation program, and analyze potential alternative performance measures. After analyzing the locations in more detail, using the appropriate micro- or meso-scale modeling and analysis tools based on the results of the alternative performance measures work, PBOT will recommend whether and what types of solutions are appropriate for each location for inclusion in the City's TSP. PBOT will also work with ODOT to develop and recommend alternative State Highway mobility targets for adoption by the City and the Oregon Transportation Commission.

The same language should be incorporated in the list of Major Projects Recommended for Studies. In addition, the TSP must include a timeline for completion of the refinement plan, as required by the TPR and the OHP Action 1F3.

With these changes, ODOT is happy to support adoption of the City's Transportation System Plan. Sincerely,

Lidwien Rahman
Principal Planner
ODOT Region 1

Attachment: ODOT Highway Locations of Concern

CC: Courtney Duke, PBOT
Eric Engstrom, BPS
Al Burns, BPS
Peter Hurley, PBOT
Bill Holmstrom, DLCD
Anne Debbaut, DLCD

ODOT Highway Locations of Concern - Portland TSP and Comp Plan

Hwy	Beginning	End	2012 Top 5% SPIS	TSP	CP	CP Run2	Additional Comments
Needs Further Analysis to Identify Improvements or Analysis to Seek Alternative Mobility Targets							
US30	Nicholai Street	NW 26th Drive	X	O		O	Queuing should be evaluated for safety
US30	St. John's Bridge	Corn Pass		O		X	Analyze US30 Bypass & Business Connection to St John's Bridge Including Queuing
St. John's	St. John's Bridge	NA		O		O	Analyze US30 Bypass & Business Connection to St John's Bridge Including Queuing
OR43	Boundary	Taylor's Ferry Road		O		O	
OR43	Abernathy	Curry		O		X	
OR43	Bancroft Street	Hamilton Street		O		X	
Lombard	Portsmouth	NA	X			O	
Lombard	Wall	Portsmouth		O		O	
Lombard	Olin	Chautauqua		O		O	
Lombard	Albina	NA		O		O	
Defer to Another Project to Study							
Naito	Ross Island Bridge	Barbur	X	O		O	SWCP
OR99W	Hamilton Street	OR10		O		X	SWCP
82nd	Division	NA	X	O	O	X	Powell-Division HCT
Powell	Ross Island Bridge	39th Avenue	X	O	O	O	Powell-Division HCT
Powell	39th Avenue	Foster	X		O	O	Powell-Division HCT
Killingsworth	82nd	NA		O		O	82nd Roses Plan might look at this area
16thAve	Glisan Street	Everett Street	X	O			Flanders Bridge Analysis?
Project Already Listed in TSP							
OR99E	17th Ave	Bybee	X	O		O	Keep 70030 in TSP. Clean wording; OR99E 6-lanes from Harold to Ochoco
Powell	I-205 Exit Ramps			O		X	Keep 80022 in TSP. Clean wording: Turn lane improvements at the ramp terminals.
Powell	I-205	112th	X	O			Keep 80015 in TSP. Clean wording: 99th to 162nd Three-Lanes, 162nd to 174th Four-Lanes.
Powell	162nd	174th	X	O		X	Keep 80015 in TSP. Clean wording: 99th to 162nd Three-Lanes, 162nd to 174th Four-Lanes.
I84 WB	I-205 NB	NA	X	O		O	Keep 40046 in TSP.
I205 SB	Columbia Blvd	NA	X		O	O	Keep 40018 in TSP. Clean wording: All work done except widening of I-205 SB On-Ramp.
I5 NB	Victory Blvd	NA			O	O	CRC
Project Needs to be Placed in TSP							
I-405 SB	Broadway Exit Ramp	NA	X	O			Add 3rd eastbound through lane on Broadway between Broadway Dr and 5th Ave
I-405 NB	Broadway Entrance Ramp	NA	X	O			Realign ramps and modify structures on i-405 NB from I-5 to SE 12th Ave
I-205 SB	Washington	Johnson Creek Blvd	X	O	O	O	Auxiliary Lanes on I-205 NB and SB
I-5 NB	Swan Island	Rosa Parks	X	O	O	O	Refinement Plan - Other Agency List?

Page 1 of 2

December 15, 2015

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

Re: "Comprehensive Plan Testimony"

Dear Sir,

My name is Shannon Benson. My late husband and I purchased our home at "6000 NE Bryant Street, Portland, Oregon 97218", located on the "Columbia Slough" when we were newly married in "1974". I have lived there for "42 years". This is a **"PROTECTED WILDLIFE HABITAT AND A WELL HIDDEN "PARADISE LOST" IN THE MIDDLE OF THE CITY ON THE COLUMBIA SLOUGH!"**

When we moved in - all that surrounded us were farms and fields as far as you could see and a White Church in the distance. The variety of wildlife was abundant and thriving, I saw what appeared to be a Prehistoric Monster Bird fly over the Slough and thought perhaps we had moved to an environment forgotten in time. It turned out to be a "Blue Heron", but I have yet to see any "Blue Heron" as big with such a wide immense "wing-span", since that period of time. We rowed our boat on the Sparkling Columbia Slough filled with Carp, Crawdads, Frogs, Turtles, Beaver, Musk Rats, and we ate crawdads from the Slough with no health worry. Owls, Blue Herons, Hawks, Crows, Bluejays, Squirrels, Deer and Coyotes were some of the many wildlife inhabitants that called the **"COLUMBIA SLOUGH THEIR HOME!"**

The "City of Portland", recognized the extreme importance of the area, and had a protection clause in effect to save this irreplaceable environment. This **"WILDLIFE SAUCTUARY AND THE HOMES INTER-TWINED WERE TO BE PROTECTED FROM ANY OUTSIDE INFLUENCES, (ENVIRONMENTAL, ETC)! THIS AREA WAS TO REMAIN UNTOUCHED AND UNCHANGED! AS NEIGHBORS IN A COMMON CAUSE, WE WERE ASTONISHED WHEN DOWN THE ROAD THE "CITY OF PORTLAND" DIS-AVOWED ANY PROTECTION SAYING WHEN THAT "PROTECTION" WAS PROMISED - MANY YEARS AGO, THAT IT WAS DOUBT-FUL ANY OF THOSE COLUMBIA SLOUGH RESIDENTS WERE STILL ALIVE FROM THAT "TIME-FRAME", SO THE "CITY OF PORTLAND" THREW THAT PROTECTION CLAUSE OUT LIKE "THE BATH WATER!"**

About a decade down the road, we noticed swift changes encroaching on our environment, the old white church was torn down, the fields were turning into industrial buildings, the property across the street had the zoning changed without notification to any of the neighbors and they paved a parking lot on a weekend, a cell tower sprung up less than 65 feet from our home, the Columbia Slough turned murky and green growth appeared below the surface, the crawdads grew many legs, more eyes and turned odd bluish colors, after that we did not crawdad out of the slough anymore. My dog drank out of the slough, and he developed bumps all over his body, and cried out in pain, and I had to have him put to sleep! With our large population of feral cats along the slough, I rescued them only to have them die one by one of a mysterious disease like cancer (being radiated by the cell tower less than 65 feet away as they sat in the windows of my home). My late husband, a vibrant energetic engineer with beautiful skin, his health started to fail in this environment and he developed "**Plague Psoriasis**", causing him to be in constant pain, and "**passed away after (MANY YEARS OF SUFFERING)!"** Perhaps his illnesses were caused directly from the Columbia Slough!

THIS IS THE END RESULT FROM THE "CITY OF PORTLAND", TURNING HER BACK ON

NATURE, A SITUATION THAT CANNOT BE REVERSED!

Page 2 of 2

PLEASE STOP THIS ZONING CHANGE BEFORE IT IS TOO LATE!

AS NEIGHBORS OF THE COLUMBIA SLOUGH WILDLIFE SANTUARY, WE ARE ALL
UNITED TOGETHER "AS ONE", AGAINST THIS ZONING CHANGE IN ORDER TO
PRESERVE THIS FRAGILE DOMAIN!

THIS "PROTECTED WILDLIFE (HABITAT) SANTUARY" IS SUPPOSED TO BE PROTECTED
FOR A REASON -- IF NOT PROTECTED, IT WILL BE LOST FOREVER!!!!

STOP THIS "COMPREHENSIVE PLAN ZONING CHANGE" AT ALL COSTS!!!!

SIGNED "LIFE FOR ALL LIVING CREATURES"!!!!

SHANNON BENSON.



Shannon Benson
6000 NE Bryant Street
Portland, Oregon 97218

P.S. Enclosed, please find a copy of my letter mailed to the "Audubon Society" to "Micah Meskel" in October of 2015.

cc: Micah Meskel
Audubon Society

Enclosure (1)

MEETING - PSC PUBLIC HEARING PAGE 2

OCTOBER 27, 2015

10/9/15

3:00 PM

1900 S.W. 4TH AVE, ROOM 2500

PORTLAND OR

AUDUBON SOCIETY

REZONING:
COLUMBIA SLOUGH
PROTECTED WILDLIFE
HABITAT

DEAR MICAH MESKEL

I PHONED YOU 10/9/15

RE: CITY OF PORTLAND

REZONING PROPERTY -

ON COLUMBIA SLOUGH

WE NEED TO STOP THIS -

I HAVE OWNED THIS PROPERTY

SINCE 1974.

WE NEED TO SAVE THIS AREA -

(PROTECTED WILDLIFE HABITAT)

THE WILDLIFE & BLUE HERONS

ARE WONDERFUL HERE -

I LOVE IT! PLEASE HELP US.

SHANNON BENSON

6000 N.E. BRYANT STREET

D...

DAFFIAN 07210

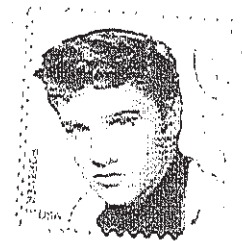
(P.S. I WILL BE
AT THE MEETING)

THANK YOU

COPY

P.S. HERE IS A COPY OF THE DOCUMENT I SAID I WOULD MAIL YOU

SHANNON D. BENSON
6000 N.E. BRYANT STREET
PORTLAND, OREGON 97218



MR. MICAH MESKEL
40 AUDUBON SOCIETY OF PORTLAND
5151 N.W. CORNELL ROAD
PORTLAND, OREGON 97210