

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:39 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: Powellhurst-Gilbert (EPNO)

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 1:32 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Bixby, Richard; Gray, Karen; Scarzello, Christina; Richard Dickinson; Silas Covert-Keefe (PGNA)
Subject: TSP Neighborhood Project Rankings: Powellhurst-Gilbert (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the Powellhurst-Gilbert Neighborhood Association (PGNA) in East Portland, I am forwarding their results to you.

David Hampsten
Hazelwood NA Transportation Chair
302 SE 105th Ave Apt 26
Portland OR 97216
david_hampsten@yahoo.com
971-322-6599

CC: PGNA Board; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

Rank	
TSP #	
Powellhurst-Gilbert TSP Project Title	
1	
80004	SE 136th Ave Active Transportation Improvements (Division to Foster)
2	
80015	Outer Powell Blvd Corridor Improvements Phase 1 (SE 116th to 136th)
3	
80032	Outer Powell Blvd Corridor Improvements Phase 2 (I-205 - 174th)
4	
80011	Outer Foster Rd Multimodal Improvements (SE 136th – Jenne) (PVATS)
5	
80016	Powellhurst/Gilbert Pedestrian Improvements
6	
50049	122nd Ave Multimodal Improvements
7	
80009	Outer Division St Streetscape Improvements (I-205 – SE 174th)
8	
80010	Outer Foster Rd Pedestrian Improvements (SE 102nd to Foster Pl)
9	
80012	Outer Holgate Active Transportation Improvements
10	
80030	Outer Harold Bikeway (SE 104th - SE 136th)

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:39 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: Pleasant Valley (EPNO)

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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 1:40 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Gray, Karen; Bauer, Linda; Bixby, Richard; Christina Scharzello (PBSP); Karen Hubbard (PVNA)
Subject: TSP Neighborhood Project Rankings: Pleasant Valley (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the Pleasant Valley Neighborhood Association (PVNA) in East Portland, I am forwarding their results to you.

David Hampsten
Hazelwood NA Transportation Chair
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Portland OR 97216
david_hampsten@yahoo.com
971-322-6599

CC: PVNA Board; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

Rank

TSP #

Pleasant Valley TSP Project Title

1

10857

0

Jenne/Foster Intersection Improvements (PV Area Tr Study)

2

10858

0

SE Powell/174th Intersection Improvements (PV Area Tr Study)

3

80011

Outer Foster Rd Multimodal Improvements (SE 136th – Jenne) (PVATS)

4

80004

SE 136th Ave Active Transportation Improvements (Division to Foster)

5

80001

Cherry Blossom/ 112th/ 111th Ped/Bike Improvements (SE Washington – Mt

Scott)

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:40 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: Russell NA (EPNO)

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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 1:46 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Bixby, Richard; Gray, Karen; Scarzello, Christina; Ron Glanville (Russell NA)
Subject: TSP Neighborhood Project Rankings: Russell NA (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the Russell Neighborhood Association (RNA) in East Portland, I am forwarding their results to you.

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CC: RNA Board; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

Rank
TSP #
Russell NA TSP Project Title

- | | | |
|---|-------|---|
| 1 | 50028 | Outer Halsey Pedestrian Improvements (NE 122nd to 162nd) |
| 2 | 50027 | San Rafael Pedestrian Improvements (NE 118th – 132nd, Halsey to San Rafael) |
| 3 | 50038 | Parkrose Heights Pedestrian Improvements |
| 4 | 50049 | 122nd Ave Multimodal Improvements |
| 5 | 50037 | San Rafael/Tillamook Neigh Greenway (NE 102nd - 148th) |

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:40 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: Wilkes (EPNO)

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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 1:53 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Bixby, Richard; Gray, Karen; Scarzello, Christina; Alice Blatt; quiltjoys@gmail.com; Kathi Holmes
Subject: TSP Neighborhood Project Rankings: Wilkes (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the Wilkes Community Group (WCG) in East Portland, I am forwarding their results to you. Similar to Argay, Wilkes is most concerned about the sight-line issue at the top of NE 148th, near the UP Railroad bridge and I-84.

David Hampsten
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CC: WCG Board; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

Rank
TSP #
Wilkes TSP Project Title
1
50009
NE 148th Ave Bicycle & Pedestrian Improvements (Marine Dr to Glisan)
2
50028
Outer Halsey Pedestrian Improvements (NE 122nd to 162nd)
3
50012
NE 162nd Ave Bikeway (Sandy – Thompson)
4
50035
Outer Sandy Blvd Safety Improvements (NE 141st – City Limits)
5
50016
Airport Way ITS

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:41 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: Woodland Park (EPNO)

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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 1:58 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Bixby, Richard; Gray, Karen; Scarzello, Christina; Alesia Reese
Subject: TSP Neighborhood Project Rankings: Woodland Park (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the Woodland Park Neighborhood Association (WPNA) in East Portland, I am forwarding their results to you.

David Hampsten
Hazelwood NA Transportation Chair
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Portland OR 97216
david_hampsten@yahoo.com
971-322-6599

CC: WPNA Board; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

Rank
TSP #

Woodland Park TSP Project Title

1

50045

Woodland Park Neighborhood Greenway

2

11647

0

I-205 Undercrossing (NE Hancock – I-84 WB On-ramp)

3

50022

Gateway Regional Center TSM

4

50014

Gateway 99th/Pacific Streetscape Improvements

5

40104

Sullivan's Gulch Trail Phase 2, NE 21st to I-205 Bike Path

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:45 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: EPAPbike (EPNO)

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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 2:11 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Bixby, Richard; Wintergreen, Lore; Gray, Karen; Scarzello, Christina; Jim Chasse; Brian Lockwood; Walter Lersch; Elizabeth Quiroz (BTA); Arlene Kimura; Jeremy O'Leary
Subject: TSP Neighborhood Project Rankings: EPAPbike (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the East Portland Action Plan Bicycle Committee (EPAPbike) in East Portland, I am forwarding their results to you.

David Hampsten
Hazelwood NA Transportation Chair
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CC: EPAPbike Committee; Linda Bauer, EP LUTC Chair; Karen Gray, PSC;
Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East
Portland District Liaison; Lore Wintergreen, EPAP staff; EPAP Co-Chairs

Rank

TSP #

EPAP Bicycle Committee (EPAPbike) TSP Project Title

1

80020

4M Neighborhood Greenway (SE Mill/Market/Millmain/Main, I-205 to City
Limits)

2

80001

Cherry Blossom/ 112th/ 111th Ped/Bike Improvements (SE Washington – Mt
Scott)

3

50047

Holladay/ Oregon/ Pacific (HOP) Greenway (Gateway TC to NE 132nd)

4

80015

Outer Powell Blvd Corridor Improvements Phase 1 (SE 116th to 136th)

5

50049

122nd Ave Multimodal Improvements

6

50045

Woodland Park Neighborhood Greenway

7

50044

Parkrose Neigh Greenway

8

80004

SE 136th Ave Active Transportation Improvements (Division to Foster)

9

11647

0

I-205 Undercrossing (NE Hancock – I-84 WB On-ramp)

10

80028

SE/NE 135th Ave Neigh Greenway (SE Division - NE Pacific)

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:47 AM
To: Kovacs, Madeline
Subject: FW: TSP project selection & prioritization process

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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 2:46 AM
To: Planning and Sustainability Commission; Transportation System Plan
Subject: TSP project selection & prioritization process

Dear Portland Planning and Sustainability Commission,

I hope your commission looks at the whole of Portland's transportation system, both of today and that of 2035, and figure out what improvements should be made to most efficiently connect residents to jobs, businesses, homes, etc, where they should be, and when or in what order, and how to pay for them, and then forward your recommendations to City Council, both the present one and those in the future. My task as a community activist is to help get you to a decision without you going nuts or giving up. Without your collective wisdom, the task of decision-recommending would essentially be left up to a set of well-meaning but over-worked bureaucrats at PBOT, who should be there to advise you, not act as gate-keepers as to what gets put in front of City Council. Such a burden should be your task.

The basic tools you and the other commissioners need, based upon my previous experience as a senior transportation planner in the Midwest:

1. A set of citywide maps showing the various TSP street classifications. The TSP, a state of Oregon-required plan, is prescriptive; what you see is the output of over 25 years of public input and expectations of how the transportation system should work.
2. A citywide map showing the Functional Transportation Plan. This shows how the system actually does work (or fails to work.) The Functional Transportation Plan will look very similar to the TSP "traffic

classification" map - the two are closely related. The Functional Transportation Plan is federally required, and is a hierarchy of traffic streets based upon measured volumes and built capacity. There are supposed to be twice as much milage of each lessor category than the next level up - more collectors than arterial roadways, for example. This map is based upon several additional data layers you need to have access to:

2a. You need a set of maps of current traffic volumes, as measured by PBOT. New maps are produced annually, based upon the latest traffic counts. Not all counts are done annually, no city can afford that, but the maps will have the latest, of whatever date or year. Volume is shown in the width of line segments and various shades of red. Maps are shown of overall average daily traffic (ADT), as well as AM & PM peak volumes. Are there local streets that have such high traffic volumes that they need to be either reclassified to a higher level, or where traffic calming needs to be implemented right away? Are there streets that should be down-classified as their traffic volumes don't justify their classifications?

2b & 2c. You also need maps showing traffic volumes expected in 2025 & 2035, as modeled by PBOT and/or Metro. This is done routinely, as required by the Federal Highway Administration (FHWA.)

2d. You need to know where pavement is of poor quality or in poor repair, where sidewalks are lacking, the state of the bridges, etc. PBOT has such maps in quantity, most recently used for the street fee proposals.

With these maps, you can begin to trace the difficulties that residents face getting to their destinations. In East Portland, our residents generally work or go to college outside of East Portland, often quite far away, and often need to travel over the whole Metro network to get there. A good exercise is to pick a random residence in East Portland, and get that person to Swan Island. Where are the bottlenecks? Where does the system work quite well? By 2025 or 2035, where does the system still work reasonably well, and why?

For bottlenecks, are you more interested in fixing them by increasing capacity, or by getting residents to use alternative routes and/or alternative modes?

Thank you for all your hard work on all of this.

Sincerely,

David Hampsten
East Portland rep to the PBOT Budget Advisory Committee
971-322-6599

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 10:09 AM
To: Kovacs, Madeline
Subject: FW: TSP Community Input: 2014 EPAP Transportation & Parks Survey Results
Attachments: Map of Survey-Suggested Sidewalk Improvements, Safe Crossings, and Popular Parks.pdf; Map of Poor Bicycle Safety.pdf; Map of Poor Crossing Safety.pdf; Map of Survey Responses.pdf

Julie Ocken
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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 2:37 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Bixby, Richard; Arlene Kimura; Gray, Karen; Travis Driessen; Scarzello, Christina; Ron Glanville (Russell NA)
Subject: TSP Community Input: 2014 EPAP Transportation & Parks Survey Results

RE: 2014 EPAP Transportation and Parks Survey: Summary of Results

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

In May 2014, an East Portland Action Plan survey was sent out to all East Portland addresses, as an insert in the local newsletter. The survey had questions related to transportation and parks use in four languages - Spanish, Russian, Vietnamese, and English. The intent was to ask information of community readers, but also to get neighbors to talk with each other and help prioritize public infrastructure.

Preferred Transportation Modes: According to the City of Portland, most East Portland residents work in industrial districts of the Columbia Corridor, North Portland, Swan Island, and nearby areas outside of Portland, but few work in downtown Portland. 76% of respondents are primarily drivers, a rate higher than the city average, while 13% primarily use some type of transit, 4% bicycle, and 7% walk. Also, 6% use two or more modes frequently, 28% own a bicycle, and 33% use transit occasionally. The most

popular transit service is the MAX (6% of responses), followed by busses 4, 77, 71, 9, 17, and 20.

Map of Survey Responses: We received a total of 1,365 East Portland responses, for a 2.4% response rate. The geographic distribution of responses was evenly distributed for current population density in East Portland.

Map of Poor Bicycle Safety and the Map of Poor Crossing Safety: Residents are very concerned about using and crossing high-crash streets. Respondents prioritize sidewalks to be built on busy streets (47%), followed by sidewalks on residential streets (37%), more paving maintenance (34%), build more frequent pedestrian crossings (29%), and pave dirt streets (22%). Respondents find crossings dangerous because of high-speed traffic (35%), unmarked or unsafe crossings (31%), no signals at the crossing (20%), and long wait times at crossings (11%).

Map of Survey-Suggested Sidewalk Improvements, Safe Crossings, and Popular Parks: The community wants East Portland's busiest streets to serve as positive community amenities, rather than operating as negative divides between neighborhoods. East Portlanders want more frequent safe pedestrian crossings, speed enforcement, and better transit, so that businesses, schools, and parks are conveniently and safely accessible by pedestrians. On the map, the thickness of red lines indicate the popularity of survey-suggested sidewalk improvements and the size of the yellow crosswalk diamonds indicate the popularity of suggested crosswalks.

Parks: 74% of the respondents use parks. The most popular uses are "enjoy nature and relaxation" (40%), "exercise or fitness" (34%), "spend time with family or friends" (33%), and "walk the dog" (21%). The most popular East Portland parks are Lents (8% of responses), Ventura (6%), Powell Butte (6%), Glendoveer (5%), and Knott (5%).

Attached are the 4 maps referred to above. This information will be presented to EPAP on Wednesday March 25th at 6:30 pm; to the PBOT "Lunch & Learn" series on Thursday, April 16th, noon to 1 pm, in the Lovejoy Room of City Hall; and published in the East Portland Neighborhood Associations Newsletter to all 60,000 East Portland addresses by April 17th.

David Hampsten
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CC: Members of the EPAP survey steering committee; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

From: John Bradley [<mailto:bradleyj@ohsu.edu>]
Sent: Friday, March 13, 2015 11:15 AM
To: Planning and Sustainability Commission
Cc: jmbb5678@gmail.com
Subject: Comp plan Comments NWDA

To Whom it may concern: Please find the NWDA's set of comments below dealing with the comprehensive plan. Please excuse the fact that no attempt to coordinate writing styles. The Transportation committee's comments have been sent under separate cover. Thanks John Bradley, Chair of planning. NWDA. 503 313 7574

Chapter 2 We believe that neighborhood associations, both by tradition and merit, represent the backbone of community involvement, yet little is said concerning them. Chapter 2 should carefully outline the association's importance and duties into the future. Information design and notification are key components of community involvement. Currently, notification for meetings and land use actions by various city commissions are scattered and require an "in the know" level of expertise not available to the average citizen. A re-evaluation and modernization of the notification system should be undertaken with the goal of creating at least a centralized web page.

Chapter 3 This chapter calls out two policies which directly impact the N.W.D.A., the establishment of a town center within our district and a new zone type for Good Samaritan Hospital. While the acknowledgement of a town center in the northwest would seem logical and in keeping with new urbanism goals, without further details we cannot support this policy. The current language here suggests a potential height and density increase beyond the current infrastructure capacity and at odds with the policies in chapter 4 of "pattern areas" and "community identity". Our relationship to Good Sam has never been better. It is guided by both a master plan concept and a good neighbor agreement which outlines each party's duties and responsibilities and sets a growth boundary. None of the rules set forward in these current set of policies are onerous to either party, they insure good communications and are changeable as needs dictate. We see no reason to change them by initiating a one size fits all zoning, trying to incorporate the very different needs of the various campuses across Portland.

Chapter 7 As our bordering states enact tough regulations concerning clean diesel, Portland must follow through and enact our own clean diesel regulations to ensure that we do not become a dumping ground for polluting older equipment. One potential way to prevent this is to require that new construction project equipment, both city funded and private, meet the tier 4 federal standards. The city must also commit to regulating smaller point source air pollution sources not currently regulated by DEQ. While these sources may not have high impacts citywide their impacts a great on a micro scale.

There are specific geographies that have a deficit or shortfall that will need to be addressed to provide an adequate supply of development capacity to meet the forecasted employment growth. Specifically, additional policy changes, zoning capacity, public investments, and development incentives will be needed to address capacity shortfalls in the Central City Industrial, Harbor & Airport Districts, Harbor Access Lands, Dispersed Employment, and Institutions geographies. The Comprehensive Plan update will need to identify changes to policy or zoning, public investments, development incentives or other means to address these deficits and meet the forecast demand.

A large portion of the Northwest District Plan area is currently zoned EX and in that area the eastern portion of the neighborhood is designated in the Northwest District Plan as the **Eastern Edge**, “a diverse, mixed-use area with a fine-grain mixture of employment, residential, and community service uses. This area serves as a transition and connection between the residential core of the Northwest District and the more intensely developed Central City.” (see attached map) Zoning the Eastern Edge area EX was purposeful.

From Title 33.140.030 Characteristics of the Zones, EX, the Central Employment zone “allows mixed – uses and is intended for areas in the center of the City that have predominantly industrial type development . The intent of the zone is to allow industrial and commercial uses which need a central location. Residential uses are allowed, but are not intended to predominate or set development standards for other uses in the area.

The Comp Plan is identifying all EX areas as Mixed Use Urban Center.

From the Comp Plan, **16. Mixed Use — Urban Center** “This designation is intended for areas that are close to the Central City and within Town Centers where urban public services are available or planned including access to high-capacity transit, very frequent bus service, or streetcar service. The designation allows a broad range of commercial and employment uses, public services, and a wide range of housing options. Areas within this designation are generally mixed-use and very urban in character. Development will be pedestrian oriented with a strong emphasis on design and street level activity, and will range from low- to mid-rise in scale. The range of zones and development scale associated with this designation are intended to allow for more intense development in core areas of centers and corridors and near transit stations, while providing transitions to adjacent residential areas.”

However, the Eastern Edge is holds many jobs, (see attached map) and the Northwest District Plan policies for this area are for it to remain the fine-grain mixture of employment, residential, and community service uses.

With the loss of EX zoning we request that the area of the Eastern Edge not be identified Mixed Use Urban Center but rather a Mixed Use Neighborhood which will place less stress on high intensity use which will effectively drive out the small jobs that are needed, in particularly near the Central City.

NWDA Comp Plan Testimony re:
Historic Alphabet District

As NWDA testified to during the 11/4/2014 BDS public hearing, the draft Comp Plan discusses historic preservation in broad strokes but the sections dealing with preservation lack teeth. In addition, many provisions in the draft Comp Plan seem to limit place limits on historic preservation – for instance, to properties already identified on the HRI, which can be removed at any time by their owners, or to only beautiful buildings. This approach fails to encourage preservation or at the minimum, investigation of preservation of potentially valuable historic resources.

Therefore, NWDA requests the following specific edits to the draft Comp Plan to address this city-wide concern:

Page I-37 (under “Inner Neighborhoods”)	<p>New development should enhance the fine-grain, pedestrian-scaled built environment. In Inner Neighborhoods that are closest to the Central City,</p> <p>new development should take advantage of this proximity with increased densities, while at the same time working to enhance and preserve identified historic and cultural resources. Traffic and parking will need active management throughout the Inner Neighborhoods.</p>
Page GP3-22	<p>Policy 3.79 Inner Neighborhoods infill. Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and reuse of historic buildings on adopted inventories. Integrate new development into these districts’ historic development patterns.</p>
Page GP 4-5	<p>Goal 4.B: Historic and cultural resources</p> <p>Historic and cultural resources are integral parts of an urban environment that continues to evolve and are preserved whenever possible.</p>
Page GP 4-11	<p>Historic and cultural resources</p> <p>Portland has several hundred designated historic landmarks and historic and conservation districts. These special places help create a sense of place, contribute to neighborhood character, and recognize past history and events. More than half of Portland’s buildings are over 50 years old, creating a vast pool of potentially significant properties. These policies support the protection of all resources of statewide significance and encourage the identification and preservation of historic and culturally significant resources.</p>
Page GP 4-11	<p>Policy 4.36 Historic and cultural resource protection. Encourage the protection and restoration of high-quality historic buildings and places that contribute to the distinctive character and history of Portland’s evolving urban environment, wherever possible feasible.</p>
Page GP 4-11	<p>Policy 4.38 Demolition. Protect potentially significant historic structures more than 50 years old from demolition until opportunities can be provided for public comment, pursuit of alternatives to demolition, or actions that mitigate for the loss. Require 120-day demolition delay for buildings more than 50 years old.</p>
Page GP 4-11	<p>Policy 4.40 Historic Resources Inventory. Survey and update inventory of historic resources as part of future planning projects, with a focus on areas of anticipated growth and change. Provide notice and opportunity for public comment prior to removal of resource from historic resources inventory.</p>

Page GP 4-11	Policy 4.41 Preservation equity. Expand historic preservation inventories, regulations, and programs to encourage historic preservation of all buildings more than 50 years old , in areas that are underrepresented by current historic preservation efforts.
Page GP 4-11	Policy 4.42 Cultural diversity. Work with Portland's diverse communities to identify and preserve places of historic and cultural significance. Provide incentives for cultural preservation of communities similar to those for historic preservation.
Page G-7	Historic resource: A structure, place, or object that has a relationship to events or conditions of the human past. Historic resources may be significant for architectural, historical, and cultural reasons. Examples include historic landmarks, conservation landmarks, historic districts, conservation districts, and structures or objects that are identified as contributing to the historic significance of a district, including resources that are listed in the National Register of Historic Places. Structures, places, and objects that are more than 50 years old or included in historic inventories are potential historic resources.

In addition, as NWDA testified to before BDS on 11/04/2014, current zoning in the Historic Alphabet District (and in other historic and conservation districts city-wide) are incongruent with underlying base zoning, which conflicts with preservation goals, causes confusion among owners and developers, sets inflated property values, and creates costly, inefficient and difficult historic design reviews. NWDA therefore requests the following specific edits to current zoning and zoning under the Comp Plan update to reconcile historic overlays with underlying zoning "entitlements":

FAR/Heights	<ul style="list-style-type: none"> • Reduce FAR from 4:1 to 2:1 in RH Zones in the Historic Alphabet District where such FAR does not currently exist. • Reduce Maximum Allowable Height in RH Zones in the Historic Alphabet District to no more than 45'. <p><i>Please see attached map.</i></p>
FAR Transfers	Prohibit FAR transfers WITHIN and T0 projects within the Historic Alphabet District.
Historic and Plan District Overlay Designation	Clarify on City Maps Historic and Plan District overlays within the Northwest District Plan area. (<i>Today, the (d) designation appears inconsistently on city maps and no historic overlay designation appears at all.</i>)

In order to further historic preservation efforts and provide more certainty to owners and developers, NWDA also advocates for similar treatment to other historic and conservation districts throughout the city.

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:40 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony Irvington Community Association (ICA)
Attachments: FAR Irvington Squire Presentation.pdf; ICA Board recommendations approved 3 12 15.pdf; Zoning maps and chart for multi fam and comm.pdf

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Dean P. Gisvold [mailto:deang@mcewengisvold.com]
Sent: Friday, March 13, 2015 12:12 PM
To: Planning and Sustainability Commission
Cc: Barb Christopher; Brad Perkins; Dean P. Gisvold; Donald Wood; Ed Abrahamson; James Heuer; Jeff Jones; Jim Barta; Meryl Logue; Mickey Bishop; Nathan Corser; Nikki Johnston; Peter O'Neil; Robert Ridgeway; Stephen Doubleday; Steven Cole; Tom Mertes; William Archer
Subject: Comprehensive Plan Testimony Irvington Community Association (ICA)

Dear PSC Chairman Baugh and PSC Commission Members

At its regularly scheduled March meeting, held March 12, 2015, the ICA Board of Directors approved the Resolution attached to this email. In particular, I call your attention to the first 3 action items regarding zoning changes (keep in mind that in the material supporting the resolutions I defined the Broadway Edge as the north side of Broadway in the Irvington Historic District from NE 7th to NE 28th and from Broadway to NE Tillamook-the area is better defined on the attached zoning map):

1. For the area in the Broadway Edge presently zoned CX between NE 7th and NE 16th, change this zoning to CM 2, which is mixed use neighborhood, subject to the final zoning details.
2. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 16th from RH to R-1.
3. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 22nd from R-1 to R-2.

The Resolutions respond to those portions of the draft Comp Plan that affect density, height, massing and scale, primarily on the Broadway "edge" of the

Irvington Historic District. We believe that these changes will provide a better transition from the predominate R-5 zoning, moving first to R-2, then to R-1, and finally to RH or the commercial zones. It is interesting to note that east of NE 22nd, this form of transition already exists, from R-5 to R-2 to commercial.

City staff admit that the vacant and underutilized land within certain residentially designated areas have a combined development capacity that is double the expected growth. This means that it is possible to be more selective about where development occurs in residential zones and in historic districts. This is the case for the Irvington commercial and multifamily zoning areas noted on the attached maps and which are part of the historic district. We have known about this over capacity for some time in Irvington because of the FAR study we did in connection with the proposed "Irvington Squire" project.

I am attaching a copy of an 2009 FAR study that the ICA land use committee undertook when the original Irvington Squire was proposed for the corner lot at NE 15th and Hancock. Please take the time to review this report. When we did this analysis we were stunned to see the results. This iteration of the project did not get built. This study graphically shows the amount of development capacity already in the zoning system, at least in the RH zone that takes up approximately 10 blocks on the Irvington's Broadway edge. Please note what a 71 foot height limit does to an adjoining historical structure. And the last two pages shows the effect of a 4 to 1 FAR. I did not incorporate all aspects of the study, but if there is interest, I would be happy to provide the entire study.

The zoning for the Broadway Edge, between NE 7th and NE 26th, and between Broadway and Tillamook, and the density that results from such zoning, was put in place as part of the Irvington Community Plan of 1993, 17 years before the Irvington Historic District was approved by the State and the Feds. I was involved in the 1992-93 Irvington Neighborhood Plan and, frankly, I and others approved such over zoning on the southern edge, the Broadway Edge, with way too much density. It was a mistake on our part, in my opinion.

Given my experience with land use and planning in the neighborhood, I am absolutely convinced that Irvington will continue to take on a fair share of new density under the changes approved above by the ICA Board. The City does not need to maintain a zoning system with twice as much capacity, which I believe results in less development, not more. Owners are more likely to stay on the sidelines until a project comes along that will maximize the density and the profit of the owners.

We hope that staff and PSC are able to make the changes proposed by the ICA Board for the north side of Broadway that is in Irvington, without making changes to the corridor designation. Our proposed changes are not intended to limit the densities promoted by adjoining neighborhoods for their portions of Broadway. Again, one size does not fit all.

Regarding items 5, 6 and 7, we strongly support the implementation and full development of the proposed Inner Ring Policy. We would like to participate in such development.

We have learned recently with two partition applications that the criteria for reviewing a partition does not include a factor for its impact on an existing historic district. In particular, an applicant wants to partition a 5000 sq. ft. lot into two legal lots, one 3500 and the other 1500. This 5000 sq. ft. platting is an integral part of

the Irvington history. In our work to counter the proposed Historic District boundary reduction proposal, we did more digging into the various plats that make up the District and the role of Elizabeth Irving in their development. It turns out that she was very particular about how the plats were broken up into blocks and lots, decreeing that even after she sold a chunk of land to developers to sell to the public, they were not allowed to deviate from her block/lot layout. She is the one who is responsible for the pattern that is almost universal in Irvington north of Hancock where we have long, skinny north-south blocks with 50' X 100' lots on either side. Even east of 24th, where there were plats that she didn't directly control (but her relatives had their hands in them), the developers copied her block/lot layout so as to tie their developments into the very successful "Irvington District" to the west. This additional work has reinforced our belief that these 50' X 100' lots are an important historic aspect of the District and should be preserved, especially as it relates to infill construction.

Finally, recent articles in the Tribune and the Eastmoreland Comments suggest a diminution in the role of neighborhood associations, which if accurate, we are very much opposed to.

Thank you for your consideration. By return email, please confirm timely receipt of this comp plan testimony for the ICA Board with attachments. Thanks.

Dean Gisvold,
ICA Board member and Land Use Chair

Dean P. Gisvold | Attorney at Law | Senior Partner
MCEWEN GISVOLD LLP - EST. 1886
1600 Standard Plaza, 1100 SW Sixth Avenue, Portland, Oregon 97204
Direct: 503-412-3548 | Office: 503-226-7321 | Fax: 503-243-2687
Email: deang@mcewengisvold.com
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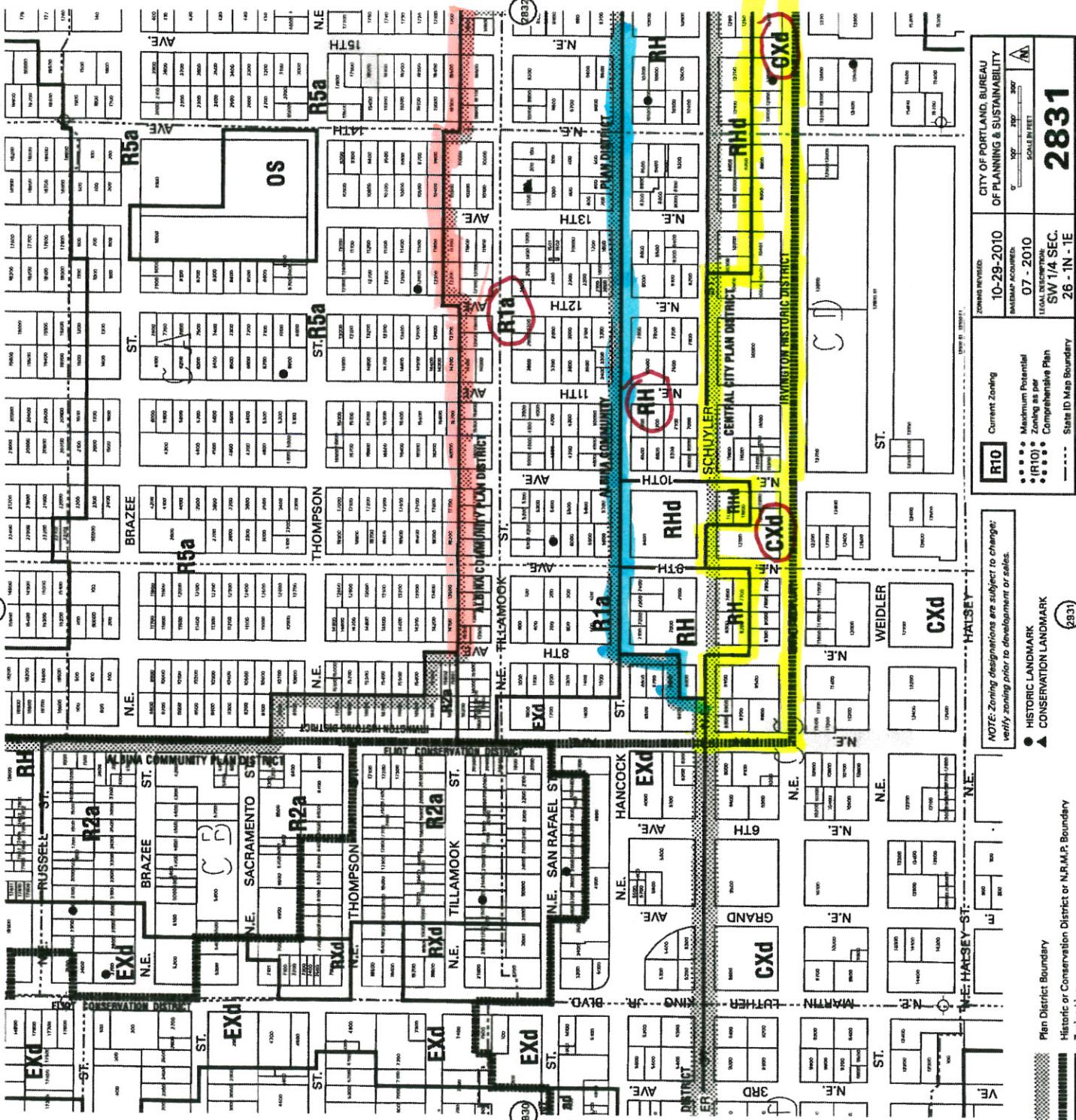
Recommendations for Board Action:

1. For the area in the Broadway Edge presently zoned CX between NE 7th and NE 16th, Change this zoning to CM 2, which is mixed use neighborhood, subject to the final zoning details.
2. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 16th from RH to R-1.
3. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 22nd from R-1 to R-2.
4. If it is needed to accomplish recommendation no. 1 above, discuss with stakeholders the re-designation of NE Broadway from a civic corridor to neighborhood corridor, which is defined as:

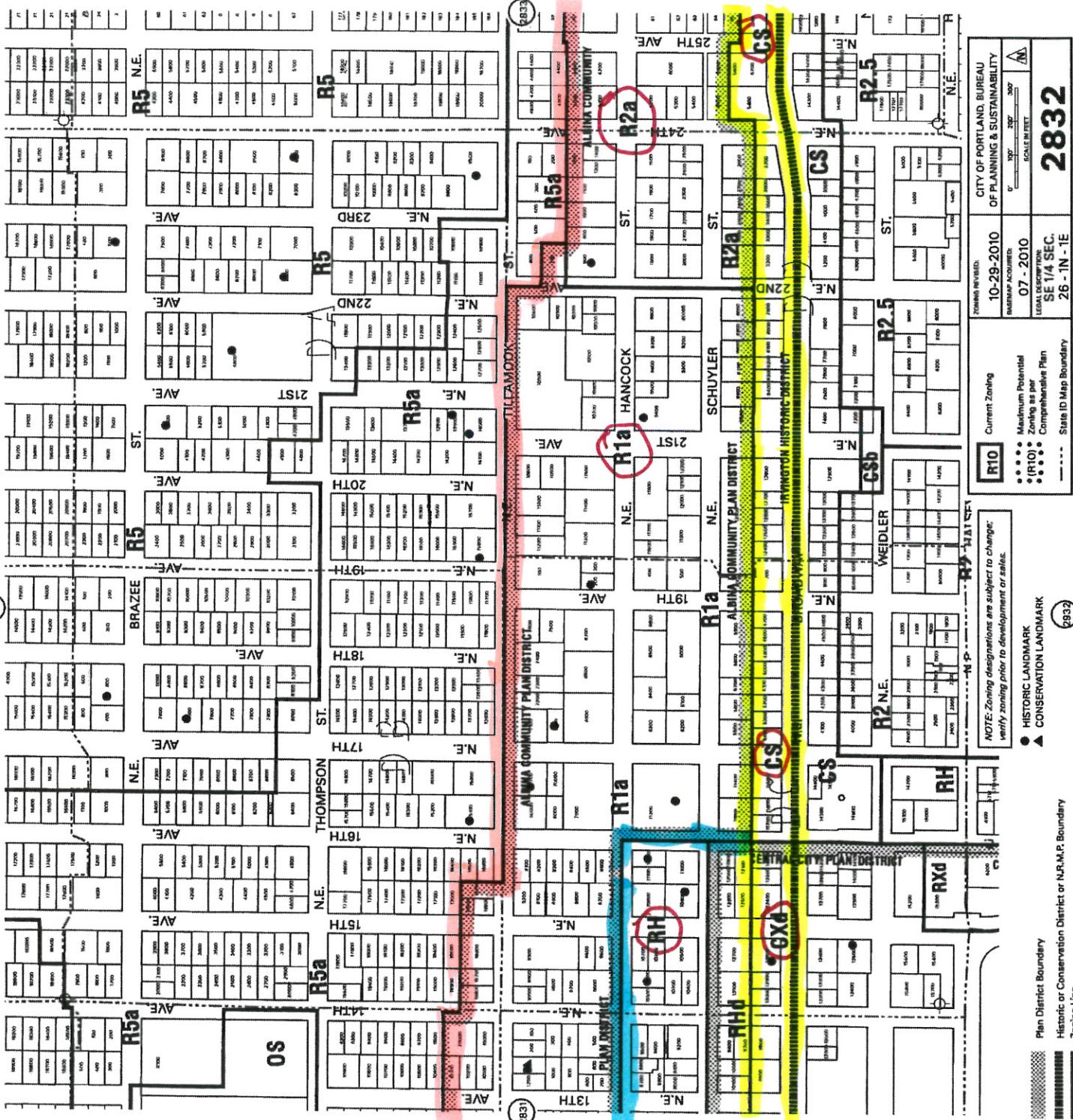
"Neighborhood corridors are narrower main streets that connect neighborhoods with each other and to other parts of the city. They support the viability of neighborhood business districts and provide location for additional housing opportunities close to local services, amenities, and transit lines."

5. Make the Inner Ring policy part of the Comp Plan.
6. Amend the City Code to add a new criterion to the criteria for partitions occurring in an historic district that would allow the decision maker to consider the effect of such partition on historic character and fabric of an historic district.
7. The roles and responsibilities of neighborhood associations must be maintained.

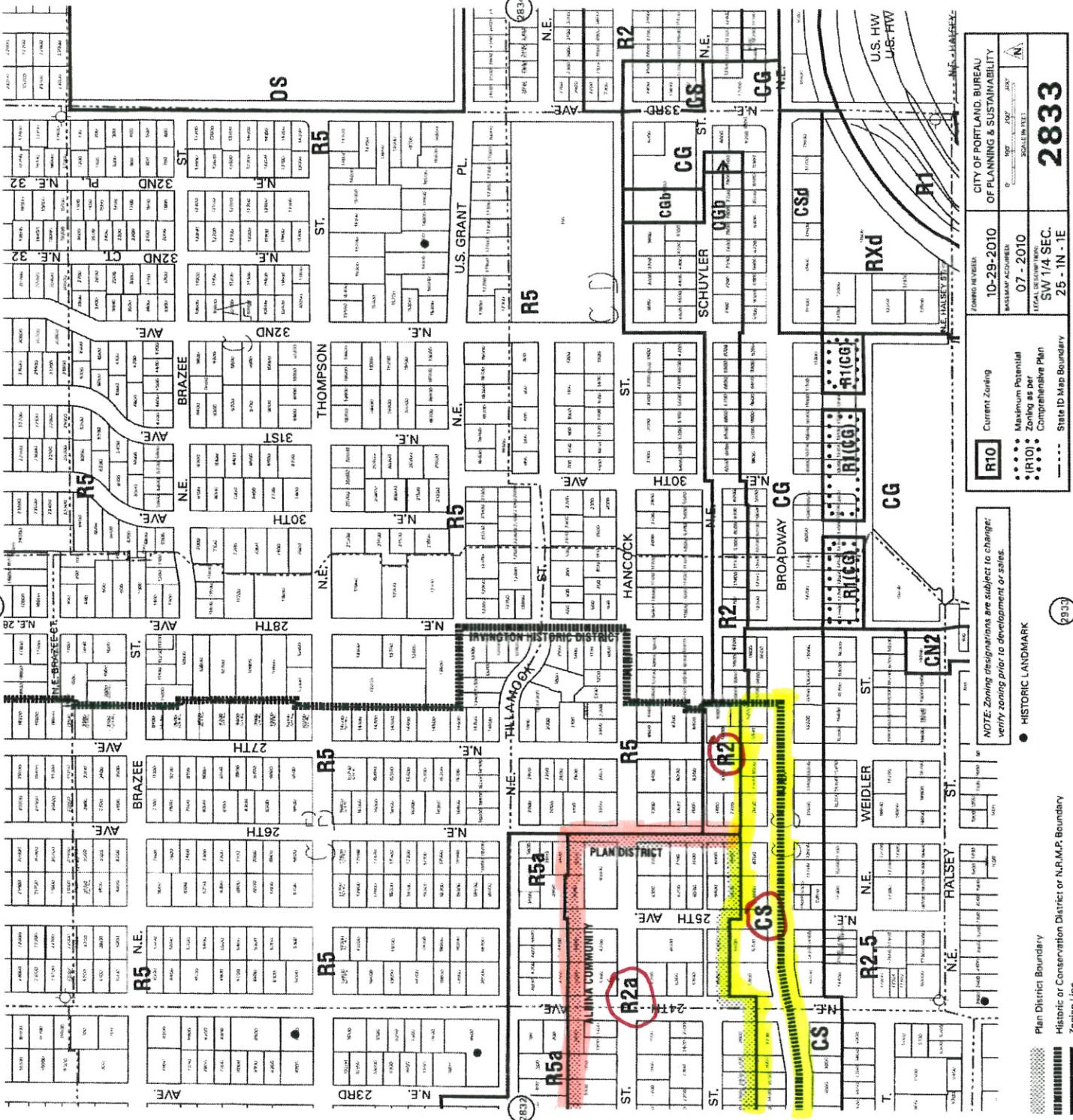
Approved by ICA Board at its
regular March meeting 3/12/15



Ord. 187832 Vol. 2.3.B, page 13927



Ord. 187832 Vol. 2.3.B, page 13928



Ord. 187832 Vol. 2.3.B, page 13929

**RH Areas with
Maximum FAR of 4:1**

Map 120-10

Map Revised January 1, 2015



— City Boundary

■ Boundary of Existing/Potential
RH - Zoned Area

Quarter Section(s): 2831, 2832



0 300 600

Scale in Feet

Bureau of Planning and Sustainability
Portland, Oregon

Ord. 187832 Vol. 2.3.B, page 13930

Apply to Zoning Map

The MUZ Project will work closely with the City's District Liaisons to publish a map of proposed zoning. This process will help fine tune the mapping/application of new zones where specific circumstances may warrant application of a different zone than recommended through the conversion table. Examples of these circumstances could include areas of unique topography or natural resource impacts; with significant historic resources; where transition to a different development pattern may be desired (e.g., less auto oriented or more employment focused).

Public Review

The Portland Planning and Sustainability Commission (PSC) will hold public hearings on the new zoning codes, proposed conversion approach, and proposed map in mid-2015. Adjustments may be made based on public testimony. The PSC recommendations will be forwarded to Portland City Council for final public hearings and adoption in late 2015.

Comparison of Current and Conceptual Zones

The table below compares key use and development parameters for existing zones and for conceptual new mixed use zones.

	Small-size Zones				Medium-size Zones					Large-size Zones			
	Existing Zones			Concept Zone	Existing Zones			Concept Zone		Existing Zones		Concept Zone	
	CN1	CN2	CO1	CM1	CO2	CM	CS	CG	CM2	CE	EX	CX	CM3
Commercial													
Retail sales and service	L	Y	N	L	L	L	Y	Y	Y	Y	Y	Y	Y
Office	L	Y	Y	Y	Y	L	Y	Y	Y	Y	Y	Y	Y
Quick vehicle servicing	N	L	N	V	N	N	N	Y	V	Y	N	L	V
Vehicle repair	N	N	N	V	N	N	Y	Y	V	Y	Y	L	V
Commercial parking	N	N	N	TBD	N	N	Y	CU	TBD	TBD	CU	CU	TBD
Self-service storage	N	N	N	V	N	N	N	L	V	Y	L	L	V
Residential	Y	Y	Y	Y	Y	Y	Y	Y	Y	L	Y	Y	Y
Industrial	L	L	L	L	L	L	L	L	L	Y/L	Y	Y	Y
Height	30	30	30	35-38	45	45	45	45	35-58	45	65	75	45-78
FAR*	.75:1	.75:1	.75:1	1:1 – 2.5:1	2:1	1:1	3:1	3:1	2:1 – 3.5:1	2:1 – 3:1	3:1	4:1	3:1 – 4.5:1

Y = Yes, allowed

N = No, not allowed

L = Limited

V = Variable based on location

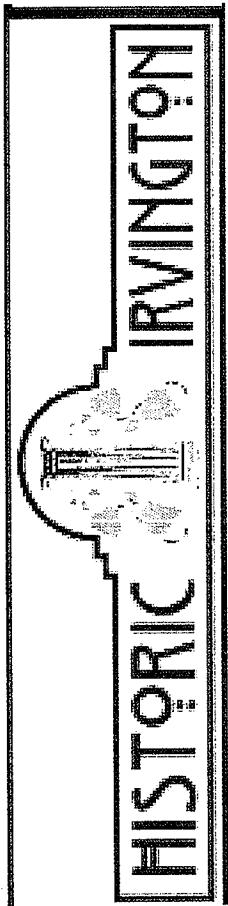
* = Currently, except in EX zone, residential is not counted in FAR limits and is allowed to the height limit and zone setbacks. Residential uses are proposed to be counted in FAR in new zones.

* Important

(5)

R-1 One dwelling unit per
45 height 1000 sq ft

R-2 One dwelling unit per
40 height 5000 sq ft



Protecting Our Heritage

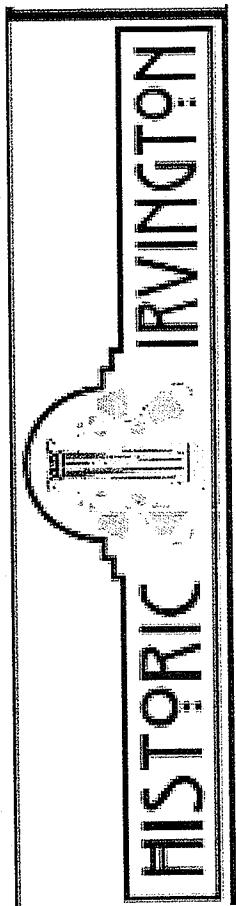
*Irvington Community Association's Fight
Against the Irvington Squire*

Dean Gisvold

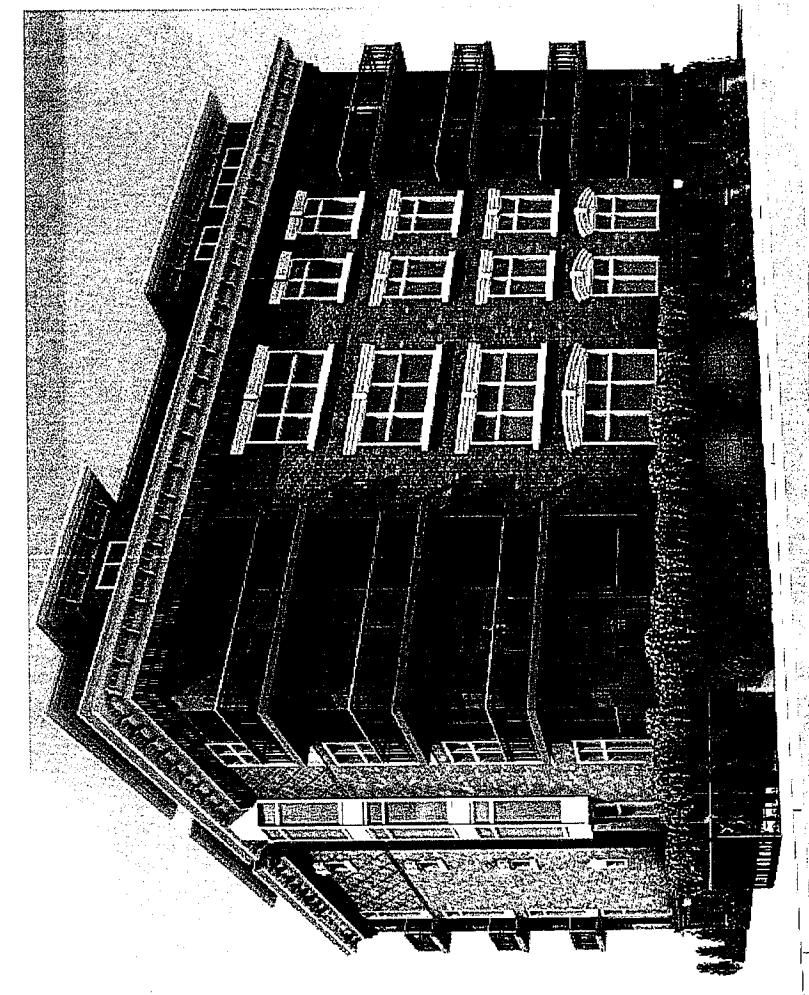
Dean Smith — Ex-PGE manager
former city planner

Co-chairs, ICA Land Use Committee Former ~~member~~ of paper
journalist w/ On Journal

July 28, 2009

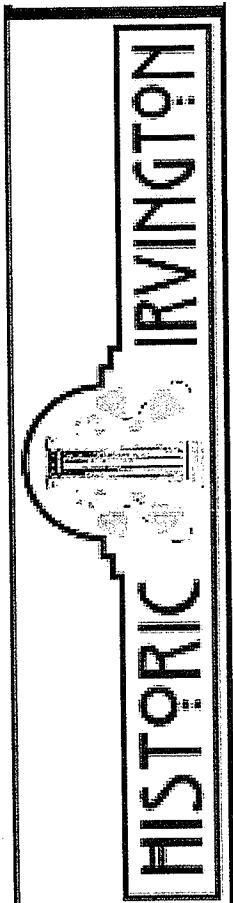


What the FUSS was About



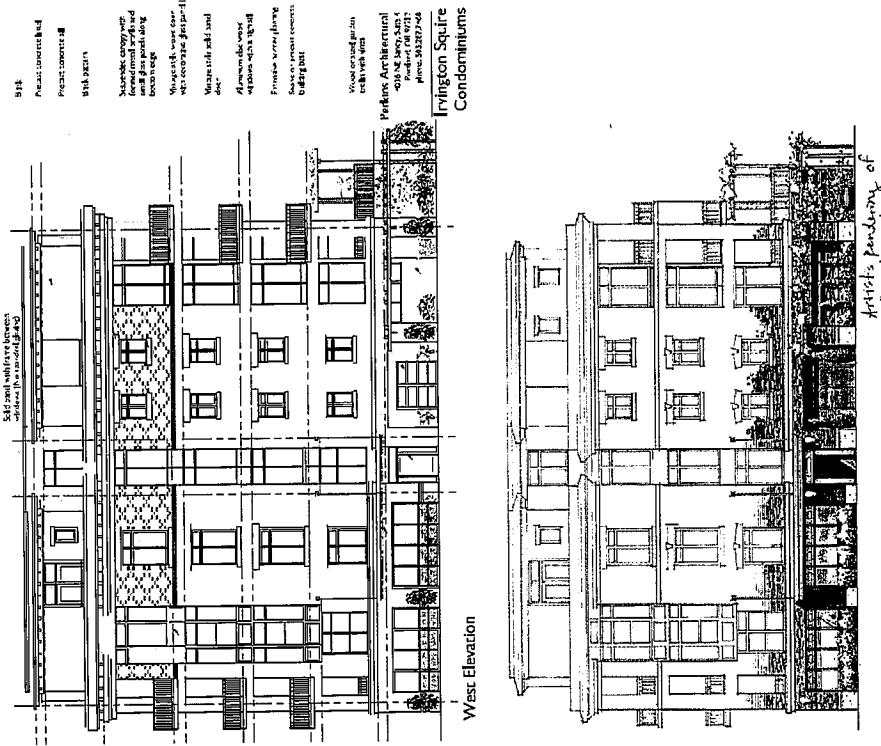
1/4 block
 $\frac{1}{2}$ stories
new
designed
structure
18 units

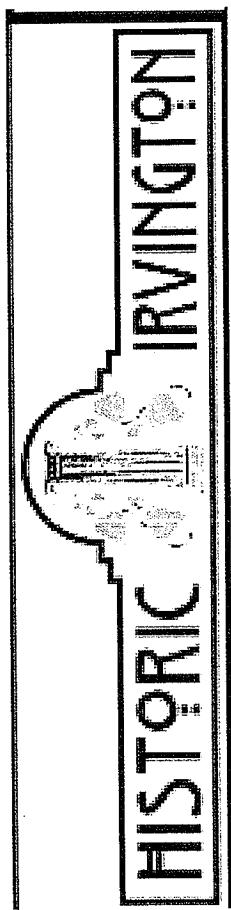
Proposed 6-story, 18-unit Irvington Squire in
Irvington's Historic Conservation District



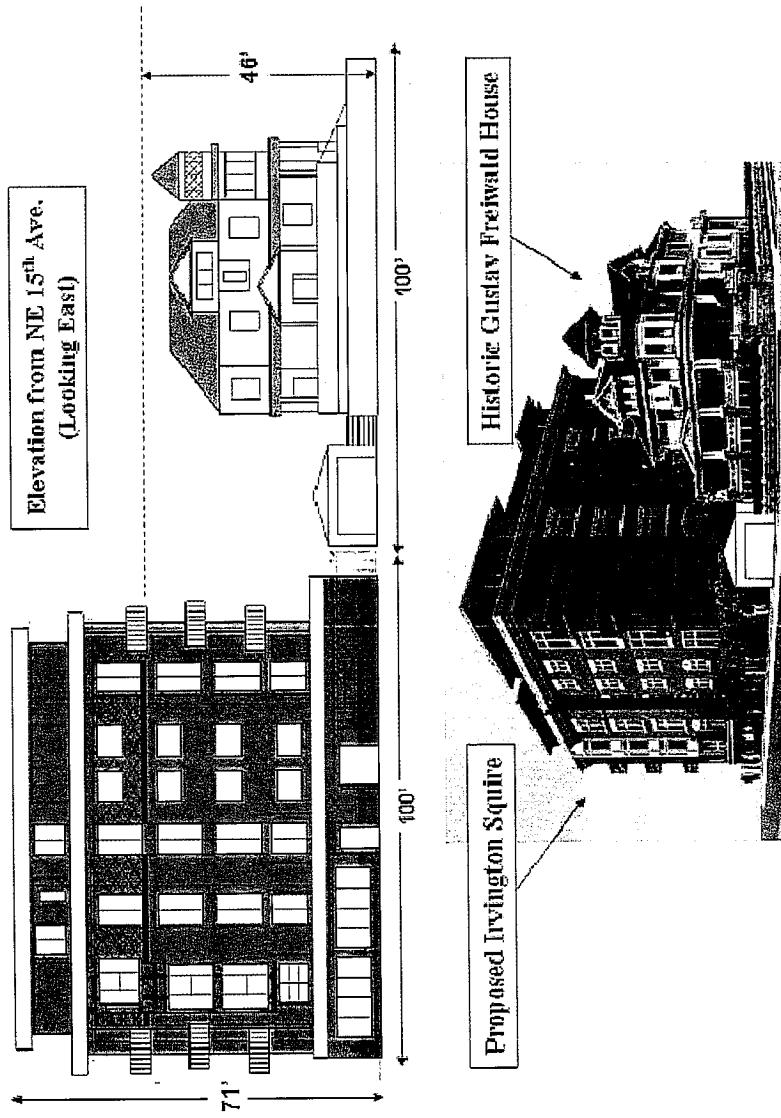
The Irvington Squire Project

- Developer's Initial Proposal to ICA
 - 6 stories – 65 feet
 - 18 units
 - Neighborhood objected to height/mass
- Developers Initial Filing with City
 - 6 stories – 71 feet tall (+ mechanicals)
 - 18 units
 - No change in building footprint
- Developer's Revised Proposal
 - 5 stories – 64 feet
 - 14 units
 - Top floor with increased setback
 - No change in building footprint

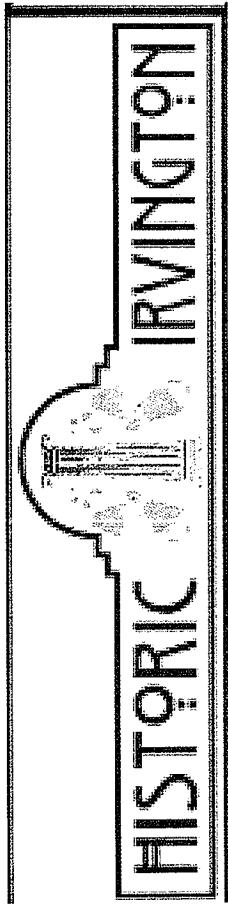




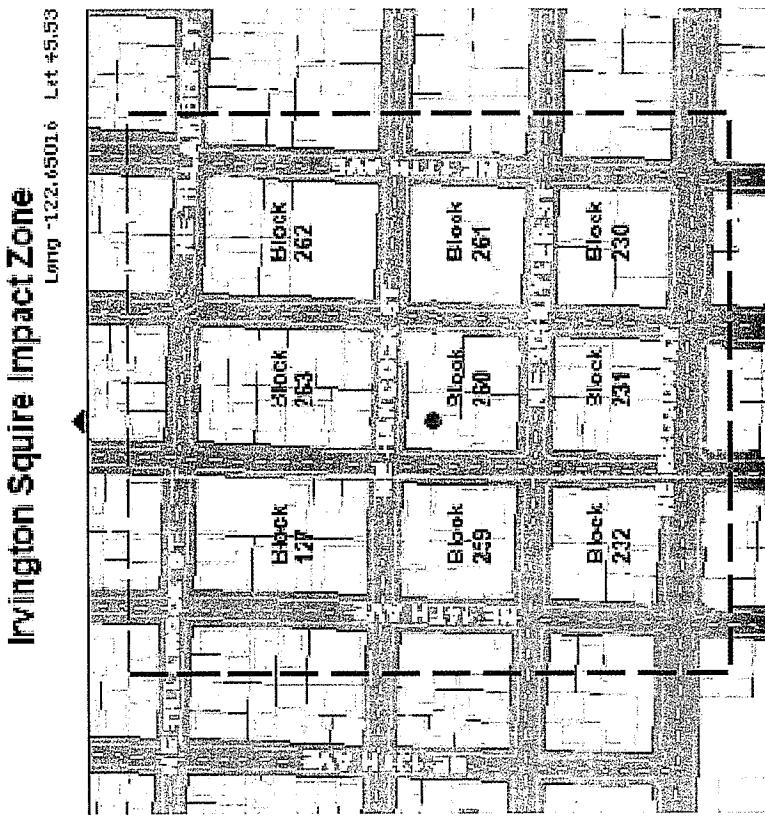
Establishing the Context



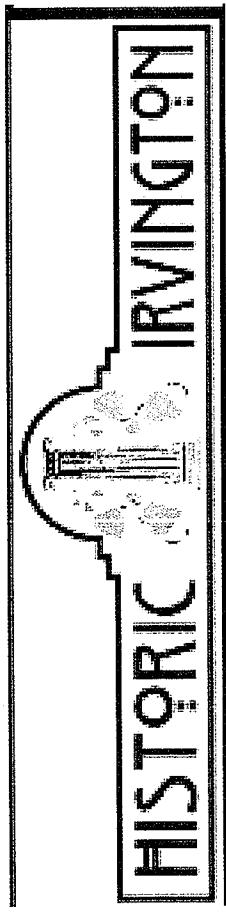
The developer's first formal application showed a project that literally dwarfed the adjacent Gustav Freiwald House.



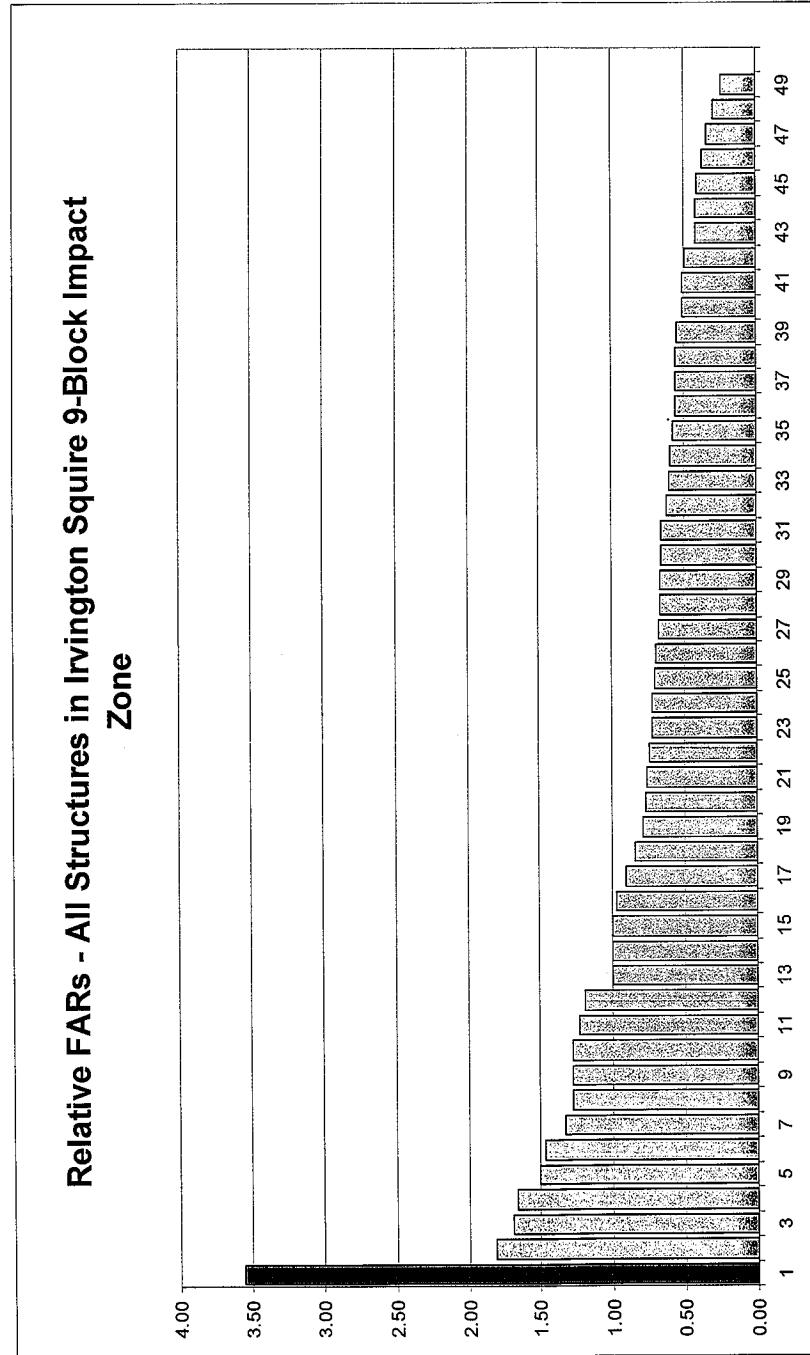
Focusing on the 'Impact Zone'



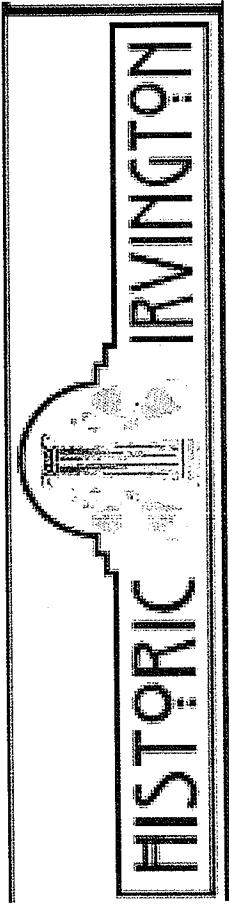
It was important to establish the context, not only of for the Freiwald House but also of the neighboring "impact zone". The ICA submitted a 10-page argument plus block-by-block analysis. 18



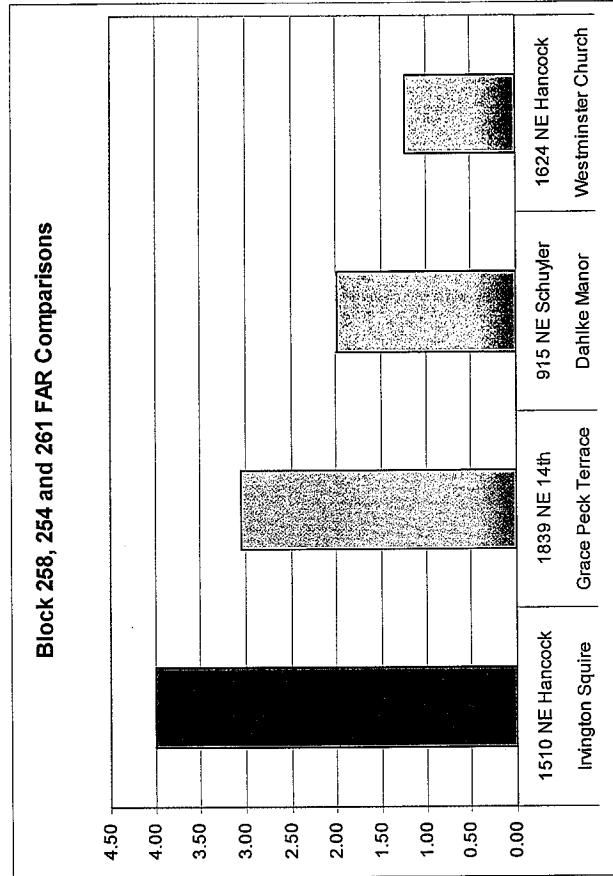
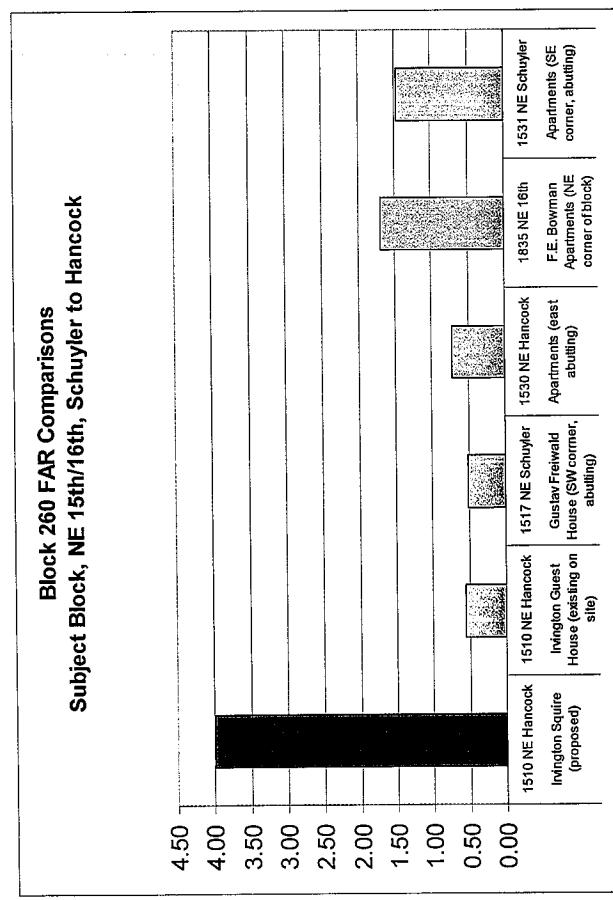
Making the Key Argument – Part 1



With height and bulk our main arguments, we calculated FAR on every building in the surrounding blocks and presented it graphically to BDS Staff and the Landmarks Commission. 19



Making the Key Argument – Part 2



For further context, we compared the “reduced size” Squire with the buildings on its block (left) and also the three largest buildings in the entire neighborhood (right).

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:43 PM
To: Kovacs, Madeline
Subject: FW: Richmond Neighborhood Association letter re March 9 2015 vote on planning issues
Attachments: car blocking driveway.JPG

Julie Ocken
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From: Allen F [mailto:allen_field@yahoo.com]
Sent: Friday, March 13, 2015 12:32 PM
To: Novick, Steve; Planning and Sustainability Commission; Manning, Barry
Cc: Stockton, Marty; Zehnder, Joe; Anderson, Susan; Hales, Mayor; Heather FlintChatto; Commissioner Fritz; Commissioner Fish; Commissioner Saltzman; Nebel, Erika
Subject: Re: Richmond Neighborhood Association letter re March 9 2015 vote on planning issues

Hi Commissioner Novick: Thank you for your comments. The RNA's vote expressly left open the issue of allowing extra stories through amenity or performance bonuses. Since the Mixed Use Zones Project has not finalized the performance bonus framework or the menu of performance bonus elements, it was not ripe for us to address that. We reserved that for next month's meeting when Barry Manning will present on the Mixed Use Zones Project.

You should interpret the RNA's vote as analogous to a statement that, of the three alternative approaches for the Performance Bonus framework (see p. 11 of the Mixed Use Zoning Project: Draft Revised Zoning Concept Information Sessions, February 25-26, 2015), the RNA prefers the framework that sets a base height level with allowable bonuses up to the current height allowance which is 4 stories on Division with the Division Green St/Main St Plan Overlay established in 2006. So, if next month we recommend the performance bonus model, then our position would be to request the base height level to be 3 stories and allow a 4th story, or maybe even a 5th story, if certain performance bonuses are provided.

As my letter explains, the RNA's vote was informed by the significant community backlash we've felt at our meetings (I will invite you to attend the next RNA meeting where a developer presents on another new 4-story apartment building for Division) and that has been expressed in the Division Perceptions Survey, where 83% of respondents

prefer 3 story buildings and 90% generally stated they want smaller buildings.

As Mayor Hales has stated, there needs to be a balance between density and livability, and as Commissioner Fritz has stated, it shouldn't be density at all cost. The new development on SE Division St., particularly the stretch between SE 29th and Cesar Chavez Blvd, has tipped the balance to where livability is being seriously impacted for the community, especially those living within 2 blocks of Division.

Having grown up in LA and drawn to Portland by college and all that is not-LA here, density brings with it a variety of social costs/livability costs, such as parking shortages, trash, noise, crime, etc. As the recent email you received from Kent Tylman (and the photo of his blocked driveway, attached) shows, these livability impacts effect neighbors on a weekly and daily basis. The problem is that the city has allowed developers to externalize all of the social costs of density onto neighbors. On Division, the situation has grown beyond the breaking point for many neighbors, such as Kent. This Sunday, the Oregonian is doing an editorial on the impacts on livability from this intense development which stems from an ugly encounter an Oregonian reporter had with resident on SE Caruthers over parking issues.

The city needs to do more to fix the balance between density and livability, and it has started to go down that path, such as the minimum parking requirements established a few years ago. Other things the city could do are:

- * require Transportation Demand Management analyses and plans for mixed-use and multi-family buildings to encourage or require lessen the parking demand associated with their projects. PBOT is considering this but it's not certain they will do it.
- * Revisit the minimum parking requirements to consider implementing a cumulative impact measure for the parking requirements. Parking wise, five 30-unit apartment buildings within 2 blocks is the same as a 150-unit building. Commissioner Fish was curious about this idea during the parking council hearing and hoped this idea could be explored in the Comp Plan Update process, but that hasn't happened. Also, Commissioner Fritz stated back then that she saw the minimum parking requirements as a stopgap measure so that the issue could be reassessed during the Comp Plan process, but that isn't happening either. I'm on the Centers & Corridors Parking Study SAC and PBOT's position is that the minimum parking requirement discussion is over and done.
- * Do an assessment of available but unused on-street parking.
- * Revise the Mini APP Program to allow blocks of neighbors to get parking permit system and make it cheaper than \$65/car/year. The Parking Study SAC will likely recommend this, but it will likely be one the most expensive permits in the country.
- * Improve parking enforcement so that the problem of people blocking or parking in neighbors' driveways can be sufficiently addressed.
- * Implement incentives for developers to do more to pro-actively attract car-free tenants. Through rent rebates/discounts, free bus passes and car-share membership, luxury bike storage and accommodations shared parking arrangements with businesses, building owners can maybe achieve a .2 parking ratio or less, not the .9 parking ratio that the city's study revealed (it also revealed that, because of the LTE program, the 2 buildings with the cheapest rent have onsite parking).
- * Require buildings to have sufficient trash receptacles for tenants, which 1/2 or more have dogs, and whose poop bags are going into neighbors yard waste and recycling rollcarts.

* Encourage building owners to enter into GNAs with neighbors to work together to sole some of these issues. With the help of Kim Malek, Salt & Straw, we'll finally have the UD+P Developer coming to the table to discuss a GNA and to follow through on promises made to neighbors 2 years ago.

A final note is that, even if the height limit is 3 stories on Division or remains at 4-stories, the city's zoning capacity for the next 20 years is more than sufficient to accommodate the projected population growth. No one is going to be unable to move to or work in Portland if Division's height limit within the Main St Overlay is 3 or 4 stories, and there will be little to no impact to climate disruption in the grand scheme of things.

I really appreciate the chance to discuss this with you via your email.

Best regards,
Allen

>
> From: "Novick, Steve" <Steve.Novick@portlandoregon.gov>
> To: 'Allen F' <allen_field@yahoo.com>; Planning and Sustainability Commission
<psc@portlandoregon.gov>; "Manning, Barry" <Barry.Manning@portlandoregon.gov>
> Cc: "Stockton, Marty" <Marty.Stockton@portlandoregon.gov>; "Zehnder, Joe"
<Joe.Zehnder@portlandoregon.gov>; "Anderson, Susan"
<Susan.Anderson@portlandoregon.gov>; "Hales, Mayor"
<mayorcharliehales@portlandoregon.gov>
> Sent: Friday, March 13, 2015 9:31 AM
> Subject: RE: Richmond Neighborhood Association letter re March 9 2015 vote on
planning issues

>
>
>
>Allen – I have to say I'm disappointed. Height is critical to density, and density, which makes transit more viable, is critical to reducing carbon emissions. And I expect our population increase to way outstrip current projections, given that it appears that much of the rest of the country will become uninhabitable at a rapid rate as a result of climate disruption.

>
>
>
>
>From:Allen F [mailto:allen_field@yahoo.com]
>Sent: Thursday, March 12, 2015 9:31 PM
>To: Planning and Sustainability Commission; Manning, Barry
>Cc: Stockton, Marty; Zehnder, Joe; Anderson, Susan; Hales, Mayor; Commissioner Fritz; Commissioner Fish; Novick, Steve; Commissioner Saltzman
>Subject: Richmond Neighborhood Association letter re March 9 2015 vote on planning issues

>
>Dear Planning and Sustainability Commission and Mr. Manning: Please find enclosed a letter from the Richmond Neighborhood Association explaining its vote this week requesting a 3-stroy height limit for SE Division St. and supporting the creation of approval criteria for zone change requests from CM2 to CM3 under the Mixed Use Zones Project.

>
>Respectfully,
>Allen Field

>Chair

>Richmond Neighborhood Association

>

>

>

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:02 PM
To: Kovacs, Madeline
Subject: FW: Draft Comprehensive Plan

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

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From: Cathy Galbraith [mailto:cathyg@visitahc.org]
Sent: Friday, March 13, 2015 3:38 PM
To: Planning and Sustainability Commission
Subject: RE: Draft Comprehensive Plan

I need to raise and add these same concerns to the areas of Skidmore/Old Town, new Chinatown/Japantown, the West End, and South Portland, all of which are recognized for their historic significance, locally and nationally.

Cathy Galbraith, Executive Director
Bosco-Milligan Foundation/Architectural Heritage Center
701 SE Grand Avenue
Portland, OR 97214

503-231-7264
www.VisitAHC.org
Portland Preservation Blog
<http://portlandpreservation.wordpress.com/>
From: Cathy Galbraith
Sent: Friday, March 13, 2015 3:26 PM
To: 'PSC@portlandoregon.gov'
Subject: Draft Comprehensive Plan

To the Portland Planning & Sustainability Commission:

A number of comments and concerns have been raised throughout many of Portland's long-established neighborhoods, all expressing serious concern about proposed comprehensive plan designations and related zoning. In summary, the proposed plan designations very often tend to ignore the long-standing building character and

development patterns that define our neighborhoods. Instead, the plan designations seem to encourage re-development and densities that will even further damage our neighborhoods.

In particular, we support the concerns expressed by residents and property owners for Buckman, Concordia, Goose Hollow, Boise, Eliot Hosford-Abernethy, Richmond and the other “inner-city” neighborhoods where the Epidemic of Demolitions has already negatively impacted neighborhood character and stability. We have reached and in some locations even surpassed the tipping point, where so much demolition has perhaps irreversibly impacted the qualities that have long attracted neighborhood residents, home owners, and tax payers.

We think another look needs to be taken at the current strategy of maximizing density through redevelopment in any and every possible location, in the interest of “protecting the urban growth boundary.” Regional rules regarding Portland’s UGB are being misinterpreted as directing the current BPS strategy of planning increased density where development has already occurred in stable neighborhoods. I have long defended the urban growth boundary as a practicing city planner, from 1976 – 1987, and since then as an advocate of historic preservation as an essential ingredient of successful city planning.

I look forward to a more careful and thoughtful approach to matching plans to existing development realities, before it is too late. The city’s physical character -- though its building heritage -- is what chiefly attracted us to settle and invest in our particular Portland neighborhoods. It is that building character that continues to invite others to settle in and invest in our beloved city, and its future.

- Cathy Galbraith, Executive Director

Cathy Galbraith, Executive Director
Bosco-Milligan Foundation/Architectural Heritage Center
701 SE Grand Avenue
Portland, OR 97214

503-231-7264
www.VisitAHC.org
Portland Preservation Blog
<http://portlandpreservation.wordpress.com/>

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 8:52 AM
To: Kovacs, Madeline
Subject: FW: Portland Comprehensive Plan

Follow Up Flag: Follow up

Flag Status: Flagged

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

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From: Tristan Tarwater [mailto:trisjtarwater@gmail.com]
Sent: Friday, March 13, 2015 8:43 AM
To: Planning and Sustainability Commission
Subject: Portland Comprehensive Plan

To Whom it May Concern,

My name is Tristan Tarwater and I live in the Woodstock neighborhood. My family and I live at 5130 SE Ellis Street. We love this neighborhood! We love how we can walk to so many great shops. We love how beautiful the main street looks, even with the construction. We love how we can see Mt. Hood on clear days from my kid's school. We love how many bus lines are available to us, and how nice the people who work in the neighborhood are! Back when my spouse and I were younger, we used to live in Milwaukie and would wish we were getting off the 75 in the Woodstock neighborhood. Now we live here and it's even better!

As someone who loves this neighborhood, it is really my sincerest wish that more people can move to this neighborhood and enjoy it. With housing prices rising, housing demolitions/flips happening left and right and a lack of high density + affordable housing, a lot of great neighborhoods are becoming attainable only to those in higher income brackets. Many of my younger friends who would have been able to afford neighborhoods like Woodstock and Division when I first moved to Portland can only afford to live in the outlying cities/towns and/or have many roommates. In addition, I know lots of people who aren't sure owning a home is for them. I love my house but I know not everyone wants a white picket fence. High density housing means more people to utilize the great businesses that are popping up here, and would hopefully cut down on cars on the road, if people can walk, bike or take the bus easily.

I know not only zoning but housing laws need to be changed in order to get the affordable housing Portland so desperately needs. Please know there is at least one family in the Woodstock neighborhood who would be more than

happy to several dozen new neighbors!

Regards,
Tristan J. Tarwater

--

Back That Elf Up
Home of the Fantasy Series 'The Valley of Ten Crescents'

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:05 AM
To: Kovacs, Madeline
Subject: FW: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Follow Up Flag: Follow up
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Julie Ocken
City of Portland
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From: Ansula Press [mailto:ansula@gmail.com]
Sent: Thursday, March 12, 2015 8:08 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Novick; Planning and Sustainability Commission; Susananderson@portlandoregon.gov; Commissioner Fritz
Subject: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

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

Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for zoning meant a minimum 5000 square ft lot.

Much

of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in these regions is 25 x 100, and they are now all available to develop within the current code. To allow these lots to be developed is a slap in the wallet to everyone who has purchased a home in an R5 neighborhood. First, the State does not recognize them as lots. They are only lots if they meet the zoning requirements for the standard of size. In the case of R5 you would need two 25 x100 lots to meet our zoning! To change the code to allow R2.5 development is to change our zoning! You have up zoned us to R2.5. Everyone in this neighborhood is suffering continued devaluation of our historic place from this development practice.

In response to this City having tacitly up zoned the finest portions of our neighborhood, the Concordia Neighborhood Residents ask that these historically platted and historically developed portions of our neighborhood be afforded the protection of R7 zoning. These subdivisions, like "Irvington Park" surrounding Concordia University, are the historic core of our community. Many homes were established with 10,000 sq/ft lots, many more with 7,500. Of course there are also 5000 square foot lots, but until the 2003 policy package 2A, there was never a 2500 square foot lot. As a neighborhood region historically developed with a character of larger lots interspersed in the fabric, and as that is the property of our neighborhood which we intend to defend, this methodology is akin to any other embattled neighborhood being granted similar protections by down zoning.

Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are

designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction practices and significant early architecture. The current designation of R2.5 leaves these neighborhood homes as targets of demolitions for the two building lots beneath. The character of this portion of our neighborhood is that of an R5 neighborhood as that was the style of the day. We value this region as it is historically built today. There is no compelling reason for this area to be zoned R2.5 as it does not abut a transit corridor. As an R5 neighborhood, all empty lots may still be developed with infill housing. We want to afford protection to the existing homes in this historic "Street Car" neighborhood region. This portion of the neighborhood will be protected to our satisfaction with an R5 designation.

Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,

Ansula Press
5533 NE 30th Ave.

--
"Participation - that's what's gonna save the human race."
~ Pete Seeger

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:05 AM
To: Kovacs, Madeline
Subject: FW: rezoning of NE Portland Concordia neighborhood

Follow Up Flag: Follow up

Flag Status: Flagged

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

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From: Diane Frank [mailto:dnfrank@spiritone.com]
Sent: Thursday, March 12, 2015 8:21 PM
To: Commissioner Saltzman; Commissioner Fish; Hales, Mayor; Commissioner Fritz; Commissioner Novick; Susananderson@portlandoregon.gov
Cc: Planning and Sustainability Commission
Subject: rezoning of NE Portland Concordia neighborhood

Dear Mayor and Commissioners,

I am a resident of over 20 years on NE 27th Ave, 2 doors down from NE Jarrett St. In the past 5 years I have watched a myriad of skinny houses, ill suited to the nature and character of the neighborhood proliferate. These houses all too often do not add much to the density of the neighborhood although they certainly do detract from its once neighborly character. Drive down the streets where these houses have artificially inflated property values and see how it feels to have them looming over their neighbors, all out of proportion to both Concordia and the nature of the neighborhood.

I have observed with genuine dismay as literally dozens of century old fir trees, so appealing and climate change friendly, have been cut down, altering the forest like character of the neighborhood that drew me there in the first place. The loss of these trees is putting more and more of the remaining trees at risk to potential wind damage as there was once safety in numbers because they helped to protect one another.

While I support increased density it should not be at the cost of changing the character and a neighborhood forever. We desperately need to protect and preserve what is important in our Concordia, a sense of well being, of being part of a larger community. There is value in history.

The greater the number of these skinny houses with no connection to Concordia and its history the more that is lost. I wonder if you would change this zoning in more affluent neighborhoods like Laurelhurst or Irvington.

This rezoning will only encourage predatory builders and real estate agents to prey on older or less affluent citizens. For once, let us not make decisions based on money, rather on what is really important in our lives. Family, community and a neighborhood that not only allows neighbors to know one another, but encourages it.

I urge you to vote NO on rezoning this stretch of Concordia. It does little in the way of good and MUCH in the way of harm.

Diane Frank
5918 NE 27th Ave.
Portland, OR 97211

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:10 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony - SE 50th Avenue and Mill street

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Kristen Pilgrim [mailto:kristenpilgrim@yahoo.com]
Sent: Thursday, March 12, 2015 8:57 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony - SE 50th Avenue and Mill street

My family and I moved to Portland a dozen years ago because it offered the livability that has made Portland famous. What is this livability? It is 1) small, affordable residential homes in inner neighborhoods close to downtown that offer 2) yards for gardening/food/nutrition/sustainability, recreation, privacy, and sunlight, 3) sidewalks for walking for recreation and to local stores, 4) quiet-enough streets for biking and walking 5) low level buildings to see Portland's hills and not live in shadow, 6) established neighborhoods where residents stay for decades and even generations and invest their life savings and hard work to support the schools, arts, City taxes, local stores and restaurants, etc. 7) neighborhoods where neighbors know each other, where babies flourish next to seniors, and where there are no gates. Suddenly ALL OF THIS IS BEING TAKEN AWAY FROM THE NEIGHBORS WHO HAVE MADE THIS NEIGHBORHOOD LIVABLE AND SPECIAL AND IS BEING GIVEN TO SK HOFF AND FAMILY TO FURTHER LINE THEIR ALREADY DOLLAR-STUFFED POCKETS.

SK Hoff is capitalizing on spot zoning. He is being allowed to take on CG building that was small and in scale with the neighborhood PLUS an adjacent R1 single-family home and turn it into a massive monstrosity of an apartment that will be 45-50' high, 84 400 and 500 square foot units with only 21 parking spots. This 84-unit MONSTROSITY will take away ALL of our livability: our R5 zoned house will be plunged into deep and impenetrable shadow from mid-morning to night. This will kill our large garden, our blueberry bushes, and apple and plum trees. Our nighttime moonlight will never again be seen, as it will be blocked and replaced by many apartment lights, TVs, monitors, etc. and nor will we see another sunset. This massive, out-of-

scale apartment will eliminate our privacy and safety. Unknown apartment dwellers will be staring down into our yard and into the back of our house where we spend most of our time.

How can we safely raise our family? Our elementary-aged daughter will be stared at by numerous people we will never know. There will be mad traffic and a daily scramble for parking. With almost no parking, the apartment residents will park on SE 49th, SE 50th, and SE 51st, and likely further out. Currently Bus 14 is already full, oftentimes standing room only already at SE 50th and SE Lincoln. How many more busses will need to come? How many more cars? Already the traffic is at a standstill at busy times of day. We have invited two real estate agents to our property to assess the impact of an apartment size of this LARGE SCALE to find out if it will impact our investment. One realtor is with Old Portland PDX and the other with Urban Nest. Both realtors said our property will decrease in value by 25% - 30% if this apartment is built at the current size. Why is it okay to LOSE OUR INVESTMENT? Why can SK HOFF make millions off of our investment and we lose everything?! This monstrosity might be technically legal but it is not ethical. It is a taking pure and simple. There is no giving. The entire neighborhood wants SKHoff to negotiate, starting with 30' high maximum and more parking. We are not against appropriate development that sustains the neighborhood into which it comes. But this is NOT appropriate development. This is making a dollar killing without a single thought to the livability of two once special neighborhoods: Richmond and Mt. Tabor.

The SKHoff development is shameless. The City needs to either require spot zoning to be in line with what the neighborhood requests, or it needs to pose a moratorium to examine whether it is in the best interest of Portland to destroy two special neighborhoods. Lastly, the SKHoff monstrosity is ONLY ONE OF FOUR new planned developments planned for the 3/10-mile of mostly residential stretch from SE50th & Hawthorne to SE 50th and Division. No one in the city is even looking at the compound effect of soooo many new residents, traffic, and noise in such a small residential area. STOP THE SKHOFF development until it is compatible with the neighborhood and adds rather than destroys. If Portland destroys what makes it livable, then it is nothing but a low-wage city.

Sincerely,

Kristen Pilgrim
Kristenpilgrim@yahoo.com
1925 SE 51st Avenue

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:10 AM
To: Kovacs, Madeline
Subject: FW: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Follow Up Flag: Follow up
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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: jos@josphotographers.com [mailto:jos@josphotographers.com] On Behalf Of Jos - JOS studios
Sent: Thursday, March 12, 2015 9:08 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Planning and Sustainability Commission; Susananderson@portlandoregon.gov
Subject: Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish,

Commissioner Amanda Fritz, and Commissioner Steve Novick,

The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for

zoning meant a minimum 5000 square ft lot. Much of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in

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In response to this City having tacitly up zoned the finest portions of our neighborhood, the Concordia Neighborhood Residents ask that these historically platted and historically developed portions of our neighborhood be afforded the protection of R7 zoning. These subdivisions, like "Irvington Park" surrounding Concordia University, are the historic core of our community. Many homes were established with 10,000 sq/ft lots, many more with 7,500. Of course there are also 5000 square foot lots, but until the 2003 policy package 2A, there was never a 2500 square foot lot. As a neighborhood region historically developed with a character of larger lots interspersed in the fabric, and as that is the property of our neighborhood which we intend to defend, this methodology is akin to any other embattled neighborhood being granted similar protections by down zoning.

Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction

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Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,

Tree (Theresa) Wood & Jos Smith
5706 NE 16th Ave

On Thu, Mar 12, 2015 at 9:06 PM, Jos - JOS studios <jos@josstudios.com> wrote:
Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish,

Commissioner Amanda Fritz, and Commissioner Steve Novick,

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Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,
Tree (Theresa) Wood
5706 NE 16th Ave

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:25 AM
To: Kovacs, Madeline
Subject: FW: Feedback on proposed zoning density increases for Buckman

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
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From: Eric OConnor [mailto:eric@magnetichealthfactory.com]
Sent: Thursday, March 12, 2015 4:15 PM
To: Planning and Sustainability Commission
Subject: Re: Feedback on proposed zoning density increases for Buckman

Sure thing Julie!

523 SE 19th Avenue
Portland, OR 97214

Thanks,
Eric

From: Planning and Sustainability Commission <psc@portlandoregon.gov>
To: Eric OConnor <eric@magnetichealthfactory.com>
Sent: Thursday, March 12, 2015 4:09 PM
Subject: RE: Feedback on proposed zoning density increases for Buckman

Hello Eric,

So that we can include your comments in the official testimony record and forward the message to PSC members, can you please email me your mailing address? It is required for all incoming testimony.

Thank you,
julie

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
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From: Eric OConnor [mailto:eric@magnetichealthfactory.com]
Sent: Thursday, March 12, 2015 2:54 PM
To: Planning and Sustainability Commission
Subject: Feedback on proposed zoning density increases for Buckman

Hello,

My name is Eric O'Connor and I'm a 10-year resident of the Buckman neighborhood. I'm also an active participant in the Buckman Community Association, and a former Board member.

I'm writing to offer my input on the proposed zoning density increases along, I believe, Morrison and Belmont Streets. I'm concerned about these proposals, and the impact they will have on the neighborhood. My concerns do not stem from an anti-growth position. I have lived in urban areas for all of my adult life, and consider myself a "city person" through and through. If anything, I've been pleased to see the growth in Portland in the relatively short time I've been here. But in recent years, that growth seems to have reached a point where it no longer feels organic to me. It feels instead like the city is simply trying to shoehorn in as many people as possible.

Like most Portlanders, I appreciate the historical efforts to enforce an urban growth boundary and limit sprawl. But at some point there is a limit on how many people Portland proper will hold. This limit exists across multiple dimensions: physical, cultural, etc. Exactly where we choose to set that limit is a decision that all Portlanders must come to collectively. Right now, it feels like the the Portland Development Commission is having a disproportionate say in that decision-making process. I don't hear a lot of Buckman residents, for example, complaining that our neighborhood needs more large-scale apartment buildings with little to no street parking.

The pace of such development has been proceeding at what many feel is a breakneck pace. Perhaps it's time to stay put at or near the current level, catch our breath, and just live in this "new" Portland for a while?

Thanks,
Eric

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:47 AM
To: Kovacs, Madeline
Subject: FW: Ch 3: Urban Form - Eastern Neighborhoods Pattern Area

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
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1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 3:59 AM
To: Planning and Sustainability Commission
Cc: Scarzello, Christina; Bauer, Linda; Arlene Kimura; Wintergreen, Lore; Sweet, David; Gray, Karen; Nick Sauvie; Jean DeMaster; Frieda Christopher
Subject: Ch 3: Urban Form - Eastern Neighborhoods Pattern Area

Dear City of Portland Planning and Sustainability Commission,

I have several changes I would like to suggest within the Comp Plan document -
[deletes in brackets], additions in red:

Eastern Neighborhoods Pattern Area (page GP3-23)

The Eastern Neighborhoods feature a diverse range of urban and natural landscapes. Many structures in the Eastern Neighborhoods, which also include parts of Brentwood? Darlington Sumner, and Cully, were developed after World War II as part of Multnomah County. [In addition, most] Most of this area was annexed into the City of Portland after the 1980 Comprehensive Plan was completed, with very high rates of new population growth but very little corresponding public investment in needed infrastructure by the City of Portland. A majority of area residents work outside of downtown, in industrial districts in North Portland, Swan Island, along the Columbia Corridor, and in surrounding counties and cities. As in Southwestern Portland, the lack of active transportation infrastructure and historically poor connectivity encourages working residents to drive more, and farther, than other city residents. Unemployment and poverty is persistently higher in this area than other parts of the city. Similar to

Southwestern Portland, local residents pay more property taxes per unit of value, and per person, than in inner Portland, and historically receive fewer services and public investment, except more policing.

The Eastern Neighborhoods are also the most ethnically diverse in Portland, with a greater concentration and numbers of new immigrants, refugees, and New Portlanders, than any other part of the city. The area also has more larger households, more population growth, and more youth, than any other district, with six different school districts: Portland (15% of its students), Parkrose (98% of its students), David Douglas (98% of its students), Reynolds (20% of its students), Centennial (70% of its students), and North Clackamas (less than 2% of its students). Gentrification and involuntary residential displacement are increasing, with many new residents recently displaced from previously-diverse inner Portland neighborhoods. The policies for the Eastern Neighborhoods promote design that responds to and enhances the area's distinctive mix of urban patterns and natural features, such as groves of Douglas firs, the Eastern Buttes, and varying terrain [streams]. Some policies address the opportunities and challenges presented by the area's large blocks, wide right-of-way, and deep lots.

The Eastern Neighborhoods provide opportunities for new and distinctive approaches to the design of development and infrastructure that can enhance the area's positive characteristics and improve quality of life. It is important to continue the area's verdant character, increase access to services, and provide a more livable environment, while reducing disparities and involuntary residential displacement. [increasing access to services.]

Policy 3.82 Eastern Neighborhoods street, block, and lot pattern. Guide the evolving street and block system in the Eastern Neighborhoods in ways that build on positive aspects of the area's large blocks, such as opportunities to continue mid-block open space patterns. [and create] Require and prioritize new connections through blocks that make it easier to access community destinations using active transportation. Adopt policies that discourage the involuntary displacement of existing residents and jobs while encouraging dynamic growth and development in East Portland.

Policy 3.83 Eastern Neighborhoods trees and natural features. [Encourage] Require development and right?of?way design that preserves and incorporates Douglas fir trees and groves, and that protects the area's streams, forests, wetlands, steep slopes, and buttes.

Policy 3.84 Eastern Neighborhoods buttes. Enhance public views of the area's skyline of buttes and stands of tall trees, especially Douglas firs.

Policy 3.85 Eastern Neighborhoods corridor landscaping. Encourage landscaped building setbacks along residential corridors on major streets. Require and prioritize active transportation uses and in-street landscaping along major streets with wide right-of-way, such as 122nd, Stark, Division, Glisan, Halsey, SE 148th, & SE 162nd.

Policy 3.86 Eastern Neighborhoods active transportation. Enhance access to regional centers, town centers and other community destinations in Eastern Neighborhoods by ensuring that corridors have safe and accessible pedestrian facilities and creating additional secondary connections that provide low?stress pedestrian and bicycle access. Aggressively pursue active transportation connections for East Portland residents, especially frequent and reliable transit, to industrial and employment districts that have family-wage employment, including to North Portland, Swan Island, Washington County, Clark County, Gresham, and Clackamas County.

Thank you.

David Hampsten
Hazelwood NA resident
302 SE 105th Ave Apt 26
Portland, OR 97216
david_hampsten@yahoo.com
971-322-6599

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:56 AM
To: Kovacs, Madeline
Subject: FW: "Comprehensive Plan Testimony"

Follow Up Flag: Follow up

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Julie Ocken
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From: anne greenwood [mailto:annegreenwood.net@gmail.com]
Sent: Friday, March 13, 2015 9:43 AM
To: Planning and Sustainability Commission
Subject: Re: "Comprehensive Plan Testimony"

Anne Greenwood
911 N Humboldt St
Portland Or 97217

On Fri, Mar 13, 2015 at 9:23 AM, Planning and Sustainability Commission
<psc@portlandoregon.gov> wrote:
Hello Anne,

Thank you for your comments to the Planning and Sustainability Commission. So that I may include them in the record and forward them to the PSC members, can you please email me your mailing address? That is required for all testimony.

Thanks,
julie

Julie Ocken
City of Portland
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From: anne greenwood [mailto:annegreenwood.net@gmail.com]

Sent: Friday, March 13, 2015 8:55 AM

To: Planning and Sustainability Commission

Subject: "Comprehensive Plan Testimony"

To Whom It May Concern-

I have lived in the Humboldt Neighborhood for the last twenty years. I moved from Boise-Elliott, and before that the Hawthorne area. I came to Portland in 1989 from Fargo, North Dakota. My husband and I purchased and rehabilitated our home here on Humboldt Street in 1996: it was a condemned 'crack' house. We moved here specifically to share our lives with a diverse community as we are a multicultural family. My husband grew up in Santiago, Chile and Washington DC.

North and North East Portland once possessed the rich fabric of community, with tradition, heritage, and diversity. I believe in change, but not at the cost of pricing families out of their homes, and tearing apart the very fabric of a community. Please consider the following feedback from myself and our neighborhood.

Look towards redevelopment of industrial areas, not natural areas.

Consider the integrity of new housing development and the affect it will have on the families in the community long term.

Include rent control and the continuous price increase of new housing in this community.

Address the gentrification issue with equitable decisions not only what is equal. Consider the history of our communities population with a lens of ethnicity, race, socioeconomic status. Look toward reparation with providing affordable housing and community meeting places.

Discourage developers and work with individuals.

Communicate land use updates.

There is no notification policy in place to keep developers accountable when working with neighborhood associations on issues of design guidelines, integrity, affordability. Put something in place so that neighborhood associations have some influence and ability to be heard.

Insure that development is employing MWBE business certified local labor and that people who live and work in these neighborhoods can be part of the change.

And educate yourselves through participating and sharing in the valuable resources our community has provided in the very recent past, such as:

the movie by local artists Jodi Darby and Julie Perini

Ord. 187832 Vol. 2.3.B, page 13967

<https://www.arrestingpower.com/>
the Multnomah County Library Everybody
Reads 2015 featuring "The Residue Years" by
Mitchell S. Jackson
http://www.nytimes.com/2013/08/18/books/review/mitchell-s-jacksons-residue-years.html?_r=0

and Ifanyi Bell's video inspired by his essay in the latest issue of Oregon Humanities magazine about growing up black in Portland. It's a powerful five-minute video that contemplates loss and hope in Portland's black communities.

<http://oregonhumanities.org/magazine-extras/magazine-extras/video-future-portland/1062/>

Thank you for your time!
Warmly-

--
Anne Greenwood Rioseco

--
Anne

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:58 AM
To: Kovacs, Madeline
Subject: FW: Zoning and density

Follow Up Flag: Follow up

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Julie Ocken
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From: D K [mailto:dkonman@msn.com]
Sent: Friday, March 13, 2015 9:50 AM
To: Planning and Sustainability Commission
Subject: Zoning and density

To Whom it may concern,

My name is Dwight Konrad and I live at 605 SE 15th Ave. I went to my Buckman neighborhood meeting last night to find some disturbing news about proposed zoning changes that would certainly affect the neighborhood. I have watched the Washington HS project from its inception from my kitchen window and have been affected by noise and parking issues. This project alone will have a huge impact on our neighborhood and I would like to see what happens before we start rezoning and making radical zoning changes for the corner of Stark and 14th and the heart of Buckman between Stark and Belmont and 14th and 20th Avenues.

It seems like there are plenty of options for infill apartments that are currently zoned for commercial and residential along the SE bus lines and up and down 11th and 12th to keep the developers busy for a decade or two. It would be a shame to start tearing down some of the historic housing stock and putting up monolith apartments in this fantastic family neighborhood before it becomes necessary. I understand we need to plan for strong growth and inner SE is going to change over the years. It already has. That is part of progress, but let's try to keep the basic feel and livability of these close in neighborhoods by smart growth and not over zealous zoning changes.

In my judgement there is a need for:

- Apartments that offer parking.
- Family sized and affordable apartments, not just studios and 1 BR's that start at

\$1000 and up.

- Parking permits to prevent people who don't use their cars more than once or twice a month from plugging up our neighborhoods. On my street the residents have to walk a block or two to get to their home every day because cars park on our street and stay there for weeks at a time.
- Zoning that shapes a livable neighborhood and doesn't favor a bunch of 4 story buildings that are not on buslines or major streets.

Our neighborhood association is a good group of very concerned citizens and we will be involved in these changes and watching very closely as the proposed changes evolve. It seems like a complete turnaround from last year when Buckman was very close to becoming a historic designated neighborhood to all of a sudden changed to the hit list for tearing down the beautiful old buildings that make this the great neighborhood to live in.

My vote is to solidify the definition of the zoning codes, which seem to be in flux, and then stand pat without making more radical changes for a few years until we see the impact of the WA HS project and the 14th/Morrison area, along with the planned apartments along Belmont and Morrison from 20th to 11th.

Sincerely,
Dwight Konrad
605 SE 15th AVE
Portland, OR 97214
503-232-7673

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 11:11 AM
To: Kovacs, Madeline
Subject: FW: Comp Plan map

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From: L Robinson [mailto:lrobinspdx@comcast.net]
Sent: Friday, March 13, 2015 11:09 AM
To: Planning and Sustainability Commission
Subject: Comp Plan map

I've been looking at the Comp Plan Map App this morning and noticed some zoning changes that should be made. Since there is no proposed change, I wasn't able to add a comment to the map -- and it was suggested I send the comments to this email address.

According to PortlandMaps, that land where the new Gateway Park and Plaza is being built soon is currently zoned CXd -- and the Comp Plan doesn't propose any change in that zoning [NE Halsey between 104th & 106th on south side of Halsey]. I thought it was going to be changed to an Open Space zoning. Can you check on that. [Since there is NO proposed change, I was not able to add a comment to the map!]

Also, the property purchased by PP&R last year for a new park (south of Division, and east of 148th) should be changed to Open Space, instead of the R3 designation currently on the property There are two parcels, I think, but both appear to have the same street address on Portland Maps -- 15004 SE Division St. Again, because no change was proposed, I can't add a comment on the map.

I'm also concerned that the transportation map shows NO projects on the I-205 multi-use path, which has several AWFUL sections as it travels through the Gateway area. One of the worst, is where it crosses NE Glisan, but the section between Stark and

Washington is also difficult to navigate (narrow sidewalk with utility poles in the middle of it!)

-- Linda

Linda Robinson
1115 NE 135th Ave
Portland, OR 97230

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:27 AM
To: Kovacs, Madeline
Subject: FW: Comment on Draft 2035 Comprehensive Plan

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From: Vischer,Karl (BPA) - CBE-3 [mailto:kvischer@bpa.gov]
Sent: Friday, March 13, 2015 9:11 AM
To: Planning and Sustainability Commission
Subject: Comment on Draft 2035 Comprehensive Plan

Dear PSC,

I agree with Carol McCarthy (Portland Tribune Op-ED March 10, 2015) that should continue to retain the current role of Portland's Neighborhood Associations, and if possible, strengthen that role, as well as the role of other community-based groups seeking comment on Bureau policies and decisions. Public participation is essential to the sustainability of Portland as a livable city!

Sincerely,

Karl Vischer
2007 NE 12th Ave.
Portland, OR
503-206-9592

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 11:28 AM
To: Kovacs, Madeline
Subject: FW: Comp Plan Testimony Comments of Dean Gisvold
Attachments: Eastmoreland comments first six pages.pdf

Follow Up Flag: Follow up
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From: Dean P. Gisvold [mailto:deang@mcewengisvold.com]
Sent: Friday, March 13, 2015 11:15 AM
To: Planning and Sustainability Commission
Cc: Barb Christopher; Brad Perkins; Dean P. Gisvold; Donald Wood; Ed Abrahamson; James Heuer; Jeff Jones; Jim Barta; Meryl Logue; Mickey Bishop; Nathan Corser; Nikki Johnston; Peter O'Neil; Robert Ridgeway; Stephen Doubleday; Steven Cole; Tom Mertes; William Archer
Subject: Comp Plan Testimony Comments of Dean Gisvold

Dear PSC Chairman Baugh and PSC Commission Members

I have reviewed the first six pages of the Eastmoreland Neighborhood Association Testimony (see attachment), and wish to go on record as personally supporting such testimony, especially the Summary policy Comments on page 6. The first comment is especially relevant to my experience:

"The residential zoning designations need to relate to the context (one size does not fit all). Densities should reflect historic patterns, but also a pattern of increased density in the context of planned, complete neighborhoods that protect historic and cultural resource values."

As Chair of the Irvington Land Use Committee for the last 6 years, I have experienced first-hand the problems noted in the attached testimony. I would expand on the quote by adding multifamily and commercial zoning designations-these too must relate to and protect historic and cultural resources. More density can work if due consideration is given to the design, massing, scale, and

compatibility with existing resources.

The role of the neighborhood associations in the planning and zoning process must be maintained without any reduction in notice or other action to reduce such role.

Thank you for your consideration. Again, I am not speaking for the Land Use Committee, but only for myself.

By return email, please confirm timely receipt of my comp plan testimony. Thanks.

Dean Gisvold

Dean P. Gisvold | Attorney at Law | Senior Partner
MCEWEN GISVOLD LLP - EST. 1886
1600 Standard Plaza, 1100 SW Sixth Avenue, Portland, Oregon 97204
Direct: 503-412-3548 | Office: 503-226-7321 | Fax: 503-243-2687
Email: deang@mcewengisvold.com
Website: <http://www.mcewengisvold.com>

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From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:30 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up

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From: Christopher Eykamp [mailto:chris@eykamp.com]
Sent: Friday, March 13, 2015 11:53 AM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

Dear Members of the Planning and Sustainability Commission,

I am a resident of the HAND neighborhood, and request that you consider the following points while finalizing the Comprehensive Plan.

* Please opt for the lowest-intensity commercial zoning designation for commercial properties along SE Clinton St (at 16th, 21st, 26th, 34th, and 41st). I support small-scale neighborhood oriented businesses in these locations, but larger development would be out-of-place in given the surrounding neighborhoods. Please do not add commercial zoning to any currently non-commercial properties surrounding these nodes. They are the right size as they are, and it would be a mistake to encourage larger-scale development that would attract more traffic to one of Portland's busiest bikeways.

* Neighborhoods should have more control in how they grow and develop. They are places people are passionate about, and have chosen to make their homes. To that end, we need either a design-review overlay, pattern area standards, or, better, a neighborhood plan to encourage development beneficial to the neighborhood.

* The zoning code needs mechanisms for preserving solar access to existing structures, and to encourage preservation and reuse of historical structures.

* I am concerned about the development along Division that has occurred in the Richmond neighborhood. The buildings are too tall for a narrow street like Division, and, frankly, the building design is poor. The comp plan should limit maximum building height along narrower streets like Division and Belmont. Again, design-review or similar standards

would help drive better design in these buildings that will be an enduring part of our community.

* Neighborhoods need better notification of coming development. They should be notified early in the process, ideally during the pre-app stage, and again as the permitting application proceeds. This should be required for all major developments, not just those that require code adjustments. Better communication between developers and residents will, in most cases, result in better buildings, which will benefit all parties.

* In areas that are expected to become more dense, such as the HAND neighborhood, we need tools to discourage demolition of older homes to be replaced with larger single-family houses. This sort of development runs counter to many of the neighborhood's and city's goals of increasing sustainability, density, and livability.

Thank you for your consideration,

Chris Eykamp

2101 SE Tibbetts

Portland, OR 97202

From: mvogelpnw@gmail.com [mailto:mvogelpnw@gmail.com] On Behalf Of Mary Vogel

Sent: Friday, March 13, 2015 12:50 PM

To: Planning and Sustainability Commission

Subject: Comment on the Comp Plan - role for Neighborhood Associations

Please see: <http://pamplinmedia.com/pt/10-opinion/253076-121516-my-view-growth-plan-doesnt-foster-livability>

Carol McCarthy asks in the article above and I really like her question: Are we paying the planners to manage growth, or to promote it? While I live downtown where I expect construction noise and welcome at least some of the growth, I would also like planners to do a better job of managing for that growth.

I would like to second Carol's call for recognizing an important role for Neighborhood Associations in the Comp Plan. She says:

The comprehensive plan currently in place requires that the city coordinate land-use planning by providing notice of official hearings to the neighborhood associations. This language has been removed from the draft plan. Not only that, the proposed glossary definition of "neighborhoods" concludes: "In general, the word 'neighborhoods' is not intended to refer to specific neighborhood geographies."

I request that the draft plan be amended to define neighborhoods by their association boundaries and that the existing role of the neighborhood associations not only be retained but expanded. One idea she has is to give each neighborhood coalition a seat on the PSC. I think that's worthy of discussion.

Thanks for the opportunity to comment on the 2035 Comp Plan.

Mary Vogel, CNU-A

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503-245-7858

mary@plangreen.net

<http://plangreen.net>

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:19 PM
To: Kovacs, Madeline
Subject: FW: mas response to Re: responses to the Comprehensive Plan and Mixed Use Zone projects

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Julie Ocken
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From: Schwab Mary Ann [mailto:e33maschwab@gmail.com]
Sent: Friday, March 13, 2015 2:09 PM
To: Don M.; Planning and Sustainability Commission
Cc: Bob Kellett; Yun Christine; Nettekoven, Linda; MacGillvray Don; McCullough, Robert
Subject: mas response to Re: responses to the Comprehensive Plan and Mixed Use Zone projects

Dear PSC and BDS Planners:

Accept my apology for your receiving duplicate emails, supporting Don MacGillravry's comments below from the movers and shakers on his contact list.

I am asking his comments be taken seriously within the Staff's Comp Plan review. I am concerned in that he did not sign off with his name and address is comment would not be entered into the record.

So please consider his comments, mine as well.

As for building heights along SE Belmont and North side of SE Hawthorne Blvd, please consider three condos, should Developer trade off 30% set aside low income units, the grant BDS approval providing the forth floor(s) are set back to allow sunlight in immediate neighbor's back yards, with careful attention to placement of windows.

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

On Mar 13, 2015, at 1:03 PM, Don M. wrote:

Dear PSC planners and other interested parties,

Please make sure that this goes to the proper people and is included in the current public comments regarding these two plans.

I am sorry I don't have more time as I would like to say much more than what I can say below.

1st. Centers and Corridors are lumped together. Each type of these two mixed use areas is very different and the map of centers confuses this distinction. A center is a compact area that is several blocks wide by several blocks in width. Corridors are very long and narrow strips that are often only 100 feet wide on each side of a neighborhood arterial.

Centers depending on size and existing development can take all four of the new mixed use zones. The Corridors being so narrow are an integral part of the surrounding neighborhood and should mostly be zoned CM-1 and care should be taken in locating CM-2 along corridors.

I am also very concerned about the idea of bonuses that allow addition FAR and/or building height to a development. Along corridors four story buildings are too high and would need too much of a set back from the adjoining residential neighborhood. The specific bonuses are generally good, but why don't developers include them without getting additional building size. Also the developer gets to choose the bonus and the city then approves it. It is the users of the building and the neighborhood that get the benefit of the specific bonus. The neighborhood should have a voice in the selection of the specific bonus or be able to choose it themselves.

2nd. I believe that it is not clear how the concerns of the neighborhoods about context, scale, compatibility, design will be implemented through the zoning code. It is clear that the developers and architects are getting much of what they want, but in spite of 30+ years of advocacy and activism the neighborhood concerns remain only aspirations and generally unfulfilled.

3rd. The people living around a new development should be informed of the project at the earliest possible date so they can respond with their suggestions. They also need some bargaining power to see that their concerns are addressed. Failure to do this is a violation of the cities "Citizen Involvement Principals" adopted by the City Council about five years ago.

4th. I also believe that each center and corridor should have a plan for its future development. This need not be all inclusive, but it should include the ideas of all stakeholders. It should also inventory the goods and services available nearby and suggest (with the intent to implement) needed additions. It also should include some design basics and what existing buildings are to be preserved and improved. Great changes will be needed over the next 25 years and developers alone cannot be expected to do everything that needs to be done. Neither can the city but city regulations can help if followed appropriately.

There is much more I could say, but I will stop for now. I hope you will take these suggestions seriously and I will look for them in the next draft of the plan.

Keep up the good work. I am impressed with many of the great things that are happening with these plans.

"Happiness is when what you think,what you say, and what you do are in harmony."
Mahatma
Gandhi

Best wishes,

Don MacGillivray

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:28 PM
To: Kovacs, Madeline
Subject: FW: PSC Comprehensive Plan Testimony

Follow Up Flag: Follow up

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From: Kirk Paulsen [mailto:kirk.paulsen@gmail.com]
Sent: Friday, March 13, 2015 3:58 PM
To: Planning and Sustainability Commission; Transportation System Plan; PDX Comp Plan
Subject: PSC Comprehensive Plan Testimony

Hello,

My name is Kirk Paulsen, I am a resident of NE Portland and live at the following address: 3241 NE Holman Street, Portland, OR, 97211. The following is my testimony for the update to Portland's Comp Plan:

Transportation Hierarchy

The best part of Chapter 9 in the current Comprehensive Plan draft is the transportation hierarchy. This policy will allow the city to make the important (and necessary) choices for a better, more sustainable, more livable future. We need the hierarchy in place in order to responsibly grow Portland over the next few decades and maintain/improve our quality of life.

Additionally, I'd like to see safety as the #1 item in the hierarchy, above all specific modes. Safety is the most comprehensive way to contextualize the rest of our prioritization.

Diverters on Local Service Streets

The Transportation System Plan's local service street is missing a bullet point:

* Diversion: Local Service Traffic Streets should feature frequent traffic diverters to discourage motor vehicle cut-through traffic. This is important to me because my girlfriend and I use Greenways and other neighborhood streets as our primary routes most of the time for commuting to work, to shopping, and to downtown. We frequently deal with some form of harassment / threats in the form of vehicular violence by users that feel entitled to the roadway while driving a motorized vehicle. This is becoming apparent that our effort to keep people biking away from traveling along the major streets is turning into a bike backlash, and it is getting extremely stressful / disappointing to bike around town. We need more physical tools to limit where large numbers of people can drive through neighborhoods, implementing diversion is critical to meeting this goal.

Prioritize SEPARATED bike and car infrastructure on Major Streets.

In addition to providing neighborhood greenways which provide a comfortable/calm/quiet route next to homes, we need to introduce separated bicycle infrastructure on our major streets so that people are able to observe that biking to the store is possible and attractive. If we shove all of the people biking onto the neighborhood roads, it won't be apparent to the person that drives for most of their trips that biking around town is possible. We want to get 25% of our trips made by bike, but we'll never get there if we don't provide quality infrastructure on our major streets.

Provide calmed shared space bike and car infrastructure on Major Streets.

For roadways that are too narrow to provide separated bike and car infrastructure, the roadway should be calmed as much as possible in order to make the commercial roadway into a 'commercial greenway' of sorts.

Repurposing Street Space

I fully support Policy 9.15, Repurposing street space. Encourage repurposing street segments that are not critical for transportation connectivity to other community purposes.

This helps east Portland make the best of the unpaved roads, and gives all neighborhoods more freedom for place-making and community building.

Vision Zero

As a fairly new resident who chose to live in Portland over any other city in the United States, because I perceived the city provided the best opportunity to travel sustainably and enjoyably, without needing to own a car, I am dismayed by the city government's inability to make meaningful changes to improve safety and comfort while focusing almost entirely on paving roads - some that need it, and many that don't. A strong endorsement of Vision Zero, by putting safety at the top of the transportation hierarchy, above walking, cycling, and transit, will open the doors to so much low hanging fruit, and anchor the hierarchy in a truly multi-modal way.

Reduce Parking Minimums

Over-investment in parking is un-economical and places a burden on future generations. The Comprehensive Plan should favor drawing down the amount of land dedicated to automobile storage. Reducing minimum parking requirements from new construction, and encouraging the conversion of existing parking lots and structures to more productive use should be a key tenet of our land use policy.

Parking is also an equity issue as the money developers spend on automobile storage

is directly passed on to the rent people pay. With a reduced requirement to include as much parking in new developments, we'll end up with more affordable density, a much better state of affairs than the current trend of pushing low-income folks to the suburbs so they end up driving (and parking) in Portland.

Route Redundancy

An important concept in any transportation network is Route Redundancy. It animates many of our discussions when it comes to automobile traffic planning, but is also needed in multimodal planning. By treating bicyclists as equal citizens on our commercial corridors, we'll also mitigate issues that can occur when Neighborhood Greenways are closed for repair or other reasons.

When automobile drivers encounter construction or delay, it's expected that they'll just use the "next best" route. For people walking, biking, and using transit, there frequently isn't a next best route. This is why we should prioritize redundant routes for all modes.

Allowing/Promoting Responsibly Built Alternative Dwelling Units and 'Skinny Homes'

Responsibly built ADUs and 'skinny homes' are our best shot at maintaining neighborhood character. Character comes not only from the style of the housing stock, but also from maintaining the affordability of dense central neighborhoods as places for the types of creative people who made Portland what it is today. ADUs and skinny homes should be encouraged anywhere single family housing is found. Affordability in the central city is an equity issue, so the faster we can create housing the better our chances of weathering our current boom and resulting in a city that's affordable for people who put quality of life before income.

However, in order to create such ADUs and skinny homes, we should do so responsibly. Deconstruction should be prioritized/encouraged/incentivized over demolition. Also, these smaller type of homes should not be required to provide driveways to garages, as the garage doors typically become the entire front of the first floor of the unit - which is definitely NOT within the character of the neighborhood, and furthermore ruin the safety and connectivity of the pedestrian network whenever a curb cut is introduced across a sidewalk. This is in line with reducing our parking minimums, and acknowledging that the people that will be living in these smaller type of units will likely not own as many cars as typical people living in larger single-family homes.

Street Classifications

I support the re-designation of our streets, especially bike routes, to be more in line with the 2030 bike plan. This will help direct development of those streets for better access and safety.

More Cross-Departmental Projects

I support the concept of actively combining water, transportation, parks, etc. money for efficiency in implementation and better design of our city's physical improvements.

Need for Quantifiable Metrics

We need quantifiable metrics to improve the community, safety, and traffic patterns in order to better discuss the issues with Neighborhood Associations, businesses, and the city. For example, bicycle level of stress should be a better metric for designing/improving neighborhood greenways rather than the daily level of car traffic along the roadway.

Inclusionary Zoning

Inclusionary Zoning is a critical tool for maintaining equity as Portland becomes more desirable. Currently there are state-level constraints on what we can do, but a long-range plan like the 2035 Comprehensive Plan should assume those state-level constraints will be resolved in its time frame. As new zones comparable to existing zones are developed, they should describe inclusionary zoning policies consistent with our values, so that when these tools become available to us, we are ready to use them.

Study I-5 Removal and Removing CRC from the Plan

It's commonly acknowledged in urban planning circles, that the 20th century's freeway boom was regretful mistake. Restoring public access and productive land use to areas of the city currently blighted by highways is an investment our future residents will thank us for. This is a big task, but by 2035 we'll wish we had started studying it earlier. There's no reason not to start now.

Similarly, we shouldn't be expanding the size of our freeways if we ever want to become more sustainable. Let's not repeat our past mistakes, and instead plan for smarter more sustainable bridges. The CRC in its latest form is a failed project and shouldn't be included on the future comp plan.

Thank You!

Thank you for taking the time to read through all of these items. I truly appreciate it.

Cheers,
-Kirk

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:39 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Completed

Grumpy, grumpy. It must be the end of the day. :)

Julie Ocken
City of Portland
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From: David Krogh, AICP [mailto:kroghplanning@gmail.com]
Sent: Friday, March 13, 2015 4:33 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

March 13, 2015

I hereby request the public comment period for the 2035 plan update process be extended at least 90 days. The current process has not been well presented to the general public and therefore citizen involvement per statewide planning goals is not adequately met. With changes to the Oregonian, it is no longer a newspaper of general distribution throughout the metro area and because of its lack of content and subscription changes, many people no longer receive this paper. Similarly, I have not received a neighborhood association newsletter in years, so I have no idea how involved my association is or what kind of outreach to my neighborhood has occurred. Finally, you have to be extremely savvy with negotiating computer websites to be able to figure out what is going on with the comprehensive plan update process. The Map On function doesn't work on my computer and the various parts of the plan are so separated that it is difficult to get a holistic picture of what is proposed. Dividing the city into neighborhood areas does not help when you seek a holistic picture. In summary, the web information is confusing and I would doubt that a majority of residents in Portland even are aware of this process. More time is needed, especially when a doubling of households is proposed by this update.

In case additional review time is not granted, here are specific comments/concerns that I have:

1. Housing is not accommodated fairly and affordably. Gentrification is raising rents overall. The homeless are not accommodated adequately (tent camps don't count as

housing). Single family houses are being squeezed out in favor of medium to high density apartment housing. This does not provide for housing choice. I think Portland is violating the Federal Fair Housing Act.

2. Transportation plans do not accommodate anticipated growth. Too many bicycle lanes are being added while arterial streets are being reduced in capacity. Earth to Portland Planning: the car is not going away. As higher efficiency and mileage vehicles are marketed (hybrids, electric, fuel cell technology) cars will continue to be the choice of transportation for a majority of residents. Reducing the capacity of SE Division Street is already causing gridlock during peak PM hours. Doing similar to SE Foster will be even worse as both Foster and Division are arterial streets which feed I-205.

3. Street maintenance is abysmal. The plan should set in law maintenance provisions to prevent the City Council from taking street maintenance funding and using it for none street maintenance purposes. Increasing street use because of increased population and housing but not accommodating maintenance means the infrastructure is inadequate. This violates the public facilities goal of the statewide planning goals. Solve infrastructure problems before designating increase facilities use.

4. Don't modify single family residential areas into quasi-commercial. Turning single family homes into bnb's is not appropriate for single family residential areas. What about traffic? What about rental houses becoming bnb's? Just because the City Council was suckered by Airbnb doesn't mean this is appropriate. Similarly, the city also allows day cares to operate in rental houses with the only requirement that someone have a drivers license with that address on it. This does not guarantee the house has a resident living in it. The city's definition of resident needs to be better defined and enforced.

5. Stop allowing apartment housing to have little or no parking adjacent to low density neighborhoods. A study last year showed 60% of tenants have cars. Guess where they park? On the neighborhood streets. Parking is going to be a major problem in coming years because the car is not going away, no matter how much whining there is about using multimodal forms of transportation. How about striping neighborhood streets for onstreet parking? That would help. Also, did you realize that every street side rain garden Portland installs takes away from 3-5 (or more) onstreet parking spaces?

6. Better coordination is needed in the implementation of the plan. Housing density shouldn't be increased if street capacities are not accommodated, for example.

7. Terminate the current antiquated commission form of government in favor of City Council which deals with policies and a city manager in charge of overall city operations. It would be more efficient and force better coordination of implementation of city services.

8. Stop gentrification and the promotion of certain areas of the city over others. Gentrification leads to higher housing prices and ghettos. Where's the balance? And why are areas like the Pearl not providing housing choice in terms of affordability? A recent article indicated approximately 20,000 people work in the Pearl and 10,000 live there. But virtually none of the people who work there can afford to live there. That's a travesty.

9. More citizen involvement is needed. More neighborhood involvement is needed. Stop using racist terms such as "people of color." Stop talking about improving schools when Portland Planning has nothing to do with the operations of PPS.

10. How about more neighborhood parks? My neighborhood (Richmond) does not have a single park within it. How can you accommodate more growth in the city when you can't provide new

parks or even maintain existing parks without special tax levies?

In closing, this process needs more work and more time.

Regards,

David Krogh, AICP
1720 SE 44th Ave.
Portland, OR 97215

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:26 PM
To: Kovacs, Madeline
Subject: FW: PSC Comprehensive Plan Testimony

Follow Up Flag: Follow up

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Julie Ocken
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From: Marilyn Drichas [mailto:mdrichas@gmail.com]
Sent: Friday, March 13, 2015 6:50 PM
To: Planning and Sustainability Commission
Subject: PSC Comprehensive Plan Testimony

Mrs. Marilyn W. Drichas
P. O. Box 15220
Portland, Or 97293

For consideration for the City of Portland Comprehensive Plan 2035:

Please include in your long term planning a major increase in low income housing, including section 8 and affordable housing for families, which has been on the decline in inner Southeast Portland since the late 1990's.

Its decline has resulted in gentrification, high priced housing, forced relocation for many, and a break up of communities of mixed socioeconomic levels and cultural diversity, which we need to be a vibrant urban society.

Thank you for your consideration.

Sincerely,

Marilyn W. Drichas

From: Planning and Sustainability Commission
Sent: Sunday, March 15, 2015 9:04 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
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From: PDX Comp Plan
Sent: Saturday, March 14, 2015 10:40 PM
To: Planning and Sustainability Commission
Subject: FW: Comprehensive Plan

This one was originally received on Thursday, address added on Saturday.

Sara Wright
p: (503) 823-7728

From: Will White [mailto:wmwhite0502@gmail.com]
Sent: Saturday, March 14, 2015 9:53 AM
To: PDX Comp Plan
Subject: Re: Comprehensive Plan

Yes, I would like to have my comments on the Comprehensive Plan entered in the official record.

As requested, I am re-submitting my comments, together with my current mailing address. Thanks for letting me know you need that information.

Please confirm that you have received this message, so I'll be sure you now have everything that you need.

Thanks,
Will White

* Thank you for working to update the Comprehensive Plan. I'm pleased that you will be including targets for affordable housing, as I consider this an essential component of any community planning process.

I am submitting my comments as someone who has spent most of my career working on affordable housing: ten years as executive director of the Housing Development Center, five years as director of the Bureau of Housing and Community Development, and five years as housing advisor to Senator Jeff Merkley.

First, I would urge you to be more explicit in setting the city housing goals. As you know, housing policy that is related to income is typically established based on the different income levels - expressed as a percentage of the median family income (MFI) for a given geographic area. The characteristics of households at 80% MFI are very different from those for households at 30% MFI, and the housing cost and available tools will vary greatly based on these income levels.

I therefore recommend that the section on housing go beyond setting a single target for people at or below 80% MFI. Portland's plan should include explicit numeric targets for development and preservation of housing affordable to extremely low income (30% MFI and below), very low-income (50% and below), and low income (80% MFI and below). These more granular goals will be extremely important as strategies are devised to create balanced communities.

Secondly, those of us who have spent decades working on housing consider affordable housing to be community infrastructure, just like parks and roads. That's why it is important that the housing be affordable permanently, or at least for sixty years - as currently required by City policy. The need for affordable housing will not go away, so we must plan for it and preserve it for the long term. I request that the City develop a companion to the 2014 List of Significant Projects (July 2014), that describes housing strategies that align with infrastructure investments that could lead to gentrification and displacement, in an effort to ensure we have done all that is possible to avoid displacement of existing populations when public investment elevates the real estate values of a given area.

Thanks for considering these comments, and don't hesitate to contact me if you'd like to have any further conversation of these matters.

- Will White
P. O. Box 657, Mosier, OR 97040
503 758-6986

On Thu, Mar 12, 2015 at 11:43 PM, PDX Comp Plan <pdxcompplan@portlandoregon.gov> wrote:

Thank you for submitting your comments. If you would like them to be entered into the official testimony record, please include your address in your comments, and resend your email to psc@portlandoregon.gov with the subject line "Comprehensive Plan Testimony"

Please give me a call if you need more information or clarification.

Thank you,

Sara Wright
p: (503) 823-7728

From: Will White [mailto:wmwhite0502@gmail.com]

Sent: Thursday, March 12, 2015 7:14 PM

To: PDX Comp Plan

Subject: Comprehensive Plan

* Thank you for working to update the Comprehensive Plan. I'm pleased that you will be including targets for affordable housing, as I consider this an essential component of any community planning process.

I am submitting my comments as someone who has spent most of my career working on affordable housing: ten years as executive director of the Housing Development Center, five years as director of the Bureau of Housing and Community Development, and five years as housing advisor to Senator Jeff Merkley.

First, I would urge you to be more explicit in setting the city housing goals. As you know, housing policy that is related to income is typically established based on the different income levels - expressed as a percentage of the median family income (MFI) for a given geographic area. The characteristics of households at 80% MFI are very different from those for households at 30% MFI, and the housing cost and available tools will vary greatly based on these income levels.

I therefore recommend that the section on housing go beyond setting a single target for people at or below 80% MFI. Portland's plan should include explicit numeric targets for development and preservation of housing affordable to extremely low income (30% MFI and below), very low-income (50% and below), and low income (80% MFI and below). These more granular goals will be extremely important as strategies are devised to create balanced communities.

Secondly, those of us who have spent decades working on housing consider affordable housing to be community infrastructure, just like parks and roads. That's why it is important that the housing be affordable permanently, or at least for sixty years - as currently required by City policy. The need for affordable housing will not go away, so we must plan for it and preserve it for the long term. I request that the City develop a companion to the 2014 List of Significant Projects (July 2014), that describes housing strategies that align with infrastructure investments that could lead to gentrification and displacement, in an effort to ensure we have done all that is possible to avoid displacement of existing populations when public investment elevates the real estate values of a given area.

Thanks for considering these comments, and don't hesitate to contact me if you'd like to have any further conversation of these matters.

- Will White
503 758-6986

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:04 AM
To: Kovacs, Madeline
Subject: FW: Project #90026 Capitol Hwy project

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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-----Original Message-----

From: debbietim.or@netzero.net [mailto:debbietim.or@netzero.net]
Sent: Thursday, March 12, 2015 6:46 PM
To: Planning and Sustainability Commission; tsp@portlandoregon.gov:
Subject: Project #90026 Capitol Hwy project

Hello,

I am writing to you in regards to project #90026, Capitol Hwy Corridor Improvements. I have lived on Capitol Hwy for 30 years and I am on the Capitol Hwy. Ad Hoc Committee.

I am in support of sidewalks and a bike path on Capitol Hwy, but not on both sides of the street. I suggest sidewalks on the downhill side of Capitol, with no bike path on that side. Have the bike path only on the uphill side. I heard that only having a bike path on the uphill side would be doable since bikers go faster down hill and don't have to have a path. This design would also cost less.

I have been to several meeting and looked at plans that show sidewalks and bike paths on both side of the street. My concern is that this design does not make room for any street parking for at least a mile. Some What about family and friends? Several of us, including myself, would need to incorporate parking onto our property. This would be a burden for me because I am a senior on a fixed income.

How do I stay informed about future meetings and documents related to the project? I would also like to see the results of this survey. My e-mail is debbietim.or@netzero.net. Phone is 503-260-3760.

Thank you,
Debra Timmins

9433 SW Capitol Hwy.
Portland, OR 97219
Project #90026
Capitol Hwy Corridor Improvements

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:08 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up
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From: Sergei and Kristen [mailto:sergeikristen@q.com]
Sent: Thursday, March 12, 2015 8:22 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

Please do NOT change the zoning to allow multi-dwelling. Do not approve a 84 unit to appear at SE 50th and Mill Street. As a homeowner that sits on SE 51st Avenue, on a R5 lot and street(!), directly behind the SK Hoff development, it disheartens me to know a 45 foot tall structure can be built. This proposal is out of scale with the neighborhood. Where are my rights? I stand to lose property value, view, safety, privacy, sunlight and gardening!! As a Portlander, I do not want my city to turn into a nondescript suburban Beaverton (This is where David Sackhoff lives and has his business) or a crowded, cemented over San Francisco. I am in favor of two story development as this would fit into the neighborhood.. The area between on SE 50th between Hawthorne and Division is comprised of 1 and 2 story buildings and mostly single dwelling homes zoned R5 and R1. Please do not allow zoning changes or approval of projects until traffic and neighborhood impact is studied. Keep Portland liveable! This is why we chose to live here. This is why we invested our money and talents to Portland – exactly because it was livable. This Sackhoff development takes away our investment and our livability.

Sincerely,
Sergei Schmidt
SergeiKristen@q.com
1925 SE 51st Avenue

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:13 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
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From: Valerie King [mailto:v_j_king@yahoo.com]
Sent: Thursday, March 12, 2015 10:11 PM
To: Planning and Sustainability Commission
Cc: Valerie King; Paul S. Kennedy
Subject: Comprehensive Plan Testimony

This set of comments address Proposed Change #644 and relate to 2855 SW Patton Road, 97201, historically known as "Strohecker's Market."

The proposed changes would allow the property to move from "Neighborhood Commercial" (with a 1984 Ordinance No. 155609 allowing Strohecker's to expand to its current size only) to "Mixed Use Dispersed."

I very much value having a local grocery store and appreciate that Strohecker's has incorporated such amenities as a contract post office, liquor store, dry cleaning service and pharmacy into their business space. I believe that having the property do some changing with the times is appropriate and would certainly find a small cafe or deli to be a good addition to the neighborhood.

However, I would not welcome a multi-unit dwelling on the site. Parking is already tight and traffic too heavy to welcome either more dense housing or businesses with substantial traffic into that space. The key factor for me is that I wouldn't value more

housing across the street and I would hate to lose the types of businesses at Strohecker's that I use several times per week.

Sincerely yours,
Valerie King

Valerie J. King
2828 SW Patton Rd.
Portland, OR 97201
v_j_king@yahoo.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:25 AM
To: Kovacs, Madeline
Subject: FW: Comment on Proposed change #62 and ALL

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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From: ken Diener [mailto:kjdarch.com]
Sent: Friday, March 13, 2015 9:01 AM
To: Planning and Sustainability Commission
Subject: Comment on Proposed change #62 and ALL

This is a comment on Proposed change #62 and all the proposed Belmont Morrison changes between 12th and 30th

Proposed Change #
62

Pasted from <<http://www.portlandmaps.com/bps/cpmapp2/>>

This sweeping change allows the destruction of an integral mixed historic and residential quality to the Buckman neighborhood corridor. In the mid 90s the BLAZ study spent MONTHS of public outreach NOTICE and many meetings between the Sunnyside /Buckman and REACH organizations for THIS VERY CORRIDOR and with great PROPERTY by property analysis of every property non conforming with the existing planner broadbrush ivory tower zone designation. THIS SWEEPING corridor change DESTROYS countless existing historic residential structures and TOTALLY impacts the hundreds of residential properties across the streets to the south of Belmont and North of Morrison and with the Inexcusable lack of required parking allowed for the new proposed designations this change WOULD SWAMP the adjoining neighborhoods with their overflow UN

Accounted for parking. DO Not change this corridor ZONE without
LOT by LOT neighborhood outreach.

Ken Diener
KJD Architecture PC
536 SE 17th Ave
Portland Or 97214

p.503-231-2884
f. 503-231-9521

Kend@kjdarch.com
www.kjdarch.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 10:11 AM
To: Kovacs, Madeline
Subject: FW: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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From: astabb [mailto:astabb@aol.com]
Sent: Friday, March 13, 2015 10:07 AM
To: Planning and Sustainability Commission
Subject: Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for zoning meant a minimum 5000 square ft lot. Much of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and gardens, Concordia is

particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in these regions is 25 x 100, and they are now all available to develop within the current code. To allow these lots to be developed is a slap in the wallet to everyone who has purchased a home in an R5 neighborhood. First, the State does not recognize them as lots. They are only lots if they meet the zoning requirements for the standard of size. In the case of R5 you would need two 25 x100 lots to meet our zoning! To change the code to allow R2.5 development is to change our zoning! You have up zoned us to R2.5. Everyone in this neighborhood is suffering continued devaluation of our historic place from this development practice.

In response to this City having tacitly up zoned the finest portions of our neighborhood, the Concordia Neighborhood Residents ask that these historically platted and historically developed portions of our neighborhood be afforded the protection of R7 zoning. These subdivisions, like "Irvington Park" surrounding Concordia University, are the historic core of our community. Many homes were established with 10,000 sq/ft lots, many more with 7,500. Of course there are also 5000 square foot lots, but until the 2003 policy package 2A, there was never a 2500 square foot lot. As a neighborhood region historically developed with a character of larger lots interspersed in the fabric, and as that is the property of our neighborhood which we intend to defend, this methodology is akin to any other embattled neighborhood being granted similar protections by down zoning.

Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction practices and significant early architecture. The current designation of R2.5 leaves these neighborhood homes as targets of demolitions for the two building lots beneath. The character of this portion of our neighborhood is that of an R5 neighborhood as that was the style of the day. We value this region as it is historically built today. There is no compelling reason for this area to be zoned R2.5 as it does not abut a transit corridor. As an R5 neighborhood, all empty lots may still be developed with infill housing. We want to afford protection to the existing homes in this historic "Street Car" neighborhood region. This portion of the neighborhood will be protected to our satisfaction with an R5 designation.

Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,

Rosemary Alcaraz
2606 NE Ainsworth st
Portland, OR 97211

Sent via the Samsung GALAXY S®4, an AT&T 4G LTE smartphone

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 10:45 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up

Flag Status: Flagged

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

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From: Robert Rounseville [mailto:realproperties@gmail.com]
Sent: Friday, March 13, 2015 10:32 AM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

Dear Commissioners,

I wanted to formally comment on the zoning for my property at 3103 SE 52nd. As everyone is well aware of, Portland is growing at a rapid rate and it is becoming increasingly difficult to find housing to rent or purchase closer in. The rents are incredibly high and there is much competition to even get into a home. I read that in the next couple of decades, there is expected to be a huge population increase in Portland. How will we accommodate that influx?

The Comprehensive Plan states that it wants to focus growth on centers and corridors. 52nd Ave between Hawthorne and the Woodstock neighborhood to the South is a major corridor.

The SE 52nd Ave corridor between Woodward and Powell is zoned R2.5 on the East side of the street. The other side (West) of the street has a zoning of R5 with a Comp plan designation of R2.5. There are also two houses diagonally to the West of me that have a zoning of R2.5. This is a two home R2.5 zoned island in the middle of a R5 zone making for an incongruous plan.

There are already major developments in the SE 50th and SE 52nd areas with construction of commercial buildings. Also, with the soon to be started Foster Transportation and Streetscape Plan, the two corridors will become even busier as more people commute thru the area to visit other neighborhoods.

I would like to see the zoning on the West side of SE 52nd changed from R5 to R2.5 to reflect the Comp Plan, match the opposite (East) side of the street, and to enable and encourage sustainable housing growth in the neighborhood.

Sincerely,

Robert A. Rounseville
2220 SE Spruce Ave
Portland OR 97214

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 10:45 AM
To: Kovacs, Madeline
Subject: FW: Please NO MORE SKINNY LOTS AND OVER ZEALOUS Development in Portland...

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
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From: Suzinn Weiss [mailto:suzinn@comcast.net]
Sent: Friday, March 13, 2015 10:41 AM
To: Planning and Sustainability Commission
Subject: Please NO MORE SKINNY LOTS AND OVER ZEALOUS Development in Portland...

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

Re: The continuing destruction of our North East Portland Neighborhood
thanks to City policy regarding development of substandard lots

Dear Commissioners,

I am writing out of a dire concern for my neighborhood which I have lived in since 1992. The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for zoning meant a minimum 5000 square ft lot. Much of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in these regions is 25 x 100, and they are now all available to develop within the current code. To allow these lots to be developed is a slap in the wallet to everyone who has purchased a home in an R5 neighborhood. First, the State does not recognize them as lots. They are only lots if they meet the zoning requirements for the standard of size. In the case of R5 you would need two 25 x100 lots to meet our zoning! To change the code to allow R2.5 development is to change our zoning! You have up zoned us to R2.5. Everyone in this neighborhood is suffering continued devaluation of our historic place from this development practice.

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Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction practices and significant early architecture. The current designation of R2.5 leaves these neighborhood homes as targets of demolitions for the to building lots beneath. The character of this portion of our neighborhood is

that of an R5 neighborhood as that was the style of the day. We value this region as it is historically built today. There is no compelling reason for this area to be zoned R2.5 as it does not abut a transit corridor. As an R5 neighborhood, all empty lots may still be developed with infill housing. We want to afford protection to the existing homes in this historic "Street Car" neighborhood region. This portion of the neighborhood will be protected to our satisfaction with an R5 designation.

Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,
Suzinn Weiss
5603 NE 31 AVE
PORTLAND, OR 97211
bepeace&peacewillbe
bepeace&peacewillbe

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 11:11 AM
To: Kovacs, Madeline
Subject: FW: Comp Plan map

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
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From: L Robinson [mailto:lrobinspdx@comcast.net]
Sent: Friday, March 13, 2015 11:09 AM
To: Planning and Sustainability Commission
Subject: Comp Plan map

I've been looking at the Comp Plan Map App this morning and noticed some zoning changes that should be made. Since there is no proposed change, I wasn't able to add a comment to the map -- and it was suggested I send the comments to this email address.

According to PortlandMaps, that land where the new Gateway Park and Plaza is being built soon is currently zoned CXd -- and the Comp Plan doesn't propose any change in that zoning [NE Halsey between 104th & 106th on south side of Halsey]. I thought it was going to be changed to an Open Space zoning. Can you check on that. [Since there is NO proposed change, I was not able to add a comment to the map!]

Also, the property purchased by PP&R last year for a new park (south of Division, and east of 148th) should be changed to Open Space, instead of the R3 designation currently on the property. There are two parcels, I think, but both appear to have the same street address on Portland Maps -- 15004 SE Division St. Again, because no change was proposed, I can't add a comment on the map.

I'm also concerned that the transportation map shows NO projects on the I-205 multi-use path, which has several AWFUL sections as it travels through the Gateway area. One of the worst, is where it crosses NE Glisan, but the section between Stark and

Washington is also difficult to navigate (narrow sidewalk with utility poles in the middle of it!)

-- Linda

Linda Robinson
1115 NE 135th Ave
Portland, OR 97230

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 11:12 AM
To: Kovacs, Madeline
Subject: FW: Comments submitted 3/13/15 on SE Mill St & SE 50th

Follow Up Flag: Follow up

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From: Sergei and Kristen [mailto:sergeikristen@q.com]
Sent: Friday, March 13, 2015 11:10 AM
To: Planning and Sustainability Commission
Subject: Comments submitted 3/13/15 on SE Mill St & SE 50th

RE: Comprehenisve Plan - SE 50th & SE Mill Street

Please do NOT change the zoning to allow multi-dwelling. And, do not approve a 84 unit to appear at SE 50th and Mill Street. As a homeowner that sits on SE 51st Avenue, on a R5 lot and street(!), directly behind the SK Hoff development, it disheartens me to know a 45 foot tall structure can be built. This proposal is out of scale with the neighborhood. Where are my rights? I stand to lose property value, view, safety, privacy, sunlight and gardening!! As a Portlander, I do not want my city to turn into a nondescript suburban Beaverton (This is where David Sackhoff lives and has his business) or a crowded, cemented over San Francisco. I am in favor of two story development as this would fit into the neighborhood.. The area between on SE 50th between Hawthorne and Division is comprised of 1 and 2 story buildings and mostly single dwelling homes zoned R5 and R1. Please do not allow zoning changings or approval of projects until traffic and neighborhood impact is studied. Keep Portland liveable! This is why we chose to live here. This is why we invested our money and talents to Portland – exactly because it was livable. This Sackhoff development takes away our investment and our livability.

Sergei Schmidt
1925 SE 51st Ave

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 11:34 AM
To: Kovacs, Madeline
Subject: FW: 6141SW Canyon Court Zone Change(R326896)

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
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From: John Braestrup [mailto:john@amfibre.com]
Sent: Friday, March 13, 2015 11:27 AM
To: Planning and Sustainability Commission; joan.fredericksen@portlandoregon.gov
Subject: 6141SW Canyon Court Zone Change(R326896)

Dear Ms. Fredericksen,

We live at 5724 SW Barnes and oppose this zoning change as the City is attempting to change the character of our neighborhood.

John & Justie Braestrup

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:46 PM
To: Kovacs, Madeline
Subject: FW: Transportation System Plan Comments

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
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From: Warwick, Mike [mailto:mike.warwick@pnnl.gov]
Sent: Friday, March 13, 2015 12:55 PM
To: Planning and Sustainability Commission
Cc: Stark, Nan
Subject: Transportation System Plan Comments

Excluding the transportation chapter from the printed version of the Facilities Plan made review of all “systems” more awkward than it should have been. Just saying.

My comments on the TSP are limited and focused on the Eliot neighborhood area.

1. Shame on you for dropping MLK streetcar! I understand the reason for this was a belief that development along MLK will occur without it. That may be true and may be a valid criteria in the wealthy areas where streetcar routes were identified in the Streetcar Plan and have been routed thus far. But Inner NE is NOT a wealthy area. Streetcar along MLK has been viewed as a form of “payback” for the ethnic cleansing the City and PDC deployed against this community to make way for the Rose Quarter, Emanuel, the PPS building, Water Bureau parking lots, Albina Yards and I-5. It is wholly inappropriate to apply strict economic criteria to this decision. I strongly recommend streetcar on MLK be returned to “active consideration” from “study.”
2. NE 7th/9th Greenway I strongly support this project (#116340 on the list). Eliot has complained about use of 7th as a bypass route for commuters who should be on MLK or 15th, which are properly classified for that use. 7th is NOT classified as a commuter route; however, recent changes to Williams have significantly increased that use. It is however, an excellent north south bike route for neighborhoods east of MLK. But, before it can be developed as a bikeway, measures MUST be taken to divert commuter traffic/reduce traffic volume and speed. The steps necessary to accomplish that are similar to those required for a bikeway, specifically more

and more effective traffic calming measures. The speed humps that were added for the bikeway along Morris and on other bikeways seem to be far more effective than the current traffic “ovals” that were modified to suit the fire department to the point where they still allow traffic speeds up to 50 MPH (which were measured on the street AFTER they were installed). Some drivers still attempt to exceed that speed, but usually end up in the circle rather than going around it. Regardless, those accidents, although infrequent, are ample evidence excessive speed needs to be addressed. In addition, most of the intersections with 7th in Eliot are offset. This presents a clear and present danger currently along the Tillamook bikeway. I strongly recommend STOP signs be installed on both sides of this intersection to provide crossing bikes with adequate protection in the intersection. Finally, presuming bikeway improvements will eliminate parking on one side of the roadway, I note that parking isn’t allowed on the EAST side along Irving Park currently. I would recommend that pattern continue through Eliot so as to provide an improved bikeway on that side of the street. However, removing parking will make the street look like it is a thoroughfare for commuters, so it must be accompanied by measures that defeat that, such as a separated bikeway extending between Broadway and, say Tillamook.

3. ODOT I-5 Broadway Interchange Eliot has worked closely with PBOT and ODOT on the current proposal to “fix” the 5-way intersection where the southbound I-5 off-ramp meets Broadway. I support these changes for the safety of bike riders and pedestrians. This was one of many recommendations/plan to come out of the NE Quadrant Plan. Another significant one was a proposal to put “lids” over sections of I-5 IF it is widened. It must be noted that all of the adjacent neighborhoods, including the Blazers, only agreed to support widening the freeway with the “lids” are part of the project. Without the lids, that project will not have neighborhood support. In fact, it will have active opposition. The TSP is silent on the necessary investment to implement this requirement. That must be rectified, even if it is for the TSP to acknowledge while it may be primarily an ODOT responsibility PBOT and City leaders will insure it IS part of the project.

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:52 PM
To: Kovacs, Madeline
Subject: FW: 2035 Comprehensive Plan

Follow Up Flag: Follow up
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Julie Ocken
City of Portland
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From: Sherry Bozek [mailto:sherrytbozek@gmail.com]
Sent: Friday, March 13, 2015 1:49 PM
To: Planning and Sustainability Commission
Subject: RE: 2035 Comprehensive Plan

Sherry Bozek 13718 NE Beech Ct. Portland, OR 97230
On Mar 13, 2015 1:43 PM, "Planning and Sustainability Commission"
<psc@portlandoregon.gov> wrote:
Hello Sherry,

Thank you for your comments to the Planning and Sustainability Commission. So that I may include this as testimony and forward it to the PSC members, can you please email me your mailing address? That is required for all testimony.

Thanks,
julie

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
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From: Sherry Bozek [mailto:sherrytbozek@gmail.com]
Sent: Friday, March 13, 2015 12:32 PM
To: Planning and Sustainability Commission
Subject: 2035 Comprehensive Plan

I live in Aragay Terrace and oppose the mixed employment designation for NE 122nd Avenue and Shaver Street for the following reasons:

Our neighborhood already has multiple vacant buildings. There are several empty office spaces on Sandy Blvd and NE 141st. There is also a huge K-Mart parking lot where new offices could be put, not to mention abandoned buildings on 122nd Avenue, south and north of the area you are targeting.

Newly remodeled schools surround the area in question, along with parks, make single family dwellings a better fit for our neighborhood.

Increased traffic new business will bring is a danger to children and young adults as they navigate our streets on the way to school.

Please listen to the voices of concerned citizens when we say - This is a bad idea!

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:53 PM
To: Kovacs, Madeline
Subject: FW: ATTN: Leslie Lum; Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
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From: BPS Mailbox
Sent: Friday, March 13, 2015 1:40 PM
To: Planning and Sustainability Commission
Cc: Lum, Leslie
Subject: FW: ATTN: Leslie Lum; Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

NaTasha Gaskin
City of Portland
Bureau of Planning and Sustainability
Ph: 503-823- 7802
Follow us on Twitter: @PortlandBPS
Subscribe to the BPS Enews
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From: justin callaway [mailto:justincallaway@gmail.com]
Sent: Friday, March 13, 2015 11:23 AM
To: BPS Mailbox
Subject: ATTN: Leslie Lum; Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

Justin Callaway
8850 NE Levee Rd.

Portland, OR 97211

ATTN: Leslie Lum,

My name is Justin Callaway, I own the property at 8850 NE Levee Rd and I am the steward for the conservation easement held on my step father's parcel at R171714 by the Wetlands Conservancy.

I support the attached proposal for an R-20 zoning change request of my residential farming property by removing the Industrial Sanctuary designation. When this was proposed in the past I felt it made no sense for both my property and my

dad's as the noise code has never been enforced with nearby trucking operations that have had an incredibly negative impact on my wellness and mental health, especially as a result of my experience with code enforcement staff that refuses

to enforce in a timely, comprehensive or meaningful way when engaged in good faith only to experience something quite

the contrary. When trucking operations are allowed to honk semi's or crash triple trailers in the middle of the night such that is impossible to expect an uninterrupted night's rest and code enforcement staff is derelict in duty, there is as reason why we did not develop the vacant lot. Of course, the irony is in the Nov. Comp Plan testimony, my kids and I waited four

and half hours to testify and we got to hear Paul Van Orden defend his half acre on Fremont and the assault on his equity

with a zone change from r2 to 2.5 and the millions lost for his kids inheritance and his retirement, yet he has never defended my protections afforded to me through the noise code, weakened as they are with the Noise Ghetto +5db Noise

overlay. I wish I could have the long view Mr. Van Orden can have but unfortunately that's kind of hard when he won't enforce your right to an uninterrupted night's sleep with proven out of compliance trucking operations. But I digress.

I do believe that this R-20 Change Request offers the possibility for a group of landowners to do what the City of Portland

refuses to do: find a real balance between residential livability, healthy natural habitat and code compliant industrial operations. Perhaps with this zone change there will be a real effort to find fairness and equity for East Columbia. First and

foremost, you need to get it right when these industrial properties were permitted under the guise of being compatible with

nearby residential housing stock and there has never been any attempt to address the original industrial developments and

the negative impact, the unbearable negative impact, that these out of compliance operations have had and code enforcement staff has permitted. Please keep in mind when I first engaged the noise code enforcement staff reluctantly, I was told I had to complain and subsequently I received a retaliatory complaint on the donkey that came with our property

as not being permitted. Immediately addressed. Asked about protections against those with more resources like multi-million dollar interstate trucking operations-- NONE. Please explain how a system that is supposed to be your check and balance for noise then becomes a form of further victimization? Of course, I've never complained about Oak Harbour's invasive weed army that invades my property line. Or the rampant light pollution with new developments more than a half

a mile away such that not only can you not see stars and better yet this light pollution blasts the whole tree canopy along the Peninsula Canal that has conservation and environmental overlays. Dare I risk retaliatory action by complaining when

your BDS staff permits such new developments or environmental staff doesn't try and ensure that when your property is to

lose development equity in the name of natural habitat that is the best habitat possible. The City that imposed these could

really care less about what kind of habitat is created by nearby industrial noise, light and air pollution. Diesel for breakfast

is not an uncommon experience in drainage district surrounded by levees where low pressure systems and air pollution stagnate in our shared residential, environmental and industrial low lying basin. But who really cares about the health of families near industrial properties when you live in East Columbia, where the bus is 1.5 miles away and an uncovered stop

at that. When there is no safe route for schools, and when I mentioned to you Leslie Lum about the 40 Mile Loop, you thought this would be a good homework project for East Columbia residents. I am confused because this is a past planning

promise that included the Safe Route that has never been fulfilled, why would this not be an immediate and primary concern handled by planning staff? I could be wrong, but I thought it was a past Comp Plan effort to complete East Columbia, yet there is nothing on that level in this Comp Plan like the gifts to West Hayden Island when not even annexed. Why is the Comp Plan not addressing the horrific realities of industrial trucking yards near residential properties

which clearly have a negative impact, before doubling down on Industrial Sanctuary changes from IG2 on our properties?

When I hear Comprehensive Plan, I think that genuine planners are trying to assess the challenges to each neighborhood and ensure that thought planning brings the necessary solutions, but my experience couldn't be further from the case.

Barry

Manning at the first open house, pointing to a map of East Columbia as all industrial, and when prompted, "What about the neighborhood that is there?" He said, "They can stay if they want." Yes, the same Barry Manning when prompted about lack of industrial access just assumes all residential farming properties will give up and sell together to help make his map a reality. There are a lot of assumptions in that but he is right that many of have homes that are unlivable or barely

livable. Ah, yes, the same Barry Manning who had the audacity to say that some retired white people who championed that they do not want bus service closer in the neighborhood was a valid point of view as a City of Portland planner, when

my neighbor's kids walk a mile and a half on a road with no sidewalk and semi trailers and drainage ditch below because

Tri-Met is there school bus. Is that a valid Planning Bureau position? I think not. But he's in good company, because Jay Saugnet, in that condescending Portland Planning way, responded to my concern about the lack of sidewalks when dealing

with the trainwreck in participatory democracy that was Airport Futures, by saying he lives in SW Portland and looooooves

his lack of sidewalks. At least Mindy Brooks was candid enough in saying that Portland is "just holding it's breath to see what it has to do here." Don't you think Airport Futures or the Comprehensive Plan would have been a more honest process if you just say it outright that you want to kill this neighborhood with no basic services and trash basic rights with

relentless insistence on more industrial impacts in a way that comprehensively undermines residential livability and true biodiversity.

So, I have to ask, when I corresponded with Leslie Lum after finding out when I went to the Nov. Comp. Plan testimony that when I saw maps that showed no zone change, I was jubilant because for the first time in any of the many, many planning processes did my feedback actually get implemented. I sung the praise of the wonderful visionary people seeking

to provide redress to years of intentionally engineered planning processes, like Airport Futures that stopped at 13th, to divide a neighborhood but also to conveniently make sure no pesky environmental overlays existed for the ensuing Comp

Plan industrial property parade past 13th later. Commissioner Fritz had no desire to help heal the neighborhood in the aftermath. So, when Leslie told me that I was mistaken the Industrial Sanctuary was to stay in place, I was dumbfounded

and confused. She stated that nothing has changed with the old IG2, everything is the same. Huh? What about all of the additional environmental overlays and wetland delineations on residential farming properties, especially those flooded

by

Oak Harbour's wetland per MCDD staff, yet Oak Harbour sued and had removed. Nothing has changed but a full scale assault on the development equity of those properties and to find any industrial property developer that would want to help

fulfill Barry Manning's vision for East Columbia of all industrial. Or, when asking Leslie Lum about the limited development equity on my property with environmental overlays and industrial inventory potential, she said that most likely I would IG1. Wait but the last Comp Plan put in IG2 and if they wanted IG1, would not that be what would be reflected? Nothing has changed? I am confused. Industrial Sanctuary seems like sleazy effort to make it not a change but

creating these as subcategories to unleash more industrial with no concern about the impact or to address past impacts, so

this is not a change?

Most importantly, it took two emails and finally Leslie Lum did share with me the answer to the following question: i asked in the last email, please clarify will the industrial acreage you are claiming actually account for past planning impacts with environmental, conservation and most recently wetland overlays (resisted through public testimony but only the preferred industrial property class, like oak harbour that sue and do not engage in good faith in a non-litigious way with a public planning process, no do not have them) that have rendered these areas as essentially non-developable (as you agreed as much in our conversation) and thus one would think should be subtracted from any such actual total submitted in the end toward planning goals as to not mislead the public if you are being genuine having already diminished development equity of these properties in the name of degraded natural habitat thanks to adjacent industrial activities and having asking for public input and having already received it from many of these proposed IS property owners requesting to not make this change and imposing it anyway? in short: are you claiming total acreage vs developable acreage on these IS proposed properties? I believe we are counting all acreage that is zoned or has a comp plan designation of Industrial.

So, how is it that property that is known to not have full development equity claimed in entirety toward viable, industrial inventory acreage? A good question if I am a business seeking to locate here and looking to buy all of these residential farming properties and then realizing that City of Portland is misrepresenting the full industrial acreage potential of these

properties. Or, is the taxpayers in Portland who are so ecstatic to see so much viable industrial inventory in East Columbia? Or is it Metro/State of Oregon planning goals being reported that when "ground-truthed" (A Paul Van Orden phrase, quite lovely since he seems to change facts depending on the audience and denies conversations that took place as

reason to deny code enforcement protection) turns out to be not actually developable industrial property at all.

Has anyone ever stopped to think that there are actually people, families and property owners that are personally affected

by these planning processes, and that when they engage and all input or concerns are ignored? Or when they seek to find solutions to past nightmares created by 24-hour trucking yards when noise code enforcement refuses to their job and go to

BDS to review original documents, Michelle Seward makes no attempt to address the actual operations and the impact but

is more interested in the cyclocross races at the landfill that the Fazio's got in trouble for claiming a farm credit, which I believe is the same landowner responsible for why we don't have a Safe Route or 40 mile loop (could be wrong) for East Columbia but I guess that's homework for me to find out, but she makes sure to tell me because of all of the environmental

overlays I will have to go through three different agencies if I ever wanted to build a dock on my waterfront property. I am

just glad that all East Columbia residents with any environmental, conservation or wetland delineations actually have to pay fees to a drainage district that no other Portlanders not in a drainage district don't have to pay when their properties

are conserved for the public good. In essence, we doubly subsidize habitat for the public good and we are rewarded with light, noise and air pollution and a colossal destruction of equity for degraded habitat.

And this is why I support this proposal for R-20. Because I know how hopeless it is to decline into mental illness when engaging with public employees who have no sense of compassion or reality of the impact, like trucking yards, when you create participatory democracy processes or code enforcement for your property or individual rights or the complete lack of oversight of staff and bureaus that are not a good faith partner but instead treats public service as a political calculation ignoring the human impact on people and the families. It's brutal and shameful that such an amazing neighborhood like East Columbia that should be a jewel in natural conservation and residential livability, is really nothing more than a degraded habitat with compromised residential rights with a whole lot more to come based on the Comprehensive Plan.

So, I support this initiative because when you claim something exists, whether natural habitat, residential housing stock or industrial inventory, you should really, really mean it. And if you haven't and the result is mess that a real Comprehensive Plan would seek to address, then maybe this proposal allows you a chance to see that there is a human component and a lot of work to do to show how to find a balance of residential, nature and industry. And the first place to start is removing the absurd Orwellian "new math" Industrial Sanctuary designation onslaught and then by seeking to find out how to give equal priority to true biodiversity for habitat and restore residential livability of homes like mine that predate the trucking yards by FOUR DECADES, so please don't go down the condescending multi-bureau "established industrial" excuse for not fixing problems that you own. The corollary is we degraded habitat so badly and so adversely impacted livability, we just need to become the Barry Manning industrial prophecy. No. Please own your role and become a good faith partner for once. So, while it is unclear if I would actually benefit until the City of Portland addresses the impact of 24-trucking operations, I do believe that collectively this R-20 plan allows for enough good meaning citizens to have the hope that for the first time, the City of Portland cares and is ready to begin a conversation that is circumspect and genuine, not just satisfying some contradictory planning objective at the expense of our property rights or livability.

Finally, I am immeasurably frustrated and disappointed in my experience throughout almost all planning processes. They have been foregone conclusions leaving no oxygen in the room for anyone contributing to have a voice. When protocols or conflicts of interests have occurred there has been no follow through. Furthermore, to have actually Planning staff advocate for positions completely contrary to the most basic concepts of distributive justice issues like public transportation for kids invalidates any desire to continue to engage. Or, to have to repeat questions and then to get answers that on face value mock the whole intent of the process with no sense of shame or interest in elucidating contradictions or addressing agonizing on the ground realities as such. Simply, my experience has eroded any faith in local governance to provide oversight or earnestness from its public employees, that should either be unbiased facilitators or compassionate enforcement staff but instead champion interests incredibly contrary to their capacity as a liaison to the public with no compunction in doing so.

I believe in true public service and I believe in an inclusive participatory democratic process. This is a fine opportunity

to
show it exists.

--

Justin Callaway
503.477.7298
justincallaway@gmail.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 1:55 PM
To: Kovacs, Madeline
Subject: FW: proposed change 675

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: PDX Comp Plan
Sent: Friday, March 13, 2015 1:28 PM
To: Planning and Sustainability Commission
Subject: FW: proposed change 675

Testimony.

Sara Wright
p: (503) 823-7728

From: Zachary Brooks [mailto:zacharymbrooks@yahoo.com]
Sent: Friday, March 13, 2015 1:24 PM
To: PDX Comp Plan
Subject: proposed change 675

I would like to express my opposition to the proposed change of zoning for the area around SE 17/18th and Morrison/Stark (#675). I live at 1110 SE 16th ave. The Buckman neighborhood is the site of many recent and forthcoming major developments. Rezoning this section of land will almost certainly result in the demolition of historic homes, and the construction of large, unaffordable residential units.

Please take this into consideration when rezoning residential neighborhoods.

Sincerely,
Zach Brooks

503-516-9838

zacharymbrooks@yahoo.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:16 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan comment

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From: Warwick, Mike [mailto:mike.warwick@pnnl.gov]
Sent: Friday, March 13, 2015 1:56 PM
To: Planning and Sustainability Commission
Cc: Stark, Nan
Subject: Comprehensive Plan comment

435 NE Stanton and adjacent vacant lot to the east – Request for support of proposed rezone to R1.

The Eliot Neighborhood Association proposed wholesale downzoning to R 2.5 protect the Eliot Historic Conservation District from inappropriate infill (4 plexes versus duplexes). Adjustments were made after this proposal was submitted to parcels OUTSIDE the Conservation District, presumably to compensate for the reduced density within it. The association Land Use Committee wishes to retain the current R2 zoning on these parcels for consistency with its initial proposal, despite the fact they it is not contesting changes staff made to that proposal for other parcels. I wish to retain the R1 zone as staff proposed.

These two parcels were upzoned from their current R2 to R1 in that process. I own both parcels (through an LLC). Although I did not request this change, I strongly endorse it for the following reasons:

- * The property to the west fronts MLK. It is currently a non-conforming commercial use and will be rezoned for Mixed Use. Since MLK is a civic corridor and this area is within those parcels are expected to be rezoned to be comparable to EX density, or allow buildings up to 6 stories high.
- * The property across the street (south of the parcel) was developed for Mixed Use including high density residential development to the east past these parcels. In other words, these parcels already front residential development consistent with R1 density.
- * The adjacent residential properties to the west are a single family residence, and two parcels developed as part of the Mixed Use development across the street to densities comparable to R1.

- * The adjacent single family residence is in probate and expected to sell to a developer.
- * The draft Mixed Use zones require “transitions” adjacent to residential parcels that scale with the R zone classification. An R1 zone is more compatible with EX scale development than the R2 zone.
- * The Comp Plan expects the Williams/Fremont Neighborhood Center population to increase 250%. Increased density on these parcels is consistent with that goal.
- * The 435 parcel includes some large trees that could be preserved if both parcels were combined under an R1 zone as that would provide more flexibility to site housing where it would not interfere with the trees.

In summary,

- * none of the nearby properties along Stanton street will be impacted by a zone change,
- * R1 level of development is consistent with development on surrounding parcels along Stanton,
- * R1 level of development is consistent with population targets for this neighborhood center, and
- * the property is outside the historic conservation district and un/underdeveloped.

Thank you

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:20 PM
To: Kovacs, Madeline
Subject: FW: Please preserve the character of our neighborhood! Concordia needs yards and trees.

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From: Gregor [mailto:gregor@metamorphic-pdx.com]
Sent: Friday, March 13, 2015 2:10 PM
To: Planning and Sustainability Commission
Subject: RE: Please preserve the character of our neighborhood! Concordia needs yards and trees.

Certainly, thanks for the quick reply.

5826 NE 27th Ave
Portland, OR 97211

Gregor Miziumski
Metamorphic LLC
CCB Lic. 170932
503-327-9777
gregor@metamorphic-pdx.com
www.metamorphic-pdx.com

----- Original message -----

From: Planning and Sustainability Commission <psc@portlandoregon.gov>
Date: 03/13/2015 1:43 PM (GMT-08:00)
To: gregor@metamorphic-pdx.com
Cc:
Subject: RE: Please preserve the character of our neighborhood! Concordia needs yards and trees.

Hello Gregor,

Thank you for your comments to the Planning and Sustainability Commission. So that I may include this as testimony and forward it to the PSC members, can you please email me your mailing address? That is required for all testimony.

Thanks,
julie

Julie Ocken
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-----Original Message-----

From: gregor@metamorphic-pdx.com [mailto:gregor@metamorphic-pdx.com]
Sent: Friday, March 13, 2015 12:39 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Fritz;
Commissioner Novick; Planning and Sustainability Commission;
Susananderson@portlandoregon.gov
Subject: Please preserve the character of our neighborhood! Concordia needs yards and trees.

I have been a property owner on NE 27th Ave for 10 years. Our neighborhood has a great look and friendly vibe. Rezoning the area along Killingsworth is likely to lead to unscrupulous development, and a degradation of the character that we enjoy.

"Skinny Houses" are not the answer for infill. It is wasteful to raze old houses simply to build low-quality new ones. New construction leads to less greenery, and specifically to clear-cutting of old trees.

Sorry, I'm not feeling very articulate today, and this is a very depressing topic.

Thanks, Gregor

Gregor Miziumski
Metamorphic LLC
CCB Lic. 170932
www.metamorphic-pdx.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:20 PM
To: Kovacs, Madeline
Subject: FW: Support the Green Hierarchy

Follow Up Flag: Follow up
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Julie Ocken
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From: Chris Anderson [mailto:jchris@gmail.com]
Sent: Friday, March 13, 2015 2:10 PM
To: Planning and Sustainability Commission; Transportation System Plan
Subject: Support the Green Hierarchy

I've testified in favor of the Green Hierarchy before, but I want to share two more points:

* I was planning and packed to bring a camera to a big Family Biking event on Halloween last fall, and getting a whole bunch of kids and parents to give video testimony in support of the Green Hierarchy and bike safety / comfort projects. Alas it was a freak windstorm with tree branches falling so the ride was cancelled. :(It would have looked like this: <https://www.flickr.com/photos/bikeportland/sets/72157625228180094> The next ride is coming up soon, so maybe you'll get some late videos.

* The more I talk to actual on-the-ground traffic engineers, the more I see how a Green Hierarchy would mean a foundational shift in the way they design our city. I won't rehash the arguments about how a livable Portland is a prosperous one, but a Green Hierarchy would help usher in a golden age in Portland.

* I think the freight question is an interesting one in the Green Hierarchy. I think a lot of freight / bike conflicts are really caused by car congestion on freight routes, so maybe freight / bus priority lanes are the answer? I support a Green Hierarchy that puts freight above single occupancy vehicles. What about incentives for Green Freight (cargo bikes / zero emissions vehicles, etc)?

Chris Anderson

5276 NE 26th Ave
Portland, OR 97211

--

Chris Anderson
<http://www.couchbase.com>
<http://twitter.com/jchris>

"Compromising before you even begin fighting is illogical." – Joshua Wong

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:23 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony - General Comments

Follow Up Flag: Follow up

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Julie Ocken
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From: Brian Posewitz [mailto:brianposewitz@comcast.net]
Sent: Friday, March 13, 2015 2:15 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony - General Comments

Greetings,

Re-development and increased height and density are good for the urban area, even if they change the character of existing neighborhoods. They remove old, blighted properties, limit urban sprawl and create more affordable housing. Neighborhoods change over time, just as the original development changed the “neighborhood.” There is nothing magical about “existing character.” Often it is simply the random byproduct of previous socio-economic distributions and architectural preferences. Nothing says it is the pinnacle of urban design for a particular area. In most places, changes to “existing character” are not a bad thing. They make neighborhoods nicer, more vibrant and more interesting, and allow us to accommodate more people in a given area. The changes may seem overwhelming now, but the markets will likely slow change on their own, without further government intervention, as the past eight years of monetary easing are unwound.

So please resist the over-reaction to demolitions, no-parking apartments and new construction that doesn’t look just like what’s already there. The changes advocated by some “neighborhood activists” would throw out the baby with the bathwater and prevent the natural, beneficial evolution of our neighborhoods.

Thank you for considering these comments.

Brian Posewitz

8508 SE 11th Ave.
Portland, OR 97202

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:38 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony - Specific Request - 8508 SE 11th Ave., Portland

Follow Up Flag: Follow up

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From: Brian Posewitz [mailto:brianposewitz@comcast.net]
Sent: Friday, March 13, 2015 2:27 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony - Specific Request - 8508 SE 11th Ave., Portland

Dear PSC,

Please consider the following specific request for rezoning as part of your comprehensive plan review:

Please change the zoning on the above property back to R2 (from R2.5). The zoning was R2 when I purchased the property in 1996. The zoning was changed to R2.5 in 1998 as an accommodation to neighborhood residents concerned about increased density elsewhere. It makes a big difference for my lot because the lot is 6,300 square feet – slightly larger than the standard neighborhood lot size of 5,000 square feet – meaning, roughly, that I can have three units at R2 but only two at R2.5. R2 is the appropriate zoning because: (1) it was historically R2; (2) the property is surrounded by numerous multi-family structures, including a three-story apartment building at 11th and Marion; and (3) the change would promote more density and affordable housing units in the neighborhood.

Thank you for considering this request.

Regards,

Brian Posewitz
8508 SE 11th Ave.
Portland, OR 97202

503-432-8249

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:41 PM
To: Kovacs, Madeline
Subject: FW: TSP Project #40020 - NE 92nd Ave Ped/Bike Improvements

Follow Up Flag: Follow up

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Julie Ocken
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From: Kristen Kibler [mailto:kristenkibler@gmail.com]
Sent: Friday, March 13, 2015 2:34 PM
To: Planning and Sustainability Commission; Transportation System Plan
Subject: TSP Project #40020 - NE 92nd Ave Ped/Bike Improvements

Planning and Sustainability Commission:

As a neighbor in the Madison South neighborhood, I'd like to thank you for including several projects in the recommended draft TSP list that could benefit our neighborhood in the future.

I support all of the projects in the recommended draft list that I see shown for the area. The 82nd Avenue Corridor is top priority. Most of the other projects recommended in Madison South have a regional focus and will move people through our neighborhood. Unfortunately, nearly half of our neighborhood (north of NE Russell Street) will still not have safe access to these recommended bicycle/multi-modal improvements proposed for NE Tillamook, NE Halsey, the I-205 undercrossing, or Sullivan's Gulch Trail that are located in our neighborhood.

In terms of comfortable and safe bicycle and pedestrian travel, Madison South is limited by man-made and natural barriers: I-84 on the south, Rocky Butte/Grotto on the north, Rocky Butte/I-205 on the east, and NE 82nd Avenue (large properties of Madison H.S/Rose City Golf Course) on much of the west. Additionally, the center of our neighborhood includes over 20 acres of privately held land that greatly limits north-south bike or direct pedestrian access. Only NE 82nd and NE 92nd allow north-south travel for our neighbors. Improvements to NE 92nd Avenue would greatly benefit our ability to get around by foot or bike.

Why are pedestrian and bicycle improvements on NE 92nd Avenue important to us?

- * Many students of Jason Lee K-8 School cannot currently walk or ride bicycles to this neighborhood school—even if they are within a ½ to 1 mile distance (north of NE Russell Street).
- * There is no alternate route to this busy neighborhood street or the neighborhood school. For many now and in the future, the school is a frequent destination and we need to make sure all arrive and depart safely.
- * Many neighbors, especially families, youth, or new bicycle riders (especially north of NE Russell Street) do not feel comfortable accessing the NE Tillamook bikeway due to the unsafe stretch of NE 92nd Avenue.
- * There is a unique opportunity to encourage school-aged children and their families to walk and bike within their neighborhood and begin using the greater Portland cycling network.
- * NE 92nd Avenue is served by TriMet. Walking to and from bus stops can feel unsafe in the narrowest areas. The buses can also create safety/visibility concerns for other pedestrians and cyclists.
- * The neighborhood will likely see increases in housing infill over the next decades, so the multi-modal demands and safety conflicts on NE 92nd Avenue will likely increase.
- * This section of NE 92nd Avenue is actually part of the Rocky Butte Scenic Drive Historic District. The road leading all the way to the top of Rocky Butte is included on the U.S. National Historic Register. Accessing this historic resource should be easier for the public.
- * NE 92nd Avenue provides access to the popular cycling destination of Rocky Butte and will aid in increased eastbound bicycle travel from other inner NE neighborhoods via the proposed I-205 undercrossing that will access the I-205 multi-use path and Gateway Green.

I understand the \$5M+ cost makes this project difficult to envision in the foreseeable future. If it could be done in phases, the pinchpoint that has no refuge for pedestrians, is between NE Benjamin and NE Russell. The remainder of the stretch does have some narrow shoulders and some sections of sidewalk.

Please find a way to fund improvements on NE 92nd Avenue. Without improving safety on NE 92nd Avenue, we are failing to encourage multi-modal travel for most of the neighborhood. Creating future pedestrians and cyclists in our City is a necessity to realize the benefits of this long list of transportation investments.

I personally would love if the families in our neighborhood could ride or walk to the neighborhood school and the future Gateway Green on the other side of the freeway. I hope to someday see a safer NE 92nd Avenue.

Sincerely,

Brent Carnes and Kristen Kibler (and school aged child attending PPS Jason Lee K-8)
 3440 NE Cadet Avenue
 Portland, OR 97220
 (503) 493-9892
 kristenkibler@gmail.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 2:59 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony - 1403-1415 Stark

Follow Up Flag: Follow up
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Julie Ocken
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From: Nancy Oberschmidt [mailto:nancyoberschmidt@gmail.com]
Sent: Friday, March 13, 2015 2:56 PM
To: Planning and Sustainability Commission
Cc: Susan Lindsay; Wague Ronna Neuenschwander-Diakite
Subject: Comprehensive Plan Testimony - 1403-1415 Stark

Date: 3-13-15

RE: Comprehensive Plan Testimony 1403 –1415 SE Stark

FROM: Nancy Oberschmidt
PO Box 14337, Portland OR 97293
1507 SE Alder, Portland OR 97214

I am concerned about the comp plan proposed zoning changes to the property at 1403 – 1415 SE Stark. The current use of this property is 1 story commercial creative space in a R1 zone.

The proposed zoning is CS – will totally change the atmosphere in this neighborhood. CS allows four stories of residential development, with no true requirement to develop the first floor as commercial space. Also this the north side of the street; build out with the CS zone would cut off the sun light to the residences on the other side of the block.

As I see it, there are two acceptable uses of this corner:

1. R1 – Non-Conforming use with the existing buildings
2. Develop within the R1 zoning – Note the townhouse apartments recently built at SE Alder and 20th.

Thanks for your consideration!

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 3:48 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony 1900 Block between Alder and Washington

Follow Up Flag: Follow up
Flag Status: Flagged

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From: Nancy Oberschmidt [mailto:nancyoberschmidt@gmail.com]
Sent: Friday, March 13, 2015 3:00 PM
To: Planning and Sustainability Commission
Cc: Christine Yun; Susan Lindsay
Subject: Comprehensive Plan Testimony 1900 Block between Alder and Washington

DATE: 3-13-15

RE: Comprehensive Plan Testimony 1900 Block between Alder and Washington

FROM: Nancy Oberschmidt
PO Box 14337 Portland OR 97293
1507 SE Alder Portland OR 97214

The western half of this block is proposed to be zoned R2.5 to match the rest of the block. (from the R5 current zoning). Three of the properties are on 5000 SF lots, two single family residences and one single family with an attic ADU. This change forces non-conformance as two of these lots cannot be divided without pan-handle shapes and therefore encourages demolition.

Please leave this zoning intact at R5. Save our historic homes!

Thank you for your attention!

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 3:49 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony - SE 15th to 19th between Morrison and Belmont

Follow Up Flag: Follow up
Flag Status: Flagged

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

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From: Nancy Oberschmidt [mailto:nancyoberschmidt@gmail.com]
Sent: Friday, March 13, 2015 3:04 PM
To: Planning and Sustainability Commission
Cc: Susan Lindsay; Christine Yun
Subject: Comprehensive Plan Testimony - SE 15th to 19th between Morrison and Belmont

DATE: 3-13-15

RE: Comprehensive Plan Testimony SE 15th to 19th Between Morrison and Belmont

FROM: Nancy Oberschmidt
PO Box 14337 Portland OR 97293
1507 SE Alder Portland OR 97214

This section is a mixture of R1, R2.5, CM and CS. It is proposed that it be changed to CS. The change to CS would allow unlimited density of residential units without requiring commercial space on the first floor. The expected height of 45 ft and zero property line development would make a visual barrier between the north and south parts of the neighborhood.

The result of CS zoning would be to create a four block long high-rent district with no guarantee of commercial space to support it.

For a walkable neighborhood that supports people (owners and renters) of all incomes:

- o Please support the existing single and multi-family housing by leaving their zoning intact
- o Change the zoning on current non-conforming use properties such as the Telecom building at SE 17th between Belmont and Morrison
- o Change the remainder to a zone allowing a mix of residential and commercial use. (not CS)

These streets are active with children who attend Buckman School (SE 16th and Stark). Lets keep it that way!

Thanks for your interest!

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 3:49 PM
To: Kovacs, Madeline
Subject: FW: Rezoning Concordia

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
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From: Levy, Violet [mailto:Violet.Levy@aecon.com]
Sent: Friday, March 13, 2015 3:12 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Planning and Sustainability Commission; Susananderson@portlandoregon.gov
Subject: Rezoning Concordia

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

I am concerned about re-zoning the area between Killingsworth and Jarrett, and 33rd and 22nd avenues to allow for more infill. With so much of Portland stark, treeless, and in need of redevelopment, I cannot see the logic in targeting an historic neighborhood filled with 100 year old fir trees and homes. Many of us have spent our time, energy and money investing in a troubled neighborhood, restoring old homes, planting trees, and building community to transform Concordia into the neighborhood it is today. It seems unfair to have that effort reversed and our property values threatened. It makes more sense to encourage restoration over replacement for our remaining homes.

Every week I receive predatory letters from developers and realtors, eager to buy my 1914 Craftsman home of 11 years in order to destroy and flip it. With the aggression that these agencies are moving forward, I have no doubt that once they get the green light, the raising of old homes and trees will be swift and severe. I have watched too much of our fir grove come down in the last few years and now I fear for the rest of them. The new construction on Jarrett Street that went in a few years ago changed the feel of that block and I'd hate to see that expanded. I think we have already sacrificed enough with this, and the expansion of Concordia University. Please allow us to save what's left and encourage development in a neighborhood that needs the help, not one that's

already beautiful.

Thank you for your consideration,
Sarah Levy
5826 NE 27th Ave.
Portland, OR 97211

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From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 3:52 PM
To: Kovacs, Madeline
Subject: FW: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Follow Up Flag: Follow up
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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
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From: Larrabee [mailto:zerofi@teleport.com]
Sent: Friday, March 13, 2015 2:03 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Planning and Sustainability Commission; Susananderson@portlandoregon.gov
Subject: Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction practices and significant early architecture. The current designation of R2.5 leaves these neighborhood homes as targets of demolitions for the to building lots beneath. The character of this portion of our neighborhood is that of an R5 neighborhood as that was the style of the day. We value this region as it is historically built today. There is no compelling reason for this area to be zoned R2.5 as it does not abut a transit corridor. As an R5 neighborhood, all empty lots may still be developed with infill housing. We want to afford protection to the existing homes in this historic "Street Car" neighborhood

region. This portion of the neighborhood will be protected to our satisfaction with an R5 designation.

The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for zoning meant a minimum 5000 square ft lot. Much of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in these regions is 25 x 100, and they are now all available to develop within the current code. To allow these lots to be developed is a slap in the wallet to everyone who has purchased a home in an R5 neighborhood. First, the State does not recognize them as lots. They are only lots if they meet the zoning requirements for the standard of size. In the case of R5 you would need two 25 x100 lots to meet our zoning! To change the code to allow R2.5 development is to change our zoning! You have up zoned us to R2.5. Everyone in this neighborhood is suffering continued devaluation of our historic place from this development practice.

In response to this City having tacitly up zoned the finest portions of our neighborhood, the Concordia Neighborhood Residents ask that these historically platted and historically developed portions of our neighborhood be afforded the protection of R7 zoning. These subdivisions, like "Irvington Park" surrounding Concordia University, are the historic core of our

community. Many homes were established with 10,000 sq/ft lots, many more with 7,500. Of course there are also 5000 square foot lots, but until the 2003 policy package 2A, there was never a 2500 square foot lot. As a neighborhood region historically developed with a character of larger lots interspersed in the fabric, and as that is the property of our neighborhood which we intend to defend, this methodology is akin to any other embattled neighborhood being granted similar protections by down zoning.

Concordia Resident and member of SDP (Stop demolishing Portland),

Brad Larrabee
4711 NE 26th Ave

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 3:59 PM
To: Kovacs, Madeline
Subject: FW: SE 15th and Belmont

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Matt Brischetto [mailto:matt.brischetto@gmail.com]
Sent: Friday, March 13, 2015 3:29 PM
To: Planning and Sustainability Commission
Cc: Engstrom, Eric (Planning); Stein, Deborah; Stockton, Marty
Subject: SE 15th and Belmont

Planning and Sustainability Commissioners:

I am submitting this addendum to my earlier testimony on the proposed zoning changes for the Belmont/Morrison Corridor in the 2035 Portland Comp Plan. I am the new homeowner at 822 SE 15th, which is comprised of the Victorian quartet including the addresses 822 SE 15th, 1503 SE Belmont, 1509 SE Belmont and 1517 SE Belmont. It is a 10,000 square foot tax lot on the corner of 15th and Belmont with four detached single family dwellings.

I am a proponent of the proposed zoning changes along Belmont/Morrison between 15th and 19th, and have expressed those in prior testimony.

In this testimony, I am submitting some specific reasons why I'm strongly in favor of CM zoning specifically for the 15th and Belmont parcel:

1) Protected Structures/Future plans. I have zero interest, or the ability, in demolishing these structures. In addition, with the purchase in February '15 and cosmetic rehabilitation last summer while under lease-option contract, I have over \$1m vested into the property - much of which is into the buildings themselves. I'm 35 years old, and plan to own the property for the foreseeable future – improving and rehabilitating the buildings in conjunction with the SPHO. I have been in touch with Joy Sears at the SPHO in Salem on this topic dating back to last summer. The barrier to ever demolish a historic landmark is so high that I would not be able to even if I desired

it. It would require a Type IV land use review in front of the City Council (which is a long process and expensive), and my understanding is that demolishing a historic landmark has been granted only once in the City's history. I only recently acquired the property (February 27, 2015) so am still sorting through a long term rehabilitation plan.

2) Since the structures are protected, there exists no downside to mixed used higher density zoning, and only upside. As a landmark, I do currently have the flexibility to use the land for commercial uses. However, in the event of an unplanned natural disaster, the FAR allocated by CM-type mixed use has far more flexibility and development potential than does R1, is more consistent with the rest of Belmont St zoning, and is in line with sustainable development goals along major transit corridors. In addition, absent of such a catastrophic event, the historic designation allows flexibility for the transfer of density to other nearby projects (within a 2 mile radius). So, granting this FAR density now can enable its use by a far greater reach of projects than its non-historic counterparts. Were the buildings to ever fail, I'd favor a higher density mixed use building that included ground level retail – which I believe a high growth inner SE neighborhood needs to balance all of the residential building growth. Provided structures make it another 100 years, I could see utilizing that FAR somewhere else, transferring it to another property owner, or just retaining it for the future owner of this property. Part of the reason this density transfer flexibility is allowed is to incentivize homeowners like myself to preserve the structures.

In summary, I hope the PSC will consider my request to have the 15th and Belmont parcel at 822 SE 15th Ave. changed from R1 to mixed use CM.

Best,

Matt Brischetto

1503 SE Belmont St.

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:24 PM
To: Kovacs, Madeline
Subject: FW: Comments on the TSP

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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-----Original Message-----

From: Michael Harmon [mailto:mharmon@fastmail.us]
Sent: Friday, March 13, 2015 3:51 PM
To: Planning and Sustainability Commission; Transportation System Plan
Subject: Comments on the TSP

Thank you for providing the comprehensive online map and for the ability to offer testimony via email. My comments are specific to cycling facilities. I would like to see the projects that provide continuous, safe, and protected facilities on major commercial corridors prioritized over neighborhood greenway and trail projects. My job, my kid's school, banks, libraries, grocery stores, etc are all on major streets that have little or nothing by way of bicycle access. If we are to reach the goals for cycling as part of the green transportation hierarchy, then we need a vastly different approach than focusing largely on circuitous routes that are tucked away from key commercial corridors and destinations.

Thank you
Michael J. Harmon
5818 NE 23rd Avenue
Portland, OR 97211

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:26 PM
To: Kovacs, Madeline
Subject: FW: Zoning changes being proposed for SE Belmont and SE Morrison in the Buckman neighborhood

Follow Up Flag: Follow up
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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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-----Original Message-----

From: Scott M. Neal [mailto:scottmneal@gmail.com]
Sent: Friday, March 13, 2015 3:56 PM
To: Planning and Sustainability Commission
Cc: Scott M. Neal
Subject: Zoning changes being proposed for SE Belmont and SE Morrison in the Buckman neighborhood

City of Portland
Planning and Sustainability Commission
1900 S.W. Fourth Ave.
Portland, OR 97201-5380

PSC,

I have been a resident of Buckman since I purchased the Queen Anne Victorian on the corner of SE Morrison St. and SE 17th Ave in 1993. I was away for several years taking care of family, but now that I am back I am stunned at what seems to be (but hopefully isn't) a semi-secret blanket change to the zoning here.

I understand the need to provide more housing for current and future residents of Portland, but I believe the proposed rezoning of SE Belmont and SE Morrison between SE 15th and SE 19th avenues is premature and unnecessary.

This neighborhood has a balanced mix of high density and medium density already (no multi-acre lots or other suburban-style wasted land usage), and yet is still family-friendly and feels like a neighborhood, two of the traits that make Portland especially palatable. My children walk to Buckman elementary a few blocks away, and also to Colonel Summers park (which is much more family-friendly than it was in the past, as long as the sun is out...)

The areas of SE Portland / Buckman west of SE 12th Ave. have already undergone extensive rezoning to balance the increasing density of the area and at least partially preserve the Industrial district that is so critical to the health and quality of life of the entire city of Portland. Other districts that seem to be getting more sane high-density development include Lloyd, and of course the wildly successful Pearl district--my nostalgia for seeing freight trains roll right up to the Henry Weinhard brewery to load/unload new and spent hops notwithstanding, I am very proud of the way that the former railyard has been converted into high-density housing and living done right.

I, and many others in the neighborhood, believe that the density should continue to increase west of SE 12th and in other high-density-friendly areas first, and then, perhaps in 10, 15, 20, or 25 years, we can re-asses the need to infill areas east of SE 12th. A study several years ago called BLAZE looked closely into the needs of this area (encompassing Buckman/Kerns/Sunnyside/Hosford-Abernathy), and consisted of several community events to allow the neighbors (and developers) to coordinate with the city and county to ensure that adding more residents (which is potentially a quite welcome occurrence) to the neighborhood is balanced with what makes this a great neighborhood to be in. I don't recall seeing or hearing anything remotely similar to that happening recently, and in fact it was through sheer Buckman Community Association canvassing (meaning a flyer on my front porch) that I knew this was even being considered in the first place!

No one is ever going to take the time (or spend the money) to build an 1894 Queen Anne victorian again, so it is critical that existing housing stock like mine that is irreplaceable be maintained for future generations. The 2x4 timbers in my house are actually 2 inches by 4 inches! There are already plenty of empty (or parking) lots awaiting redevelopment in the areas I've already mentioned without having to destroy historic structures.

Please "hold the line" on the current zoning on SE Belmont and SE Morrison for now, and then let's see how the next few rounds of development go in the neighborhoods that can better support them (and where it already makes more sense, both for current and future residents).

Thank you for your time,

Scott M. Neal
1636 SE Morrison St.
Portland, OR 97214
(503) 781-0781

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:29 PM
To: Kovacs, Madeline
Subject: FW: Zoning in Concordia and NE Portland

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Mona Bowen [mailto:missmmona@gmail.com]
Sent: Friday, March 13, 2015 4:02 PM
To: Hales, Mayor
Cc: Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Planning and Sustainability Commission; Susananderson@portlandoregon.gov
Subject: Zoning in Concordia and NE Portland

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

Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for zoning meant a minimum 5000 square ft lot. Much of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in these regions is 25 x 100, and they are now all available to develop within the current code. To allow these lots to be developed is a slap in the wallet to everyone who has purchased a home in an R5 neighborhood. First, the State does not recognize them as lots. They are only lots if they meet the zoning requirements for the standard of size. In the case of R5 you would need two 25 x 100 lots to meet our zoning! To change the code to allow R2.5 development is to change our zoning! You have up zoned us to R2.5. Everyone in this neighborhood is suffering continued devaluation of our historic place from this development practice.

In response to this City having tacitly up zoned the finest portions of our neighborhood, the Concordia Neighborhood Residents ask that these historically platted and historically developed portions of our neighborhood be afforded the protection of R7 zoning. These subdivisions, like "Irvington Park" surrounding Concordia University, are the historic core of our community. Many homes were established with 10,000 sq/ft lots, many more with 7,500. Of course there are also 5000 square foot lots, but until the 2003 policy package 2A, there was never a 2500 square foot lot. As a neighborhood region historically developed with a character of larger lots interspersed in the fabric, and as that is the property of our neighborhood which we intend to defend, this methodology is akin to any other embattled neighborhood being granted similar protections by down zoning.

Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction practices and significant early architecture. The current designation of R2.5 leaves these neighborhood homes as targets of demolitions for the two building lots beneath. The character of this portion of our neighborhood is that of an R5 neighborhood as that was the style of the day. We value this region as it is historically built today. There is no compelling reason for this area to be zoned R2.5 as it does not abut a transit corridor. As an R5 neighborhood, all empty lots may still be developed with infill housing. We want to afford protection to the existing homes in this historic "Street Car" neighborhood region. This portion of the neighborhood will be protected to our satisfaction with an R5 designation.

Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,
Mary Bowen
1734 NE Bryant St

Portland, OR 97211

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:29 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive plan testimony

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
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From: Phyllis on Sprint [mailto:phyllissmoore@comcast.net]
Sent: Friday, March 13, 2015 4:03 PM
To: Planning and Sustainability Commission
Subject: Comprehensive plan testimony

I am a 20 year resident of NE Portland. Lately mile long trains carrying dangerous diesel fumes and fuel have been traversing our neighborhood bringing noise and air pollution. This adversely affects my lungs, property value, and general well being. When I think of younger lungs in my neighborhood my concern deepens.

Now we hear of NE 11th St overpasses and Kenton track widening plans for more pollution instead of directing funds now into a greenspace near NE 13th and 14th to be delayed till 2025. This is not the environmentally conscious Portland most city residents cherish -- it is a sellout to Canadian LNG interests and a blight on mother Earth. Please turn this train around and head it in the right direction before it's too late for Portland air quality and the planet. We are disproportionately carrying the burden of fossil fuel pollution in NE Portland and vehemently protest these plans. I hope you will listen and act on our concerns.

Phyllis Moore
6936 NE 6th
Portland 97211

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:31 PM
To: Kovacs, Madeline
Subject: FW: Portland Comprehensive Plan Testimony

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Teresa Loveland [mailto:tloveland2003@yahoo.com]
Sent: Friday, March 13, 2015 4:22 PM
To: Planning and Sustainability Commission
Subject: Portland Comprehensive Plan Testimony

I live on SE Morrison Street, 1 blk north of Belmont. I have owned my home for over 20 years. I strongly feel that neighbors on both sides of Belmont should have received a mailer giving us detailed information regarding the proposed comprehensive plan in advance of any decision regarding the urban vs. village concept. I feel that an actual neighborhood vote should happen, not just deferring this to the neighborhood association to cast the deciding vote. It is clear that most homeowners never attend neighborhood association meetings and the select group that does go doesn't always speak for the masses. Maps, sample drawings and clear explanations of how this could affect everyone would have been helpful. The village concept is a much more sustainable choice over the urban center as Belmont is a narrow 2 lane street and few would want to repeat the canyon effect that's happened on Division. If traffic slows down on Belmont like it has on Division, drivers will begin detouring through side streets causing greater potential for pedestrian and bicycle accidents. No matter how you feel about it, people will not stop commuting by car and even those who ride bikes will still use a Car to Go when needed or drive their own vehicle. Purposely slowing traffic and providing less parking spaces (bioswales and street seats) does not encourage less driving it only encourages driveway blocking and frustration for the homeowners in the area. I originally moved from NW Portland because parking was so bad it was literally unsafe to get from my car to my front door at night. I feel that the city has become overrun with bicycle proponents who are eager to create havoc in any way possible for those who own cars.

Sunnyside neighbors already endure the party block between SE 33rd and 34th. Unless we are mindful to encourage a diverse array of businesses to serve the neighborhood, another mecca of bars and restaurants will be created, drawing people from all over the city, increasing traffic and putting a strain on

already limited parking. It's one thing to encourage more people to live in a neighborhood but a whole other thing to create an entertainment hub, which then becomes a major visitor destination. Let's do what we can to provide extra living spaces and still respect the overall livability of the neighborhood. Another note, I've noticed an increased amount of young couples with children in the neighborhood and it would be nice to see more places for families to go that aren't alcohol driven. My own teenagers complain that there isn't any place for them to go, that everything is a bar.

The city must do a better job of monitoring developers of single family homes and apartments. It should be mandatory for all new buildings, condo, apartment, or retail, to offer parking for tenants and customers even on a limited basis. The condo building on SE 35th and Belmont was able to offer parking as well as a ground floor restaurant and hair salon. Buildings should not be so tall that they entirely block the sunlight and windows should be placed to respect the neighbors homes behind them. The city should approve all building designs to avoid what happened on Division. Regarding single family homes, building homes that don't blend with the neighborhood creates a jarring look and is upsetting to the people who live around them and who paid good money to live there. I've heard people say "Well if you don't like it just move!". This cavalier statement usually comes from people who are new to the area, are themselves rootless, rent, and have no clue about the time and investment a homeowner has put in.

Lastly, please don't forget that homeowners are deeply invested in the area and are far more impacted in the short and long term than someone else who can easily pick up and move.

Thanks for allowing my input.

Sincerely,

Teresa Loveland
3540 SE Morrison
Portland, OR 97214

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:40 PM
To: Kovacs, Madeline
Subject: FW: Concerns for changes to Buckman neighborhood

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
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From: Windy Lyle [mailto:windylyle@gmail.com]
Sent: Friday, March 13, 2015 4:34 PM
To: Planning and Sustainability Commission
Subject: Concerns for changes to Buckman neighborhood

March 11, 2015

To The City of Portland Planning Commission:

I am submitting these comments regarding proposed plans and zoning changes in the Buckman neighborhood.

I know that there is a large influx of people wishing to move into Portland because of its unique creative and livable family friendly environment. I suspect that the planning committee is very busy trying to figure out where all of these people will live, work and how they will transport themselves throughout the city.

I am an Oregonian and 40 plus years ago decided to make my home and raise my family in the Buckman neighborhood. I have huge concerns for the decisions being made – and dare say, that I question where loyalties lay. Is the planning commission identifying the needs for healthy strong neighborhoods or the visions of developers.

Over the last 5 years apartment complexes have been raised and some with little to no parking options for the renters – around 20th and SE Morrison. The noise, trash, increase in traffic in the area and fighting over parking places has increased significantly. I used to know my neighbors for blocks around and shared a healthy community. Living a small rural / urban experience. Now the density has increased and community decreased.

More development proposals are coming at us :

15th to 19th between Belmont & Morrison , the zoning proposed will allow unlimited density of residential units. We will end up with monolithic buildings, high density

small high-rent units – displacing family- friendly housing, affordable duplexes and quadrplex rentals. STOP – what are the options –

1900 block between Alder and Washington : Do not change the zoning of the R5 properties to R2.5 properties . WHY would this even be considered, unless there were thoughts of increasing the density in the heart of Buckman neighborhood in the future. These are single family dwellings – that have historic significance.

14th and Stark: PLEASE do not disrupt this neighborhood any more – they will lose St Francis park and have to make room for ~100 new people into their space and are being impacted by the reuse of Washington High School. Find zoning that supports small scale retail and service use for the residential neighborhood...

CONSIDER: There is development capacity west of 12th -- that can be integrated with the warehouse businesses that already exist there.

1) Buckman Elementary already is having safety issues for children walking or biking to school.

2) The best zoning for our neighborhood, is one that supports existing single and multi-family housing – the existing zoning.

3) I propose a Safe, livable , walkable, community – that supports this creative small urban/rural neighborhood --- with low density.

Sincerely,

Windy Lyle
1904 SE Washington (house born 1908)
Portland, Oregon , 97214

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:40 PM
To: Kovacs, Madeline
Subject: FW: comp plan comments

Follow Up Flag: Follow up

Flag Status: Flagged

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From: Erinne Goodell [mailto:erinne.larissa@gmail.com]
Sent: Friday, March 13, 2015 4:35 PM
To: Planning and Sustainability Commission; Transportation System Plan; PDX Comp Plan
Subject: comp plan comments

Hello,

My name is Erinne Goodell, and I live at 3241 NE Holman Street, Portland, OR, 97211. The following is my testimony for the update to Portland's Comp Plan:

Transportation Hierarchy

The best part of Chapter 9 in the current Comprehensive Plan draft is the transportation hierarchy. This policy will allow the city to make the important (and necessary) choices for a better, more sustainable, more livable future. We need the hierarchy in place in order to responsibly grow Portland over the next few decades and maintain/improve our quality of life.

Additionally, I'd like to see safety as the #1 item in the hierarchy, above all specific modes. Safety is the most comprehensive way to contextualize the rest of our prioritization.

Diverters on Local Service Streets

The Transportation System Plan's local service street is missing a bullet point:

* Diversion: Local Service Traffic Streets should feature frequent traffic diverters

to discourage motor vehicle cut-through traffic. This is important to me because my partner and I ride bicycles (with our dog) on Greenways and other neighborhood streets as our primary routes most of the time for commuting to work, to shopping, and to downtown. There is entirely too much cut-through auto traffic, especially on greenways with their lack of stop signs. We frequently deal with some form of harassment / threats in the form of vehicular violence by users that feel entitled to the roadway while driving a motorized vehicle. This is becoming apparent that our effort to keep people biking away from traveling along the major streets is turning into a bike backlash, and it is getting extremely stressful / disappointing to bike around town. We need more physical tools to limit where large numbers of people can drive through neighborhoods, and implementing diversion is critical to meeting this goal.

Prioritize SEPARATED bike and car infrastructure on Major Streets. I want to be able to ride along Division, MLK, Hawthorne, etc. - and see what businesses those areas have to offer - both comfortably and safely.

In addition to providing neighborhood greenways which provide a comfortable/calm/quiet route next to homes, we need to introduce separated bicycle infrastructure on our major streets so that people are able to observe that biking to the store is possible and attractive. If we shove all of the people biking onto the neighborhood roads, it won't be apparent to the person that drives for most of their trips that biking around town is possible. We want to get 25% of our trips made by bike, but we'll never get there if we don't provide quality infrastructure on our major streets.

Provide calmed shared space bike and car infrastructure on Major Streets.

For roadways that are too narrow to provide separated bike and car infrastructure, the roadway should be calmed as much as possible in order to make the commercial roadway into a 'commercial greenway' of sorts.

Repurposing Street Space

I fully support Policy 9.15, Repurposing street space. Encourage repurposing street segments that are not critical for transportation connectivity to other community purposes.

This helps east Portland make the best of the unpaved roads, and gives all neighborhoods more freedom for place-making and community building.

Vision Zero

I am dismayed by the city government's inability to make meaningful changes to improve safety and comfort while focusing almost entirely on paving roads - some that need it, and many that don't. A strong endorsement of Vision Zero, by putting safety at the top of the transportation hierarchy, above walking, cycling, and transit, will open the doors to so much low hanging fruit, and anchor the hierarchy in a truly multi-modal way.

Reduce Parking Minimums

Over-investment in parking is un-economical and places a burden on future generations. The Comprehensive Plan should favor drawing down the amount of land dedicated to automobile storage. Reducing minimum parking requirements from new construction, and encouraging the conversion of existing parking lots and structures to more productive use should be a key tenet of our land use policy.

Parking is also an equity issue as the money developers spend on automobile storage is directly passed on to the rent people pay. With a reduced requirement to include as much parking in new developments, we'll end up with more affordable density, a much better state of affairs than the current trend of pushing low-income folks to the suburbs so they end up driving (and parking) in Portland.

Route Redundancy

An important concept in any transportation network is Route Redundancy. It animates many of our discussions when it comes to automobile traffic planning, but is also needed in multimodal planning. By treating bicyclists as equal citizens on our commercial corridors, we'll also mitigate issues that can occur when Neighborhood Greenways are closed for repair or other reasons.

When automobile drivers encounter construction or delay, it's expected that they'll just use the "next best" route. For people walking, biking, and using transit, there frequently isn't a next best route. This is why we should prioritize redundant routes for all modes.

Allowing/Promoting Responsibly Built Alternative Dwelling Units and 'Skinny Homes'

Responsibly built ADUs and 'skinny homes' are our best shot at maintaining neighborhood character. Character comes not only from the style of the housing stock, but also from maintaining the affordability of dense central neighborhoods as places for the types of creative people who made Portland what it is today. ADUs and skinny homes should be encouraged anywhere single family housing is found. Affordability in the central city is an equity issue, so the faster we can create housing the better our chances of weathering our current boom and resulting in a city that's affordable for people who put quality of life before income.

However, in order to create such ADUs and skinny homes, we should do so responsibly. Deconstruction should be prioritized/encouraged/incentivized over demolition. Also, these smaller type of homes should not be required to provide driveways to garages, as the garage doors typically become the entire front of the first floor of the unit - which is definitely NOT within the character of the neighborhood, and furthermore ruin the safety and connectivity of the pedestrian network whenever a curb cut is introduced across a sidewalk. This is in line with reducing our parking minimums, and acknowledging that the people that will be living in these smaller type of units will likely not own as many cars as typical people living in larger single-family homes.

Street Classifications

I support the re-designation of our streets, especially bike routes, to be more in line with the 2030 bike plan. This will help direct development of those streets for better access and safety.

More Cross-Departmental Projects

I support the concept of actively combining water, transportation, parks, etc. money for efficiency in implementation and better design of our city's physical improvements.

Need for Quantifiable Metrics

We need quantifiable metrics to improve the community, safety, and traffic patterns in order to better discuss the issues with Neighborhood Associations, businesses, and the city. For example, bicycle level

of stress should be a better metric for designing/improving neighborhood greenways rather than the daily level of car traffic along the roadway.

Inclusionary Zoning

Inclusionary Zoning is a critical tool for maintaining equity as Portland becomes more desirable. Currently there are state-level constraints on what we can do, but a long-range plan like the 2035 Comprehensive Plan should assume those state-level constraints will be resolved in its time frame. As new zones comparable to existing zones are developed, they should describe inclusionary zoning policies consistent with our values, so that when these tools become available to us, we are ready to use them.

Study I-5 Removal and Removing CRC from the Plan

It's commonly acknowledged in urban planning circles that the 20th century's freeway boom was regretful mistake. Restoring public access and productive land use to areas of the city currently blighted by highways is an investment our future residents will thank us for. This is a big task, but by 2035 we'll wish we had started studying it earlier. There's no reason not to start now.

Similarly, we shouldn't be expanding the size of our freeways if we ever want to become more sustainable. Let's not repeat our past mistakes, and instead plan for smarter more sustainable bridges. The CRC in its latest form is a failed project and shouldn't be included on the future comp plan.

Thank You!

Thank you for taking the time to read through all of these items. I truly appreciate it.

--Erinne

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:41 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony-Argay Neighborhood

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
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From: Darlene Vinson-Mid-county Memo Dept. Editor [mailto:editor@midcountymemo.com]
Sent: Friday, March 13, 2015 4:39 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony-Argay Neighborhood

I came to live in Parkrose in 1965 and graduated from Parkrose High School in 1969. While all Parkrose neighborhoods were annexed into the city of Portland decades ago, this community has remained an especially unique and cohesive one.

I know live in the Argay neighborhood.

I want vacant or undeveloped land that is currently zoned R-3 in this neighborhood to be reclassified to R-5 or R-7 single family residential and the mixed employment areas (change numbers 287, 288 and 289 at Northeast 122nd Avenue and Shaver Street, and 290 on Northeast 147th Avenue and Sandy Boulevard and 688 along Northeast 148th Avenue north of I-84) also be reclassified to R-5 or R-7 single family.

Argay has long been a family friendly neighborhood. I want to keep it that way.

Business corridors are important, but the impact of the current city plan for the above noted plots will be devastating. Please create an environment that will allow future generations to grow up in the kind of safe and supportive atmosphere I experienced.

Darlene Curran
3510 N.E. 134th Ave
Portland, OR 97230
503 282 9846

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:43 PM
To: Kovacs, Madeline
Subject: FW: Homestead Schoolhouse written testimony

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
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From: keli@thehomesteadschoolhouse.com [mailto:keli@thehomesteadschoolhouse.com]
Sent: Friday, March 13, 2015 4:40 PM
To: Planning and Sustainability Commission
Cc: Stockton, Marty
Subject: Homestead Schoolhouse written testimony

March 13, 2015

Bureau of Planning and Sustainability,

Hello. My name is Kiley Cronen, and my wife, Keli, and I operate the Homestead Schoolhouse in the Woodstock neighborhood. We have been in business for 5 years and very recently purchased the property, which is located at 4121 SE Woodstock Blvd.(Property Id# 312680, Tax roll Woodstock block 37, E half of lot 2. Zoned CS) Also, we purchased the bare lot directly behind the building (Property Id#312679, Tax roll Woodstock, block 37, E half of lot 1) The bare lot has a comprehensive plan designation of R 2.5, as well as R5. (The property due west of the bare lot is R2)

We are submitting testimony regarding our back lot and future expansion and would like to have mixed use designation. Looking at the future growth of our preschool and the Woodstock neighborhood, we feel that receiving mixed use designation would not only be crucial for expansion, but also beneficial to our community. We host the community holiday tree lighting, have wait lists, and have become an important part of the community. We love the Woodstock neighborhood and hope to keep serving our community for many years to come.

Thank you for your time and we look forward to hearing from you.

Sincerely,

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 4:49 PM
To: Kovacs, Madeline
Subject: FW: Oil Trains

Follow Up Flag: Follow up
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Julie Ocken
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From: Pat Sprint Yahoo [mailto:oregonworldtraveler@yahoo.com]
Sent: Friday, March 13, 2015 4:48 PM
To: Planning and Sustainability Commission
Subject: Oil Trains

A few of my friends/ neighbors have written eloquently to you about their deep concern about the oil & coal trains rolling thru our neighborhood day and long into the night.

Eloquence is not my forte' but I am very unsettled and fearful about this recent development. I am 74 yrs. old and don't want to be forced out of my home of 20 years because of increased toxic environmental or safety issues.

Please stop the trains so we in Woodlawn/ NE Portland can live, and sleep in peace.

Thank You,
Patricia Christiansen
834 NE Madrona St.
Portland OR 97211

Sent from my Samsung Epic™ 4G Touch

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:04 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony SE 13th Ave. btw Sherrett and Linn streets

Follow Up Flag: Follow up

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From: Brian Posewitz [mailto:brianposewitz@comcast.net]
Sent: Friday, March 13, 2015 4:57 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony SE 13th Ave. btw Sherrett and Linn streets

Greetings:

I support the proposed mixed use designation for SE 13th Ave. from Sherrett Street south to Linn Street. I live around the corner, on SE 11th Ave. at Sherrett Street. I support the mixed use designation (v. residential) for the following reasons:

1. The area involved has a history of mixed use. A “Divorce Shop” is giving way to an art and framing store on 13th Ave. between Clatsop and Marion. There is an industrial building (metal shop?) at 13th and Marion. On 13th Ave. between Sherrett St. and Clatsop St. (west side), there have been a fishing shop and a hair salon (in one location) and a large house converted to multiple shops and offices. In the more distant past (10 years), there was a large industrial building where the Trolley Barn townhouses now sit (between 11th and 13th at Linn).
2. Future plan designations should not just be about what is there now but about what would lead to a more attractive city and neighborhood in the future. In my view, mixed use on 13th would create a better neighborhood than limiting development to residential uses.
3. There is no compelling reason to distinguish the area of 13th Ave. north or Harney from the area south of Sherrett.

Thank you for considering my comments.

Brian Posewitz
8508 SE 11th Ave.
Portland, OR 97202

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:06 PM
To: Kovacs, Madeline
Subject: FW: City of Portland Proposed Zoning Testimony

Follow Up Flag: Follow up

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Julie Ocken
City of Portland
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From: Julie Handsaker [mailto:jchandsaker@gmail.com]
Sent: Friday, March 13, 2015 4:57 PM
To: Planning and Sustainability Commission
Cc: buckmanboard@googlegroups.com
Subject: City of Portland Proposed Zoning Testimony

To: The City of Portland Planning Commission
From: Julie Handsaker

Re: Proposed zoning changes in the following areas:

- ? Blocks from SE 15th to SE 19th between SE Belmont and SE Morrison Streets
- ? The 1900 block between SE Alder and SE Washington Streets
- ? The area of SE 14th avenue and SE Stark Street

Please accept my submission of comments as public testimony concerning the proposed planning changes in the Buckman neighborhood.

Blocks SE 15th/19th avenues between SE Belmont and Morrison Streets. Proposed zoning change to CS:

These blocks currently have R1, R2.5, CM and CS zoning designations. The proposed implementation of CS zoning would not only serve to disturb and unsettle the present character and personality of the neighborhood, but create an undue hardship that will adversely impact the livability of current residents, many of whom are long-term (10 plus years) or native Portland residents.

The adverse affects of CS zoning will reduce setbacks to zero, thereby supporting demolition of the existing housing supply and create an environment of monolithic structures that encourage

small high-rent studio units, thus displacing family orientated housing and further reducing affordable housing options. CS zoning will not encourage family housing, thereby creating an environment reducing the number of school age in-district children attending Buckman Elementary School. We need to support housing that encourages families to remain in Buckman and not infill developments that support high-rent units with a transitory tenant base demographics.

The 1900 block of SE Alder and Washington Streets. Proposed zoning change to R2.5 from R5:

The proposed change in zoning to R2.5 is not consistent with current use and could further destroy, in the future, the current character and personality of the neighborhood that has made it such a desirable area in which to reside. Therefore, I support preserving the current zoning of R5.

Conclusion:

There appears to be a growing hemorrhaging against the brisk rise of real estate demolition and the type of replacement infill developments and the manner in which it is being ushered. Residents, citywide, are becoming increasing astonished and rebellious at the current undesirable changes occurring, seemingly overnight, in their neighborhoods and which their local government progressively appears to be promoting. Managing growth and sustainability while promoting livability are not easy measures to obtain when confronted with diverse opinions how to achieve a community's long-term goals.

Sincerely,

Julie Handsaker-Gray
1437 SE 28th Avenue #25
Portland, Oregon 97214

Julie C. Handsaker-Gray
J.D. Candidate
Portland, Or
o: 503.446.1257
f: 503.715.5695

Member of Oregon Women Lawyers (OWL)

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From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:18 PM
To: Kovacs, Madeline
Subject: FW: SW Portland resident - comments on draft 2035 Comp Plan

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Julie Ocken
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From: Maripat Hensel [mailto:henselm@comcast.net]
Sent: Friday, March 13, 2015 5:10 PM
To: Planning and Sustainability Commission
Cc: mnachair@gmail.com
Subject: RE: SW Portland resident - comments on draft 2035 Comp Plan

My address is 2911 Orchard Hill Place, Lake Oswego 97035-1194 – this is the mailing correct Portland address. I am in Multnomah County and part of the City of Portland Neighborhoods, in Sundance addition off Boones Ferry and SW Stephenson.

Maripat

From: Maripat Hensel [mailto:henselm@comcast.net]
Sent: Friday, March 13, 2015 12:16 PM
To: 'psc@portlandoregon.gov'
Cc: 'mnachair@gmail.com'
Subject: SW Portland resident - comments on draft 2035 Comp Plan

Hello Planning and Sustainability Commissioners,

I urge you to look carefully at what you are proposing in a plan that will guide Portland for 20 years. From volunteer work and business projects I have been involved in, we have a very clumsy and onerous process in the City of Portland. The public needs to be alerted and aware and we also need to balance this effort with opportunities for elected officials to take action.

I would like to see the neighborhoods represented on the PSC – all neighborhoods via the existing ONI

identified areas. I support Carol McCarthy's opinion articles that have been in local papers. She understands what we want and need and is taking action to ensure neighbors stay informed. How do we ensure we get seats at your table?

In case you haven't felt the overwhelming amount of information that we see and hear about, let me remind you of the bits and pieces of data in the news or what we talk about when we meet for coffee with neighbors. We have a City TSP, Metro SW Corridor, 2013 Barbur Concept and the current Comprehensive Plan info passing by and simultaneously we have TriMet service enhancements to consider and taxes, including arts and possibly street fees. So many different plans and competing organizations, such as the County and Metro vying for support and work. It is confusing to residents, such as my family who stay active. I can only imagine what it is like for those who do not take the time to search the websites or attend meetings.

Allow us to keep the NA infrastructure in place going forward. And, provide technologies, such as video conferencing and Go To Meeting types of services so we can include younger residents and newcomers who may not be able to leave work to attend work hour meetings or who may not be able to pay for childcare to attend evening meetings. 2035 is a long way off – hone the Portland system to work in this new era and style of civic involvement. Provide the equity that is needed to make it easy for residents to participate in a timely fashion.

You have an opportunity to help all of us to get our hearts and minds around all of these plans and allow us to embrace a few things that we can actually implement in a timely fashion before the next set of plans are started.

Maripat Hensel
SW Portland resident since 1987, Arnold Creek
503-936-5863 mobile or text
henselm@comcast.net

Cc: Carol McCarthy, Multnomah Neighborhood Association

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:21 PM
To: Kovacs, Madeline
Subject: FW: Planning and Sustainability Commission zoning on Terminal 1, to include staging the film industry vs selling public property for highest bidder

Follow Up Flag: Follow up

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From: Katherine Wilson [mailto:katherinewil@gmail.com]
Sent: Friday, March 13, 2015 5:35 PM
To: Commissioner Fish; Planning and Sustainability Commission; Hales, Mayor; Moore-Love, Karla; Quinton, Patrick; Midthun, Shelley
Cc: Ray Nelsen; ee33maschwab@gmail.com
Subject: Planning and Sustainability Commission zoning on Terminal 1, to include staging the film industry vs selling public property for highest bidder

March 13th, 2015

Commissioner-in-Charge of the Portland Water Bureau and the Bureau of Environmental Services, Commissioner, Regional Arts and Culture Council (RACC) Commissioner Nick Fish

Julie Ocken, Commissioner Clerk
Bureau of Planning and Sustainability Commissioners

Mayor Charlie Hales

Karla Moore-Love, Council Clerk City Hall

Patrick Quinton, Portland Development Commission President

Dear Esteemed Portland Public Servants,

My name is Katherine Wilson, and I have worked in film in Portland since 1974. My husband Philip Krysl and I have worked on nearly 50 major Motion Pictures, almost all of them in Portland. He works on Grimm now. My credits also include other films shot outside of Portland, such as Governor's Liaison to the set of "One Flew Over the Cuckoo's Nest", Locations and Casting for "Animal House" and "Stand By Me". We also have worked very hard all of these years to grow this Industry, whether by serving on Governor Task Force's or by lobbying the Legislature.

My husband told me recently that the Producers of Grimm wanted to rent Terminal 1 for their sound stage, but at the time the City was still using this building. And I found out recently it is now being put up for sale as a surplus building, and will be going for a sealed highest bid, such as a company who would buy propane being burned off in to the atmosphere at the Bakken oil fields in North Dakota, then ship it by train, store it in tanks and then load it to the Asia market. Portland's harbor is already a brown field!

Then again, many businesses or people of Portland can afford to outbid them? Many of us believe that the highest and best use of the property is for the people of Portland, keeping it in the city ownership in perpetuity for the future generations and the burgeoning Portland Film Industry.

My understanding is that Commissioner Fish asked BES and the Water Bureau to adopt interim land disposition policies, but that these bureaus will adopt the city-wide policy once it's developed. I am concerned that the surplus property identification of this property @ Terminal 1 will be sold before this is implemented.

You can help me save this property, from the last best place for a Portland Film Studio/ Sound Stage. I know it is a long shot, I just ask you hear me out as to why, from an experienced filmmaker's point of view, my heart is set on this one particular historic building and lot. The reasons are very diverse. I think they will surprise you. But in a nutshell, it is perfect, just the way it is for this highly labor intensive, environmentally friendly industry that pays a living wage.

I saw a blog Commissioner Nick Fish wrote wherein he mentioned that educating young people for our industry was important. I can't tell you how right you are. And I have possible funding for this idea, whose time has come. I would like for you to take a look at what I have put together at the request of the investors.

In that regard, I am sending you the revised plan today on a thumb drive (a visual proposal, keeping in line with the visual literacy goal we have and consequently too large for an email) that I have put together as a rough draft proposal. Please know that is currently being revised by John Nelsen, a very successful Portland School Administrator, to clearly delineate what the Mission Visions and Goals of the Academy are and how its career development will work. We would also wish to work with your departments to further facilitate its success.

Please take a look at the draft proposal that is on its way, and then let me discuss this with you? I will forever be grateful for your time and attention to something that is a win-win for not only Oregon and Portland, but especially for Artistic Young Adults (and yes, disenfranchised) who historically make up the Creatives in the film industry!

In closing, I think it is important to note these words you have already received via email from Mary Ann Schwab: "Deed>Title to the Terminal 1 property purchased by water rate payers must be kept in perpetuity for future generations. Meanwhile, the Terminal 1 property could be leased long term to the film industry, rental returned to the Water Bureau's long-term maintenance, with Mt. Tabor Reservoir basins and water pump systems #1 on the deferred maintenance list."

Looking forward to meeting you and hearing your thoughts on the proposal. Please call if you have any questions in the interim.

Best,

Katherine Wilson
Executive Manager
Stage III Productions, LLC
PO Box 398,
Walterville, Oregon 97489
(541) 521-3378
[Http://imdb.me/katherinewilson](http://imdb.me/katherinewilson)
katherinewil@gmail.com

Philip Krysl: <http://www.imdb.com/name/nm0473024/>
Member

John Nelsen
195 Bridge Street
Fairview, Oregon 97024
Member

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:23 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Flagged

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

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From: Jean-Pierre Veillet [mailto:jpsiteworks@icloud.com]
Sent: Friday, March 13, 2015 6:15 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

Dear Planning and Sustainability Commission:

I write to you as the purchaser of property at 2831 SW Barbur Blvd. The existing CN zoning does not support or allow the existing building, which is why we are requesting the new comprehensive plan designate this property as CM3. As owners of the property, we plan to renovate the structure to allow a major company with over 300 jobs to locate to the building. In the renovation we would like to utilize the existing public capital infrastructure of the major arterial street (Hwy 99) and the property's close proximity to the central city to increase density and square footage on the site in support of jobs.

The proposed use of office would revitalize the vacant building yet generate less traffic than the athletic club that was previously there. To add the additional square footage, the height limit would need to increase to 55-60 feet. The proposed Mixed Use Urban Center designation supports the property's close proximity to downtown, frequent transit service with an eye to allow mid-rise development. The attached sketch shows the existing level of underground parking, two existing floors as well as the additional floor. Please consider this request to transition the property into the CM3 zone as proposed.

Jean Pierre Veillet,
Director, Terwilliger Parkway Investors

240 SE 2nd Ave
Portland, OR 97214

Jean-Pierre Veillet
Chief
971-506-2337 cell
JP@SITWORKSPORTLAND.COM
SITEWORKS DESIGN | BUILD
240 SE 2nd Ave. Portland, OR 97214
503 230 2337 tel 503 241 6596 fax
OR 113920 | WA SITEWDB880JW | CA 982952
WWW.SITWORKSPORTLAND.COM

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:31 PM
To: Kovacs, Madeline
Subject: FW: Opposition to Proposed Zoning Changes In Buckman

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Susan Lindsay [mailto:lindsay@pdx.edu]
Sent: Friday, March 13, 2015 11:49 PM
To: Planning and Sustainability Commission
Subject: Opposition to Proposed Zoning Changes In Buckman

Dear Chair Baugh and fellow PSC Commissioners,

I write in opposition to rezoning of SE 17th--19th, Stark to Morrison from R5 to R2.5

Also, in strong opposition to the wholesale blanket rezoning of SE Morrison, 15th-19th, Belmont.

These proposals are hurtful and damaging to our neighborhood and are widely opposed.

We do not want a canyon of 4-6 story dense, block after block of apartment buildings in the heart of our residential neighborhood.

There is ample room for this kind of development already in place three blocks to the west at 12th Avenue.

Please pull these proposals out and help us preserve what good housing stock and affordability we have.

Thank you,

Susan Lindsay

625 SE 17th Avenue
Portland, OR 97214

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Susan Lindsay

From: Planning and Sustainability Commission
Sent: Saturday, March 14, 2015 3:31 PM
To: Kovacs, Madeline
Subject: FW: Project # 90026: Capitol Highway Corridor Improvements

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
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From: Scott Gibson [mailto:rscottgibson@gmail.com]
Sent: Friday, March 13, 2015 11:58 PM
To: Planning and Sustainability Commission; Transportation System Plan
Subject: Project # 90026: Capitol Highway Corridor Improvements

March 13, 2015

To whom it may concern:

RE: Project #90026: Capitol Highway Corridor Improvement public comments.

As a long-time resident on this section of Capitol Highway, I would like to voice my concern that improvements to this section are woefully long overdue.

I drive, bike or walk Capitol Highway almost daily. The lack of a bike lane and sidewalk are perilously evident to anyone trying to navigate this stretch without the benefit of a motor vehicle. I fear it's a matter of time before a serious injury or fatality puts an unfortunate exclamation-mark on the seriousness of this neglected but well-used highway. I know a neighbor who routinely walks her children in a stroller – she has to walk in the actual traffic lanes in particular sections because of the lack of shoulder or sidewalk. I've seen trucks and buses narrowly pass by her and her children. Sometimes this occurs in dark and rainy conditions.

Personally, I refrain from biking along Capitol Highway. I believe it's dangerous. With the lack of a proper shoulder or bike lane, there is not enough room to accommodate a high traffic volume, including a popular bus route. This makes it nearly impossible to maintain a safe buffer

from vehicles while biking.

This project must not be continued to be curbed indefinitely. The Capitol Highway Corridor must be considered a priority.

Sincerely,

Scott Gibson
9415 S.W. Capitol Hwy.
Portland, OR. 97219

rscottgibson@gmail.com

From: Planning and Sustainability Commission
Sent: Sunday, March 15, 2015 8:57 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
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From: Ben Earle [mailto:ben.earle@comcast.net]
Sent: Saturday, March 14, 2015 12:00 AM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

To the Portland Planning and Sustainability Commission,

First I want to commend you on the overall thoroughness and quality of the “2035 Comprehensive Plan” process and the content / results produced so far. This is significantly demanding and complex project and achieving a truly balanced & genuinely effective end product that will provide a reliable, fair, and definitive guide for the on-going growth and development of this unique city requires a great deal of dedicated and insightful effort on not just for your part but also for your proactive reaching out to and assessing the input from the wide variety of public & private “stakeholders”.

Having lived in and owned for the past 37+ years the same home at NE 30th & Killingsworth, directly off the North of the currently CS zoned “Fox Chase Corners” “mini-business district”, my wife & I have a distinctly experienced perspective on the changes in this area of the city. FYI, ours is a classic “story & ½” style house built in 1903 on a Concordia neighborhood “standard” double-lot with surrounding yard and a number of older, large trees.

While we could submit many hopefully useful comments, I will focus at this time on the major concerns we have about the potential negative impact an likely imminent commercial property development may have on us.

Because we are adjacent to the “Bighouse Auto & U-Haul” business that started as a gas station / auto repair in 1939, when Dave Bighouse sells the property – which he has openly told us and our neighbors

he will do sometime within the coming 9 – 12~ months when finally has a buyer & deal that he is satisfied with – as the current CS zoning for his property allows a building as high as 45 ft to be constructed, we are very concerned that the solar panels we had installed by Solar City in late 2010 through the city supported Neighborhood Association promotion will be significantly if not entirely blocked from the sun's rays for a major portion of the year.

As a result, not only would our approximate \$8000 investment (after rebates & energy tax credits) and the associated property value improvement be at risk, but we would also lose the 30-35% electrical deferment they provide.

We are also concerned about the neighborhood character impact as well as parking problems such a development might entail.

Respectively,

Ben and Sandra Earle
5524 N3 30th Ave.
Portland, OR 97211
503-282-7018

From: Planning and Sustainability Commission
Sent: Tuesday, March 17, 2015 5:40 PM
To: Kovacs, Madeline
Subject: FW: R326896

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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-----Original Message-----

From: Frederiksen, Joan
Sent: Tuesday, March 17, 2015 5:08 PM
To: Planning and Sustainability Commission
Subject: FW: R326896

Joan Frederiksen | West District Liaison

City of Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue | Suite 7100 | Portland, OR 97201
p: 503.823.3111 f: 503.823.5884
e: Joan.Frederiksen@portlandoregon.gov
www.portlandoregon.gov

P Please consider the environment before printing this e-mail -----Original Message-----

From: John Holtz [mailto:holtzdesign@gmail.com]
Sent: Friday, March 13, 2015 2:44 PM
To: Frederiksen, Joan
Subject: R326896

March 12, 2015

Joan Frederiksen
c/o Planning and Sustainability Commission
1900 SW 4th Avenue #7100
Portland, OR 97201

Dear Joan,

I write to express our concern regarding the requested zoning change to tax lot R326896 at 6141 SW Canyon Court. Lisa and I feel this rezoning would be inappropriate and we strongly oppose changing this property to a multi family zoning code.

Currently the property is accessed by a residential driveway on SW 61st Drive and as a result of a South facing retaining wall, it would likely remain that way in the future. SW 61st Drive serves a single-family residential neighborhood in a rural/urban setting. The road has no sidewalks or curbing. As a family unit with two young children we drive, walk and bike on 61st. Since cars often travel in excess of posted 25 mile speed limit, one parent must always accompany our children if playing on this neighborhood street. This street has limited sightlines and we know it can be extremely dangerous to drivers and pedestrians alike. We believe the proposed zoning change and accompanying project as proposed will undoubtedly increase traffic making the street even more unsafe.

This single-family zoned street should remain just that. We feel this zone change request will enrich just one property owner and has the potential of endangering all the remaining single family property owners and their families. We believe any zoning change will redefine the fabric and safety of the community we bought into and as such, we strongly recommend denial of this application.

Thank you so much for your time and consideration.

Respectfully submitted,

John and Lisa Holtz



Forest Park Neighborhood Association
C/O Neighbors West Northwest
2257 NW Raleigh St.
Portland, Oregon 97210

March 13, 2015

Planning and Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97201-5380

Re: Comprehensive Plan and TSP Testimony

Dear Chair Baugh and Commissioners,

Forest Park Neighborhood is unique for the extent and quality of wildlife habitat and headwater streams in our community. The neighborhood includes Forest Park, and extends from West Burnside to Cornelius Pass Road in the Tualatin Mountains. Our wildlife habitat is especially valuable because it helps keep Forest Park connected to the Coast Range and to the Tualatin Valley, ensuring genetic diversity for wildlife and plants.

The neighborhood landscape is also full of steep slopes and landslide hazards. Together with Forest Park, these conditions have left us with narrow unimproved roads that are often cut deeply into hillsides. Residential densities are low, and there are extremely limited commercial or retail resources in the neighborhood.

We like the idea of encouraging folks to bicycle and walk instead of driving to meet their daily needs, but in our area the steep hills and long distances make this impractical. Bicycling on our roads is almost entirely recreational and may result in car trips to the area to access Skyline Blvd without cycling up a steep hill. Most cycling and pedestrian improvements are unlikely to reduce VMT in our area.

Expanding these roadways around Forest Park for any purpose, including bike lanes or sidewalks, almost always requires:

- extensive cut and fill,
- removal of native trees and vegetation,
- creation of harmful breaks in contiguous tree canopy cover,
- constructing vast retaining walls that restrict critical wildlife movement,
- adding Jersey barriers or other barriers to fence off steep drops adjacent to the roadway (which also restrict wildlife movement), and
- installing acres of new asphalt, increasing stormwater runoff into headwater streams.

We might call this transformation “Green to Black,” in contrast to the city’s “Gray to Green” program. We also fear that wider pavement and improved sightlines will enable more speeding and encourage more out of lane driving (using the bike lanes and oncoming traffic lane) that will endanger drivers and cyclists.

New retaining walls, fencing or Jersey barriers, and wider pavements will significantly restrict wildlife movement in and around Forest Park, reducing the park's wildlife internal and external wildlife connections. Adding 4' paved bike lanes to existing 22' roadways will increase the pavement by 36%, a harmful addition to stormwater runoff into valuable, healthy headwater streams.

We support the city's designation of our roads as Scenic Corridors, but wider pavement will transform these pastoral green roadsides into concrete-lined tunnels.

We have two requests. First, that the city add a policy to the Comprehensive Plan that would require PBOT to weigh the harm to wildlife and increases in stormwater against the transportation (as opposed to recreational) value of a proposed transportation project, and to use alternative approaches such as sharrows, signage, and bike pull-outs or passing lanes before considering bike lanes and sidewalks in the sensitive habitat areas in the West Hills, and to minimize and mitigate any expansion of pavement by including wildlife crossings wherever possible. This policy could be specific to the West Hills, or could be broader to cover any high value habitat in the city.

Second, we ask that the city require that TSP projects 60007 and 60015 (adding bike lanes along NW Cornell Road through Forest Park, and along NW Skyline) be reconsidered. Alternative approaches for these projects should be considered.¹

We're very pleased with policies already in the draft Comprehensive Plan that encourage environmental protections and adaptation to local context, but our recent experience with PBOT suggests that a transportation-specific policy is required in addition to these general policies. For example, PBOT has been reluctant to enforce the codes for scenic corridors in our neighborhood, too often permitting fencing that clearly violated the code, arguing that because the fence was within the right-of-way (and therefore within PBOT's jurisdiction), they weren't required to enforce development codes that were in the purview of BDS.²

To their credit, at least in the past, PBOT has allowed innovative approaches to pedestrian pathways along Skyline. However, a recent permit applicant was told that they needed to construct a 7-foot wide raised concrete sidewalk along a section of NW Skyline Blvd where there is a very steep drop off (so a huge retaining wall would be required, resulting in an absolute barrier to nearly all wildlife movement) in an area where adjacent properties are fully developed with no sidewalk. It is highly unlikely that this 7-foot wide island of concrete sidewalk will ever connect to their neighbors along Skyline. Certainly we continue to oppose this particular PBOT mandate, but what we believe is needed is a more sensitive policy in this area, a policy that requires the Bureau to seriously consider the local context, which in this neighborhood means that for any roadway improvement, negative effects on wildlife passage, habitat, headwater streams and the scenic corridor are carefully evaluated, minimized and mitigated.

PBOT also endorsed Metro's plan for the Westside Trail, which includes paved 4-foot wide sidewalks along portions of Skyline that will require retaining walls long and high enough to severely limit wildlife movement around Forest Park. We are opposing portions of the Westside

¹ We do not oppose adding a single bike lane along the outside lane of NW Cornell Road between NW 30th and Audubon Society of Portland because it appears that this can be constructed without new retaining walls, and because the tunnels provide very good wildlife passage in this area.

² We suggest that while PBOT should be consulted on any development within their rights-of-way, development code procedures and enforcement should be handled by BDS.

Trail, for the same reasons we object to recent PBOT decisions, which is that planners have not adequately considered, minimized and mitigated negative impacts on wildlife, habitat, view corridors and streams. We recommend that Portland adopt policies within its update that reflect these concerns.

The city's desire to support bicycling and walking currently seems to outweigh environmental and local context policies. Again, we feel that specific language is required to ensure that wildlife, stormwater, and other environmental impacts are weighed (and harms minimized and mitigated) when transportation infrastructure upgrades are considered. For transportation projects within Forest Park, we believe that PBOT should consult with Portland Parks and Recreation. This policy should apply to TSP projects 60007 and 60015.

We believe that TSM (Transportation System Management) and TDM (Transportation & Parking Demand Management) approaches (projects 10012 and 10013) will be much more effective at reducing VMT and safety on the roads in our neighborhood than adding bike lanes and sidewalks.

We do support project 60029, however, to add bicycle facilities along NW Miller Road between NW Cornell and NW Barnes Roads. In this area the habitat is less valuable, and the topography should not require many extensive retaining walls. This road is also serves areas with higher residential densities, transit, schools, and retail and commercial resources, making it more useful for meeting daily needs. This road is relatively level, making it more attractive for cyclists and pedestrians, and it would provide a valuable connection for bike commuters between Washington County and NW Portland.

We think the best approach to reducing VMT and improving safety in our neighborhood is to invest first in reducing vehicle traffic. Beyond that, creative bike and pedestrian improvements should be considered that (1) will not harm the environment, restrict wildlife movement or negatively impact the scenic corridors, and (2) will improve bike and pedestrian access to destinations that serve daily needs (rather than for people who travel to the area to ride their bicycles for recreation). Bicycle improvement projects should also be evaluated based on elevation gain and distance to destinations. Cyclists commuting to work, for example, are not likely to traverse our neighborhood's Tualatin Mountains when there are more reasonable routes available. And it makes no sense to design improvements to encourage them to do so, especially if the improvements will damage wildlife corridors, habitat and headwater streams important to the environmental values of the City of Portland, our neighborhood and to Forest Park.

Thank you for your consideration.

Sincerely,



Jerry Grossnickle, President
Forest Park Neighborhood Association

Comprehensive (meaning long) Draft Comprehensive Plan Comments

From Mike Warwick, March 2015

Bona Fides

I was born in Portland, grew up on a farm outside Carlton and attended school in Eugene and Corvallis. I am about as “Oregonian” as you can get despite a short stint in the regional planning graduate program at the University of Wisconsin and the year I worked in Washington DC. I have been fortunate that my profession has taken me to every US state and all of the nation’s major (and many more minor) cities and provided for vacation time to visit major cities in Europe, China and Africa. My interest in planning has expressed itself in Portland as a long time member and former Chair of the Eliot Board and Land Use Committee, former Chair of PDC’s Oregon Convention Center and MLK Urban Renewal Advisory Committees and member of the Governor’s (and later Mayor’s) MLK Action Committee and recently, the NE Quadrant, Mixed Use and Institutional Advisory Committees for the current Comprehensive Plan. I was also one of the original organizers of the Eliot Neighborhood Association and active in the development of both the Eliot and Albina Community Plans.

I have lived in the Eliot neighborhood the last 35 plus years. I have seen it transformed from an area destined for ruination due to would-be home owners being “red lined” by banks to favor development for warehouses. Fortunately, the depressed value and dilapidated condition of the housing stock proved affordable for first time homeowners and renters willing to accept substandard conditions and brave gangs, drug dealers and prostitutes. At the time, these home buyers were celebrated as “urban pioneers” for restoring both historic homes and community and “bad” landlords were exposed in the pages of Willamette Week. Although currently vilified for “gentrification” by those ignorant of the history, the result was the creation of protective historic enclaves and revitalization along Mississippi and Williams that has earned favorable reviews by urban planners everywhere. This transformation was enabled by the combination of longtime minority homeowners and new residents who used the previous Comprehensive Plan to reverse the course Portland’s inner NE neighborhoods were on at the time. The current Comprehensive Plan process provides an opportunity to review the performance of the prior plan and improve on it with the new one.

Overall Impression of the Plan

Strengths of the Draft Plan

- The focus on “centers” and linking “corridors” and their relationship on a “rank order” basis appears to be derived from Central Place Theory, and rightly so.
- The notion of “pattern areas” appears to be based on “The Pattern Language,” rather superficially, but that is better than not at all.
- The concept of directing new development to centers and corridors specifically to preserve “unique [residential] neighborhoods” is critically important both to maintain *Portlandia* and to enlist public support.

- The focus on “fixing” the “mixed use” zone is also critical so as prevent further erosion of unique residential areas and enlist public support.

Weakness of the Draft Plan

- Clumsy use of statistics to justify social engineering.
- The “equity lens,” as applied in the Plan. It is fine as one of many decision making tools, but when it is used to justify certain zoning proposals and policies it will likely create the opposite outcome.
- Failure to address inappropriate Rx and Rh zones.
- Failure to address conflicts between neighborhood preservation (especially historic neighborhoods) and in-fill that leads to both destruction of neighborhoods and gentrification.

Specific Comments

Adopt the Plan NOW!

This plan is a significant and much needed improvement over the current plan. It must be adopted as soon as possible. Although there are some outstanding details, specifically regarding the proposed “mixed use” zone, additional delay for further debate is letting the perfect become the enemy of the good. It is worth noting, the “equity” lens when applied to this issue reveals it is the “have” neighborhoods who are asking for delay while the most impacted close in and “have not” neighborhoods will be the most damaged the longer the current plan and zoning remains in place.

Fix the Rx zone

Title 33 describes the Rx zone as a “Central City” zone. However, the current plan has pockets of Rx zoning outside the Central City. That should be changed immediately and the Rx zone should be restricted to the Central City as intended.

Bring the Rh zone into conformity with proposed “mixed use” zone heights, FAR, and step/set backs.

One of the goals of the current “mixed use” review process is to address neighborhood issues with recent infill development in the current C and E zones and transitions to R zones. This is an issue because the flexibility allowed in these zones was exploited by developers to the detriment of established neighborhoods and residents. Addressing neighborhood issues with the “loopholes” developers exploited won’t stop them so long as the Rh zone offers equally lax development options.

- Ideally, the Rh zone should be included in the new “mixed use” zones so as to reflect the “context sensitive design” being developed for these new zones (relating building height and mass to street scale, etc.).
- If the Rh zone continues as a unique zone, it must conform to the same height, mass and step/set back standards in the “mixed use” zone. If it remains an exclusive residential zone, nominally in predominately residential areas, additional bonuses for height and mass must not be allowed.
- The current height and FAR bonuses for proximity to “transit” should be reduced. The 100 foot height allowance should be reduced to 75 and the 75 foot limit

reduced to 50. The “1,000 foot from transit facilities” should be reduced to “within 100 feet from transit streets.” This will facilitate more dense development along transit corridors, while protecting nearby residential areas that may have pockets of Rh zoning. In this regard, the “1,000” feet allowance encompasses almost all of Portland’s “historic” districts. An Rh parcel in Irvington three blocks from Broadway could host a 75 foot tower in the midst of its Historic District. That makes no sense, yet, that is what is happening now at NE 7th and Russell.

Infill IS Gentrification. Stop it NOW!

The Plan misapplies statistics to justify density increases in neighborhoods to address perceived “affordability” and “gentrification/displacement” policies (see GP 3, 3.78 and 79). As currently practiced, this has the opposite effect. Rather than preserving existing family homes that are affordable to school teachers and city employees, current medium density and lot division rules encourage the demolition of this affordable housing stock and its replacement with infill projects that sell for two to three times prevailing existing home prices. THAT is gentrification! Worse, much of the new infill is insensitive to the neighborhood character and is gradually destroying what makes individual neighborhoods “unique,” both in terms of the scale and style of construction and the fabric of the neighborhood, primarily by eliminating front porches and back yards that facilitate “neighborliness.” That is impossible when the developer’s objective is to squeeze as much building on the subdivided parcel as possible. This practice flies in the face of the Plan’s “equity” goals. But equally important, undermining existing neighborhood character creates with the new residents an “uncaring” population that will have less concern about the welfare of former residents they displace. That strikes at the heart of the Plan’s equity goals, namely fair treatment of people.

Protect Portland’s Historic Neighborhoods, not just Individual Buildings

The plan offers little in the way of protection to historic “areas,” and scant protection to Historic Buildings. When it refers to historic preservation it adds the “when feasible” qualification (see GP4, 4.36). That is unacceptable. The Plan recognizes Portland’s unique neighborhoods are an asset. Many of the “inner” neighborhoods have architectural and commercial features that are characteristic of both each neighborhood and of Portland’s development history. Loss of this would leave Portland looking like most any other late 20th Century urban place; in other words, not unique and rather boring. This is highlighted by comparing new residential infill in inner neighborhoods with existing homes. Ugh! The same is true for new mixed use projects and existing commercial and historic mixed use buildings. On the one hand, it is unfortunate few of the older buildings remain, but on the other, the new buildings generally fill vacant or underutilized parcels so the loss isn’t as critical as in residential areas.

Several things should be done to protect Portland’s historic “fabric.”

- One is to provide a “buffer” between historic buildings and districts (including conservation districts) to ease the transition between new and historic structures. At present minimal set backs are required. I would propose the buffer be doubled if landscaped, but to allow this buffer area to be used for townhome type

- residences facing adjacent R zones instead of landscaping. That will put the buffer area to practical use that is more compatible with adjacent residences.
- Another is to provide assistance to elderly and/or poor building owners of historic and “contributing” buildings to properly maintain them, both to preserve them and to maintain current residents. This can prevent fire sale pricing that enables demolition for infill. It also furthers the Plan’s equity objective as many of the inner city owners are minorities and, obviously, most are elderly with fixed or limited incomes.
 - In designated “historic districts,” like Irvington, there is a great deal of uncertainty about what is and isn’t permitted that has generated backlash to the historic listing. Much greater clarity of both what is permitted and the approval process should be provided, essentially a “prescriptive path” or “community design standard” that removes some of the current subjectivity in the review and approval process. That would help alleviate some of the current concern in existing historic districts and facilitate transition of “conservation districts” like Eliot to full “historic district” status.

Resilient Communities

Resilience in the face of natural hazards is a worthwhile objective; however, it is impossible to accurately anticipate all hazards and their potential impact. Further, it is impractical to protect against all risks. Even the scope and scale of impacts from identified risks, such as a major earthquake, are difficult to predict. Protecting against the most extreme events presents unnecessary burdens as does imposing protective codes on all areas irrespective of likely risk. Regardless, even if this is done following best practice, the actual event may have more dire impacts than expected and, more likely, some other, unexpected event, will be more damaging. Rather than placing faith that these events can be known and planning accordingly, Portland should have a “Plan B Plan”; a Plan for what should and could happen after a significant loss of public and private infrastructure. Should downtown be rebuilt after a major quake in light of the risk posed by future quakes and rising sea levels? Should residences on slide prone hills be rebuilt? Rather than just repeating the prior development pattern, Portland should consider what a more resilient community would look like if redevelopment in the riskiest areas was prohibited. A Plan B Plan isn’t needed in this Plan, but the concept should be introduced.

Preserving Existing Neighborhoods is Essential to *Portlandia*

Portland’s reputation for friendliness is inherent in our urban fabric, not our water. That fabric includes residential characteristics like front porches and back yards that facilitate neighborliness. The Plan will affect neighborhood character through both “form” and “design.”

Form - The Plan has a vision more clearly rooted in the “language” of urban planning than previous plans. This contrasts to prior Comp and Neighborhood Plans that often seemed focused on “problem solving.” The hierarchy of “centers” and linking “corridors” is consistent with natural development as

described in Central Place Theory. This approach will be highly successful to the extent these natural tendencies are accommodated in the revised “mixed use” zones as applied in centers and along corridors. Equally important to the success of centers and corridors is healthy adjacent neighborhoods to support them. Most of Portland’s neighborhoods fit this definition; however many of the healthiest neighborhoods are being undermined by inappropriate infill that is unraveling the current neighborhood fabric. Portland neighborhoods owe their uniqueness and the city its reputation for friendliness to features like *front porches and back yards that facilitate neighborliness*. New infill typically replaces single family homes with town homes and the front porch is replaced with a second floor balcony where residents literally “look down upon” longtime residents. Back yards are replaced with roof gardens where neighbors are further isolated. As noted previously, this kind of in-fill also increases gentrification that further isolates infill residents from long time neighbors by income level. The net effect is that new residents are uncaring about their current and recently displaced neighbors. That is a serious equity issue.

Design and Design Process - The “Goal” to focus development so as to protect existing residential neighborhoods’ “character” is critical to public acceptance of the plan and credibility of future development decisions. That is lacking in the existing comp plan as well as current the development decision process, both land use and design reviews. The proposed Plan’s effort to address it is only the first step. Much more needs to be done to provide land use and design processes with “levers” the public (via neighborhood associations) can use to accommodate their interpretation of “neighborhood character.” If the goal (3A) is “A city designed for people,” much needs to be done to change the current land use and design procedures so the city is designed “by the people,” rather than the current goal of enriching developers. The major implementation challenge is whose view of neighborhood character should prevail. At present, it is that of developers who generally have no relationship to or within their target neighborhood. The result is development that doesn’t fit in in terms of scale or design. It tends to be too big and follow a design template dictated by financial considerations instead neighborhood character. The end result to date has been essentially the same building with minor variations on the same materials. No effort is being made to echo existing buildings, at least for large multi-family and mixed use projects. For all of the apparent variety of new construction along North Williams, if you had dirty glasses it would look like the same boxy building is replicated along its length and the same as along Belmont, Division and so on. Sadly, the current “design review” process enables this because the Design Commission is composed to fellow architects who use a similar design style and palette. The injection of true neighborhood aesthetics from impacted neighborhoods is sorely needed.

Pattern Areas - The concept of “pattern areas” included in the Plan is welcome, at least to the extent it draws on “A Pattern Language;” if so, it is superficially

applied. For example, the “inner” pattern area extends to east 82nd. Portland’s inner NE areas don’t extend much past 33rd and are distinct from the inner areas of SE Portland. More granularity in the application of “pattern areas” based on the era of development and age of housing stock is necessary. If that IS reflected in the final plan, it should be embedded in the “design review” process or “community design standards.”

Equity/Affordable Housing

Inequities are a critical social problem; however, municipal efforts to address them in the US have a mixed record at best, because housing affordability has many root causes that local governments cannot affect to any significant degree. Over the long term, housing affordability is an employment issue. Healthy, diversified economies promote home ownership and housing choice. Changes in policies can increase housing affordability far more effectively than changes in zoning. But, some of those policies intersect with zoning and this Draft Plan:

- The Plan should identify neighborhoods that lack affordable housing options, say areas with fewer than 15% of units meeting “affordability” metrics. Portland typically concentrates low income housing in inner N/NE neighborhoods where public resistance (and wealthy donors to Council persons) is low. It lacks the political will to force wealthy neighborhoods to shoulder a fair share of this responsibility. The absence of data on the distribution of low income units enables continuation of that policy, which is shameful.
- Similarly, the Plan should identify areas where employment options are likely to exist for non-college educated residents. This survey should not ignore opportunities for “menial” jobs such as building and household cleaning, child care, family food servicing, and so on. Portland’s wealthy enclaves can provide jobs as well as its industrial sanctuaries. Affordable housing should be located to provide employees close to these potential jobs, rather than in race segregated project in the inner city.
- The Plan should recommend that City policy prioritize its housing strategy to ensure equitable access to housing city wide with the bulk of new units in proximity to employment opportunities.

The Plan should recognize that focusing on new units will not address pressing current needs for affordable housing and should recommend programs and policies to preserve existing housing units that provide the bulk of rental units today. Those should include disincentives for in-fill projects that increase average housing costs over previous home value/rental levels, preservation of housing stock that suffers from deferred maintenance due to homeowner/resident income and/or age challenges and strategies to secure long-term affordability agreements upon land transfers, such as freezing property taxes in exchange for rent regulation.

The Plan should carefully consider so called “inclusionary zoning” implemented by fiat or through incentives. Portland’s housing market is not as constrained by geography like San Francisco and larger metro areas like LA where commute times are barriers for

housing choice. If Portland adopts complicated or onerous affordable housing requirements, new units will be built in the surrounding communities instead. The irony is that Portland's current housing policy concentrates low income units in job poor areas is fine so long as they are close to light rail. The assumption is residents are just a light rail trip away from productive employment. However, this is a two-edged sword. If Portland and the Plan insists on onerous affordable housing requirements in new housing, or worse, rent control, new units will be built outside Portland, but on light rail lines, so those residents can commute into Portland for work. That kind of policy would produce few affordable units and simply chase new residents to the area out of Portland. Portland will lose both the density new development can provide AND the affordable housing it hopes to get.

Some of the proposed measures can work. Density bonuses in exchange for affordable housing might be attractive in high rent neighborhoods and in "new" neighborhoods, like the Pearl, South Waterfront, Chinatown/River District and potentially the Lloyd and PSU districts. These are areas where new housing development is highly profitable for developers, such that the "benefit" for providing affordable housing without subsidy will be less likely to deter construction due to somewhat lower profitability. Consequently, affordable housing requirements should not be incorporated into the zoning code, rather they should be mandated in "plan districts" where wholly new neighborhoods will be (and are being) created.

New Industrial Land

"Free" Industrial Land - Portland has a fairly high manufacturing base for its size. That suggests new industrial land will be required to accommodate a growing population with manufacturing jobs. However, it isn't obvious what the "industry" of the future will be. 3-D printing may reduce the need for large manufacturing sites and allow "manufacturing" to occur in office buildings (which is common in New York City). Regardless, large "campus" sites are needed to attract most current Fortune 500 companies and corporate HQs. One of the first places Portland can look for "new" industrial land is in-house. Specifically, the properties in Lower Albina used by the Water Bureau and Albina Yards for vehicle parking should be repurposed for manufacturing use. Those vehicles can and should be stored outside the urban core. This would be essentially a "free" source of industrial land.

"New" Industrial Land - A second source for industrial land is also just beneath the City's nose; outdated rail yards. The Pearl rose from rail facilities that were out dated. The SP yard in Albina and the Brooklyn Yard are also past their "pull by" date, but their owners don't want to spend the funds to replace them with modern facilities in Clark or Clackamas County, or even east Multnomah County at this time. They are replacing similar inner city yards elsewhere however. Portland needs to put pressure on the railroads to vacate these sites. And, while it is at it, it should be working to reroute rail lines through town that currently divide communities and interfere with rational urban development.

Don't "waste" industrial sites/ no MLB! - There are two sure ways to lose industrial land. One is to allow housing development, because housing and industrial uses don't mix. The second is to site a low intensity use, like sports arenas on land that could otherwise host three shift manufacturing or warehousing. The single best thing the new Plan could do for inner-city jobs is prohibit development of new sports facilities in the Central City (which included Lower Albina).



March 13, 2015

Portland Bureau of Transportation
Portland Planning and Sustainability Commission

The Northeast Broadway Business Association (NEBBA) represents over 350 businesses along the NE Broadway/Weidler Civic Corridor from Martin Luther King Blvd. to NE 37th Ave. The Corridor serves as the economic spine connecting six different neighborhoods: Eliot, Lloyd District, Irvington, Sullivan's Gulch, Grant Park and Hollywood, which the Bureau of Planning and Sustainability reports contains 50,000 people and 21,000 households.

As part of our mission to strengthen economic vitality, increase jobs, and build a successful business district, NEBBA has reviewed the proposed Transportation System Plan (TSP) component of the Comprehensive Plan and offers the following comments:

NE Broadway/Weidler has been identified for planning purposes in the Comprehensive Plan as a critical Civic Corridor linking the Central City/Lloyd District with the Hollywood Town Center. Considerable future growth in those areas and infill in the middle should be accompanied by a comprehensive upgrade of the overall Corridor. It suffers from serious issues that have plagued it for several decades – of which the City of Portland and its bureaus have been fully aware – but that have not been addressed and fixed.

For example, the 2012 N/NE Quadrant Plan noted that the Corridor carries large volumes of traffic into and through the area. Further burdened with limited signalized, a wide roadway, and insufficient marked crosswalks, NE Broadway and Weidler have been identified as barriers to connectivity and to travel by walking and bicycling both from the surrounding neighborhoods and through the Corridor. The resulting insufficient access, high vehicle speeds and poor street-level environment has hurt businesses, reduced economic growth and made for a much less livable community overall for residents.

Given the complexity of a major business district within a high traffic commercial corridor surrounded by multiple neighborhoods, it is critical that any work here be approached in a careful and balanced manner. While there have been a few piecemeal fixes over the last 20 years, the time has come to study the entire Corridor and create a major plan that balances better overall design, multiple transportation modes, parking resources, delivery requirements, sidewalk upgrades for a pedestrian-oriented streetscape and more. Our primary goal: a dynamic main street that can support and grow our retail/commercial economy, serve as a gathering spot for neighborhoods, and help the City reach its goal of healthy connected neighborhoods.

NEBBA strongly encourages PBOT to seek a planning grant to be included in the TSP that would comprehensively update the outdated 1996 Broadway/Weidler Corridor Plan, followed by a major improvement project for the Corridor from the Broadway Bridge to Hollywood. The

concept was addressed in the N/NE Quadrant Plan as item TR6 in Implementation Actions/Lloyd District - Transportation.

In conclusion, we would like you to take action to support the projects we've identified as our top priorities, and remove those we've identified as projects of concern to support a strong NE Broadway Business District. We appreciate the opportunity to comment on the Transportation Systems Plan and help guide future transportation planning for Northeast. Thank you.



Murray Koodish
President, NE Broadway Business Association
murray@greatwinebuys.com
503-349-4574
NE Broadway Business Association 1631 NE Broadway #449 Portland, OR 97232

TSP Projects That Are NEBBA's Top Priorities

The overall NE Broadway/Weidler Corridor is complicated by the many different ways people move in and through the entire area from the Broadway Bridge to Hollywood. From the interstates and major traffic corridors to smaller neighborhood streets, from larger bicycle/pedestrian greenways to safe and local multi-modal access, there is complex interrelated movement made up of tens of thousands of smaller movements.

Outside the core of downtown Portland, no other area of the City encompasses this much traffic and public transit with such complexity. With major high-density, mixed-use growth occurring now and much more forecast over the next 20 years, several of the proposed TSP projects could help our section of NE Portland be truly first rate. We feel they deserve your strong support.

#40030 - Broadway/Weidler, NE (15th - 28th): Multi-modal Improvements, Phases II & III (Removed, but most elements potentially added back - see below).

This streetscape project - a major priority for many years by NEBBA and our neighborhood partners - was one of the few NE Broadway/Weidler Corridor projects removed from the January 30, 2015 TSP list (along with its \$9 million budget). Two related bikeway projects, #116460, Broadway/Weidler Protected Bikeway and #40108 NE Broadway Bikeway remained intact.

In discussions with PBOT staff, NEBBA questioned the removal of #40030, wondering how the city planned to handle serious needed improvements in many areas that it addressed (signals, crosswalks, wider sidewalks, better lighting, landscaping, a strategic plan for parking, etc.). We also felt that it was extremely shortsighted to only propose bicycle improvements without addressing the entire streetscape at one time.

After recent meetings and communication with PBOT, it is our understanding that the proposed revisions listed below of #116460 and #40108 will appear in the late April TSP draft update. While some critical improvements are addressed by these projects, none does so as

comprehensively as #40030. NEBBA requests an expansion of the project descriptions in #116460 and #40108 to encompass all improvements listed in #40030.

116460 – NE Broadway Corridor Improvements, Phase 1, Broadway/Weidler, Broadway Bridge – 24th, Years 1-10 (PBOT proposed revision).

“Design and implement an enhanced bikeway and improve pedestrian/bicycle crossings. Construct traffic signals, improve transit stops, and construct streetscape improvements as recommended in the Broadway Weidler Corridor Plan. Project design will consider freight movement needs, consistent with policies, street classification(s) and uses.” It is our understanding that funding has increased from \$3,500,000 in the Jan. 30, 2015 list to a proposed \$8,949,869.

There is one side note regarding “freight.” We feel that adequate delivery access to local businesses on NE Broadway and Weidler is essential and that any street redesign must provide such access, but we would like to see other transit of large freight trucks restricted to maintain an attractive main street atmosphere.

40108 – NE Broadway Corridor Improvements, Phase 2, Broadway 24th – 42nd , Years 11-20 (PBOT proposed revision).

“Design and implement bicycle facilities, ped/bike crossing improvements, transit improvements, and streetscape amenities.” NEBBA believes the final project description should be the same as for #116460. It is our understanding that funding allocation for this project has increased from \$3,500,000 in the January 30, 2015 list to a proposed \$5,681,569.

The Smart Thing to Do: Combine These Projects Into One

NEBBA feels strongly that the projects above should not be separated, but combined into a single project on an accelerated timeline during the first 10 years of the TSP. That would make it possible to undertake a comprehensive study for the entire Corridor, create a revised plan, and complete a construction project. This would minimize negative impact on businesses and neighborhoods, and prepare us for major changes in density, structure and population.

Improvements will be needed sooner, rather than later, across the entire Corridor so this critical link works well for everyone. Considerable mixed-use development is coming as the Lloyd District grows north, the eastern edge of the Corridor from 28th Ave. and Grant Park Village to 37th Ave. fills in underdeveloped areas, and more mixed-use buildings and infill projects occur in the large section between 9th and 28th Aves.

Such development will create additional serious traffic flow issues that will need attention. The intersections of NE Broadway and Weidler with signalized north-south intersections carrying considerable traffic should receive study and planning attention to alleviate current increased congestion that will only get worse as the Corridor further develops.

We would also like to see a reexamination of the I-84 on and off ramps at NE 33rd Ave., 37th Ave. and 39th Ave. for ways to minimize usage of NE Broadway as a freeway alternative and cut traffic counts. The lack of four-way access to I-84 creates inefficient vehicle patterns and pushes cars to surface streets. While a review would involve ODOT, support by PBOT would be highly beneficial.

**#116340 NE 7th/9th Neighborhood Greenway, 7th/9th Ave, NE (Holman - I-84)
#20077 Inner Eastside Pedestrian/Bicycle Bridge, 7th/8th/9th Ave NE (over I-84)**

NEBBA recommends improving NE 7th to contain both an enhanced bikeway and auto lanes. We would not support the project if it removed autos from NE 7th. This is a well-used north-south street that brings customers back and forth to local Corridor businesses, keeps cars out of smaller neighborhood streets, and also serves as a relief valve for often-jammed Martin Luther King Blvd. We want to see a smooth flow of autos in and out of the Corridor, while at the same time making it more accessible and safer for bicycles to move from NE Portland to I-84, the future Sullivan's Gulch Trail, and on to SE Portland or Downtown.

We also support the proposed pedestrian/bicycle bridge over I-84, which would enhance pedestrian and bicycle access to the Lloyd District, the Sullivan's Gulch Trail, the NE Broadway/Weidler Corridor and to the north up NE 7th Ave. The bridge would also help separate cars and bicycles in the area to improve safety and travel efficiency.

TSP Projects That NEBBA Opposes or Has Concerns About

#11102, Hollywood Streetcar Expansion

It appears that an Eastside extension of the Streetcar on NE Broadway/Weidler is not planned or budgeted. NEBBA has serious concerns and does not support the Streetcar at this time. Our concerns include: taxes on property owners that would raise costs and lease rates for businesses, heavy infrastructure investment, construction disruptions that would harm many businesses, usage of right of way that might be best used for other needs, blockage of traffic flow if streets are narrowed from the current number of lanes, and irreplaceable parking loss, among other things.

#40109 NE 14th Ave. Neighborhood Greenway

#40110 Upper NE 22nd Ave. Neighborhood Greenway

While we are in favor of improving bicycle access to the NE Broadway/Weidler Corridor and recognize the potential to bring more cyclists as customers to area businesses, we also want to be cautious of negative side effects. We've had issues on NE 7th with removal of already-limited parking for businesses due to bicycle improvements. Businesses tell us their number one customer complaint is a lack of parking. While we hope to encourage other transit modes and reduce parking pressure, our priority is making sure customers can reach us to spend money and grow the local economy. We ask that any bicycle project on, adjacent to or crossing the commercial corridor be closely vetted so as to minimize negative impacts on businesses.

#108670 ODOT. I-5/Broadway/Weidler Interchange, Phase

#108840 ODOT. I-5/Broadway/Weidler Interchange, Phase 2

#111760 ODOT. I-5/Broadway/Weidler Interchange, Phase 3

The I-5/NE Broadway/Weidler interchange project was examined during the N/NE Quadrant Plan. Some of the safety and design aspects are admirable, but we have concerns about the potentially multi-year negative impact on business districts in the Corridor due to construction. We also question if funds could be better spent in NE Portland on higher priority projects. We would like to see this project plan updated and discussed in much greater depth by the City.

March 13, 2015

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

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

Dear Chair Baugh and Members of the Commission:

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

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

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

Mr. André Baugh, Chair

March 13, 2015

Page 2

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

Very truly yours,



Michael C. Robinson

MCR:rsr

Enclosure

cc: Ms. Dana White (via email) (w/ encl.)
Ms. Karen Weylandt (via email) (w/ encl.)
Ms. Michelle Bernard (via email) (w/ encl.)
Ms. Marty Stiven (via email) (w/ encl.)



Real Estate and Construction

November 3, 2014

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

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

Dear Chair Baugh and Members of the Commission:

I am writing this letter on behalf of Providence Heath & Services - Oregon to comment on the proposed Plan policies. The purpose of the proposed Plan policies is to recognize and support campus institutional uses, including medical centers. Providence appreciates the City's recognition of the importance of campus institutions in supporting the region's economy.

There are several issues Providence would like the Commission to consider before making a recommendation to the Portland City Council.

1. The Plan policies should expressly state that existing Conditional Use Master Plan ("CUMP") decisions remain valid pursuant to the terms of a CUMP approval.

In the case of the Providence Portland Medical Center CUMP, Providence spent a considerable amount of time seeking approval for this 10 year master plan. Providence's capital plan is based upon the CUMP approval. CUMP approvals should remain valid and unaffected by land use regulation changes. Providence does not want the Providence Portland Medical Center uses and development to become nonconforming. The proposed Plan policies should include specific implementation direction that existing CUMP decisions shall remain valid.

2. Medical institutions should have the option of retaining and using the CUMP process or seeking a quasi-judicial zoning map amendment.

The CUMP process has a number of benefits, including not constituting a post-acknowledgment amendment to the City's acknowledged land use regulations. Unless the City's Transportation System Plan ("TSP") is amended to reflect the proposed Plan policies supporting campus institutions, an applicant for a quasi-judicial map amendment will be

Mr. Andre Baugh, Chair
November 3, 2014
Page 2

required to address the Transportation Planning Rule ("TPR"). This places a substantial burden on a quasi-judicial applicant to solve what are, in many cases, region-wide transportation issues.

The proposed Plan policies should include specific direction that they may be implemented either through the CUMP process, or a quasi-judicial map amendment, at the Applicant's choice.

3. The City should adopt the proposed Plan policies and the land use regulations concurrently.

While Providence supports the proposed Plan policies acknowledging the importance of campus institutions to the region's economy, once the Plan policies are adopted and acknowledged, the City will implement those policies with land use regulations. These land use regulations as adopted may not be satisfactory to campus institutions. Therefore, because implementation is so important, the City should act on the proposed Plan policies and the implementing land use regulations concurrently so that all of the affected parties, including neighbors, have an opportunity to review and comment on the entire amendment package.

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

Very truly yours,



Dana White

Cc: Ms. Karen Weylandt (via email)
Ms. Marty Stiven (via email)
Mr. Michael C. Robinson (via email)



VIA E-MAIL (PDXCOMPLAN@PORTLANDOREGON.GOV)

March 13, 2015

Portland Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: PSC Comprehensive Plan Testimony, related to Testimony Related to
2035 Comprehensive Plan (July 2014 Draft) Goals and Policies and the
Economics Opportunity Analysis

Dear Portland Planning and Sustainability Commission:

NAIOP, the Commercial Real Estate Development Association, is one of the leading organizations for developers, investors, owners & operators, brokers, and related professionals in office, industrial and mixed-use real estate throughout the United States, Canada, and Mexico. The Oregon Chapter's members represent a broad and diverse range of companies involved with commercial real estate activities in the Portland metropolitan area, including developers, owners, brokers, and managers, along with other professionals providing legal, finance, title, engineering, architectural, construction, and other services.

One of the issues that is most important to NAIOP's members is that the City, and our region, include an adequate number of sites to accommodate projected employment demands. While land that is available over the long term is an element of planning, our focus is on sites that are readily available for productive use. For this reason, we have partnered with Metro, the Port of Portland, Portland Business Alliance, and Business Oregon since 2011 in a series of studies of the region's supply of large lot industrial land [*Land Availability: Limited Options, An Analysis of Industrial Land Ready for Future Employers*. Value of Jobs Coalition (2012, updated in 2014)].

It is through this site availability lens that we analyzed the draft comprehensive plan and monitor the City's Goal 9 work, including the Economic Opportunities Analysis ("EOA"). As detailed below, while Chapter 6: Economic Development includes policies supportive of economic growth, we are very concerned that prosperity is unachievable because Chapter 7: Environment and Watershed Health will prevent job retention and growth.

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Executive Director

Kelly Ross

Lack of Balance in the Comprehensive Plan

Chapter 7 currently requires the “protection” of many resources, which likely means that development is prohibited, regardless of quality of the resource, the economic and equity consequences of prohibiting development, and regardless of the ability to avoid, minimize and mitigate potential negative environmental consequences. We understand that the PSC has considered this “balance” issue.

Requested Solution: We request that the comp plan policies be revised so that the term “protect” is used in a more restrained manner. Additionally, we request that the comp plan specifically define “protect” so that it is abundantly clear that the City does not intend for the term to prohibit development, which is a departure from how “protect” has been interpreted in the past.

Refinements in Chapter 6: Economic Development

We believe that Chapter 6: Economic Development includes Goals and policies that will help our community prosper, although some refinement is appropriate. For example, we support that the draft plan includes a policy directed at the Portland Harbor Superfund (Policy 6.40), and we appreciate the City’s recognition that industrial jobs are relevant to our community’s equity goals. However, we believe that these important policies could be strengthened.

Additionally, we understand that the EOA relies upon the City’s business-friendly business climate as a means to increase the capacity of our limited supply of industrial land. This concept needs to be elaborated upon in the comp plan, particularly given the lack of balance between Chapters 6 and 7, and the City’s recent history in imposing (or considering imposing) significant mitigation measures on employment uses, such as Airport Futures, the River Plan, West Hayden Island and Pembina’s proposed propane export terminal.

Requested Solution: Revise the comp plan so that Superfund and brownfield remediation efforts are increased, so that the link between equity and industrial jobs is strengthened, and meaningful and measurable gestures that ensure a fair, predictable and not overly-burdensome regulatory climate.

Site Specific Needs Must Be Emphasized

Another major concern is that Chapter 7 does not acknowledge the site needs or operational characteristics of industrial uses, and requires the introduction of vegetation regardless of whether there is an impact on the functionality of the use. These issues raise serious concerns about the erosion of the city’s industrial land supply, from both a total acreage perspective and ability to feasibly provide jobs on the land that is remaining.

Requested Solution: Revise the comp plan policies to acknowledge that the functionality of industrial sites, which includes operating in a financially viable manner, must be maintained.

Preliminary Concerns with the EOA

We understand that an updated draft to the EOA is forthcoming, and there will be additional opportunities to provide public comment. In the meantime, there are two issues that are of concern to our members.

1. The forecasted marine commodity demand has been reduced -- The marine terminal commodity movement demand forecast has been reduced so that now only the low end demand will be met. The 2012 EOA assumed a mid-range cargo forecast, which was described, at the time, as the "most likely scenario." We understand that the basis for the reduction is the City's likely policy choice to not assume that West Hayden Island will be developed within 20 years. We urge the City to not let this presumed outcome dictate the assumptions in the EOA, particularly when the assumption (cargo demand) sends a strong message about whether the City is open for business.
2. Accountability for, and reasonableness of, capacity creating measures -- It appears as if the measures that the City is relying upon to increase industrial land capacity are ambitious. For example, the conversion of golf courses is assumed, even though the owners are on record objecting to a change in use. Additionally, the assumed brownfield remediation rates exceed historic rates, notwithstanding the significant uncertainty related to Superfund. We understand that the capacity management approach is a potential method for determining whether the assumed capacity generating measures are working. We support the inclusion of metrics of success. However, we wonder whether it is premature for the EOA to take credit for the success of these significant capacity generating measures from the outset.

Thank you for the opportunity to comment on the com plan and EOA. We look forward to continued participation.

Sincerely,



Kelly Ross
Executive Director



March 13, 2015

André Baugh, Chair
Portland Planning and Sustainability Commission
c/o Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7000
Portland, Oregon 97201

Dear Chair Baugh and Fellow Commissioners,

Portland Community College (PCC) is pleased to have this opportunity to comment on the City's Comprehensive Plan update. PCC *conditionally* supports the proposed Campus Institution Comprehensive Plan designation as it recognizes the substantial contribution that institutions make to the region's social, educational, cultural, and economic well-being. We respectfully request further discussion regarding the proposed zoning regulations and implementation process before finalizing this effort.

It is estimated that educational and medical institutions collectively will account for 50,000 new jobs (24 percent) in Portland by 2035¹. With 3,205 employees and more than 90,000 students, PCC is the largest higher-education institution and a top 20 employer in the state. Providing sufficient development capacity and flexibility is an important first step toward supporting our institutions, which is why PCC supports the Campus Institution designation and the policies 6.53-6.58, which outline the importance of educational institutions. The real challenge lies in the translation and implementation of the new designation.

Currently, three of PCC's four campuses, Cascade, Sylvania and Southeast, are within city limits and subject to either an Impact Mitigation Plan (IMP) or Conditional Use Master Plan (CUMP). PCC does not find sufficient incentive in the proposed regulations to re-zone its campuses for several reasons:

- 1) The re-zoning of institutional campuses may be predicated on more binding Transportation Demand Management Plans (TDMPs) than are now in force. The possible prohibition of future development based on a failure to meet mode-share targets makes planning for future growth difficult. PCC has had a district-wide TDMP in place since 1992 and recently updated it to offer a menu of strategies for each of our campuses. Our intention has been to customize this plan based on site-specific considerations and to better support PCC's and the City's Climate Action Plan. We offer our own shuttle service and strive daily to reduce our SOV rate. The City's intent is admirable, yet before implementation, a broader

¹GP6, Draft Comprehensive Plan.

discussion is needed with TriMet and the City to discuss transit service levels and capital improvement needs.

- 2) The proposed transition process from the existing IMP/CUMP approval to the new Campus Institution designation also needs additional discussion. PCC would prefer that the new zoning designation for our campuses be undertaken concurrently with the legislative imposition of the new Institutional Campus designation. For instance, PCC's Cascade Campus has more than 100,000 square feet of allowable development under the current IMP. It will take some time to reach build out. Rather than requiring a subsequent time-consuming and costly quasi-judicial zone change process, a greater incentive would be to memorialize existing development potential and streamline the proposed transition process.

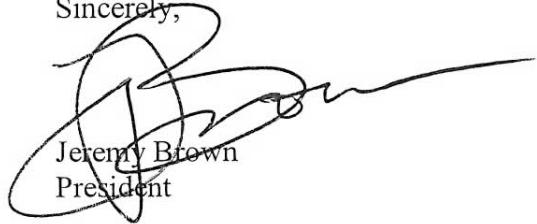
The Comprehensive Plan is also creating a Mixed Use land use designation. Subsequent application of the planned Mixed Use zones is proposed to be automatic without the requirement for an owner-initiated Type III process. We encourage the City to legislatively apply the IC base zones, the language of which is sufficient to guide growth, urban form, and campus compatibility with neighborhoods, and work with institutional partners to ensure compliance with the zone. We are asking to receive the same treatment in the new Campus Institution zone and not require a public agency such as PCC to use public money to go through an expensive and time consuming process.

- 3) The design review process is not addressed in this effort. Our experience with design review has shown the process to be cumbersome and subjective. The Cascade Campus, for example, has been subject to lengthy design review for such projects as a new surface parking lot and window replacement in a noncontributing, existing building. Some of this is due to our own IMP, which in certain instances is silent, causing us to defer to city development code. Acknowledgment of the campus setting by regulating development impacts on the adjacent neighborhood while providing more flexible allowances in the campus interior, would be beneficial to our planning and development process. We take great pride in the appearance of our campuses and seek only to improve the physical and natural experience for our users and our neighbors.
- 4) The base zone boundary is shown to be around our current property ownership. Or as outlined in our current IMP, many of the properties abutting our campuses are designated as mixed-use, in which colleges are an allowed use. However, if in the future PCC were to purchase other properties in these mixed-use zones we want to make sure we would not have to "rezone" those to Campus Institution. We have received a verbal response from City staff that we would not, however, it would be beneficial to have that stated as part of this process. As well, an adjacent property at our Southeast Center is zoned mixed-employment and precludes college use. PCC would like the properties around our campus to allow college use.

I urge the City to revisit the proposed Campus Institution regulations and seriously consider an approach that mitigates the impacts of development and preserves the livability of our neighborhoods, while also reducing the onerous and often expensive requirements of the current

zoning regulations, particularly associated with design review. I encourage the City to continue its work in refining the zoning regulations and implementation process through ongoing dialogue with institutional representatives. To this end, PCC pledges to continue its active participation in City's Campus Institution Zoning Update Advisory Committee.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Brown".

Jeremy Brown
President

cc: John Cole, Senior Planner, Bureau of Planning and Sustainability

2257 NW RALEIGH ST.
PORTLAND, OR 97210



503.823.4288
www.PEARLDISTRICT.ORG

March 13, 2015

Re: Transportation System Management Plan

Dear Commissioner Novick:

The Pearl District Neighborhood Association has looked over the online draft of the Transportation Management System Plan. Unfortunately, PBOT staff chose not to attend one of our meetings when asked at the Neighbors West Northwest Coalition to discuss this matter directly with this so we are left with a letter for communication of our reactions and thoughts to the proposal.

As you are aware, this plan is setting direction for the next twenty years for transportation matters within the city. To that end, there are a number of issues that need to be amended to reflect the goals of our neighborhood as reflected in the Pearl District Access and Circulation Plan. Our intention has always been to balance out the various modes of transportation (Bicycle, Pedestrian, Mass Transit, Automobile). To that end, our thoughts and reactions are as follows:

#20069 NW Marshall Ped/Bike Bridge: NW Marshall is the least important of the bridges that have been proposed in the neighborhood – In order of importance, the pedestrian bridges are a bridge from the Fields Park to the Greenway Trail/Centennial Mills, Flanders Bridge across the freeway, a bridge over the railway tracks at the end of NW 13th Avenue, and then NW Marshall St. If this line item is to stay in the plan, we would prefer it to be NW 13th Avenue. 13th Avenue is a key street in the neighborhood and needs a good resolution at the North end – a pedestrian bridge is a very good solution.

#20104 Pearl District Traffic Signals, Phase 2: Traffic signals may not be necessary at all these locations – specifically the locations along Northrup Street. Traffic studies should be part of the decision making process for Northrup and less expensive options may be a better fit on that street. NW Flanders should be looked at for the installation of a bicycle diverter at NW Broadway (especially in conjunction with a bridge across the freeway & improvements at Naito). NW Flanders is a key bicycle street in every plan of the area and turning that street into a local only street will be key to its success. Improvements to NW Flanders should be done within the next 10 years.

#20105 Pearl District Crossing Improvements: Some of the locations in this line item will need lights rather than rapid flash beacons within the next decade. This list is also incomplete. There are thousands of housing units being built now at the North end of the neighborhood. Hundreds of units of housing are also being constructed at the Conway Site. NW Overton is a direct connector between the Northwest District and Naito Parkway. A serious conflict exists already on NW Overton at the Fields Park prior to the new housing coming online. Lights will be desperately needed at NW Overton & NW 11th Avenue and NW Overton & NW 10th Avenue. A light will also be needed at NW Johnson & NW 14th.

Missing elements of the TSP are as follows:

- Build the Cycletrack on the Park Blocks – this is a legacy project that could make a huge difference to the ridership of the entire downtown core. Beyond improvements to NW Flanders, this project is the second most important bicycle project within the neighborhood.
- Improve pedestrian safety over the freeway at NW Everett & NW Glisan. Widen the sidewalks on both crossing to City Standards within next two decades.
- The streetcar is looking to improve their transit time overall with some of the changes occurring within the Pearl District. Lights will be needed at NW Hoyt & NW 10th and NW Hoyt and NW 11th for their purposes within the next few years.
- The Pearl District Access & Circulation Plan called for street classification changes – these updates are critical especially as they relate to transit service within the neighborhood.

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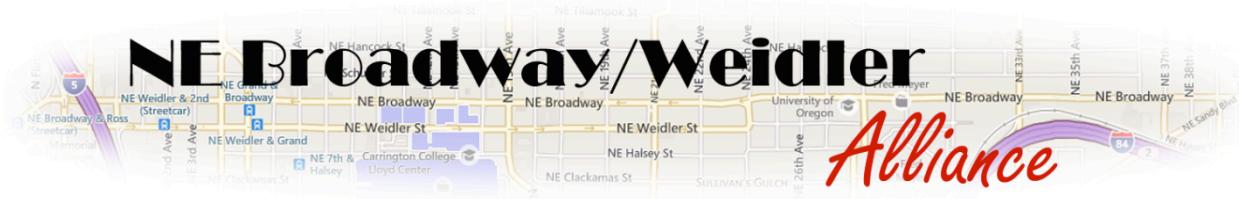
- We saw a PBOT plan for improvements at NW Hoyt and Broadway to improve bicycle safety this past year – our recommendation was to add a bicycle only light to that intersection like the intersection of NW Lovejoy & Broadway and a No Turn on Red sign. The goal is to allow bicycles to move prior to automobile traffic so the intersection is cleared before automobiles are allowed to turn. This is an important project now that PNCA has completed and opened the 511 building at that intersection.
- Cuts across the rail tracks on NW 15th at the bicycle streets (Johnson, Marshall, Pettygrove, Overton) need to be added to the plan. Those tracks are dangerous to bicycles and can easily be cut, removed, and patched in key locations to increase safety. Regrading the railroad crossing at NW 9th & NW Naito also needs to be completed for the same reason.

We are always available for deeper conversation regarding these matters and look forward to these changes in the plan.

Regards,

Patricia Gardner
Chair, Planning & Transportation Committee
Pearl District Neighborhood Association

Cc: Planning & Sustainability Commission
Leah Treat, PBOT



March 13, 2015

TO:

Portland Bureau of Transportation
Portland Planning and Sustainability Commission

The Northeast Broadway-Weidler Alliance (BWA) is a consortium of business organizations and neighborhood associations that are proximate to the Broadway commercial corridor from the east end of the Broadway Bridge to the Hollywood Transit Center. The group speaks with one voice about economic vitality, land use, infrastructure, transportation, jobs and any other current or future plans and concerns related to or impacting the NE Broadway/Weidler Corridor.

Members include Eliot Neighborhood Association, Go Lloyd, Grant Park Neighborhood Association, Hollywood Neighborhood Association, Irvington Community Association, Lloyd District Community Association, Lloyd EcoDistrict, Lloyd Center, Northeast Broadway Business Association, and Sullivan's Gulch Neighborhood Association.

Our goal is a vibrant, economically strong commercial corridor with successful business districts that serve as a gateway and gathering spot for the surrounding neighborhoods.

BWA reviewed the proposed Transportation System Plan (TSP) component of the Comprehensive Plan and offers the following comments:

NE Broadway/Weidler is a critical Civic Corridor that links the Central City with the Hollywood Town Center. It suffers from serious issues that have plagued it for decades – of which the city and its bureaus have been fully aware. The 2012 N/NE Quadrant Plan noted that the corridor carries large volumes of traffic into and through the area – one that supports large and small businesses and regional attractions. Because of high traffic speeds, limited signalized crossings and insufficient marked crosswalks, NE Broadway and Weidler have been identified as barriers to connectivity and to travel by walking and biking. The resulting poor access and street-level environment has hurt businesses and made for a much less livable community.

While there have been piecemeal fixes over the last 20 years, the time has come to examine the entire corridor and to create a plan that balances streetscape design, multiple transportation modes, parking requirements and more. The corridor's neighborhoods and business groups strongly encourage PBOT to seek a planning grant that could be included in the TSP to update the outdated 1996 Broadway/Weidler Corridor Plan, followed by a comprehensive planning project for the NE Broadway/Weidler Corridor from the Broadway Bridge to Hollywood. The N/NE Quadrant Plan includes such a review as item TR6 in Implementation Actions/Lloyd District - Transportation.

BWA Highlights These Proposed TSP Projects for Strong Support:

The overall NE Broadway/Weidler Corridor is complicated by the many different ways people move in and through the entire area from the Broadway Bridge to Hollywood. From the interstates and major traffic corridors to smaller neighborhood streets, from larger bicycle/pedestrian greenways

to safe and local multi-modal access, there is complex interrelated movement made up of tens of thousands of smaller movements. The following projects would offer major improvements for the Corridor and we ask you to financially constrain them:

#40030 - Broadway/Weidler, NE (15th - 28th): Multi-modal Improvements, Phases II & III.

This streetscape project – a major priority for many years by BWA partners - was one of the few NE Broadway/Weidler Corridor projects removed from the January 30, 2015 TSP list (along with its \$9 million budget). Two related bikeway projects, #116460, Broadway/Weidler Protected Bikeway and #40108 NE Broadway Bikeway remained on the list. BWA questions removal of #40030 and asks how the city plans to handle needed improvements in many areas that it addressed (signals, crosswalks, wider sidewalks, better lighting, landscaping, a strategic plan for parking, etc.)

After recent meetings and communication with PBOT, it is our understanding that proposed revisions of #116460 and #40108 listed below will appear in the late April TSP draft update which add improvements from the original project. Neither does so as comprehensively and BWA requests reinstatement of #40030 with an expansion to more of the Corridor or an extension of the project descriptions to encompass all improvements listed in #40030.

116460 – NE Broadway Corridor Improvements, Phase 1, Broadway Bridge – 24th (proposed revision).

“Design and implement an enhanced bikeway and improve pedestrian/bicycle crossings. Construct traffic signals, improve transit stops, and construct streetscape improvements as recommended in the Broadway Weidler Corridor Plan. Project design will consider freight movement needs, consistent with policies, street classification(s) and uses.” It is our understanding that the funding allocation has increased from \$3,500,000 in the Jan. 30, 2015 list to a proposed \$8,949,869.

40108 – NE Broadway Corridor Improvements, Phase 2, 24th – 32nd (proposed revision).

“Design and implement bicycle facilities, ped/bike crossing improvements, transit improvements, and streetscape amenities.” The project description is not as inclusive as Phase 1. BWA believes the final description should at least be the same as for #116460. It is our understanding that funding allocation for this project has increased from \$3,500,000 in the January 30, 2015 list to a proposed \$5,681,569.

In regards to freight movement, BWA agrees that adequate delivery and pick-up access to local businesses on NE Broadway and Weidler is essential and that any street redesign must provide such access; however, we do not believe Broadway or Weidler are appropriate thoroughfares for large freight trucks that should use I-84 or I-5 instead.

Most importantly, BWA is of the strong opinion that these two projects should not be separated, but should be combined into a single project to take place during the first 10 years of the TSP. That would allow undertaking a comprehensive study to create a revised plan for the entire Corridor.

With considerable mixed-use development planned for the Lloyd District's north end, plus potential infill and other challenges in the middle section, improvements will be needed sooner, rather than later across those parts of the Corridor to make this critical link work well for everyone. There has also been substantial development at 33rd Avenue (a large 5-acre property) where Grant Park Village added more than 215 units of housing, as well as a New Seasons Market and other commercial businesses. Work to soon begin on Phase 2 will add a large number of apartments.

BWA expects that Grant Park Village will spur other economic development along NE Broadway from 33rd Ave. to Hollywood. This underdeveloped area with large parking lots and single story businesses would be ideal for high density, mixed-use commercial/residential development on the

southern side. Such development will create additional serious traffic flow issues as this end of the Corridor further develops, and we feel comprehensive planning for this area cannot wait 10 years and should be an immediate priority.

Two aspects of the city street and highway system at this end concern us. The intersections of NE 33rd, NE 37th, and NE 39th Avenues are already severely congested. Also, on and off ramps from I-84 at NE 33rd Ave. and near 37th and 39th Avenues create inefficient traffic patterns and a lack of four-way access to I-84 that result in increased vehicular use of NW Broadway as a freeway alternative. While remedying this would involve ODOT, support by PBOT for a review would be extremely beneficial. Proactive intervention in the immediate future will improve conditions at these intersections and ramps, ensuring successful economic development and neighborhood livability.

#116340 NE 7th/9th Neighborhood Greenway, 7th/9th Ave, NE (Holman - I-84)

#20077 Inner Eastside Pedestrian/Bicycle Bridge, 7th/8th/9th Ave NE (over I-84)

#116360 NE Multnomah Protected Bikeway Improvements, NE Multnomah St.

These three projects are related and together would help create an integrated network that would enhance pedestrian and bicycle access to and through the Lloyd District, the NE Broadway/Weidler Corridor and to North and Northeast Portland up NE 7th Ave (our preferred routing).

BWA recommends constructing permanent improvements to the NE Multnomah St protected bikeway and construction of the proposed pedestrian/bicycle bridge over I-84 at 7th Ave. We also ask you to explore redesigning NE 7th Ave. to contain both an enhanced bikeway and auto lanes. This highly used north-south street serves as a bicycle route and provides neighborhood access, and a more efficient and safer NE 7th would greatly contribute to positive revitalization of the NE Broadway/Weidler Corridor.

#113230 Sullivan's Gulch Trail Phase 1 (Eastbank Esplanade - 21st)

#40104 Sullivan's Gulch Trail Phase 2 (21st - I-205)

BWA supports biking and walking as significant transit options in our region. The idea of providing bicyclists and pedestrians with a system of trails and greenways for safe access to a regional, world-class transportation system is a worthy goal. We suggest the Sullivan's Gulch Trail provides the connectivity needed to link together existing and planned trails throughout this region. Because of widespread support for the trail, the significant economic opportunities (existing and planned) associated with trailside development and the opportunity to link all Portland communities to jobs, cultural events, and day-to-day activities, we believe this trail must be constructed immediately in its entirety.

We understand that this transit option will be costly; however, we also believe there are ways to finance this infrastructure, that we will share with planners in order to facilitate development. The Sullivan's Gulch Trail System will play an important role in future economic growth in the region and will demonstrate the city's interest in smart community development, travel safety for bikes and pedestrians, and equitable transit options for all people.

BWA Comments on I-5 Widening Project without signifying support

#108670 ODOT I-5/Broadway/Weidler Interchange, Phase 1 Interstate 5 (I-405 - I-84)

#108840 ODOT I-5/Broadway/Weidler Interchange, Phase 2 Interstate 5 (I-405 - I-84)

#111760 ODOT I-5/Broadway/Weidler Interchange, Phase 3 Interstate 5 (I-405 - I-84)

The I-5/NE Broadway/Weidler interchange is a high priority for ODOT pursuant to the TSP; however, PBOT collaboration with ODOT investment in the necessary infrastructure design required to construct surface streets and “lids” over the highway does not appear on the TSP. While understanding that federal funds may not be available to construct the “lids”, BWA supports safety improvements proposed by ODOT and the development of “lids” to improve surface access and economic opportunity.

We believe there is significant opportunity for the creation of additional real estate and taxable property through the development of the lids. This opportunity also provides the city with the potential to create a public/private partnership with nearby stakeholders. Examples of these include, but are not limited to, Portland Public Schools, neighborhoods, sporting and entertainment venues, low-income housing, light industrial and small businesses. We encourage PBOT to consider this opportunity and BWA would welcome an opportunity to talk to the City about this in greater detail.

In Conclusion

Some of BWA’s suggestions and comments above pertain to issues and agencies not strictly within the purview of PBOT, but we believe that a broad consideration of all development strategies and venues is essential. While recognizing the significant challenges that comprehensive citywide planning poses, BWA respectfully suggests that a better end result can occur when future long-range development goals are not limited by city Bureau responsibility.

BWA appreciates the opportunity to comment on and help guide future transportation planning for Northeast Portland along the NE Broadway/Weidler Corridor. Please carefully consider our comments and suggestions. Thank you.

Northeast Broadway/Weidler Alliance, by its Co-Chairs,



Carol Gossett
Sullivan's Gulch Neighborhood Association
Land Use and Transportation Chair

gossett.carol@gmail.com



Murray Koodish
NE Broadway Business Association
President, Land Use and Transportation Chair

murray@greatwinebuys.com

Carol Gossett
2533 NE Clackamas St.
Portland, OR. 97232

NE Broadway Business Association
1631 NE Broadway #449
Portland, OR. 97232

March 13, 2015

Portland Planning and Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97201-5380

Re: Transportation System Plan Project #90026

Dear Portland Planning and Sustainability Commission:

The Multnomah Neighborhood Association strongly supports Transportation System Plan (TSP) Project #90026 (Capitol Hwy Corridor Improvements) as the neighborhood's top priority transportation project, which would bring much needed and overdue multimodal and stormwater improvements to the SW Capitol Highway Corridor between Multnomah Boulevard and Taylor's Ferry Road. This corridor serves as a critical link between the Multnomah Village business district and all points south. Currently, however, this busy stretch of roadway is known for its lack of basic infrastructure – no sidewalks, no bike lanes, no crosswalks, and no stormwater management. Quite simply, the corridor is woefully inadequate from an environmental standpoint and an outright danger for pedestrians and bicyclists alike.

Since its development in 1996, the *Capitol Highway Plan* has provided a conceptual framework for pedestrian and bicycling improvements for SW Capitol Highway. Unfortunately, after nearly 20 years, the project remains incomplete. Were it to be completed, the Capitol Highway project would drastically improve the safety and livability for thousands of residents of Southwest Portland who depend on this vital corridor on a daily basis. Further, the addition of stormwater infrastructure would prevent deterioration of new and existing transportation infrastructure in this area, ensuring taxpayer dollars are well spent.

Southwest Neighborhoods, Inc. (SWNI), individual neighborhoods, and local business associations continue to consistently rank the Capitol Highway project as the **top** transportation priority for SW Portland. As the neighborhood in which the project is located, Multnomah agrees with this ranking and believes that the project is needed now more than ever before.

In the last year, the Portland Street Fund Project List identified this project as the #1 sidewalk project in Portland set to receive \$5 million + \$5 million in SDC funds should the Street Fund pass. While we remain hopeful for this local funding, additional monies will be required to complete the project in its entirety. We urge the city to explore all avenues for state and local funding to help make this project within our community a reality. Demands on this roadway will only continue to increase as our area attracts more residents, and the condition of this important corridor is directly linked to our neighborhood's degree of livability and especially safety. We strongly believe that the project can be made a reality with further refinement of the design and pooling of funds from a variety of state & local sources.

Once again, the Multnomah Neighborhood Association urges your support for making TSP Project #90026 a top transportation priority within the City of Portland. Thank you for your consideration.

Sincerely,



Carol McCarthy
Multnomah Neighborhood Association Chair
Portland, Oregon 97219

Cc: Mayor Charlie Hales
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Steve Novick
Commissioner Dan Saltzman
Leah Treat, Director, Portland Bureau of Transportation
Art Pearce, Portland Bureau of Transportation
Roger Averbeck, SWNI Transportation Committee Chair

March 13, 2015

Portland Planning & Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, Oregon 97201

RE: Division Design Committee Comprehensive Plan Comment Letter

Dear Planning and Sustainability Committee Members,

Before I tell you what concerns me about the draft Comprehensive Plan, I want to thank you for the countless hours of time you have devoted to the Comp Plan process. Your thoughtful consideration of the issues is greatly appreciated.

Most of my concerns center around how the Plan is to be implemented. The language of the Goals and Policies points us (to my mind) in the right direction. However, past experience tells me how easily these good ideas can run off the rails, leaving me concerned about how to ensure that the values and vision espoused in the Plan's policies are reflected in what is built — or not — in our city. There is no clear path for reconciling what trumps what when conflicts occur. Below are a few other concerns.

Neighborhood Corridors

Policy 3.37 Green Infrastructure in Corridors —

Talks about enhancing corridors with distinctive green infrastructure ... and yet the Mixed Use Zoning Committee is talking about reducing/eliminating landscaping requirements for inner ring corridors since greenery is not part of the current pattern of development (as it is further east). Many of these areas are already park deficient and have long been told that the Parks Bureau cannot afford to acquire any more land in their neighborhoods and are now being told that landscaping requirements will be reduced. There is hope that plazas, perhaps with large trees, might appear as part of bonusing scenarios, but how will this "amenity" to some, "necessity" to others, be treated amidst the demands for density? How do our proposed corridor development policies keep us from increasing, instead of diminishing the heat island effect?

Consider joint approaches to green infrastructure requirements. In cases where multiple lots or whole blocks are being redeveloped by more than one developer, can the City explore allowing (and if feasible, encouraging) shared energy systems, joint (and more distinctive) stormwater management approaches, rooftop gardens that span more than one building, etc.

Increasing Employment along Neighborhood Corridors

Policy 3.42 Multiple Roles of Neighborhood Corridors (also covered in Policy 3.78 & Chapter 6)

Talks about vibrant neighborhood business districts with quality multi-family housing...

Their role in providing **employment** is mentioned other places, but it easily could be assumed to mean primarily the lowest paying retail and service types of jobs. There needs to be more emphasis on encouraging family wage employment, including maintaining incubator and small start spaces on gentrifying corridors and on identifying employment clusters as they emerge.

Neighborhood Business Districts section in Chapter 6 contains good ideas, but it is not clear how things like Policy 6.64 Investment priority, an important goal re: prioritizing development on corridors where people have limited access... can be implemented or if Policy 6.65 on Involuntary Commercial Displacement can be implemented quickly enough on some of the rapidly redeveloping corridors.

Nodal Development

Can our zoning be crafted to encourage **phased development** and accommodate the **ebbs and flows of the economy** at the same time? Developing miles and miles of mixed use buildings along our corridors does not lead to vibrant districts or walkable neighborhoods.

- Consider an overlay on corridor nodes where the retail uses are the strongest that keeps ground floor retail/commercial happening without interruption along a limited streetscape. SE Division has a historically nodal pattern with residential spans between small commercial nodes.
- Allow fully residential buildings between commercial nodes with ground floor units that can be converted as demand grows over decades. Or focus other employment (hopefully with family wage jobs) on the ground floor where it doesn't interrupt the retail environment (see next bullet).
- Allow first floor spaces that can function as Live/Work or are allowed to shift to residential uses when the economy can't support all the commercial spaces.
- "Old town overlays" to protect the small historic core of commercial corridors. Using the national "Main Street" approach, encourage neighborhoods and business districts to identify older buildings with historic or cultural significance to the community that help anchor the sense of place for a district. Instead of zoning them for higher density (a recipe for certain demolition), create an overlay for a block or two (if they exist in a cluster) or for dispersed structures that helps encourage owners and communities to take advantage of resources and regulatory incentives to preserve, adapt and reuse those structures.

Design Guidance

Inner Neighborhoods Pattern Area Policies 3.76 - 3.81 and the Design and Development policies in Chapter 4 lay out wonderful lists of design considerations that should be included in new or renovated development, but there is no way to ensure these things will be considered, whether it's a single lot infill project or the redevelopment of whole blocks as is the case on SE Division. I am sensitive to the time and money involved in design guidelines, design review, etc. However, if the City wishes to get more of us on board with redevelopment and infill designed to help us respond to climate change, then people need to have more say in what is being built in their neighborhoods and business districts. There also is a great need to increase the design literacy of our entire community. Finding ways to help people better understand development proposals and give voice to their ideas and concerns beyond saying "no" or "I don't like it" should be a high priority for a city that is expecting to grow.

Notification

The City needs to take a careful look at its entire array of notification requirements. However, given the current, rapid rate of development there needs to be a short term focus and interim adjustment of the notification requirements for new development/redevelopment affecting centers and corridors. The Division Design Initiative has put forward one such proposal. This cannot wait until the Comp Plan is adopted by City Council and forwarded to the State LDCC in 2017.

Thank you for your consideration of these comments.

Sincerely,

Linda Nettekoven
2018 SE Ladd Ave
Portland, OR 97214



March 13, 2014

City of Portland

Attn: Planning and Sustainability Commission

1221 SW 4th St.

Portland, OR 97204

RE: Mt. Scott-Arleta Neighborhood Association Draft Comprehensive Plan Testimony

Dear Chairman Baugh and PSC Commissioners:

Thank you for considering our testimony in regards to the City of Portland's Draft Comprehensive Plan, summer of 2014. The mission of the Mt. Scott-Arleta Neighborhood Association (MSANA) is, "*to actively maintain and improve our neighborhood, to foster community and keep neighbors up-to-date on events and happenings both locally and on a city-wide level.*" This letter is written addressing the draft Plan in context to concerns that the MSANA board has heard from our neighbors, and addresses specific policies within the Plan document.

Neighborhood Concerns:

In summary, we have heard concerns about the following:

Retaining Neighborhood Character: The neighborhood consists of primarily traditional single-family, detached dwellings on 5,000 square foot lots (50 ft. wide by 100 feet in depth). We have a diverse housing stock ranging from turn of the century bungalows; traditional American Foursquare homes with large porches, and post-war modern suburban housing (ranch and split-levels) recognizing the rise of automobiles. Within the past couple of years we have seen the housing market recover and the State of Oregon attracting new residents from out of state. An estimated 33,549 individuals move to Multnomah County from out of state each year. Our neighborhood is experiencing demolitions and building of new expensive homes of overwhelming size on existing lots. These homes dominate the surrounding blocks in height, scale and site coverage. While we understand there is a clear demand for larger and new single family homes, there is a need to recognize and encourage housing design that fits within our neighborhood context.

Honoring the Voices of Our Neighborhood: Our neighborhood plan was adopted on January 31, 1996 by Ordinance No. 169763 and Resolution No. 35491. This plan took policies from the city's adopted Comprehensive Plan and provided the opportunity for the neighborhood to establish its' own objectives under each. It allowed for projects, programs, and other provisions which are unique to Mt. Scott-Arleta yet reinforcing the city's Comprehensive Plan elements. Over the years the elements in this plan have been used to guide the work of the Neighborhood Association and have been the subjects of requests for capital improvement projects and grant applications (Arleta Triangle project at 72nd and Woodstock, Foster Road Transportation Plan, etc.). Please recognize that broad policy language to describe "categorical" land use patterns (Five Portland plan approach) does not take into account distinct characteristics and contexts of Portland neighborhoods that each have their own histories, stories, and current narratives to tell.

Plan Policies:

Our comments regarding specific Plan policies are addressed below:

Chapter 3: Urban Form

Civic Corridors

Civic Corridors are the city's busiest, widest and most prominent streets. They provide major connections among centers, the rest of the City and the region. They support the movement of people and goods across the city, with high levels of traffic and, in some cases, pedestrian activity. Civic Corridors provide opportunities for growth and transit supportive densities of housing, commerce, and employment. Development in Civic Corridors is intended to be mid-rise in scale. Mid-rise development includes buildings from five to 10 stories in height, but most frequently ranging from five to six stories.

Abundant trees and high-quality landscaping beautify Civic Corridors and offset the impacts of their large paved areas. These corridors exemplify the benefits of green infrastructure by cleaning and soaking up stormwater runoff and minimizing urban heat island effects, while also being enjoyable places to live, work and gather. Civic corridors are safe for all types of transportation. Civic Corridors policies apply to the roadway, the public realm of the street and the buildings that line the street.

MSANA Comment: This description of transportation facility use, land use, and multi-modal use seem to be conflicting with one another. High levels of traffic and bicycle/pedestrian activity often conflict with one another. The description above and policies 3.38- 3.41 (pg.

GP3-13) are conflicting and confusing. At one point Foster Road was/is considered a Civic Corridor. The neighborhood was involved in the Foster Road Streetscape Plan update. This plan (keeping the street the same width) provides for less vehicular travel lanes and in doing so enhances safety for transit riders, pedestrians and bicyclists. Safety is of utmost importance in these corridor areas. The implementing policies talk about “safe” environments it’s not clear what “safe” means in terms of users. Policy 3.39 (pg. GP3-13) only speaks to pedestrian safety. Since City Council has adopted the Updated Foster Streetscape Plan in 2014, we would hope that when this Comprehensive Plan is adopted that the description of Civic Corridors above would not somehow delay the Foster Road plan from being fully implemented.

The description of the Civic Corridors state, *“They support the movement of people and goods across the city, with high levels of traffic and, in some cases, pedestrian activity.”* If these areas support higher density (mid-rise developments) with commerce and employment, you would assume that this would only increase and support pedestrian/bicycle activity. Housing and Commerce will need parking. The City has heard the complaints about parking from the new mid-rise developments building along Division Street. Some of these developments included very little to no parking what-so-ever. These developments have impacted the surrounding neighborhood as patrons to these new commercial businesses and new residents compete for parking spaces, blocking access to driveways, and creating hazards to pedestrians and cyclists. Great Places (Policy 3.39, pg. GP3-13) can also include and should include the need for vehicle parking – encourage shared-use agreements, create public/private partnerships for shared use of parking areas, metered and time limited parking, and neighborhood parking permits, etc.

Civic Corridors need to be safe, complete, and innovative streets for all modes of travel and supportive of adjacent land uses. This idea of “Civic Corridors” isn’t fully developed at this time which is understandable, however, it would be beneficial to create a policy that states that all “Civic Corridors” have their own “Transportation & Design Plans” with elements that are specific and relate to the characteristics of each individual Civic Corridor.

Chapter 5: Housing

MSANA COMMENT: We agree with the proposed Housing Goals listed and recognize the need for housing type diversity, equitable access to housing, and affordable housing as housing costs increase throughout the city. If the city wants equitable access to housing policymakers must also consider special populations and the use of Universal Design features for the elderly, those with disabilities, and children. Housing for these special populations is important and appropriate near transit corridors.

We recognize that some of the housing stock in our neighborhood is in disrepair and actually some pose actual risk (fire, life and safety) that they should be replaced. Most of our neighborhood was platted with lots of 5,000 sq. feet or smaller. The neighborhood shares a historical development pattern, common streetscapes (porches, landscaped yards), and houses proportioned to lot size.

We often hear from residents the confusion over zoning (R2.5a) for single-family lots that are split to create smaller lots (2,500 sq. foot lots) "skinny homes" on a 25 foot wide by 100 ft in depth and are three stories in height if you count the two stories typically above the garage. The "a" overlay is confusing to residents and there has been new development that has been granted the bonus density that does NOT fit with the surrounding block. The design review for bonus density is NOT necessarily meeting the intent of the language of the code, *"To encourage the provision of well designed housing that is attractive and compatible with an areas established character."*

We are seeing more homes demolished and replacement housing that is built at a scale that overshadows neighboring homes and yards that leave little open spaces (front and backyards) for landscaping, gardens and other passive uses. These new homes are built maximizing lot coverage and have little to no front yard space.

We understand that these homes provide additional density but they do not fit with the characteristics of neighborhood and are generally less affordable than the houses that they replaced. Attached dwelling units sharing a common wall, duplexes and triplexes on corner lots, should be encouraged instead so that houses are built proportional to the lot size and zone designation -- however, context to height and scale to the surrounding block should be considered as well.

The city should also re-evaluate its' policy of historical "lots of record". If these lots can not be consolidated into larger lots that meet the density standard of the zone it is only then they should be considered for development -- again this is to ensure compatibility with the existing neighborhood and housing styles and lot layouts.

Are the current "infill" standards, policies, regulatory design criteria making housing more affordable within the city and are they truly compatible with existing neighborhood characteristics? From what our board hears, many of our neighbors do not think so. The result is larger, less diverse, less affordable housing that do not blend with the characteristics of the neighborhood. We are seeing less and less usable green spaces on these lots as lot coverage is maximized. We have seen our neighborhood tree canopy decrease as large trees have been cut down to make way for new developments that maximize the lot area. Once the Comprehensive

Plan is adopted and the city moves toward implementation the allowable lot coverage and bonus density for development especially in the R2.a zone should be reconsidered. Our neighborhood supports seeing a reduction of lot coverage standards to allow for usable yard space. As board representing the voices of our neighborhood we see the allowance of the additional density accrue to private development interests at the expense of the existing and future neighborhood residents.

Our board hasn't heard many negative comments regarding accessory dwelling units. Our neighborhood is unique in that it was platted with numerous alleyways for access. Some alleys are well maintained because they are used for access and others go unused and are under utilized areas that can create public nuisances. Right-of-way design standards for accessory dwelling units that want to utilize alleyways should be reviewed to lessen barriers and utilize green street/alley features.

Closing Summary

Portland neighborhoods each differ in their needs and each need to be heard and involved in planning processes. Neighborhood plans can reinforce Comprehensive Plan policies but can be structured in the context to address the needs and desires of the residents and business community. The neighborhood supports density but it should not be detrimental to natural spaces and existing urban canopy, housing affordability, and overall neighborhood compatibility and characteristics.

Thank you for your consideration,

Erika Palmer-Wilson
Erika Palmer-Wilson, MSANA Co-Chair

Jonathan Brandt
Jonathan Brandt, MSANA Co-Chair

Cc: Marty Stockton, SE Portland District Liaison

NW DANCE PROJECT
ARTISTIC DIRECTOR
SARAH SLEPPER

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Home demolitions skyrocket in Portland, neighbors demand advance warning



New homes are being built in established neighborhoods throughout Portland, particularly in the Southeast. Photographed here, a new home nearly four times the size of houses around it is being constructed in Mt. Scott-Arleta. (Melissa Binder/The Oregonian)

[Print](#) (http://blog.oregonlive.com/portland_impact/print.html?entry=/2013/12/home_demolitions_skyrocket_nei.html)
 [By Melissa Binder](http://connect.oregonlive.com/staff/mabbey/index.html) | mbinder@oregonlive.com (<http://connect.oregonlive.com/staff/mabbey/posts.html>)
[Email the author](#)

on December 11, 2013 at 7:20 AM, updated April 25, 2014 at 2:49 PM

Maria Baker got a call from a nervous neighbor one Friday morning: The house two doors down was about to be demolished. Did she know?

The Eastmoreland resident did not. She screamed and ran outside.

"I marched over there and I stood between the tractor and the house," she said.

Baker couldn't stop the demolition, and now two new homes are being built on the property.

Cases such as Baker's lie at the heart of a fight arising in some of Portland's most established close-in neighborhoods.

The number of single-family home demolitions has skyrocketed since the end of the recession. City regulators have approved more than 230 demolitions so far this year, up 40 percent from all of 2011.

Now neighbors are pushing back, arguing they deserve ample advance warning when a house is about to come down.

(http://ads.oregonlive.com/RealMedia/ads/click_lx.ads/www.oregonlive.com/portland/2013/12/home_demolitions_skyrocket_nei.html/1175836588/SecSponsor/OREGONLIVE/default/empty.gif/514872326931506f39576b4143722b74)

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Oregon Senate passes bill allowing bicycles, motorcycles to run red lights
(http://www.oregonlive.com/commuting/index.ssf/2015/03/bicycles_oregonglawrun_red_lights#incart_most)

Ord. 187832 Vol 23.B, page 14129

March 13, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

Howard Shapiro, CIC Chair
psc@portlandoregon.gov

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

**Re: Reconsideration of Extension Request
2035 Comprehensive Plan**

The Multnomah Neighborhood Association would like to thank Mr. Baugh for his response (attachment 1) to our request (attachment 2) to extend the comment period for the Draft 2035 Comprehensive Plan. We would like you to reconsider your decision so that we can evaluate the expected impacts on our neighborhood of the mixed-use designations after they are made public. The proposed Draft 2035 Comprehensive Plan policies related to the new zoning designations are too vague for us to evaluate the impacts and what should probably be included in the goals and policies has been moved to the implementation phase.

Properties in Multnomah with the vaguely defined mixed-use designations are slated to encompass up to 28% of the increased capacity in our neighborhood. For this reason, we feel it is necessary that we have the opportunity to testify on any concerns that these designations raise before the comment period is closed. A similar request for a time extension was submitted by SWNI on behalf of 17 neighborhood associations. Based on the discussion at the SWNI Board meeting, the SWNI request was due in large part to the uncertainty of the new land use designations for mixed-use and campus-institutional zoning. These concerns are widespread and should be given serious consideration.

In the response to our initial request, it was mentioned that the CIC discussed extension requests at the Nov. 18th PSC workshop and that the CIC did not endorse an extension. At the outset of his CIC testimony at the Nov. 18th PSC workshop, Stan Penkin specifically stated that the CIC was testifying to summarize observations, not to make recommendations. At the same workshop, Linda Nettekoven stated that she attributed people requesting more time to the overload of documents and important topics being simultaneously addressed. This is another reason that additional time is needed. We have submitted many requests for amendments and additions, and with more time, we would be able to more thoroughly review this important document. It is noteworthy, that Stan Penkin also testified that he was aware that Southeast had expressed a need for additional time.

The following excerpts from the minutes of the subsequent February 25, 2015 CIC meeting argue that the CIC recognized the need to extend the comment period:

"Members discussed issues that have surfaced in Comprehensive Plan testimony about the public engagement element of the process. Most of the process-related testimony is related to the timing of the release of the draft components of the Comprehensive Plan (particularly the Task 5 projects), and CIC members agree that this has been a concern. Members articulated community concerns about being asked to "write a blank check" by having designations considered before zones.

CIC members expressed frustration with public engagement around the TSP; the concerns about a compressed timeline are particularly strong for this part of the Comprehensive Plan, because the material is very complex. Concern was also expressed about the perception of a lack of connection between transportation planning and land use planning."

If additional time is being requested by the neighborhoods in Southeast as well as Southwest, then the CIC should analyze the merits of these requests in detail before making a formal recommendation. We are not asking for unlimited time, but have linked our request to the release of details that we consider crucial to our review of the Draft Comprehensive Plan. To our knowledge, the CIC did not review our letter or get an account of the scores of individuals, neighborhood associations, and neighborhood coalitions that have submitted extension requests to the record. They should be provided this information to inform their recommendation.

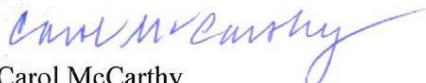
The BPS staff has been introducing new material for the Comprehensive Plan in staff reports that has not had any public review in PSC hearings or work sessions. The Provisional Center Boundaries maps were first seen by the public in a February 4, 2015 staff report to the PSC. If new material is added by staff, more hearings are required.

Based on informal discussions with the LCDC, we understand that the #1 Goal of citizen involvement is paramount. If the City were to discuss our request with the LCDC, we believe it would be seriously considered and likely granted. We hope that you will take the opportunity to demonstrate that citizen involvement means more than outreach. It requires that citizen feedback be heard to inform the process.

We were heartened by Mr. Baugh's comment "And the PSC is prepared to increase opportunities for review and testimony if necessary" and we are hopeful that this our second request will be given the detailed and thorough consideration that we believe it warrants.

Please add this to the record.

Thank you,



Carol McCarthy
Multnomah Neighborhood
Association Chair
mnachair@gmail.com

cc: Anne Debbault, DLCD, Portland Regional Representative, adebbaut@dlcd.state.or.us
Elissa Gertler, Metro Regional Planning Director, elissa.gertler@oregon.metro.gov
Amanda Fritz, Commissioner, amanda@portlandoregon.gov
Nick Fish, Commissioner, nick@portlandoregon.gov
Steve Novick, Commissioner, novick@portlandoregon.gov
Dan Salzman, Commissioner, dan@portlandoregon.g

Dear Carol and Multnomah Neighborhood:

Thank you for your comments below about the Comprehensive Plan Update and for expressing your concerns about the timeline for providing testimony at the Planning and Sustainability Commission. I wanted to respond to some of your concerns.

The PSC is the decision-maker as to when we close the record, and when we vote. On November 18, 2014, the PSC discussed our work session schedule and the most recent extension requests. We did not change the deadline; March 13, 2015 is still the deadline for written comments.

The Community Involvement Committee (CIC) is the citizen advisory committee that gives advice to BPS and the PSC on matters of public involvement. They also discussed the extension requests at Tuesday's meeting and did not recommend an extension. Members of the CIC gave a good overview of all of our public involvement work last night at the PSC. It is certainly worth watching — you can view the video online at <https://www.youtube.com/watch?v=LCowwMliz7U>.

The Comprehensive Plan will be sent to Council in two steps — policy and general land use diagrams and maps as the first action, implementation zoning details (zoning maps and codes) as the second action. I understand the Multnomah Neighborhood concern is primarily related to implementation — zoning code details related to the mixed use zones in particular. Initial concepts for the mixed use zoning are now available for public review at <https://www.portlandoregon.gov/bps/article/509414>.

Both steps will involve public hearings at the PSC and Council before anything goes into effect. There will be additional PSC hearings on the mixed use implementation details in late spring 2015. Nothing will go into effect until both steps have been approved by Council, and acknowledged by the state (probably 2016).

Additionally, in terms of a further extension at the PSC, there are state-imposed deadlines to complete this work in 2015, and we have already used up the allowed extensions. It is not unusual to break the decision into steps like this — other jurisdictions throughout the state and region do it this way. Policy and high level direction is typically established first, then we get into implementation details. If something about the implementation details causes us to re-think the broader policy, we can do that. It is iterative, and there are hearings all along the way. Additionally the PSC will not hesitate to re-open the broader policy or neighborhood center map designations if the code details and mapping reveal implementation problems.

And to be sure you understand our current timeline, the date you note in the below message for the PSC vote and recommendation (March 2015) is not correct; the anticipated PSC vote is planned in May 2015.

Going forward I feel comfortable citizens will have ample opportunities to testify in person and provide written testimony on policy and implementation of the Comp Plan. And the PSC is prepared to increase opportunities for review and testimony if necessary.

Thank you for expressing your concerns and I look forward to your continued involvement.

Sincerely,
Andre Baugh
Chair
Portland Planning and Sustainability Commission

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

November 14, 2014

André Baugh, PSC Chair
psc@portlandoregon.gov

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

Re: Request for PSC Timeline Changes
2035 Comprehensive Plan

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission change the timeline as shown in Figure 1. The timeline modifications allow citizens to comment on the **complete** 2035 Comprehensive Plan before it goes to City Council. This permits the citizens to comment on the adopted definitions from the Campus Institutional Project and the Mixed Use Zone Project before they are incorporated into the Comprehensive Plan. These changes, as shown in Figure 1, revise the City's timeline as follows:

- 1) Remove the PSC vote in March 2015.
- 2) Change the July 2015 City Council hearings on the Comprehensive Plan Goals and Policies to PSC hearings which allows citizens the chance to comment on revisions made by the PSC before the Goals and Policies are incorporated into the Comprehensive Plan.
- 3) The November 2015 City Council hearings would be changed to PSC hearings to allow citizens an opportunity to comment before the Comprehensive Plan and the Implementation Package move forward to City Council.
- 4) Reschedule the City Council hearings on the Comprehensive Plan and Implementation Package to February 2016.

The modified timeline would need to be slightly condensed to meet the December 31, 2015 deadline or an extension would need to be requested. Extending the deadline of Task 4 would require State approval from the DLCD. It is our understanding that the DLCD would grant these timeline changes and extension requests. The timeline changes would make the process to adopt the 2035 Comprehensive Plan consistent with the provisions of Goal 1 Citizen Involvement of the Oregon's Statewide Planning Goals and Policies OAR 660-015-0000(1).

Please add this to the record.

Thank you,

Carol McCarthy
Multnomah Neighborhood
Association Chair
mnachair@gmail.com

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



DIVISION MIDWAY ALLIANCE FOR COMMUNITY IMPROVEMENT

March 13, 2015

Planning and Sustainability Commission
1900 SW Fourth Avenue #7000
Portland, OR 97201

RE: Mixed Use Zoning as it relates to the Comprehensive Plan

Respected Commission Members,

The Division Midway Alliance for Community Improvement (DMA) is deeply disturbed by how the currently proposed mixed use zoning incentives will adversely affect future East Portland development. DMA is one of six Portland Neighborhood Prosperity Initiatives; the organization is dedicated to revitalizing the commercial corridor and improving the livability for residents along Division Street between 117th & 148th Avenues. DMA is also an active participant in the East Portland Action Plan (EPAP) and actively advocates to *Market East Portland as a Place to do Business*, which is an EPAP strategic priority.

The Midway district's largest concentration of businesses is located within 10 blocks of 122nd & Division Street, which is designated as a Towncenter in the proposed Comprehensive Plan. A Towncenter designation indicates a level of vibrancy that is far above the Midway District's current status, and if this status is to be achieved, it is imperative that special incentive bonuses be written into East Portland mixed use zones including requiring small, affordable commercial activation on the street level.

DMA staff serves on the mixed use zones committee and has advocated, repeatedly, with other committee and community members, to determine a way to require small, affordable commercial development on the street level. This requirement would prevent future 'tooth-gaps' caused by residential only developments existing within the mixed use zones in commercial districts. Tooth-gaps prevent walkability, detract from commercial district continuity, and are extremely prevalent in East Portland's current business districts. Allowing for small, affordable commercial development promotes local business and can be an effective anti-displacement tool by providing entrepreneurial-minded residents the opportunity to invest in their communities by building their own businesses.

Committee members have been made to understand that requiring small, affordable commercial development on the street level would not only be too difficult to write into building codes, it would inhibit development, and BPS staff have proposed incentive bonuses to address this.

Division-Midway Alliance for Community Improvement
2536 SE 122nd Avenue
Portland, OR 97236
www.divisionmidwayalliance.com

Ord. 187832 Vol. 2.3.B, page 14134



DIVISION MIDWAY ALLIANCE FOR COMMUNITY IMPROVEMENT

However, these bonuses provide NO incentives for East Portland development. DMA understands that other municipalities require commercial development on the street level, and DMA believes the Commission can find a way to require it, as well.

DMA advocates that the Commission determine an East Portland Development Package designed to provide a fast track to development for community supported developments in Mixed Use Zone areas in East Portland. These packages would offer deferred SDC and permit fees, development models, community organization partnerships and assistance for developments with a set percentage of small, affordable commercial street level spaces (750-1250 square feet) designed for small and micro enterprise businesses receiving community partner assistance. Developers would agree to maintain rents at a set percentage below market rent rates for the area, which DMA understands is allowable but not practiced tool available in Portland. Enforcement would need to be built into the program at all levels, including the opportunity for neighborhood business association review.

DMA understands such a proposal would require a City-wide effort and that time is limited to affect the mixed use zones as it pertains to the comprehensive plan, but it implores upon Commission members to make the time to create an East Portland specific development incentive package for mixed use zones. In the words of John Wooden, "If you don't have time to do it right, when will you have time to do it over?"

Best Regards,

Board of Directors,
The Division Midway Alliance
for Community Improvement

cc: Division Midway Alliance Board of Directors
David Edwards, President, Midway district property owner
Jean DeMaster, Treasurer, Executive Director, Human Solutions
Lorelei Young, Secretary, Keepsake Family Tree Video, co-owner
Connor Riggs, David Douglas Thespian Board
Trevor Hopper, Mill Park Neighborhood Association President
Susan Spencer, Employer Partnership Coordinator, Mount Hood Community College
Dawn Luethe, Senior Community Manager, Hidden Court Apartments
Kem Marks, Americorps VISTA volunteer, Division Midway Alliance

Division-Midway Alliance for Community Improvement
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Ord. 187832 Vol. 2.3.B, page 14135

Eastmoreland Neighborhood Association

Date: March 13, 2015
To: The Planning and Sustainability Commission
Cc: Deborah Stein, Principal Planner & Marty Stockton
From: Eastmoreland Neighborhood Association
Rod Merrick and Nelson Clark, Eastmoreland Land Use Co-Chairs
Robert McCullough, President
Subject: Portland Oregon Bureau of Planning and Sustainability (BPS)
Residential Densities memo dated February 25, 2015]

Recognizing that the PSC will be strongly influenced by staff comments and recommendations, we are very concerned that the memo on these vital issues was prepared in advance of the closing date for submittal of testimony. Meeting schedule cannot be considered a justification for bypassing the schedule and providing staff insufficient time to digest and present the issues in a balanced fashion.

The Eastmoreland Neighborhood Association is equally concerned with what we regard as misinterpretation of the issues and the testimony derived from the MapAp and other comments submitted prior to the date of the subject report. This memo addresses the most obvious misinformation contained in the report:

Page 16

Quote: "Reed's proposal was followed by a request by the Eastmoreland Neighborhood Association to down designate the entire Eastmoreland neighborhood, also with the intent of preserving the scale and architectural quality of the neighborhood and reduce the potential for demolitions and lot divisions particularly for large lots that could be subdivided to below 5,000 sq ft (as allowed in R5)".

Rebuttal: The Eastmoreland Neighborhood has requested R7 zoning for the entire neighborhood because an R7 zone most accurately reflects the current density and lot sizes within the neighborhood as a whole. Because of the widespread presence of underlying lots of record throughout and especially in the SE quadrant, R5 zoning allows for the development of lots much less than 5000 sq ft, making smaller, more affordable homes and houses on larger lots vulnerable to demolition and redevelopment and removing the present diversity of more affordable housing . These redevelopment

projects are bringing substantial unintended and unwelcome changes to the character and density of the neighborhood. An R7 designation addresses both issues .

Eastmoreland is not asking for something new, but rather a return to what the lot sizes were designated before the 1990s consistent with the development patterns of a mature neighborhood. Once R-5 meant 5000 sq ft, lots. The definition was changed so that lots can be 3000 sq ft with 36 ft front. (PDX Title 33: 33.10 table 110-6) An R7 designation now allows lots as small as 4200 SF.

Page 19 and 20 summary of Eastmoreland Map App testimony

Over 75 comments were made on the Map App regarding an R5 to R7 zone change within the Eastmoreland neighborhood and other comments were submitted in writing. Our neighborhood volunteers carefully counted and evaluated the comments.

- Of the MapApp comments, about 64 were in favor of the R5 to R7 zone change. Many also favored extending the R7 zone to include the entire neighborhood up to SE Cesar Chavez Blvd and none opposed it. Of those opposing the zone change, *only one* lived in Eastmoreland. The opinions expressed in the very large number of MapApp responses and comments made at association meetings make it extremely clear that the neighborhood, as a whole, wants a zone change from R5 to R7.
- Eastmoreland residents cited many reasons for supporting the R-7 classifications.
 - Eastmoreland is a beautiful neighborhood with diverse housing, styles, landscaping and trees.
 - Residents want to preserve the housing and lot sizes that dominate the neighborhood and do not want to allow big houses to be placed on new, smaller lots.
 - The recent demolitions, lot divisions, and construction have caused considerable concern. The new houses are selling for much more than the old ones so there is less diversity and less affordable housing.
- The opposition is limited in number and has several concerns.
 - Nine of the ten opponents live outside of Eastmoreland.
 - Several (2) want other neighborhoods to have the opportunity to do the same thing.

- Seven opponents write that the new MAX station needs more people living near it so there should be lot splitting, higher density, multifamily housing, high rise apartments or condominiums. This fails to recognize the the Bybee station is a destination station and that there are no plans to remove Westmoreland Park, the Eastmoreland Golf Course, or the Rhododendron Garden for a new town center. Lot splitting, or replacing 20 small houses with 20 to 30 big ones, is not going to affect the success of MAX.)
- Two opponents suggest the establishment of a historic district. (Presumably they don't know both the difficulty in doing so and that it would not stop lot splitting, etc.)
- Some opponents believe Portland needs more inexpensive housing. (Some hope that if a \$425,000 one and a half story house is torn down after grandma dies, it will be replaced with 2 houses that moderate income families can afford. But recent history shows the \$425,000 house being replaced by 1 or 2 houses selling in the \$1,000,000 range. That is not affordability or diversity. There are several streets in Eastmoreland with large houses on large lots and the houses fit. Building McMansions on small lots do not fit, and that is what recent experience suggests is happening.)

Page 21 Item 2b

When the February 25 memo discusses the historic significance, it does not reflect current, broader interpretations of historic preservation. In the particular case of Eastmoreland, it leaves out dozens of equally “historic” buildings and, more significantly, it almost completely ignores a very substantial, high level of typical historical structures which are the dominant backbone of the Eastmoreland Neighborhoods residential landscape. This high level of “common vernacular” is what unites the residences from 27th to 39th and Woodstock to Crystal Springs Blvd. The entire area is also unified by continuous traditions of individual residential landscape planting and street tree density that is well recognized throughout the city. To substantiate these claims, The Historic Survey Sub-Committee of the Eastmoreland Land Use Committee is working on an update of the Historic Landmarks Resources Inventory that will more completely record the full range of historic dwellings as well as the neighborhood’s high level of common vernacular housing types.

The Eastmoreland Land Use committee and the Eastmoreland Neighborhood Association have worked with Portland Planning Division personnel for three years

attempting to prevent some of the development abuses. We have hoped there was a way to ameliorate problems involving the division of lots, underlying lots of record, scale and design of new houses consistent with neighborhood character, notification of neighbors and protecting the environment when demolition occurs, and scale of new houses in proportion to the lot size. The February 25 memo does not discuss the Eastmoreland Neighborhood's desire to include all of its members in the zoning change (Berkeley Addition, etc.).

We again request that the February 25 staff report be revised and resubmitted based on all testimony provided and to accurately reflect the issues. We thank you and your staff for your efforts under pressing circumstances.

March 13, 2015

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Brendan Owens
USGBC

Kurt Stenberg
Consulting Engineer

CEO

Ralph DiNola

Portland Bureau of Planning & Sustainability
1900 SW Fourth Avenue, Suite 7100
Portland, Oregon 97201

Re: Proposed Comprehensive Plan Update and Mixed Use Zones

Dear Planning and Sustainability Commissioners:

New Buildings Institute (NBI) is pleased to comment on long range planning priorities in the Comprehensive plan regarding energy efficiency and requirements for new and renovated buildings. NBI is a national nonprofit think tank focused on high performance buildings. We provide policy research, tools and design guidance to support utilities, state agencies and cities as they work to advance codes and policy for greater energy efficiency in buildings. As the City of Portland considers updates to the Comprehensive Plan and Mixed Use Zoning requirements, we respectfully request your consideration of the following testimony.

With the knowledge that increased density allows protection of the urban growth boundary and provides great efficiencies in land use, transportation and overall sustainability, we support infill development, adaptive reuse of existing buildings and higher density development goals. Greater development returns can result from meeting these goals, but they may also result in greater impacts to existing neighborhoods and adjacent properties that are not fully documented or analyzed. These impacts may include increased traffic and carbon emissions, and loss of solar access, which reduces the capability of adjacent properties to independently generate energy through onsite renewables.

Several paths to increase energy performance can be incorporated into the Comprehensive Plan to minimize impacts associated with increased development intensity, balance the interests of developers with that of surrounding landowners and residents, and help meet long-term city climate goals.

Home of:



www.newbuildings.org

NBI suggests the following four policy recommendations be considered:

- 1) *Require Higher Energy Performance Requirements for up-zone requests from Comp Plan Designation to a Higher Intensity Zone Change.* Any voluntary request to rezone a property to a higher intensity zone should meet higher energy performance requirements, including one of the following:
 - a. Require compliance with the Energy Trust of Oregon's Path to Net Zero Building Program as demonstrated by completion of the program enrollment and Early Design Application, and submittal of energy modeling documentation demonstrating that proposed design/construction of the building is in alignment with performance targets and strategies on the Early Design Application.
 - b. Meet Oregon "Reach Code" energy requirements (18% better than OR Base Code demonstrated by energy performance modeling).
- 2) *Development projects requesting a bonus for greater FAR, square footage or height limits should meet higher building energy performance requirements including one of the following:*
 - a. Require compliance with the Energy Trust of Oregon's Path to Net Zero Building Program as demonstrated by completion of the program enrollment and Early Design Application, and submittal of energy modeling documentation demonstrating that proposed design/construction of the building is in alignment with performance targets and strategies on the Early Design Application.
 - b. Meet Oregon "Reach Code" energy requirements (18% better than OR Base Code demonstrated by energy performance modeling).
- 3) *Mitigate impacts from new development that substantively reduces solar access on adjacent properties and public rights-of-way.* To balance goals for increased density in the Comprehensive Plan with the potential impacts from loss of solar access, all new development projects over 10,000 s.f. or over 35' in height should include a solar shading and impact analysis as well as a recommendation for mitigation of any substantive impacts on solar access. Mitigation measures should include at least one of the following:
 - a. Transfer of solar development credits
 - b. Compensation to impacted individuals
 - c. Development of (or contribution towards) shared community solar or other renewable projects.
- 4) *Encourage more shared community solar resources and zero net energy buildings in public and private development.* To support increased resiliency and meet Climate Action Plan goals, NBI recommends City of Portland planning staff coordinate with the Oregon State Legislature on pending or future legislation to enable more shared community solar

*If solar access impacts are de minimis, then no mitigation would be required.

resources. The City should also consider further incentives to support more high performance and zero net energy buildings. Incentives might include:

- Fast-track permitting,
- Reduction or waiver of System Development Charges (SDC)
- Bonus of additional square footage
- Fee waivers for pre-application meetings
- Low-interest loan programs
- Technical support for modeling and integrated design

We appreciate your consideration of these issues to further Portland's legacy of innovation, sustainability and planning for livable communities., and thank you for the opportunity to comment.

Sincerely,



Ralph DiNola, CEO, LEED Fellow
New Building Institute
1600 Broadway, Vancouver, WA

CC: Jim Edelson, Director of Codes & Policy
Heather Flint Chatto, Project Manager

University Park Neighborhood Association
2209 N Schofield St
Portland, OR 97217
by email: karwaki@yahoo.com

March 13, 2015
City of Portland
Bureau of Transportation
1900 SW 4th Ave
Portland, OR 97201

Re: Transportation System Plan and Other Agency Major Projects Comments
To Whom it May Concern,

We are writing to provide feedback on the proposed projects and priorities in the Portland Bureau of Transportation (PBOT) Transportation System Plan Project. The UPNA Board reviewed the recently released Major Projects + Citywide Programs Recommendation List and voted unanimously in support of the following sentiments regarding proposed projects.

TSP ID 30035 Lombard St ITS

TSP ID 30037 N Lombard Corridor Improvements

TSP ID 30059 N Lombard Main Street Improvements

The UPNA Land Use Committee provided comments via the Map App. We strongly support the improvements to Lombard St in N/NE Portland. We have partnered with several projects working to improve Lombard in and around our neighborhood, including Lombard Reimagined and Friends of Lombard and the University Park Business District. Lombard should be a safe thoroughfare for our residents. As such, we encourage improvements to the east and west of our neighborhood in hopes that the culminating effect leads to a people- and business- friendly environment along our northern boundary.

TSP ID 102340 Columbia Slough Trail Gaps

We encourage the City and Port to close the gaps in this trail treasured for recreation by many of our neighbors.

TSP 116400, 116401, 116420, 116430 and 116440 North Portland Greenway Trail Segments 1-5

We strongly support the creation of a multi-use trail connecting the city center with North Portland allowing residents access to recreation and non-automobile travel to and from the city center. The UPNA has worked extensively with the University of Portland, PBOT, Parks and non-profits to support the development of this trail.

TSP ID 30063 Railroad Bridge Improvements

The UPNA Supports this project.

Sincerely,
Thomas Karwaki
Land Use Chair and Vice-Chair
UPNA

March 13, 2015

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

Dear Chair Baugh and Commission Members:

The Portland Business Alliance appreciates the opportunity to comment on the city of Portland Transportation System Plan (TSP). The Alliance is committed to improving the region's multi-modal transportation infrastructure, advocating for strong transportation policies and projects that encourage job growth and prosperity. A strong transportation network is absolutely critical to growing middle-income jobs for our region's residents. Our transportation system needs to promote the efficient movement of goods in order to support our traded-sector economy. Our Value of Jobs studies have found that traded-sector jobs produce higher wages that in turn raise more revenue for critical public services such as education and law enforcement.

We understand that, as our population grows, the capacity of our city's transportation system will be tested. There will be increased demand for all transportation options including bike/ped, transit, freight and auto. With limited system capacity and funds, we need to be strategic when crafting transportation policies and investing in projects to ensure a well-functioning multi-modal system. Projects and policies must be evaluated holistically and trade-offs considered when making investment decisions among a variety of modes. We, therefore, appreciate the addition of economic benefit criteria for opportunity access, freight access and freight mobility to help prioritize projects that provide the greatest return on investment and offer the greatest opportunity for quality middle-income jobs.

While we understand that it is not an exact science, we are concerned about the significant gap in financial resources proposed among different modes and the overwhelming commitment of resources to active transportation, specifically. Such a vast difference infers a prioritization of modes as opposed to projects and a shift away from a multi-modal system that would encourage job growth, livability and prosperity.

We would like to review the Portland Bureau of Transportation's (PBOT) citywide transportation capacity analysis to better understand gaps in the existing network but also determine future system needs given population growth projections. We need to ensure that projects that are included in the TSP fulfill not only neighborhood-level needs but the demands of our citywide transportation system and its role in connecting the greater Portland-metro region over the next 20 years.

We understand that the demand for transportation improvements continue to far exceed existing funding resources. As a result, those projects that demonstrate the greatest potential return for the least investment should be prioritized. For example, projects that add traffic lights and synchronize

signals help improve traffic flow at a comparatively low cost and should therefore be prioritized (e.g. project numbers 20002, 20016, 20017, 20018, 20073, 20104, and 20105).

In addition to the aforementioned central city projects, we recommend the following:

Central City Project Priorities:

- **TSP 20027 (I-405/US26/Ross Island Bridge, SW):** Construct new freeway access from Ross Island Bridge to I-405 and US 26 to improve connections between regional facilities and separate traffic from neighborhood streets.
- **TSP 20050 (Southern Triangle Circulation Improvements):** Improve local street network and regional access routes in the area between Powell, 12th, Willamette River, railroad mainline, and Hawthorne Bridge. Improve freeway access route from CEID to I-5 SB via the Ross Island Bridge.
- **TSP 20075 (Water/Stark Corridor Improvements):** Construct the multimodal transportation enhancements laid out in the Central Eastside Street Plan.
- **TSP 113230 (Sullivan's Gulch Trail, Phase 1):** Construct a multi-use trail for pedestrians and bicycles within the Banfield (I-84) Corridor from the Eastbank Esplanade to NE 21st Avenue.

Freight Project Priorities:

Based on our review of the TSP freight project list we recommend the following projects be prioritized for funding:

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

- **TSP 40102, Columbia Blvd Street Widening (Widen Columbia Blvd to a five-lane cross-section 60th-82nd):** This project has been identified as a bottleneck area on a Major City Traffic Street/Priority Truck Street. It would leverage other recent improvements on Columbia Blvd.
- **TSP 103750 (Cathedral Park Quiet Zone):** Add the city as a co-lead agency and move the project to the major city projects list.

Other Agency Project Priorities:

The Alliance also supports the inclusion of other agency projects to signify the city of Portland's partnership and future coordination with other agencies including the Port of Portland and the Oregon Department of Transportation:

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

Recommended Studies:

The Alliance would also like to see the following studies initiated and completed within the next five years:

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

While these projects and studies alone will not address all of our transportation needs, they will increase access to vacant and underutilized industrial lands, including traded-sector facilities, while

increasing access to middle-income jobs. They also provide capacity for auto and freight mobility, promote regional connectivity, tourism, and include seismic upgrades that are fundamental for system integrity.

Thank you for your consideration of these comments.

Sincerely,

Sandra McDonough
President & CEO

cc: Mayor Charlie Hales
Commissioner Steve Novick
Leah Treat, Portland Bureau of Transportation
Susan Anderson, Bureau of Planning and Sustainability

March 13, 2015

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

Dear Chair Baugh and Commission Members:

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

Overall, we appreciate the attempt to emphasize the importance of economic development, however there are still opportunities to strengthen the goal of creating a prosperous economy. If we are truly to achieve a “prosperous, healthy, equitable and resilient city” then even greater priority should be given to economic development. A business climate that supports private sector job creation and a robust economy is critical to growing good middle-income jobs and achieving equitable income distribution among households. Many studies show that a key indicator of health and quality of life is a good living wage job. Given this, attached are specific suggestions for improvement to the plan.

The Comprehensive Plan is an opportunity to better align land use and transportation with middle-income job growth. Industrial land is the primary generator of middle-income jobs that do not require a four-year college degree and are critical for a balanced economy. While our region has regained jobs lost at the low and high-end income levels, we have not regained those middle-income jobs lost during the recession. BPS’ own report, *The Industrial Middle of Portland’s Changing Income Distribution*, finds that East Portlanders, whom make up a large share of the city’s middle income workforce, rely on jobs on industrial lands. The middle-income jobs industrial lands generate are significant for achieving an equitable city as previously outlined in the adopted *Portland Plan*.

The availability of market ready industrial lands are also critical for a prosperous traded-sector economy. As we have shown in our Value of Jobs reports, 90 percent of Oregon’s exporters are small and medium sized businesses and export-related jobs pay on average 18 percent more than non-exporting jobs across sectors. In particular, the production of traded-sector goods is still the backbone of Portland-metro’s traded-sector employment and is dependent on adequate industrial land. Manufacturing jobs are also found to provide higher wages and better benefits than non-manufacturing jobs, particularly for communities of color and those with less than a four-year college degree.

The Industrial Middle of Portland’s Changing Income Distribution estimates that if the city’s 600 acre industrial lands shortfall is met nearly 32,000 middle-income jobs would be created and help to

address income polarization in our community. While we appreciate efforts to meet the shortfall with strategies such as brownfield redevelopment and golf course conversion, these options are aspirational at best and do not reflect market realities. The future economic health of our city depends on meeting the shortfall and in order to execute such strategies that promote industrial land development, such as those related to freight mobility. We recognize an updated Economic Opportunity Analysis has been completed and, as a result, these numbers have changed. We will provide additional comment on that at a later date, but would note our concern that the shortfall is reduced in part by lower expectations for the economy's performance.

Unfortunately, there are policies that hinder an adequate supply of industrial land and the potential for industrial development. We understand, for example environmental overlays proposed on new natural areas would actually add to the industrial land shortfall, particularly in the Columbia Corridor and harbor. West Hayden Island is another example where flood and forest mitigation requirements on the 300 acres allocated for industrial land would prevent its actual development. Such policies are in direct conflict with those aimed at meeting any shortfall. We strongly urge that additional actions are not taken to further increase the shortfall of industrial land if and until progress is realistically made on addressing the current shortfall.

While we understand the challenge of addressing a variety of potentially competing issues in one document, there is a need to reconcile and prioritize conflicting goals and policies among different chapters within the plan. The plan itself states, "ensure that the components of the Comprehensive Plan are internally consistent," (Policy 1.3 Internal Consistency). However, there is no guidance for how to reconcile policies that are inconsistent, and conflicting goals and policies are found throughout the plan.

For example, while the economic development narrative in chapter six is strong, some of the policies contained in the chapter are in direct conflict with those in the environment and watershed health section contained in chapter seven. The clash between policies 6.39 industrial brownfield redevelopment and 7.29 brownfield remediation is just one example of internal inconsistency. Policy 6.39 provides incentives and technical assistance for brownfield redevelopment whereas policy 7.29 imposes additional cost burden by incorporating ecological site design and resource enhancement to brownfield remediation. It is obvious that policy 6.39 is more favorable to achieving the stated goal to redevelop 60 percent of brownfield acreage by 2035 whereas policy 7.29 would hinder achievement of this goal.

Because the ability to address the significant industrial land shortfall is based on difficult to remediate brownfields, golf course conversions and the like which may or may not come to fruition, under no circumstances should policies be adopted that add additional costs and burdens to redevelopment. The plan tries to accommodate varying interests, and therefore must be read as a whole to understand its implications. Failure to address internal inconsistencies simply kicks the can down the road as future decision makers struggle with how to balance competing priorities.

Furthermore, many of the goals and policies are aspirational and we are concerned about how broadly they may be interpreted when implemented into city code. The subjective and open ended nature of these goals and policies may create legal land use challenges once implemented. To the

extent possible, we strongly urge that goals and policies be as specific as possible and include corresponding action items to avoid misinterpretation in city code and legal entanglements in the future.

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

Sincerely,

Sandra McDonough
President & CEO

Cc: Susan Anderson
Bureau of Planning and Sustainability

APPENDIX OF COMMENTS

In order to achieve good middle-income jobs for residents in our community the Alliance has concerns and comments in the following key areas:

Policy Balancing and Equity

The proposed comprehensive plan does not provide reasonable balance and equity between the policy chapters, specifically between chapter six (economic development) and chapter seven (environment and watershed health). The following are specific examples of conflicting policies needing reconciliation:

Policy 6.39 on industrial brownfield redevelopment provides incentives and technical assistance for brownfield redevelopment whereas policy 7.29 imposes additional cost burden by incorporating ecological site design and resource enhancement to brownfield remediation. Policy 6.39 should be prioritized to redevelop the stated goal of at least 60 percent of brownfield acreage by 2035. Policy 7.29 would only hinder development of this goal and should not take precedent.

Policy 7.11 requires on-site mitigation unless off-site mitigation within the same watershed will improve mitigation effectiveness. Policy 8.59 seeks to maintain the functions of natural and managed drainage ways, wetlands, and floodplains. Both policies hinder the development of adequate industrial land and middle-income job growth, particularly in the harbor. It is unclear how both policies interface with policy 6.51 on mitigation banks.

Land Supply

The proposed plan does not emphasize the importance of site quality and characteristics on industrial land. It is not just the availability or quantity of industrial land but the quality of the land and site characteristics. The proposed plan does not “protect” industrial lands in the same manner in which it “protects” environmental areas. In general, mitigation requirements should be proportional to the impact of development and no greater, per the recent Koontz case. The following are specific examples where language may be improved to ensure an adequate supply of industrial land that is market-ready to create good middle-income jobs:

Policy 6.36a **No net loss of prime industrial land.** Strictly limit quasi-judicial comprehensive plan map amendments **and text amendments** that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.

Policy 6.36.b **No net loss of prime industrial land.** Strictly limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

Policy 6.36.c Identify how regulations affect the capacity, affordability and viability of industrial uses, and **avoid** those impacts.

Policy 6.36.d **Offset** the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics.

Policy 6.44 Impact analysis. Ensure adequate supply of industrial land by evaluating and monitoring the impacts of land use plans, regulations, public land acquisition, public facility development, and other public actions on industrial land capacity. Actions that would increase the shortfall of industrial land should not be taken until the current shortfall is met.

Policy 6.48 Golf course reuse and redevelopment. Facilitate conversion of privately owned golf course sites in the Columbia Corridor for industrial development.

Policy 6.50 Public facilities and land acquisition. Strictly limit the use of prime industrial land for parks or other non-industrial public facilities.

Policy 7.11 Mitigation effectiveness. Encourage mitigation approaches that are proportional to the impact of development. Require on-site mitigation unless off-site mitigation within the same watershed will improve mitigation effectiveness.

Transportation

We understand that as our population grows there are capacity concerns about our city's transportation system. Yet, there are policies that compromise our system's capacity particularly for vehicular movement throughout this chapter. We recognize that there will be more people and increased demand of all modes. The chapter has a pervasive bias for active transportation, however, and while we understand there will be increased demand for these travel options there will also be increased demand for vehicular movement. We need to be strategic when crafting policies to ensure a balance of modal options and a system that will promote a healthy, vibrant, and prosperous community. While there are many policies included in the draft Plan that promote economic efficiency and that we support, we have focused our comments below on suggestions for changes where we do have concerns.

Policy 9.6 Transportation hierarchy for people movement. Implement a hierarchy of modes for people movement by making transportation system decisions according to the following prioritization:

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

While this "green hierarchy" of modes applies only to the movement of people, it should be made clear that it does not apply to freight corridors and the movement of goods. This hierarchy should not be applied to freight districts, regional truck ways, priority truck streets, and major truck streets as designated in the city's Transportation System Plan (TSP).

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

Policy 9.15 Repurposing street space. Encourage repurposing street segments that are not critical for transportation connectivity to other purposes.

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

Policy 9.34 Sustainable freight system. Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on – and off –street loading spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

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

- Limit the number of housing units on freight routes.
- Maintain capacity for vehicular movement (auto and freight) on arterials and place bike lanes on parallel low traffic streets to avoid modal conflicts and traffic diversion into neighborhoods while ensuring public safety.
- Freight has few alternative routes and should be prioritized on arterials as a result.
- Make greater investments in freight infrastructure to reduce travel times and improve access to industrial land.
- Monitor freight travel time and mitigate for delays by offsetting policies that hinder the efficient movement of goods with projects that remove bottlenecks and deficiencies along freight routes.

Policy 9.39 Automobile transportation. Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

The need to ensure portal capacity for vehicular movement (auto and freight) at freeway on-ramps and off-ramps and at bridgeheads should be called out in policy currently absent from this section.

Parking Management

Policy 9.50 On-street parking. Manage parking and loading demand, supply, and operations in the public right of way to encourage safety, economic vitality, and livability. Recognize that the curb zone is a public space, and as such, a physical and spatial asset that has value and cost. Allocate and manage on-street parking and loading within the curb zone in a manner that achieves the highest and best use of this public space in support of broad city policy goals and local land use context.

Our economic vitality is dependent on existing on-street parking and loading and unloading zones. Public right of way must be reserved for these uses that support adjacent businesses.

Policy 9.51 Off-street parking.

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

March 13, 2015

Portland Planning & Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, Oregon 97201

RE: Division Design Committee Comprehensive Plan Comment Letter

Planning & Sustainability Commissioners:

On behalf of the Division Design Initiative we respectfully submit this letter to provide comments on the Comprehensive Plan Update. The Division Design Initiative (DDI) is a grassroots inter-neighborhood coalition of neighborhood, business and community organizations formed in late 2013 to respond to wide community concerns about design issues and the lack of meaningful community involvement in the major redevelopment of the Division Corridor in Southeast Portland. The mission of this group includes creating design, planning, education and engagement tools that many neighborhoods can use to help shape the growth and change they are facing.

As a sustainability-minded coalition, we fully understand that to accommodate the growth that is projected to come, it will need to happen as infill within our existing urban areas, with more compact development a part of this tradeoff to maintain our Urban Growth Boundary. However, as neighbors who are living through this dramatic transformation we have a unique perspective into what is working and what is not working. We hope that our experience can help to guide you to focus on areas that need improvement so that both our main street and other areas of the city that are slated for growth in the Comprehensive Plan can grow in a way that is broadly supported.

Attached is a proposal for increased notification and community involvement for your consideration. We have also attached community responses from the Division Perceptions Survey developed by Portland State University in partnership with the Division Design Initiative. This represents only one of the questions, and we would be happy to share further data. We have been analyzing survey results with a technical consultant and will continue to share further research reports. In the meantime, we have provided these comments verbatim as evidence of the broad community concerns identified.

At the neighborhood level we hear strong interest in needed changes, specifically in the Comp Plan, to address lack of opportunity for meaningful input, design concerns, and impacts from larger new development projects including loss of community character, solar access, affordability, and increased gentrification and displacement. Others have spoken about the need for more family-friendly housing and affordable residential and commercial units, so we would like to focus our testimony on the following:

- 1) Need for Increased Community Input and Notification (see attachment)
- 2) Desire for Increased Design review requirements and policies to preserve character, context, and quality
- 3) Preservation of Important Visual & Cultural Resources
- 4) Need for Impact Analysis for new development proposals to fully assess and mitigate significant impacts

The Division community has witnessed a rapid transformation of our main street and there is real concern that the new construction that is occurring along Division fails to recognize the existing character of the neighborhood.

Portland neighborhoods are known and loved for their village-like main streets, small local businesses, and unique identity that make them special and desirable. However, the current trend of development that is occurring in the city has been noted by many as a distinct contrast to the existing character, pattern, and architecture of many neighborhoods. The Comp. Plan falls short when it comes to promoting new development that respects a neighborhood's context. Currently, new population growth is almost

exclusively being accommodated through multi-family and mixed use buildings that are significantly bigger than what previously existed along Division. Concerns about lack of context, uneven quality, poor scale relationships to the narrowness of the street, loss of solar access, lack of landscaping and green space, and increasingly homogeneous design are frequently heard in survey results and public meetings and are in direct contrast to community design goals and priorities. We recommend the following to address these issues:

1) Adopt policies that support increased design review, consideration of quadrant design commissions, and new context-sensitive design standards that respond to neighborhood patterns and priorities.

Many community members have expressed concern and surprise that neighborhoods do not have the benefit of formal design review and there is increasing concern by residents about the limited ability for any meaningful input in the quite dramatic changes taking place. How can we support well-designed compact development that also respects existing community character and identity? This is an identified goal in many City policies yet is ineffectual in practice without any design review requirements or more neighborhood specific guidelines that can help provide necessary design context and clarification of community priorities.

The strong expansion of Portland's urban network from the central city necessitates extension of other policies and procedures that have helped re-shape our downtown into a walkable and livable place, most critically the need for a design review process. Of particular interest is the idea of quadrant level design commissions. The scale and character of new development is in sharp contrast to that of the existing neighborhood and more akin to development one would expect to see in the central city yet most neighborhoods are left without the tools needed to effectively guide these new large scale redevelopments in practice. In response, many have expressed an interest in design guidelines that will help articulate the community design preferences and the Division Design Committee is now working with technical consultants to develop design guidelines for a 50-block segment of the Division Corridor. Other neighborhoods such as Boise have done the same. This is a heavy lift even for communities that do have the organizational and technical resources and an incredible challenge for those that do not have these tools needed to manage such dramatic growth. Without the benefit of design review, there is little recourse for communities to have a say in the dramatic changes taking place overnight. We ask you to help shape a broadened design review process that meets the needs for community members and stake holders throughout the city where these urban corridors are envisioned to provide new density and amenities for livability. We urge you not to eliminate our main street overlays which do provide the limited character specific guidelines for some neighborhoods that should frankly be augmented to support more neighborhood-sensitive context and design. We need buildings that are designed better to blend within the fabric of our neighborhoods and tools and processes that allow for more input into the design of buildings. Increased design review, broader notification and neighborhood input processes for such large scale changes are needed and not addressed in the Comp Plan.

2) Improved Notification Requirements & Neighborhood Involvement Policies

Change is never easy, but the pace of the change has been especially challenging for many of us. What can be done to make this easier to digest? One area we would like for you to focus on is community involvement. For years you have been hearing how neighbors don't feel like they are given adequate notice of new development. This is your opportunity to fix that. Attached is a Notification Proposal that is a summary of recommendations heard throughout our planning and research efforts over the last 18 months. The DDC has voted to recommend the City consider this proposal and integrate these recommendations into a new public involvement and notification process. Broadly, these encourage further enhancements such as requiring letters of support from Neighborhood Associations and Business Districts, a courtesy visit early in the process to the neighborhood association before designs are set in stone and when opportunities for impacts to be identified and minimized, and a required follow up form for addressing how community comments are being addressed or not rather than simply a letter stating the community has been given a presentation and here was the feedback with no required format or process to respond or address neighborhood concerns. Notice alone will not solve neighborhood discontent, but it can go a long way to ease the transitions that are going to take place if the Comprehensive Plan's visions are realized.

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

The Division Design Committee supports an update to the city's visual and cultural resources inventory as well as the historic resources inventory. Currently, the Visual Resources Inventory does not extend beyond SE 12th Street. Some important visual resources need enhanced protection. They provide a connection to sense of place and character defining community cultural and historic resources. When we block important monuments such as the Hollywood Theater with new development, we impact neighborhood visual and cultural treasures that contribute to neighborhood identity and community history. We understand that private views are not protected, however when we build so tall in SE that we block public views of the West Hills we lose our connection to sense of place. Studies like Preservation Green Lab's recent report, "Older, Smaller, Better", reinforce that mixed vintage neighborhoods have stronger economic vitality, more jobs, and provide more cultural diversity and income diversity. These buildings also contribute to the unique identity that defines Portland's neighborhoods. A growth strategy should provide more incentives for preservation and adaptive reuse of Portland's older viable historic buildings.

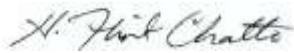
4) Need for Impact Analysis for new development proposals to fully assess and mitigate significant impacts

Significant impacts to the neighborhood and adjacent properties from new development are not fully assessed or considered when determining approval of new developments. Community members have expressed concerns about loss of solar access, increased congestion and traffic impacts, loss of historic resources, loss of affordable housing, and privacy and visual impacts. To balance goals for increased density in the Comprehensive Plan with the potential development impacts, the City should consider City and State support for required impact analysis and mitigation of any significant impacts.

Lastly, we'd like to emphasize Division Design Initiative is a direct response to some of the gaps that currently exist in our systems. This effort came about, in part, because community members felt strongly that there has been little response to very vocal design concerns expressed in frequent testimony in 2012, 2013, and 2014 on the design impacts and concerns by neighbors across the City. This group is not only citizens, residents, and activists, but also business owners, architects, planners, designers, lawyers, and other professionals. We are not an anti-development or anti-density group, we are an advocacy group for increased community input and design that fits the community goals and preferences. We understand the budget realities facing the city, but we also know that we are not the only neighborhoods that are concerned with these issues. Changes to the mixed use zones is one step but increased notification requirements, enhanced community involvement and design review process that help support community character and context are necessary requirements to help better ease the transition of our city as it grows in such a rapid manner.

Thank you for the opportunity to comment and for your work to help the City of Portland balance long-term goals for increased density with current resident goals and priorities for livable neighborhoods and more participation in the planning and design process.

Sincerely,



Heather Flint Chatto, Urban Planner & Designer, Richmond Resident & RNA Board Member, DDC Member

Submitted on behalf of the Division Design Initiative & the Division Design Committee*
Division Design Initiative | 3534 Main Street, Portland Oregon 97214 | www.divisiondesigninitiative.org
ilovedivision@gmail.com

*Membership of the DDC includes appointed and elected members from the following organizations:

*Richmond Neighborhood Association, Hosford-Abernethy Neighborhood District, South Tabor
Neighborhood Association, SE Uplift, Sustainable Southeast & the Division-Clinton Business Association*

PROPOSED NEIGHBORHOOD NOTIFICATION REQUIREMENTS

Draft based on neighborhood input, suggestions welcome! Send any input to ilovedivision@gmail.com

① Notification Requirements for Proposed Projects $\geq 10,000 \text{ SF}$ or $\geq 5 \text{ units}$ should a) include a description of the proposed project, with project existing and proposed statistics (number of units, parking spaces, site size, etc), contacts, and proposed site plan, and b) provide notice as follows:

1. Business district association: Notification via letter and email
2. Neighborhood Coalitions: Notification via letter and email
3. Neighborhood Association: Notice to land use chair plus required visit as noted below.
4. Adjacent Area Notification: 2 blocks along mixed use corridor, minimum of 1 block surrounding the site (or a 500 s.f radius, whichever is greater). Notification letters to property owners and tenants may be paid through applicant permit fees.
5. On-site Notification: support the concept of site postings with a notice including project information, permit number, site plan/key project info as is a common practice in other NW cities.
6. If Historic Designation Applies: notification by letter and email shall be made to the local historical society.
7. Letters of Support Requests for Incentives & Bonuses: Applicant may request a letter of support from the NA and business association when requesting a bonus for square footage or additional height. An applicant is not required to obtain this letter but it will be considered noteworthy by the City as a possible red flag that it has not been received.

② Neighborhood Association Presentation & Follow up Requirements:

- Notification to Neighborhood Association would include a presentation of an overview of the project to area residents, businesses, and property owners. Two (2) visits to the project's neighborhood association (NA) are encouraged:
 1. Suggested Courtesy Visit to the NA at the "Conceptual Design" stage to gather general feedback and early notice - ideally within 90-180-days prior to submittal.
 2. Required Visit: Building applicants should make a presentation visit the NA not less than 60 days prior to building permit submittal.
- **Materials to bring to NA meeting(s) for Required Visit:**
 1. Site Plan & Proposed Building footprint/plan - Minimum of 12 - 8x11 copies denoted with scale, north arrow, existing trees, and showing adjacent surrounding development.
 2. Building Elevations showing proposed building in context with existing adjacent building and block development.
 3. Solar shading analysis – illustration of solar shading impacts to adjacent development

③ Required comment response form from applicant

An applicant shall submit list of comments received from the neighborhood and a statement for each with a response as to how this is being considered. Example:

Neighborhood Association Date of Visit	Applicant Owner
SAMPLE NEIGHBORHOOD COMMENTS <ol style="list-style-type: none">1. Preserve mature tree at NE corner2. Prefer balconies at street3. Vary window patterns – continuity with variation4. More street entries desired5. Step building height up and down6. Vary rooflines7. Commercial at the first floor, smaller affordable commercial spaces requested8. More family-friendly unit sizes and amenities	SAMPLE APPLICANT RESPONSE <ol style="list-style-type: none">1. Will relocate on-site to preserve2. Now included on SE façade3. Incorporated exist. neighborhood patterns for storefront window design4. Added more frequent entries5. Will consider this to maintain better solar access6. Will discuss with architect7. Cannot make this work with program without amenities bonus8. Redesigning middle block of building to include shared courtyard with more green space and art; added several 2& 3 bedroom units

#	DESIGN: What are your design preferences for future mixed-use development (Residential and Commercial uses in the same building) on Division? For example, size, scale, style, building form, facade, street frontage, etc.?	(1) Do you live in the SE?(Y/N) (2) If so, for how long? (3) Do you live in the study area shown on the map?(Y/N) Division between 11th-60th)	(1) Are you a business owner (Y/N)? (2) If yes how long have you owned the business? (3) Is it located within the study area(Y/N)? How long have you owned this business? (4) In-home Business?
2	Much smaller scale, with parking. Mixed use. No more square boxes. High quality finishes. Self-sustaining architecture. Platinum LEED certified. Condos or townhomes.	Yes, I live in SE. I have lived here for 20 years. I live one block outside of the study area.	Yes. 16 years. No (see above). We have an on line eBay business, plus my partner's other business office is in our home.
3	2-4 stories, super-ped-friendly. Niches for public open space, for sure, and big sidewalks.	Y Y	N
4	Get the damn cars off the street!	Yes. I have been here all my life (69 years). I was No. born and raised on 51st, just 3 houses north of Division, and now I live on 24th just off Harrison.	
5	No more than 2 stories, preferably 1. Facade that is more natural - wood, metal. Less ugly painted siding.	Yes, for 8 years. I live just outside the study area. N	
6	No building higher than two stories! No building allowed within 100 feet of the property line of an existing single family residence. On-site parking required for permits for all new multi-occupancy dwellings.	Y 1 1/2 years Y	N
7	parking for residents	YES 20 years YES 1. Yes 2. 36 years 3. I think so - 24th and Grant? (3 blocks south of Division?)	NO □ 1. No 2. N/A 3. N/A 4. N/A
8	Any new buildings need adequate parking. Buy spaces and build a parking structure to serve the neighborhood. Cost of building should be covered by all the housing/commercial units which have already moved into the neighborhood and are causing the traffic nightmares. The traffic is bound to get worse as neighborhood density increases. Ensure commercial area is affordable to include shops such as Mirador and neighborhood doesn't change to reflect only Starbucks can move into new buildings.		
9	Stepped back above the second story! □ Prefer brick and/or modern design.	Y 1 year exactly. 24th ave	Y 9 years N Y
10	Human and friendly. Ditch the gray brick and the beige paint. Don't make it God-awful ugly like the Salt and Straw building. Modern design can be fun and appealing. No taller than three stories. Green plants as a feature. House tear downs not allowed to be replaced by out-sized houses that leave almost no yard in any direction. Some "square footage" is outside, and it has value too!	Yes, 15 years, yes	N
11	parking for residents courtyards with trees benches water fountains	YES 20 years YES YES	NO □ artist studio in home
12	This is all too late to consider. The massive building is done maybe we can plant a tree or 2	YES 20 plus years YES	(no answer)
13	Residential and commercial in the same building are my preference, and not too huge, and fitting in with the era in which the neighborhood was built.	1) Y 2) 15 years 3) N	1) N

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15	Street level retail - classic / traditional style; setback from street to allow for wide sidewalks	1 - Yes <input type="checkbox"/> 2 - 2 years <input type="checkbox"/> 3 - No	1 - No <input type="checkbox"/> 2 - N/A <input type="checkbox"/> 3 - N/A <input type="checkbox"/> N
16	3/4 story, stepping down to the neighborhood homes opposite the Division side of the lot. I like density but some outdoor space for residents and others taking breaks from walking the street is desired as well at street level.	Y <input type="checkbox"/> 14yrs <input type="checkbox"/> Y	
17	Variety in size, color, something to break up the monolithic appearance of the new buildings. <input type="checkbox"/> Shops flush with sidewalk and 2nd - 4th floor apartments set back at least 6 feet.	1 Y <input type="checkbox"/> 2 just outside <input type="checkbox"/> 3 36 years	1 yes <input type="checkbox"/> 2 26 years <input type="checkbox"/> 3 just outside <input type="checkbox"/> 4 run from home
18	Smaller and more in keeping with the age of the neighborhood. More welcoming from the street.	1. Yes <input type="checkbox"/> 2. I've lived in the area since 1984. <input type="checkbox"/> 3. Right outside--SE 30th/Grant. <input type="checkbox"/>	1. Yes <input type="checkbox"/> 2. 1996 <input type="checkbox"/> 3. See above <input type="checkbox"/> 4. Home-based
20	Include Parking.	(no answer)	(no answer)
21	fewer apartments and more parking. Families will not live in the tenements that are being constructed since there is no parking	1 yes <input type="checkbox"/> 2 since 1993 <input type="checkbox"/> 3 y a few blocks off division	1 y <input type="checkbox"/> 2 3 years <input type="checkbox"/> 3 no <input type="checkbox"/>
22	Include Parking.	(no answer)	(no answer)
24	The building on the corner of 30th and Division that houses American local - 2 story. Best blends into the neighborhood. Y, 35 years, yes Parking required for all multi housing over a couple of units. <input type="checkbox"/> NO MORE BIO SWALES or anything that takes parking off of Division.		No
25	Why do you assume we have to have mixed use? Lots of consumer oriented retail, and bars, bars, bars. Two story stepped back designs. None of that UDG crapola. Also, The Remmers are horrid developers. <input type="checkbox"/> THye make everything look like an ugly Portlandia-Beaverton hybrid.	Yes I live further out because close-in got too crowded for me.	(no answer)
26	Build and design in keeping with the blue-collar immigrant nature of the neighborhood, and in the greenest way, with lots of windows, solar access, patios that greet the neighbors not create a closed face. Again the white structure with the chain mail is a shining example of what should never again be built.	1 Y <input type="checkbox"/> 2 35 yrs <input type="checkbox"/> 3 Y	1. N

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27	No 4 story apartments looming over people's living space <input type="checkbox"/> 2 resident town homes <input type="checkbox"/> <input type="checkbox"/> Take a look at the building on the north corner of Division and 30th restaurant below 1 apt above that is reasonable in size and aesthetics. If you are going to build, build with class not some 2 bit structure that is made on the cheap and will look like hell inside and out in 10 yrs	Yes husband since 1970 (age 19) me since 1976 (no answer) (age 23) raised our family here.	
28	glass and not so tall right off sidewalk. more gradual raise from pedestrian stand-point.	yes. 8 years. no, though within blocks.	yes. 18-years.no.18. from home.
29	Love the use and re-use of buildings, for example, at 34th & Division, where Roman Candle Bakery and Ava Gene's are located. A couple of the new apartment buildings are of a scale that works well and are integrated nicely (building where Salt & Straw is located). The apartment buildings at 37th and next to Sen Yai are simply dreadful.	1) Yes <input type="checkbox"/> 2) 20 years <input type="checkbox"/> 3) Yes	1) No <input type="checkbox"/>
30	The new buildings need to be set back from the footpath. There really should be open spaces on each building site. <input type="checkbox"/> <input type="checkbox"/> To reduce the impact of buildings, I believe green landscaping is important and softens the harshness of these shoe-box shaped buildings.	1. Yes <input type="checkbox"/> 2. No <input type="checkbox"/> 3. No however just one block north of the defined area	No
31	love mixed use buildings. Would like to see more retail below, residential above. Feel it creates a safe vibrant streets. I think our 4 story limit is fine, work needs to be done about step backs.	Yes <input type="checkbox"/> 18 Years <input type="checkbox"/> Yes <input type="checkbox"/>	Yes <input type="checkbox"/> Less than a year <input type="checkbox"/> Yes <input type="checkbox"/> Again less than a year <input type="checkbox"/> 1) No <input type="checkbox"/>
32	Love the use and re-use of buildings, for example, at 34th & Division, where Roman Candle Bakery and Ava Gene's are located. A couple of the new apartment buildings are of a scale that works well and are integrated nicely (building where Salt & Straw is located). The apartment buildings at 37th and next to Sen Yai are simply dreadful.	1) Yes <input type="checkbox"/> 2) 20 years <input type="checkbox"/> 3) Yes	
33	I'd prefer buildings more in keeping with a local Portland neighborhood in style, rather than the ultra urban look of the current buildings in progress. <input type="checkbox"/> More space between buildings and the street, with some space between buildings. Limited to 2 or possibly three stories.	1. Y <input type="checkbox"/> 2. 16 years <input type="checkbox"/> 3. Y	1. N
34	small scale, consistent with the former aesthetic, more local run businesses that are affordable.	1- y <input type="checkbox"/> 2- 9 years <input type="checkbox"/> 3- y	1- n
35	Courtyards, no more than 3 stories, classic 'Brownstone' styling similar to many in the Pearl District, a focus on 1 or 2 bedroom units, Lots of storefronts, some side or back parking. We have enough bars, hopefully more family friendly restaurants.	Yes <input type="checkbox"/> 18 years <input type="checkbox"/> Yes	Yes <input type="checkbox"/> 8 Years <input type="checkbox"/> Yes <input type="checkbox"/> Not operated from home

#	DESIGN: What are your design preferences for future mixed-use development (Residential and Commercial uses in the same building) on Division? For example, size, scale, style, building form, facade, street frontage, etc.?	(1) Do you live in the SE?(Y/N) (2) If so, for how long? (3) Do you live in the study area shown on the map?(Y/N) Division between 11th-60th	(1) Are you a business owner (Y/N)? (2) If yes how long have you owned the business? (3) Is it located within the study area(Y/N)? How long have you owned this business? (4) In-home Business?
36	The four story, gigantic buildings are ugly atrocities, particularly the building at 37th and Division. In contrast, the mixed-use developments at 38th and Division (Little Big Burger) and 32nd and Division (Sunshine Tavern) are lower profile and more in keeping with the neighborhood.	Y <input type="checkbox"/> 10 years <input type="checkbox"/> Y	N
37	We need performance spaces, and something to encourage diversity.	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>
38	It would have been nice if the buildings had some architectural trappings reflecting the arts & crafts nature of the surrounding neighborhoods.	Since 2008 <input type="checkbox"/> I live on SE 47th & Clinton. Lived here 12 years.	2003 <input type="checkbox"/> Not a business owner.
40	the dream that 82 units & no parking will be OK because the typical resident will be "service industry, bike & public transit users" is not a realistic plan for a city and a community. its more like a nightmare for the residents already in place. <input type="checkbox"/> i totally understand that parking spaces cost money...but when the city takes sides and allows giant projects with no parking - they're taking a side that essentially sends a message <input type="checkbox"/> "sorry for your loss...but congestion is coming - suck it up" <input type="checkbox"/> thanks city of portland.	1 - yes <input type="checkbox"/> 2 - 10 years <input type="checkbox"/> 3 - 37th & Caruthers - "ground zero"	1 - no, just home owner
41	I think I covered this in the above questions. <input type="checkbox"/> <input type="checkbox"/> Smaller, smaller, smaller!	1)yes, from 1987-1998, and from 2003-present. In the years that I did not live in SE, I've owned properties in Richmond and Sunnyside. <input type="checkbox"/> 2) I am 4 houses south of the study area. (I am curious why the study area would not include my address, considering that at least up to Woodard is already impacted by extra traffic...)	No, I don't own a retail business, I just have a few rental properties in Richmond and Sunnyside.
42	Oh, for goodness sakes....some imagination!!!! No more big boxes!!!!!!	Yes, I do live in SE and I have lived here for almost 10 years. I live on SE 35th Ave and Stephens Street.....easily walking to the study area and certainly absorbing the impact of the tsunami of construction in the study area Yes. 34 years. No. I live one block south of Lincoln.	I am not a business owner but I only shop locally. I do not own a car and I am absolutely committed to the small businesses in our neighborhood No.
43	These "mixed use" buildings are ALL the same, wherever they are built. They need to be less tall in height, with copious use of red brick or true-wood siding, vertical windows that at least look double-hung. Quality, traditional doors. Some kind of roof form. A bit of a setback.	1. Yes <input type="checkbox"/> 2. 10 years <input type="checkbox"/> 3. Yes <input type="checkbox"/>	1. No
45	It would be nice to have less of the "greedy buildings" that have been mentioned in the Oregonian and Portland monthly. It would be great if these new buildings incorporate green building principles, innovative architecture, parking, and other amenities that make them integrate into long standing neighborhoods in a better manner.	Yes, coming up on 10 years. I've lived on 41st and Clinton for the past 5.5 years. Prior to that off Hawthorne and before that at 68th and Division.	No
46	I'm personally a fan of the mix of modern and classic we're seeing already. I guess what is more important to me is a pedestrian scale - store fronts and restaurants that open up onto the sidewalk. I'd love to see some street seats pop up here and there too.		

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49	Modern, efficient, preferably no taller than 2 stories, require some type of runoff management ("green roof", trees, swales, etc)	Y <input type="checkbox"/> 3 years <input type="checkbox"/> ✓ 1) Y <input type="checkbox"/> 2) since 1977 (37 years) <input type="checkbox"/> 3) Y	Y <input type="checkbox"/> 5 years <input type="checkbox"/> ✓ 1) N <input type="checkbox"/> 2-4) n/a
50	1) 4-story max <input type="checkbox"/> 2) avoid blank vertical facades 3) alternate setbacks, courtyards, and plazas with sidewalk arcades <input type="checkbox"/> 4) provide parking for residents and customers. <input type="checkbox"/> 5) revise city guidelines for all new structures of 10 or more dwelling units. Require 1) off-street car parking spaces for at least half of dwelling units; 2) car-share parking spaces and secure bicycle parking. <input type="checkbox"/>		
51	One design rule would help. <input type="checkbox"/> S=(F-1)*10. Set back from the sidewalk is equal to the floor # minus 1 times 8. first floor (retail) has no set back, 2nd fl. has 8' set back, 3rd. fl, 16"set back. Balconies and decks would not be counted. as needing set back, providing a 8" deck for all units. This would eliminate the sun blocking, wind tunnel effect of the present units. Reasonable parking space requirements, say 8 spaces for every 10 residences	1. Yes, 2. 14 years, 3. No. <input type="checkbox"/> <input type="checkbox"/>	1. No <input type="checkbox"/>
52	ground floor retail	Yes, 6mo, yes	no
53	That building near 34th - the white one with the grate on the front looks like a prison and pisses me off every time I see it. Why would anyone want to live there? So, no more of those. <input type="checkbox"/> My dad is relocating to SE Portland from LA and would have been delighted to buy one of the new condos BUT he would require a secure parking spot which is impossible. So, he will be buying someplace else. <input type="checkbox"/>	I live ON Division Street and we have lived here since 1997.	Yes, we run our businesses out of our home on Division Street
54	I would encourage highly mixed use medium rise buildings to the specs of the current zoning. Style should be determined by current trends rather than forcing a false sense of nostalgia. Perhaps a requirement that the building have architectural distinction. But leave the definition vague.	1: Yes <input type="checkbox"/> 2: on and off for 11 years <input type="checkbox"/> 3: no	1: Yes <input type="checkbox"/> 2: 10 years <input type="checkbox"/> 3: No <input type="checkbox"/> 4: No it is located in Salem
55	No more than 3 stories, not more than half a block wide, and a little back from the street to allow for either greenery and/or places to eat or to sit. No more flat-front facades, lack of artistic details, windowless sides of big buildings, and boring color!	1) Y <input type="checkbox"/> 2) 5 yrs <input type="checkbox"/> 3) Y	1) N
56	Anything not more than 3 storeys. Anything with a facade that is not flat. Anything that has some set-back. Variety! Visual interest!	1 Y <input type="checkbox"/> <input type="checkbox"/> 2 37 years <input type="checkbox"/>	1 N
57	Mixed use could be positive. Parking and transportation need to be addressed. Size and scale need to be balanced with regards to impacts to existing residences. Street capacity and infrastructure resources are limited. Developments that impact that need to be capped within reasonable limits and/or bear the financial burden of mitigating the impacts. It is unfair and counter productive to put the additional tax burden on existing residents to pay for improvements that do not benefit them.	1. Y <input type="checkbox"/> 2. 48 years <input type="checkbox"/> 3. Yes	1. Y <input type="checkbox"/> 2. 15 Years <input type="checkbox"/> 3. N <input type="checkbox"/>
59	If you're going to do mixed use, make more public plazas, preserve a space in your retail complex for small start ups and pop-up shops, create areas for food trucks and small vendors.	1. Yes <input type="checkbox"/> 2. for 8 months, <input type="checkbox"/> 3. no	1. Y <input type="checkbox"/> 2. 4 years <input type="checkbox"/> 3. No <input type="checkbox"/>

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61	More green space and plantings. Mixed facade vs. flat surfaces. Deep sidewalks. Benches. Cross walks.	(1)yes.(2) Two years(3) Yes	(no answer)
62	apartments need parking <input type="checkbox"/> lower levels for stores/commercial	yes <input type="checkbox"/> 5 1/2 years	(no answer)
63	I would like more of the new buildings to look old since the new apartments all look so contemporary.	Yes, I live in the study area and have for 6 years. No, I do not own a business.	
64	No more than 2 stories, preferably 1. Facade that is more natural - wood, metal. Less ugly painted siding.	Yes, for 8 years. I live just outside the study area. N	
66	Wider sidewalks, underground parking, outdoor tables and public spaces for sitting, 3-4ft buildings in sections where ugly strip mall buildings stand.	Y, 3years, N	N, na....
67	It needs to be affordable, so that it doesn't all have to be luxury rentals or condos. But it would be nice to have more interesting facades facing Division, like on some of the older buildings. New buildings on Division should be 4 to 6 floors	1) No, but I used to live in Laurelhurst until last year. Now live in Hollywood <input type="checkbox"/> 3) No	No
69	Onsite parking provided, at least spaces for 75% of the adults intended to live in the structure. No more than one three story structure per block. Limitations on two-story structures per block. Setbacks from the sidewalk to provide space for dirt and plants.	1) Y <input type="checkbox"/> 2) since 1999 - 15 years <input type="checkbox"/> 3) I live a few blocks south of the identified area - north of Powell	1) N
70	Same size, maybe even taller if they step back the massing. <input type="checkbox"/> <input type="checkbox"/> Use forms and icons from the existing character for inspiration. <input type="checkbox"/> <input type="checkbox"/> Somewhat traditional, but also contemporary. <input type="checkbox"/> <input type="checkbox"/> Use brick! <input type="checkbox"/>	1. Yes <input type="checkbox"/> 2. For just over a year <input type="checkbox"/> 3. Yes	No
71	Small. Very, very small.	1.) yes <input type="checkbox"/> 2.) 30 years <input type="checkbox"/>	(no answer)
73	I would like to see less height in the buildings as it leads to feeling cramped and closed in.	1 - yes <input type="checkbox"/> 2 - 22 years <input type="checkbox"/>	1 - yes <input type="checkbox"/> 2- 20 years <input type="checkbox"/>
75	add parking <input type="checkbox"/> require parking <input type="checkbox"/> demand parking	1 yes <input type="checkbox"/> 2 20 years <input type="checkbox"/> 3 yes	1 yes <input type="checkbox"/> 2 18 years <input type="checkbox"/> 3 3 yes, for 7 years <input type="checkbox"/> 4 not home
76	Residential and small biz retail. No bigger than 3 stories and use of materials and design that fit into the neighborhood - i.e. NO rusting metal, ultra modern angles, and tons of concrete!	Yes. <input type="checkbox"/> 31 years <input type="checkbox"/> No <input type="checkbox"/> <input type="checkbox"/>	(no answer)

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77	Roof step downs to minimize bldg bulk & maintain solar access, breakup bldg massing, durable & natural materials (e.g. brick & wood), balconies, more green design elements, green walls, PVs, green roofs, more variation of windows, no blank walls, dividing up bldgs into smaller visible increments to match existing 25' traditional rhythm of bldgs, more step downs next to smaller scale bldgs. Incorp. of exist. building arch. styles on Division or nearby main streets - incl. art deco, and main street facade elements. If a modern style, aim for a northwest design (shed roofs, wood and glass).	1) Y <input type="checkbox"/> 2) 4 years <input type="checkbox"/> 3) no but within 4 blocks of it	1) N <input type="checkbox"/>
78	3 to 4 (up to 5?) story storefront buildings with awnings and balconies	1. yes <input type="checkbox"/> 2. 15 years <input type="checkbox"/>	1. N
79	I want to see buildings that will age well. I know modern is very popular right now, but this look becomes dated in a decade or two and buildings need to be around a lot longer than that. The majority of the houses in the area are craftsmen style bungalows from the early 1910 -1930s. It'd be great if more of the new construction echoed building styles from that era -- and scaled appropriately.	Yes I live one block North of Division on SE Sherman St. between 54th & 55th. I have lived her for nearly 24 yrs.	Yes, I see clients from my home office for the past twenty years.
80	Something that actually fits in the neighborhood with some outdoor space features. Affordable housing to keep a diversity of residents. <input type="checkbox"/> -Something that actually looks like an architect designed it instead of looking like a suburban developers budget cash cow.	Yes, I own a house on Clinton and 28th.	No
81	smaller is better	1yes <input type="checkbox"/> 2 23 years <input type="checkbox"/>	1 no <input type="checkbox"/> 2 n/a <input type="checkbox"/>
82	see above <input type="checkbox"/> Buildings should "fit" in with the neighborhood, not overwhelm it. While square-block boxes may be the most profitable and, apparently, cheapest to build. Ugly solid, (sometimes windowless!) walls leaving only enough room for a sidewalk don't seem to leave any breathing room for the street. Division is only one lane in each direction; it's not a Hawthorne. I thought we stopped building unappealing lifeless boxes in the 70s because they were just that.	2 yes <input type="checkbox"/> 1. yes <input type="checkbox"/> 2. 5 years <input type="checkbox"/> 3. no I live 1.5 blocks outside of it	2 -'/ <input type="checkbox"/> 1. yes <input type="checkbox"/> 2. 8+ years <input type="checkbox"/> 3. no <input type="checkbox"/> 4. yes
83	Smaller buildings no more than 2-3 stories. Residential and commercial mix is Okay. Grocery stores and restaurants on the ground floor is fine. When we travel to Europe we find businesses we can easily walk to - we don't ever rent a car.	YES <input type="checkbox"/> 22 YEARS <input type="checkbox"/> YES	OWN A RENTAL HOUSE IN SUNNYSIDE NEIGHBORHOOD <input type="checkbox"/> OWNED SINCE 1990 <input type="checkbox"/>
85	Smaller scale similar to the threeplex near 26th. Brick or stucco facades. Limit the height for new buildings. Require natural materials be a primary component of facade designs. Limit color choices for facades. If we are a Greenstreet, then keep the palette natural. Consider a more generous setback for mixed use so that the sidewalks are easier and safer to navigate	Yes. <input type="checkbox"/> 24 years <input type="checkbox"/> No	No
86	Ground floor commercial and 2nd / 3rd floor residential with on site parking. Access from Main Street (like the main street / green street plan dictates)	Yes	No
87	Shorter buildings, inviting outdoor seating areas.	1. Yes <input type="checkbox"/> <input type="checkbox"/>	I am not a business owner, though I do live on Division and work from

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88	Hi quality materials, some setbacks for plants, benches, extra sidewalk room, etc. Something classy not flat and barren. break up the flat space, use good materials on windows. See Old Lauro Kitchen building, property on south side of Division at 37 or 38 - which has some space for gathering and breaks up space. big grey building west of Sen Yai is hidious as is the one nsouth of Whiskey Soda lounge, Those buildings need bigger spaces to look good. In a thigh space, they are un attractive. Work with the space we have.	Y <input type="checkbox"/> 20 years <input type="checkbox"/> y	N
90	Need to avoid too many tall building and lose green space and lose neighborhood feel.	(1) Yes <input type="checkbox"/> (2) 6 years <input type="checkbox"/>	(no answer)
91	Several story buildings with retail space on the ground floor. Preferably low-car complexes that add density and diversity to the area.	Y, 6 years, Y	N
92	current is pretty good. make structures greater than 25 units have some off-street parking or pay a parking fee/tax to be used for mass transit, biking , etc.	1.yes. <input type="checkbox"/> 2. 27 years <input type="checkbox"/> 3. no	1. yes <input type="checkbox"/> 2. 21 years <input type="checkbox"/> 3.yes <input type="checkbox"/> 4. 14 years <input type="checkbox"/>
93	High density mixed use.	Yes live in SE. Lived there 6 months. Live just outside area on map.	(no answer)
94	Two stories max with some variation on distance from street and self-contained parking underneath	Yes, 14 years, no	no
95	I like the mixed use and think it's more sustainable.	1. yes. <input type="checkbox"/> 2. 19years. <input type="checkbox"/>	work at home - both my husband and I do.
96	mixed use is fine, but STOP with all the new development already. Let things settle down. and Please, stop razing old, charming buildings for big, ugly boxes. We are losing the aesthetic charm all along Division and across the city as developers knock down old for the new.	1. Yes, near Division and 51st <input type="checkbox"/> 2. 12 years+ <input type="checkbox"/> 3. Yes	1. No <input type="checkbox"/>
97	pedestrian scale, commercial uses on the street level	(1) Y <input type="checkbox"/> (2) 11 years <input type="checkbox"/> (3) N	(1)N
98	Three story mixed use is good, but could there be at least temporary limits on the number of units per block--until we see what the problems are? At present it is a grand experiment. I think the apartment buildings should have some common outdoor space-- like the one under construction at 48th and Division. I'd like to see design review that would at least question features like the metal grate front that covers windows. Ugh.	I've lived in SE for about 20 years. Our house is just outside the study area on the map--about a half block south of Clinton Street.	Not a business owner.
99	low rise mixed use. retail/dining on ground floor, two or three stories of units above, preferably condos. They could be modern like those at 26th or more traditional.	yes. 2.5 years. yes	no. <input type="checkbox"/>
100	craftsman homes, native plants and trees mixed use architecture	1) Y <input type="checkbox"/> 2) moved in May 29th, 2014 <input type="checkbox"/>	1) N <input type="checkbox"/> 2) N/A <input type="checkbox"/>

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101	<p>size should be the important factor IF we make developer break up the facade (both in terms of projections into/away from the street and height both up and down from the street.) <input type="checkbox"/> if e cant hold developers to those guidelines, than we shouldnt allow an entire block to be developed at a single time. <input type="checkbox"/> it could be argued that the existing buidings built in the last few year meet the desired density, height and infrastructure for the next 10 years. if we halted all massive construction and let the next ten years be about smaller developers/homeowners building what they can the size/density/parking/other issue might work themselves out. <input type="checkbox"/> but...if we keep allowing the same developers to buyup all houses on a given block and build a bohemot building that takes up the whole block- than in 10 years we will have a street without businesses because people will no longer wish to walk along it. the apartments will then turn to slums and we will have taken what is one of portlands best/most walkable neighborhoods and made it one of the worst. <input type="checkbox"/> i dont think that most neighbors grasp that this isnt a density problem and it isnt a parking problem. Its a QUALITY problem.</p>	1. yes 2. 8 years 3. yes	1. starting a business as we speak 2. will be 3. effective immediatley 4. yes, operated from home (and a rented/leases workspace elsewhere in SE)
102	Parking!		No.
103	I understand and support more density in inner SE. How about we space out these giant apartments? Attempt to blend in with a traditional neighborhood instead of making cheap "design" modernistic crap. A little less concrete, some of those look like they were made by the Corps of Engineers.	I live on Clinton St. and have so for 50 years, right in the heart of the construction. I think that Y 12 years Y	N
104	no more than three stories more reuse of existing buildings like the old wild oats store	1. y 2. 9 yrs 3. y	1. y 2. 1 yr 3. y 4. home office
105	How about a little set back? The street feels overpowered by the tall buildings on such a small street. Or reduce the height of these buildings. There is money to be made so make some underground parking for goodness sakes. Does everything have to have the modern look? Can we keep cars off the bike route? Lots more cars, speeding and not stopping at stop signs because the traffic is backed up.	Yes. 8 years. Yes	No
106	Not so tall. More congruent with those nearby. Include parking. Set back from the street so it's not like a canyon.	1) Y 2) 7 years	1) N
108	Nothing above three stories, as it creates a shady dark zone both on Division itself and on the residential properties to the north of Division. Pedestrian friendly, design. Some off-street parking!	1. Y 2. 18 years 3. Y	1. N
109	the current buildings going up are kind of ugly, not sure what exactly it is	Yes, for 12 years, yes	No

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110	size: no more than 20 units, architecture that is interesting but not too flamboyant, nothing that overwhelms neighboring buildings, set back and space for public to gather, trees and natural features. sustainability is important to me, so passive energy design features and sustainable design is key.	1. yes <input type="checkbox"/> 2. 6 yrs <input type="checkbox"/> 3. no, i'm two blocks south	1. n
111	no more than three stories. <input type="checkbox"/> fits well (design) in the neighborhood. <input type="checkbox"/> adds to the center concept. <input type="checkbox"/> reduces auto use and improve transit/pedestrian use. <input type="checkbox"/> landscaping is important. <input type="checkbox"/> If appropriate commercial should be on ground floor. <input type="checkbox"/> should fit a master plan for the area. <input type="checkbox"/> include design review or other design control mechanisms. <input type="checkbox"/>	1. yes <input type="checkbox"/> 2. 40 years <input type="checkbox"/> 3.no	1. no <input type="checkbox"/> 2. na <input type="checkbox"/> 3.na <input type="checkbox"/> 4. na
112	Parking beneath main level <input type="checkbox"/> 3 stories and below in height <input type="checkbox"/> Architecture in line with Old Portland Home design <input type="checkbox"/> Mixed use	1) Yes <input type="checkbox"/> 2) 11 years <input type="checkbox"/> 3) Yes	1) Yes <input type="checkbox"/> 2) 4 months <input type="checkbox"/> 3) From home
113	I'd like to see a good mix of modern and classic- the variety is what keeps portland unique. Its also great that we have a great mix of dives to high-end establishments throughout division.	Yes, 3 years on division/43rd	No
115	I would love to see some sort of design standards to improve the quality of construction, but I think it's very difficult to judge architecture by any "standards". I definitely think the City needs to require more than token parking when higher density structures are added. I'm not sure whose quality of life the planning department thought they were improving with this zoning.	1) Y <input type="checkbox"/> 2) 24 yrs. <input type="checkbox"/> 3) N	1) Y <input type="checkbox"/> 2) 3 yrs. <input type="checkbox"/> 3) N <input type="checkbox"/> 4) Y <input type="checkbox"/> I own property and used to live very near the study area (green (1) No. <input type="checkbox"/> (2) Does not apply. <input type="checkbox"/> (3) Does not apply <input type="checkbox"/> (4) Does not apply <input type="checkbox"/> (5) Does not apply.
116	Hunh? This question is written in city planning jargon. I don't understand what the options are. What I know is, I prefer buildings that aren't ugly and that come with their own parking spaces. If new residences go up, how about some duplexes or fourplexes.	(1) Yes. <input type="checkbox"/> (2) 19 years. <input type="checkbox"/> (3) Yes.	(1) No. <input type="checkbox"/> (2) Does not apply. <input type="checkbox"/> (3) Does not apply <input type="checkbox"/> (4) Does not apply <input type="checkbox"/> (5) Does not apply.
117	it's nice when a building matches the 'flavor' of the street it's on. but Division is first of all a commercial strip and second, the area is changing so rapidly there really is no one style. shorter is better than taller for light and open feeling, wider sidewalks are preferable (I prefer more sidewalk and less landscaping, if that's a choice that has to be made, otherwise a mix is best). <input type="checkbox"/> Color would be nice. Don't sacrifice convenience for style, don't make it more difficult to gain access to businesses or homes. What I'd really like to see is a jitney that runs up and down the strip with parking at either end, a free service that runs constantly all day long - wouldn't that be cool?	1 - y <input type="checkbox"/> 2 - n	1-n
118	No fake brick or fake stone, buildings should be honest and not try to match historical buildings in a shoddy fashion. Instead they should reflect context in other ways, such as addressing human scale, choosing warm materials that aren't fake, and utilizing landscapes and plants to break up a building's bulk and invite diffuse light and color	Y <input type="checkbox"/> 4 years <input type="checkbox"/> Y	N

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119	Mixed use development would be great. 4 to 6 stories along division that step down towards the neighborhoods. nothing over 8 stories. if parking is required, put it out of sight - in garages or below ground. don't restrict styles, it makes things feel too homogeneous.	Yes, resident for 2.5 years. <input type="checkbox"/> No.	N
120	Size: no bigger than today's buildings <input type="checkbox"/> <input type="checkbox"/> Style: form follows function <input type="checkbox"/> <input type="checkbox"/> street interface to be gradual, from human scale to towering scale, w/shaded courtyards easing the transition. <input type="checkbox"/> <input type="checkbox"/> Not easy problems to solve.	yes <input type="checkbox"/> 4 yrs <input type="checkbox"/> no, but nearby	(no answer)
121	Mixed use bldngs are fine but I worry we might build too much commercial before we are ready for it. <input type="checkbox"/> Would like the following: <input type="checkbox"/> 1) Mix of bldng heights <input type="checkbox"/> 2) Thoughtful solar access <input type="checkbox"/> 3) More creative step downs to house nearby <input type="checkbox"/> 4) No blank walls <input type="checkbox"/> 5) Clearly delineated, welcoming street entrances <input type="checkbox"/> 6) room for vegetation as part of the architecture <input type="checkbox"/> 7) Spots to pause as in benches in front of Roman Candle <input type="checkbox"/> 8) Spaces for art <input type="checkbox"/> 9) Views of trees and sky <input type="checkbox"/> 10) Rooftop gardens <input type="checkbox"/> 11) Common areas in bldngs so people can get to know each other <input type="checkbox"/> 12) Some simple elegant architecture that lets your eyes rest -- right now too many of the bldngs seem to be competing for attention with no sense of pattern or rhythm <input type="checkbox"/> 13) Continue emphasis on sustainability but not at the cost of better design	1-yes in SE <input type="checkbox"/> 2 - 16 yrs <input type="checkbox"/> 3-yes	1- No
122	My ideal building is the one at the corner of 30th and SE Division on the northwest corner, where Caffe Pallino used to be. It is a low building with a few units and commercial space below. My second tier, and probably more sustainable, is the Sunshine Tavern building which has substantially more units and space for multiple businesses. <input type="checkbox"/> I am less happy with the buildings that have gone up recently which are taller and often flat facing, with virtually no street character. They are cold and detract from the neighborhood vibe. They seem to be more about cramming in more units than helping shape the streetscape.	1) Y <input type="checkbox"/> 2) 11 years <input type="checkbox"/> 3) Y	1) N <input type="checkbox"/>
124	Buidlings should look like they fit in the neighborhood not like they belong in the Pearl.	1. Yes <input type="checkbox"/> 2. 19 years <input type="checkbox"/>	No

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125	I would prefer buildings of 3-6 stories that feature setbacks after the street-front story, allowing light and space in. I love the residential over commercial type building. No preference on facade or style, but would like to see more variety.	Y, 3 years, no	No
126	Ideally, 1-2 stories, with 3-story max. Wood exteriors, earth tones, the building across street form Night Light is great example. Sunshine Tavern building good for use of wood exterior. More consistency in roof lines and design between old and new buildings. <input type="checkbox"/> But, this question is beyond the vocabulary and understanding of mos people. I could point out much better what I mean tha put it into words. I don't have the architect/design speak to know what things/designs are called.	yes <input type="checkbox"/> since 34 yrs <input type="checkbox"/> yes	no
127	Size of the current construction projects is about as big as I'd want to see in this neighborhood. Anything bigger would seem completely out of place.	Y <input type="checkbox"/> 1.5 years <input type="checkbox"/> Y	Y <input type="checkbox"/> 5 years <input type="checkbox"/> Y <input type="checkbox"/> Business operated from home
128	4 to 5 stories. Ground level commercial space.	(no answer)	(no answer)
129	It would be nice to have some buildings that were constructed with some design intention beyond "cheap, easy and fast."	1. Y <input type="checkbox"/> 2. 5 years <input type="checkbox"/>	(no answer)
130	mix it up some...variety would be niceoffer courtyard space or something to soften the impact on the street...all of the these taller buildings built right up to the set back make it a little claustrophobic.	(1)Y <input type="checkbox"/> (2)since 2007 <input type="checkbox"/> (3)Y	(1)N <input type="checkbox"/>
131	More green space flanking Division --- no buildings right up on the edge of the sidewalk; courtyards are great, but don't forget the green!	Yes <input type="checkbox"/> 16 years <input type="checkbox"/> Yes	No
132	Division Street should be lined with mixed use, dense, multi-story buildings with at least 4 stories each.	Y. 12 years. No, but it is way too narrow to think about the needs of the community. It is only located on NARROW Yes. 64 yrs.no-76th.	N
133	I don't think mixed use commercial will work. Not very successful urban planning idea.		No
134	Two story. Three at most with commercial at street level with adequate parking for residents and those interested in the commercial property.	Yes <input type="checkbox"/> 8 years <input type="checkbox"/> No <input type="checkbox"/>	No
135	I am a believer in mixed use. Buildings should be close to the street, to create a sense of place. Style of new buildings should be modern, and NEVER try to imitate older styles. That is always a recipe for architectural mediocrity.	Y <input type="checkbox"/> 9 MONTHS. <input type="checkbox"/> Y <input type="checkbox"/> DIVISION + 38TH	No <input type="checkbox"/>
137	I would say that all development must include parking.	I have lived here several years.	My business is operated from home.
138	Two to three story, enough with the buffed boxes, back up a little from the street.	Y, 8 years in August, 2014. I do not live in the study area.	Y, 7 years, no, it is not in the study area, it is adjacent. My business is

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139	Two story maximum to protect residential areas surrounding it.	Yes, we live on SE 34th, in the study area. We have lived in this house for one year. Prior to purchasing this house, we lived in a nearby house in the Richmond area for 8 years. <input type="checkbox"/>	(no answer)
140	Smaller, with parking, better materials. Concrete, brick, wood. No gypsum exterior panels.	I own a house in SE. It's been in the family for 70 years. Not in the actual area, but a few blocks	(no answer)
141	Conformity to style and character of existing neighborhood.	1) Yes, I live in SE 2) since 1988, but 3) not in this study area.	1) No.
142	Smaller scale than the buildings like Richmond Flats, greater setbacks, Craftsman or that era, lower height (at most one floor higher than the 2 story houses 1910s Craftsman houses - not the current "2 story houses with above ground "basements"), landscaping including trees and green ground cover, underground parking for residents. No to the supposed green building that look like they are put together with leftover scraps from other projects; no to 50s, 60s or 70s era styling - especially large scale. Houses in the area are having lots sold off and houses far too big for the neighborhood or the site put in. The new houses look larger than the largest existin houses and crammed into a partial lot, many with their "basement" at ground level - they are essentially 4 story houses in a neighborhood of 2 and 1-1/2 story houses.. Many of the mid-century houses were meant to have spacious yards and the ones which have sold the yards off might as well be torn down as usually huge houses are crammed in next door and it is extremely aesthetically unpleasing.	y <input type="checkbox"/> 23 years <input type="checkbox"/> n (just outside of it)	y <input type="checkbox"/> 18 years <input type="checkbox"/> n <input type="checkbox"/> 18 years <input type="checkbox"/> n
143	Find another fucking street already.	Y, 17 years, Y	NNN
145	leave it alone	yes 59 years	no
148	Parking, parking, parking. Did I mention parking? If more buildings go in, I'd like to see attractive, creative buildings like the one on 26th and Division. The recent buildings are ugly. The D Street village looks cheap and unreflective of the character of the neighborhood. No more than 3 stories (obviously). Retail space that is not jus the same thing you'll see in any high-scale area of Portland. And parking.	Yes. 13 years. Yes.	No.
149	Small in size with parking	yes 16 years yes	n
150	Arts & crafts, no more than 3strory	Y, 18 yrs, y	Y, 18 yrs, no it's at 45th and Hawthorne, yes part time

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151	<p>More buildings that reach to 4 stories would be welcome. inevitably some gaps would remain with lower buildings, but that's okay. I'd like to see overhangs, or more details at the tops of the buildings, instead of the flat top line you often see.</p> <p>More articulation in the face is desirable. Not just big notches, but articulation on a smaller scale (6 inches, one foot, etc), that adds a finer grain to the front of the building. The street frontage should be built up to the sidewalk, to create a pedestrian-oriented corridor. <input type="checkbox"/></p> <p><input type="checkbox"/> Parking lots should be eliminated. Any parking that is provided should be accessed from side streets, and narrow driveways.<input type="checkbox"/></p> <p><input type="checkbox"/> Style could be modern or traditional, as long as there is articulation of the facades, ground floor retail windows that are not blocked by planters or tables.<input type="checkbox"/></p>	Yes <input type="checkbox"/> <input type="checkbox"/> 27 years <input type="checkbox"/> <input type="checkbox"/> Yes	No <input type="checkbox"/> <input type="checkbox"/>
152	10-50 units no parking, 1-4 stories.	y, 6 years, y	n
154	Mixed use with shops, restaurants, service-based businesses. A variety of structures, not just raze the old, build new. More entertainment type businesses.	1. Yes, for two years <input type="checkbox"/> 2. Yes	1. No
155	I don't know much about building design, but I like when things are unique, and kept small, with lots of interesting details (like on craftsman style homes) and plants. I like dark wood accents, other natural elements like stone, and large windows. Landscaping is very important. I like when things match the style of their surroundings but still have some unique character. I definitely appreciate when extra thought is clearly put into design and buildings aren't just slapped up as cheaply as possible. It's very noticeable when the new buildings are boring, generic, and cheap, and it makes the area around them seem sad. I definitely do not like when they just look like a big four story box. The new D-Street complex is interesting. I don't personally like the bright orange color they used but I appreciate that they at least did something unique. I like the vintage style.	1) Yes <input type="checkbox"/> 2) 25 years <input type="checkbox"/> 3) Yes	1) No <input type="checkbox"/>
156	No high-rises. Residential at a variety of prices. Places for food carts (which are one of the things that make Portland so special). Keep things funky--that's what we like. Please, PLEASE no non-local chains. If we want chain restaurants/stores/etc., we can go to the suburbs. Keep inner Portland interesting.	1. Y <input type="checkbox"/> 2. 1.5 yrs <input type="checkbox"/> 3. N	1. N <input type="checkbox"/> 2. N/A <input type="checkbox"/> 3. N/A <input type="checkbox"/> 4. N/A
157	No more ultra-modern buildings. The mixed-use buildings should respect the age of the neighborhood, i.e. brick facades, bay windows (no vinyl), cornices, no more than 3 stories.	Have lived in SE for almost 20 years. I live 2 blocks of your boundary on the map.	Not a business owner.
158	Maximum two-three story, traditional materials (horizontal wood lap siding0; double-hung windows, pitched roofs or flat, depending on what's nearby; traditional commercial entries (recessed, clipped corner, etc.) there is NOTHING creative about "mixed use" buildings - it is the city's choice for new development in every Portland neighborhood.	Y. Since 1980. N.	M
159	3 stories or less to keep sun exposure. Preserve sidewalks. Incorporate low income housing as well.	1) Y <input type="checkbox"/> 2) 7 years <input type="checkbox"/> 3) Y <input type="checkbox"/>	1) N <input type="checkbox"/>

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162	No new multi story above 50th, and keep scale in that area primarily single-family. Like the small homes between 43rd and 44th with gardens and interesting variations in design. Don't like most of the new multistory buildings which lack character. Would like more setbacks from the street and plantings.	yes in SE, 3 yrs, yes in study area	not a business owner <input type="checkbox"/> <input type="checkbox"/> do some consulting and volunteer work from home
164	Perhaps a few indented courtyards (such as the one between Salt and Straw and St. Honore	1) Y I live in SE PDX <input type="checkbox"/> 2) I have lived in SE PDX for 13 Years <input type="checkbox"/>	1) No, I am not a business owners
165	I prefer more windows at the ground level, and high quality, durable materials at the ground level. I strongly prefer that there not be one mandated style of building or building features, but rather a variety of building styles and sizes. It's nice to see an occasional setback to provide a patio or other outdoor feature to provide a relief from the building mass. I prefer to see more than one building per block with distinctive designs - but NOT one building designed to appear as multiple buildings - it never looks right! 3-5 stories seems appropriate for the street. As I mentioned above, setbacks for some of the upper stories would allow more light onto the street, and could be used for roof patios, which can help activate the street and provide more distinctive character.	Yes, for 6 years. No, I don't live in the study area.	No.
166	I don't mind somewhat modern buildings but these huge glass and concrete things they been building are ugly and will look dated within 5 years. <input type="checkbox"/> I'd like buildings no taller than 3 stories, medium sized, maybe with some vintage touches to match the surrounding locales	Yes, for a year (homeowner), I do not live in the mapped area (I live about 10 blocks north)	No
167	No taller than 2 stories, take style of neighboring buildings into account, and include parking -- it's just realistic.	(1) Y <input type="checkbox"/> (2) 3 years <input type="checkbox"/> /3\ N	(1) N <input type="checkbox"/>
168	I'm afraid it's a done deal...the preposterous mix of facades along the stretch of new development (fly swatter metal grate building, bright orange faux tudorish, brick front, modern cube, industrial metal and glass) mixed in with the old buildings means that pretty much anything goes...and absolutely nothing goes together. Perhaps that is the aesthetic defined?	I live in Ladd's Addition, have for 21 years.	no
169	I think that a varied mix is of styles, and to a lesser degree scale. I do however, think that there should be some sort of uniqueness to any new projects. I think that any building beyond single family housing should have street level commercial along as much frontage as possible.	I do not currently live in SE but did for 2 years previous, and often patronize the affected area	No
170	Make them look like the buildings that are already there.	YES, 8 years. No, but I eat there a lot.	no. no. no. no. <input type="checkbox"/>
171	The current aesthetic resembles that of Ikea.	y 10 years. I live one block south of the line.	n
172	preferences are everything built previous to the past 6 months of rampant development. <input type="checkbox"/> preference is stop destroying what stands, just improve. why do you suppose the popular inner city neighborhood properties are the vintage 'old charm' PDX???	y 10yrs	NO
174	Like the 3-4 floor building model for a main business street.	1. Y <input type="checkbox"/> 2. 22 years <input type="checkbox"/>	1. Y <input type="checkbox"/> 2. 5 years <input type="checkbox"/>

#	DESIGN: What are your design preferences for future mixed-use development (Residential and Commercial uses in the same building) on Division? For example, size, scale, style, building form, facade, street frontage, etc.?	(1) Do you live in the SE?(Y/N) (2) If so, for how long? (3) Do you live in the study area shown on the map?(Y/N) Division between 11th-60th)	(1) Are you a business owner (Y/N)? (2) If yes how long have you owned the business? (3) Is it located within the study area(Y/N)? How long have you owned this business? (4) In-home Business?
175	Limit to 3 stories; provide parking for both residents and customers (Zupan's on Belmont does this); the most local style, though hard to adapt to a multi-story building is bungalow style/Arts and Crafts. It would be nice to see designs reflecting that style rather than glass boxes.	Yes <input type="checkbox"/> No	(no answer)
176	make sure you keep accessible sidewalk & ramps please. So people on bikes and wheelchairs and who use walkers and other mobility devices can actually make their way through the neighborhood.	Yes <input type="checkbox"/> For 6 years. With my husband who has lived here longer than that. <input type="checkbox"/> No, but I live on 22nd & Division. We actually 1. Yes. <input type="checkbox"/> 2. 3.5 years. <input type="checkbox"/> 3. No.	No
177	Max of 50 units on four floors. Energy saving/generating features. Contemporary design.	1. Yes. <input type="checkbox"/> 2. 3 years. <input type="checkbox"/> 3. No. 4. Home.	
179	The buildings should have parking for at least 75% of the residents. Currently the buildings that are going up look too similar, variety in design would help keep the unique character of Division Street. So get away from blocks of color or boxes.	(1) yes (2) five years (3) yes	No
180	Keeping the scale smaller would be more feasible for the area.	N	N
182	Think about how new construction can fit in with the classic construction of the neighborhood. One or two level, brightly painted and individualized store fronts with large windows. Less metallic and glass structures. Room for seating on street.	Yes, I grew up in this neighborhood and have owned a house that is about 5 blocks from Division for the last 6 years.	Yes. My business has been up and running for 3 months and is operated in my home.
183	There should be a lot of well designed public space, with water features, with native plantings, a poetry post, that sort of thing. <input type="checkbox"/> <input type="checkbox"/> Division has become a garish homage to the Portland restaurant, a farm-to-fork Disneyland. It's not a very interesting place and its not worth the effort to navigate the traffic to get there. And once you get there, there's no place to park. <input type="checkbox"/> <input type="checkbox"/> Except for the media superstars like the overrated Ava Genes, I wonder how all those restaurants will survive? <input type="checkbox"/> <input type="checkbox"/> There should be more business diversity amongst all those restaurants.	I have lived in the southeast (within the map area) for 12 years.	N I do not own a business here.
184	Small to medium sized mixed use with parking. Interesting shapes and facades to add diversity to the mix. D street have character and balance of scale. Not looming oversized apartment structures bearing down on you.	Yes, for 25 years. I live by Woodstock Park. My sister has lived at SE 48 and Grant for 25 years. My Mom lives at Courtyard at Tabor, has been there 2 years.	No, Always thought the corner of 50th and D would be awesome for a bistro.

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187	Limit high rise structures. <input type="checkbox"/> Limit strip mall type/generic appearance. <input type="checkbox"/> Limit super modern designs that look like they belong downtown or the Pearl Distict and not in an eclectic neighborhood community. <input type="checkbox"/> Provide parking lots to cut down on off street parking congestion.	1) Yes <input type="checkbox"/> 2) 11 years <input type="checkbox"/> 3) live 1 block outside of area	No <input type="checkbox"/>
188	Residential and commercial need to provide integrated parking. Stay at 2 stories for buildings. Natural colors -- not the bright orange that's on one of the new apartments. Lower density with more of a mixture of old and new. Facades that fit with the older buildings. More trees and green space/plantings.	1. Yes 2. No	No
189	I like the retail on the street with the residents above. Don't really have any concern as long as everything sustains itself. That is wouldn't want vacant apartments or stores. But if they fill up, not going to worry about size. I have ZERO concern about parking, and would be opposed to any parking requirements. The whole point is to get denser.	Y. 16 years. Just outside, by a block on 29th near grant.	Y. 10 years. N. My business is downtown.
190	2-3 stories. Pedestrian-friendly (no cement facades without windows or artwork or nature/water elements). More bought as to design and beauty.	Yes <input type="checkbox"/> Since 1997. <input type="checkbox"/> No	Yes <input type="checkbox"/> 2002 <input type="checkbox"/> Yes <input type="checkbox"/> No
191	taller, more colors , less plain concrete, more store fronts	1 yes <input type="checkbox"/> 2. 40 years <input type="checkbox"/>	2. No
192	Limit building height; provide off-street parking for residents and guests, try to preserve some of the "old Portland" or "Craftsman" style in architecture some of the time.	3. 4 blocks north of Division 1) yes <input type="checkbox"/> 2) 15 years <input type="checkbox"/> 3) yes	1) no <input type="checkbox"/> 2-4) N/A
194	Residential and Commercial uses in the same building with below grade parking makes sense. The current range of 4-6 stories makes sense since the surrounding residential areas are still very intact and their scale is smaller. Taller buildings along Division are the way to go. Single-family homes still on Division will eventually be moved, deconstructed or converted to commercial uses.	1 -Y <input type="checkbox"/> 2 - since 1999 <input type="checkbox"/> 3 - N, 3 blocks outside at SE 60th & Woodward	1- Y <input type="checkbox"/> 2 - 2002 <input type="checkbox"/> 3 - N <input type="checkbox"/> 4 - N
195	None. GO TO SE FOSTER!	y, 17 years, y	y, 17 years, y
196	Division is already too built up with large mixed used buildings. The street is tiny-the scale is wrong and dangerous to walk around. Socioeconomic and ethnic diversity should be more emphasized. A library branch and/or community center would be excellent. More public spaces for hanging out, which the food cart pod offered.	I live on SE 23rd a few blocks S of Division. For 15 years.	(no answer)
197	Affordable housing. single family homes, affordable apartments, no expensive condos.	I used to live on SE Division and 34th, for 2.5 years. I used to work at Division and 35th when I lived there.	No

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198	It would be nice if you could tell which block you were on rather than everything on the major 'hood streets (ex, Alberta, Mississippi, Division, etc) looking so similar. Where's the character in that? They're all starting to blend together. So, design that was influenced by the existing community, utilizing it's unique flavor.	(1)Y <input type="checkbox"/> (2) 6 months <input type="checkbox"/> (3)N <input type="checkbox"/>	(1)N
199	Newer development is aesthetically a detriment when the height is incongruent to the existing structure it may be placed beside on Southeast Division Street. □ A district with buildings of like height - so as to not dwarf the older existing commercially zoned structures - upon the street would be preferable. It would be nice to have more bicycle infrastructure as well, at the current time it is very difficult to locate adequate bicycle parking in certain blocks, due to the sidewalk tables and the construction.	1. YES. <input type="checkbox"/> 2. Five years <input type="checkbox"/> 3. No <input type="checkbox"/>	1. No <input type="checkbox"/> 2. - <input type="checkbox"/> 3. - <input type="checkbox"/> 4. - <input type="checkbox"/>
200	Store fronts with lofts are fine, but anything over two, maybe three stories stands out. The cubist futuristic buildings are obnoxious.	I grew up in SE, and moved from SE 20th and Division about six months ago. I lived there for three years. I have spent the majority of my life in SE around Hawthorne/Division.	Not a business owner.
201	small, facade should blend in with period of building surrounding it	y <input type="checkbox"/> 2 yrs <input type="checkbox"/> yes <input type="checkbox"/>	(no answer)
202	I like the idea of mixed-use but no more than 3 stories tall. I would like those building types to be up to the sidewalk.	1: Yes <input type="checkbox"/> 2: 38 Yrs <input type="checkbox"/> 3: <input type="checkbox"/>	1: No <input type="checkbox"/> 2: N/A <input type="checkbox"/> 3: <input type="checkbox"/> 4: No. <input type="checkbox"/>
203	Prefer mixed use, modern or faux-vintage exteriors, up to 8 stories. Up to one half block in size.	1. Yes. 2. 20 years. 3. No. <input type="checkbox"/>	1. No. <input type="checkbox"/>
204	I prefer mixed use buildings that front on Division. They should all include ground-floor retail. On-site parking should be minimal. Max height of in the range of 6-10 stories. Style can be anything. Prefer mixed-income developments.	(1) Yes, I live in SE Portland. <input type="checkbox"/> (2) Almost three years. <input type="checkbox"/> (3) No, but close (5 blocks) to the Division corridor. 1: Y <input type="checkbox"/> 2: 21 yrs <input type="checkbox"/> 3: N <input type="checkbox"/>	(1) No. <input type="checkbox"/> (2) N/A. <input type="checkbox"/> (3) N/A. <input type="checkbox"/> (4) N/A. <input type="checkbox"/> 1: N <input type="checkbox"/>
206	The sizes are probably about right. I would like to see more suitable landscaping, a bit more greenspace, a much less concrete/steel/aluminum. I want buildings to be pleasant from the street both individually and as part of the streetscape.□	2: 21 yrs <input type="checkbox"/> 3: N <input type="checkbox"/>	
207	You are going to need huge parking structures!	Yes, 48 years, yes! <input type="checkbox"/>	No.
208	Be respectful of what you build - you are part of a larger canvas, stop trying to make a personal statement - try to fit in.	#1. Y, #2. 1 year, #3, Y <input type="checkbox"/>	1. N <input type="checkbox"/>
210	I think the current size and scale has been great. Encouraging public spaces, or breaks mid building would be even better. yes, 8 years, yes. So instead of a whole block face there's a break, maybe a small indent where the main entrance is. They don't all have to have benches or fountains.	yes, 8 years, yes. <input type="checkbox"/>	no.
211	They should be urban, in nature and design, engaging the street, with parking incorporated into the designs (but not as open parking lots visible from the main street). Some of the terrible 60's through 90's apartment buildings, as well as some of the light industrial buildings of those eras are suburban in design and do not belong on a main street of an urban neighborhood.	My family and I have lived on 28th Place between Division and Clinton for 25 years. (in the study area) <input type="checkbox"/>	My husband and I have owned a small business on Division Street for 16 years. I also have had a home business for 24 years (in the study area as well). <input type="checkbox"/>

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212	Most important--no more than two or maybe three stories. <input type="checkbox"/> <input type="checkbox"/> Deeper set back with more interface spaces. <input type="checkbox"/> <input type="checkbox"/> Adapt to surrounding structures. <input type="checkbox"/> <input type="checkbox"/> Don't build to property line. <input type="checkbox"/> <input type="checkbox"/> Stop pushing density.	yes, 20 years, in the study area	no
213	Again--look at D Street Village. I love almost every aspect of that concept.	Y <input type="checkbox"/>	(no answer)
215	residential and commercial is fine together, but fix the parking. Continue with the current types of new buildings in style.	For 13 years <input type="checkbox"/> yes <input type="checkbox"/> 33years <input type="checkbox"/>	no
216	Any building form, any facade.... Street frontage ON Division. Let's not make strip mall SoCal... 3 stories max.	no, outside these boundaries Yes. I have owned my house here since 2008, but have been renting or visiting for long periods since 2003. <input type="checkbox"/>	I am a business owner, but do not own a brick and mortar storefront. I have been in business for myself
217	Size: no bigger than what is present, both in height, depth and width. Frontages should not be all glass. No garish or all white color schemes.	1) Yes. <input type="checkbox"/> 2) 8.5 years <input type="checkbox"/> 3) No. But only one block off	(no answer)
218	To leave Division alone. If it is to be touched keep the style and building form in line with the neighborhood. Provide parking for ANY apartment building that goes up-- COMPLETE Parkiing for every tenant. Make rent, buiilding, and restaurants afffordable so that Portland does not turn into NY.	1. Y <input type="checkbox"/> 2. 8 yrs <input type="checkbox"/> 3. N	1. N
221	living walls, wood siding left the color of the real wood. Windows. The interior look of the wild oats building is nice. The orange color is a little annoying.	Yes. 10 years. Yes, I have lived in the development area for the last 3 years.	No
222	Currently, there are rental houses from 34th and 36th and Division that fit the scale of Caruthers. I have a concern that the area between 34th and 36th and Division will be redeveloped into an MDU. When the houses get razed, I don't look forward to a view of the back of a three story building.	Yes, I live in SE. I have lived on SE 34th and Caruthers since 1978. I live in the study area.	I am not a business owner.
223	A great example of terrible design is the "Division St. Penitentiary" next to the Whiskey Soda Lounge. A big white cube, covered with prison bars. This is a great example of someone trying to make a building at the lowest cost possible. I prefer building designs that break up the skyline, have a modern edge, but look like well made structures of permanence. I fear that half the newapartment buildings on Division St. now will not age well, and look shabby within five years.	(1) Y <input type="checkbox"/> (2) 6 years <input type="checkbox"/> (3) Y	1. N <input type="checkbox"/> 2. N/A <input type="checkbox"/> 3. N/A <input type="checkbox"/> 4. N/A

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224	Smaller! Trying to max out a lot by putting X amount of condos in each building is too much. A population increase like this in one area is overwhelming. I'm all for new businesses, though businesses had been doing just fine renting the structures that had already been standing. So knocking things down for the sake of building something bigger. If it ain't broke, don't fix it!	Yes. I lived a block off of division on 58th from 1987-2003, and a block off of division on 32nd pl from 2004-present.	No.
225	Smaller scale, less generic/modern, not too tall	Yes, since 2005. No, I live on 32nd and Belmont.	No.
226	Anything over 4 stories seems out of scale with the current neighborhood but it needn't be a hard and fast rule. <input type="checkbox"/> I believe the aesthetics should be dictated by people qualified to make such judgments (ie, city planners) who have the city's interests in mind (and not developers who are turning a quick buck) but I mistrust the design decision of the people who live in proximity and have the time to complain about it. These neighbors may have different objectives than I and although they may be organized, may not represent the neighborhood's view. Not everybody wants Division to stay the way that it was. I am excited about this new commercial strip, as I think many busy young people are. <input type="checkbox"/> I like the concrete commerical main floor with two floors of wood framing or masonry above. It gives a good feel to the street while what you see from farther away is more contextually matched to the residential. I think there should be lots of windows facing the street, but not lots of windows facing what used to be private back yards.	1. Y <input type="checkbox"/> 2. 7 years <input type="checkbox"/> 3. N	1. Y <input type="checkbox"/> 2. 5 years <input type="checkbox"/> 3. N <input type="checkbox"/> 4. Yes, my business is operated from my home.
227	Any new buildings should provide parking	1) Y <input type="checkbox"/> 2) 36 years <input type="checkbox"/> 3) N - 1 block off	1) Y <input type="checkbox"/> 2) 30 <input type="checkbox"/> 3) N <input type="checkbox"/>
228	Hmm. I think keeping things at 3 stories will help keep the open feeling of the street. I don't really have a modern/traditional design preference. The better made the new construction, the better. Also development that includes green space, energy efficiency, etc. are a plus.	1) Y <input type="checkbox"/> 2) 7 years <input type="checkbox"/> 3) Y <input type="checkbox"/>	No
229	Style is one. The style of some buildings that are going up look ghetto and will not age well and assimilate into the neighborhood design. Buildings should be thoughtful and also blend in well with the neighborhood or should be architecturally significant in their own right where they become a destination or add civic pride. Size should be big to maximize land and they should have street frontage and some business opportunities on the ground floor or a public space (or green space) that is inviting to the neighborhood.	1) Yes 2) 3 years Yes. I live on 44th/Division	1) No
230	How about some crosswalks between 50th and 42nd.	1- yes <input type="checkbox"/> 2 - since 1992 <input type="checkbox"/> 3. <input type="checkbox"/>	(no answer)
231	I think it would be okay to have single use residential buildings as long as the ground floor has interest or elevated patio or stoop setback (for their privacy). I think it is impossible to always fill the ground floor with commercial or residential. Why not have quieter uses like offices, too? We need some quieter segments on Division to make it a livable place. It can't be all glitzy and commercial the entire length of it.	1. Yes, I live in Montavilla <input type="checkbox"/> 2. 2.5 years <input type="checkbox"/> 2. No, but my boyfriend has lived right near Franklin High School for the last two years, so I travel the study area frequently. He lives at 52nd and Division.	1. No <input type="checkbox"/> 2.- <input type="checkbox"/> 3.- <input type="checkbox"/> 4.-

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232	I don't mind modernist design or retro knockoffs. My main issue is that the building envelopes are mostly just giant cubes built out right to the lot line as much as possible. I would much rather see taller buildings with more varied setbacks, terraces, mews, or other design ideas to keep Division from becoming just a condo canyon. Also, I'm fine with building housing with no parking. I'd be fine with it on my own block as well. Just put a parking district in place and direct the proceeds to local improvements. No one, not even long time residents, is owed a free space on the street to store a car.	1) Y <input type="checkbox"/> 2) 9+ years <input type="checkbox"/> 3) N	(no answer)
233	rehabilitating existing buildings and keeping them under 4 stories, but have a modern twist that reflects the northwest architectural style - perhaps reflecting the work of John Yeon or John Storrs or earlier architects such as Belluschi or Doyle. Nothing too pretentious.	N	N
235	Any property zoned commercial should be required to have commercial on the ground level. <input type="checkbox"/> Appropriate parking is needed especially with larger housing complexes. <input type="checkbox"/> Have a small easement along the street to widen the sidewalk for use for dining or other appropriate use. <input type="checkbox"/> More trees. <input type="checkbox"/> New buildings no more than 3 stories unless appropriate.	1) yes <input type="checkbox"/> 2) 40 years <input type="checkbox"/> 3) no <input type="checkbox"/>	1)No <input type="checkbox"/> 2)n.a. <input type="checkbox"/> 3)n.a. <input type="checkbox"/> 4)n.a.
236	No more commercial unless replacing another one. Residential only or very small I scale only, fitting in with previous non-gentrified look, practical basic services business only.	Yes, 30 years, within a few blocks of study area. na	na
238	retail+2, on-site parking (or under-site), architectural interest (no more eyesores like on 48th or across from Do It Best). redevelopments like the Victory Bar building are great. re-use!	i live on SE 41st & sherman.	no business.
239	I would like to see tile designs envisioned by the local community adorning the outside facade of new development. This would help the community to feel invested in the place that they live and that they can help to further illustrate the identity of the Division corridor.	Y <input type="checkbox"/> 9 years <input type="checkbox"/> Y	Y <input type="checkbox"/> 4 Years <input type="checkbox"/> Y <input type="checkbox"/> Y
240	Less boxy, more artistic, more flora, colors, let the sunlight in to the street	Y <input type="checkbox"/> 15+ <input type="checkbox"/>	Y <input type="checkbox"/> 3+ <input type="checkbox"/>
241	Balconies, form to the structures, open areas in restaurants where the windows can at least open, lots of wood.	Y, 5 years, N	Y, 12 years, N, Operated from home
242	Mixed use with parking.	Y, 20 years, Y	N,
243	I would like them to have step-downs. Not feel so visually massive. It would also be nice if they were farther back from the sidewalk & had more greenery.	Yes. For a little over 2 years. I do not live in the study area.	No
245	Mixed-use is fine, but need to incorporate parking. No more McCondos that all look the same! So gross.	Y, 2.5 yrs, N	N
246	2-3 story max, human scale, set back from sidewalk, buildings match older styles	Yes, SE for 30 years <input type="checkbox"/> No, 32nd/Belmont <input type="checkbox"/>	no <input type="checkbox"/>
247	While I like some of the unique architecture of the newer construction, I would like to see preservation of older buildings. I would like to see new construction that has a more intimate, historic style.	1. Yes <input type="checkbox"/> 2. 5 years <input type="checkbox"/> 3. No	No.

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248	Low-rise (2-3 story), mixed-use OK, with some residences access at street level. Trees. Native landscaping at the street. Brick and historical materials, with a retro/modern feel. Pay homage to the old Portland style homes, and the light industrial feel of some of the old buildings. Green/eco materials and structure.	1 Y <input type="checkbox"/> 2 15 years <input type="checkbox"/> 3 N - just off of the area, in Ladd's	1 N
249	It would be nice if trees and/or landscaping and/or art could be planned into the street scape. Bicycle parking is sorely needed, as is a structure that has parking (even parking that is charged for). I get the feeling that the residential neighbors are losing all peace and/or parking.	Yes, <input type="checkbox"/> 12 years consecutively or 20 years with breaks <input type="checkbox"/> no - two blocks out of area on map	No
250	I've written on this already: new development should respect the architecture of the surrounding neighborhood, incorporate sightlines that create safe and desirable public spaces (witness the courtyard setback in the development that includes Salt and Straw, and the outdoor space maintained in the corner of D Street Village), allow for greater density but acknowledge the need for parking, are attractive for families at a variety of economic levels, and are sited to allow for walkable distances to businesses and schools.	1. Yes <input type="checkbox"/> 2. I first moved to southeast Portland in 1975. <input type="checkbox"/> 3. Yes, I have lived in the study area since 2008. <input type="checkbox"/> 4. n/a	1. No <input type="checkbox"/> 2. n/a <input type="checkbox"/> 3. n/a <input type="checkbox"/> 4. n/a
251	Use more wood or metal in facades. More underground parking.	Yes <input type="checkbox"/> 35 years <input type="checkbox"/>	Yes <input type="checkbox"/> 25 years <input type="checkbox"/>
252	Just keep it mixed.	No.	No
253	Smaller, lower, setbacks from residential properties, in keeping with early 20th century design of the neighborhood	Y; 23 years; N	Y; 18 years; N; N

MEMORANDUM

To: Planning & Sustainability Commission, City of Portland
From: Community Alliance of Tenants
Date: March 13, 2015
Subject: Comments re: Proposed Comprehensive Plan from a Tenants' Rights Perspective
Attached: Quality Rental Housing Work Group Recommendations
Multnomah County Health Department Issue Brief on the Health Effects on End of Tenancy Notice

Community Alliance of Tenants (CAT) would like to express appreciation to the City of Portland for your efforts to advance equitable community planning and increase housing affordability for all residents of Portland, regardless of background, income, or age. Rising costs and changing neighborhoods have impacted the ability for many renters to stay in inner Portland neighborhoods. Formed in 1996, CAT is Oregon's only statewide, grassroots, tenant controlled, tenants' rights organization. Our mission is to educate and empower tenants to demand and obtain safe, stable and affordable rental housing in Oregon. CAT addresses the impact of Oregon's decreasing supply of safe, affordable housing and absence of meaningful protections for tenants from unjust evictions and unsafe housing conditions. It is only fair that everyone has a safe, decent, affordable place to live.

We respectfully submit this memo, which we hope can provide perspective for the Planning and Sustainability Commission to consider "renters" as a key indicator population by which to evaluate the Comprehensive Plan. The Plan provides the overarching policy framework for city infrastructure for decades to come. Portland's renters are a significant part of Portland's population and play an important role when ensuring a diverse mix of housing options at various stages of life. As such, we implore you to elevate the fair access to quality housing, as a function of the city's infrastructure through the Comprehensive Plan. Also, attached are two community-vetted documents which are useful background and offer implementation guidance 1) Quality Rental Housing Work Group Recommendations and 2) Multnomah County Health Department Issue Brief on the Health Effects on End of Tenancy Notice.

The State of Oregon Land Use Program provides implementation guidelines for local jurisdictions in *Goal 10, Housing* in which - considering the impact on low-income households includes "coordination of the development of urban facilities and services to disperse low income housing throughout a planning area" (OAR 660-015-0000(10)).¹ The intention behind this language in Goal 10, and later through Oregon Revised Statute was to prevent exclusionary zoning practices by any single jurisdiction, and can be a valuable tool in addressing concentrated poverty and racial segregation.² It is incumbent upon Portland's Comprehensive

¹ OAR 660-015-0000(10) Oregon's Statewide Planning Goals and Guidelines, Goal 10: Housing, <http://www.oregon.gov/LCD/docs/goals/goal10.pdf>

² Orfield, Myron. "Land Use and Housing Policies to Reduce Concentrated Poverty and Racial Segregation" Fordham Urban Law Journal Vol. 33 pp. 101-159. (July 2006)

Plan to deliver this intention, seeking to house low income Portlanders in areas of opportunity at prices commensurate with their ability to pay. However the reality is that concentrated poverty persists in Portland, particularly in areas which see the lowest average rents, also indicated by lower average incomes and educational attainment, and fewer or disconnected infrastructural investments such as transit and pedestrian facilities.

Both the City's Housing and Planning and Sustainability bureaus have articulated a desire to provide equitable housing for communities of color, low income residents, older adults, people with disabilities, and those with diverse household configurations. It is important for coordination to occur between land use policy and housing provision, and we look forward to watching these conversations develop.

An equitable city requires the careful consideration of renters, who make up an increasing share of Portlanders, and are also more sensitive to shifts in the market. Six in 10 Americans believes that government should be doing more to ensure there are both sufficient affordable quality rental housing and homes to buy.³ Renters are underrepresented in current City public involvement efforts for various plans or projects. The absence of renters' perspectives precludes the diversity of income, race, ethnicity, and age that renters often bring. If renters were able to maintain stable tenure in neighborhoods of their own choosing, they may be more apt to participate in neighborhood planning as homeowners do. Moreover, the benefits of housing stability, and advancing policies and programs that target stability,⁴ are linked to equitable outcomes such as improved health, educational attainment, and increased social capital.

Renters Profile

Renters currently make up 48% of Portland residents.⁵ Portland's renters are found throughout the city, although are most prevalent in the Central City areas. This is most likely because of the greatest numbers and density of high rise multi-family buildings on both west and east sides of the river. However, other neighborhoods, particularly those in East and North Portland also have significant numbers of multi-family market rate structures, housing a large number of low income Portlanders.

The City's Gentrification Risk Study reports census tracts that have at least 46.5 percent renters, indicate a vulnerability for displacement. The concentration of renters suggests the opportunity for property owners and developers to gain greater profits from disinvested areas, by taking advantage of the "rent-gap" or investment speculation.⁶ Renters are also more sensitive to shifts in property values than are homeowners. When rapid turnover of property ownership occurs, rents rise. With no rent controls required in Portland for market rate units, rising costs go unchecked. The Risk Study also includes factors such as income and

³ How Housing Matters National Survey, MacArthur Foundation. (April 2014)

⁴ FY 2010-15 Strategic Plan. "Goal 3: Utilizing Housing as a Platform for Improving Quality of Life." HUD

⁵ American Community Survey, 2013 (5 yr est.)

⁶ Smith, Neil. (2005) Gentrification and the Rent Gap. Annals of the Association of Geographers. 77(3), 462-465.

educational attainment, which are often methodological indicators used to find spatial patterns of concentrations of poverty. The price sensitivity of renters make them a key demographic indicator in a housing market, particularly those of the lowest incomes. As Portland's rental vacancy rates continue at historic lows, low income renters bear the brunt of a tight market.

Special attention should be paid to renters who are very low-income (50% of area median income), extremely low-income (30% area median income), and households below. These are families that are least price elastic, in which rent increases of as little as \$10, or shifts in utility prices after unseasonably hot or cold weather can cause devastating cost burdens. The National Low-Income Housing Coalition (2014) reports that in order for a family of four to rent a 2-bedroom apartment in the Portland region, which averages at \$922, that family must earn at least \$17.73 an hour to afford that apartment. In actuality, the mean wage of renters in Portland is only \$15.06 an hour, meaning they could only afford an apartment which rents for \$783. This gap indicates a lack of affordability in Portland's rental market, requiring additional measures to be taken to provide relief to those of the lowest incomes. Another NLIHC report⁷ states that for every 100 extremely low income residents (30% AMI and below) in the Portland metro region, only 22 affordable and available rental housing units exist. Despite recent housing construction, the severe housing shortage for low-income renters will continue unless drastic measures are taken. Additionally, a recent Multifamily Market Analysis from Portland State's Center for Real Estate (February 2015) reports a widening affordability gap due to the predominance of expensive luxury in new construction, and that this trend is expected to continue.

Current Challenges Faced by Renters in Dynamic Neighborhoods

No-Cause Evictions

In private month-to-month rental agreements, the landlord and tenant are both not required to give a reason for ending a tenancy; either party may terminate the tenancy with at least 30 days written notice. If the tenant has been in the housing for over one year, 60 days' notice is required. The right for a landlord to end an eviction in this manner is referred to as a no-cause eviction (ORS 90.427).⁸

There is uncertainty surrounding the number and scale of no-cause evictions in the City of Portland. This is due to inconsistent and unreliable data collection methods for evictions. Despite uncertainty about the frequency of no-cause evictions in Portland, what is certain in the literature is that evictions disproportionately impact the poor, women, and communities of color.

A recent survey conducted by CAT found that 68% of tenants reporting no-cause eviction were women. Even though American Indian or Alaskan Native callers only made up 4.1% of 211 Renters' Hotline callers in February 2013, they made up 18% of callers reporting eviction. In other cities throughout the U.S., this pattern is consistent. In a recent study in Milwaukee, Wisconsin, poor black women are disproportionately at risk for eviction; making up 30% of those

⁷ National Low Income Housing Coalition. "Housing Spotlight." Vol. 5 Issue 1. March 2015

⁸ See ORS 90.427. Termination of periodic tenancies: <http://www.oregonlaws.org/ors/90.427>

evicted, but only 9.6% of the population.⁹ Prior to just-cause eviction controls being passed in Oakland, “[F]our out of five ’30 day-no Cause’ evictions (78%) [were] minority households.”¹⁰

No cause evictions can significantly contribute to destabilizing renters’ housing and lead to habitability issues inside their homes. When a landlord can evict for no cause, the threat of such an eviction limits tenant ability to protect their rights, even though retaliation is illegal in Oregon (ORS 90.385). Many tenants who live in substandard housing complain that the threat or fear of a retaliatory no-cause eviction is the most significant barrier for requesting and/or obtaining important repairs. A lack of maintenance and repairs can lead to uninhabitable living conditions and property disinvestment, which has been historically observed in Portland as the early indicators of the cycle of gentrification and displacement.¹¹ This current situation makes it easy for landlords to evict tenants and turnover a building in order to collect higher rents as a neighborhood becomes gentrified.

Ongoing housing discrimination: Section 8 and other protected classes

House Bill 2639¹² passed in the Oregon State Legislature in 2013, going into effect on July 1, 2014. The law makes it illegal to discriminate against renters who use the federal Section 8 voucher program. A limitation of this law is that it does not prevent landlords from turning down tenants based on financial or other reasons. It only outlaws blanket “No Section 8” policies that were frequently stated in rental housing advertisements.

Despite the new law, however, discriminatory practices may continue to be employed by landlords. For example, by simply raising rents above HUD fair market prices, landlords might deter Section 8 voucher holders from submitting rental applications. Such practices help to maintain patterns of concentrated poverty in neighborhoods throughout the city. This may limit the intended effectiveness of the law to open up opportunities for low income residents to access housing close to work, near good schools, and within thriving neighborhoods with active transportation infrastructure.

Because the law is only in its first year of implementation, it may be too soon to fully evaluate its impact on the rental market. Nevertheless, the city should be proactive in monitoring its effectiveness for improving access to opportunity for low income families.

Beyond tenants with Section 8 vouchers, other tenants who belong to “protected classes” under the federal Fair Housing Act continue to face disparities in their ability to find and keep affordable, safe, stable and healthy rental housing. Families with children and people with disabilities face high barriers to finding rental housing that suit their needs, even if their

⁹ Desmond, Matthew. “Eviction and the Reproduction of Urban Poverty.” AJS Volume 118 Number 1 (July 2012): pgs. 88-133.

¹⁰ East Bay Housing Organizations. “Pushed Out for No Reason: Oakland Senior and Disabled Residents at High Risk for Eviction.” Oakland, CA. (2002).

¹¹ Gibson, Karen. (2007) Bleeding Albina: A History of Community Disinvestment, 1940-2000. Transforming Anthropology. Transforming Anthropology. 15(1), 3-25.

¹² <https://olis.leg.state.or.us/liz/2013R1/Measures/Overview/HB2639>

particular landlord may not treat them in a discriminatory way. Additionally, immigrants, refugees, and tenants who don't speak English as a primary language are more likely to face challenges and be harassed or mistreated by landlords or neighbors, and they have significantly less access to the resources available to them, such as education about their rights, and legal representation, because of language and cultural barriers.

Speculative real estate practices

Land and real estate speculation are a major driving force in neighborhood change, especially in neighborhoods that have historically experienced disinvestment, depreciation of property values over time, and more recently have become desirable destinations for higher income households. Investors may enter into such neighborhoods and purchase cheap real estate, develop the property, and then sell it quickly for a high profit margin. According to some long-time homeowners in North Portland, they continue to encounter solicitors knocking on their doors who are interested in buying their homes, often times for cash below fair market value.

Increases in private and public capital investment in the form of real estate development and infrastructure improvements have contributed to gentrification and displacement of the historical residents of North Portland neighborhoods. Housing pressure and rising costs have hurt longtime homeowners and renters. Community presence and social capital diminish as homeowners succumb to enticing offers for their homes and renters fold under the pressures of rent increases.

Neighborhood turnover may also be facilitated by the proliferation of neglected, abandoned and vacant properties. Landlords who are not held accountable for their neglected properties contribute to habitability issues that negatively affect tenants. Furthermore, abandoned and vacant properties in a neighborhood drive property values down, creating the "rent gap" mentioned earlier, and ripen the market for speculative reinvestment and redevelopment.

Retail gentrification and displacement

Discussion of gentrification in Portland has largely focused on the residential aspect of neighborhood change, while little attention has gone into examining the role of retail. Retail establishments in a neighborhood are vital for offering goods and services to residents, as well as creating a quasi-public space in which some residents feel comfortable shopping, hanging out, and spending time.¹³ Because of their integral role in a neighborhood, retail establishments are important mechanisms for building social capital, reinforcing community presence, and reflecting back the cultural symbols of its residents.

We look at the Alberta neighborhood as a case for retail gentrification. Historically, the neighborhood had been a predominantly poor and majority Black neighborhood since the 1950s. Like most poor neighborhoods with Black residents, it suffered from housing discrimination, redlining, and disinvestment but began to gentrify in the mid to late 1990s.¹⁴

¹³ Sullivan, D.M. & Shaw, S.C. (2011). Retail gentrification and race: The case of Alberta Street in Portland, Oregon. *Urban Affairs Review*, 47(3), 413-432.

¹⁴ *Ibid.*

Alberta Street is the neighborhood's commercial corridor with 17 blocks of retail and while some Black businesses and institutions remain in operation, most of the new retail is White owned and caters to a largely White and mainstream clientele.¹⁵ According to Sullivan and Shaw, their study uncovered feelings of exclusion and resentment among some of the longtime Black residents in the Alberta neighborhood (2011). The findings support the importance of retail establishments in fostering neighborhood stability and identity.

Additionally, a discussion about retail in low income, communities of color and immigrant communities should also address the additional barriers faced by business owners from these communities to enter and build long-term success. One of the key determinants of success is access to capital, which historically has been denied to communities of color.

Policy Recommendations

1.0 Protect and Preserve Renters

1.1 Establish a rent regulation system to preserve and maintain affordable housing.

Consider simple language that expresses the intent to preserve rental affordability in Portland neighborhoods. The City should take a serious look into rent control options, such as solutions around the current state preemption, or ways to modify or impact state law regarding rent controls.

1.1.1 Policy Discussion

Rent regulation in the form of rent control, or rent stabilization, is a type of price control for housing. The tool would help to maintain affordability throughout the city. It has the potential to combat rising rents and ultimately stabilize neighborhoods experiencing rapid change due to capital investments and redevelopment projects. By regulating rent increases, rent control would be particularly effective for protecting vulnerable low income tenants from moving out of areas with increasing access to opportunity.

In the State of Oregon, however, rent control is prohibited at the local level.¹⁶ There is a misplaced, predominant belief that controls may cause market disruptions that would harm the affordable housing stock by increasing deferred maintenance of existing housing stock, leading to the abandonment of existing rental units, and creating a property tax shift from rental-owned to owner-occupied housing.

While the law currently limits the use of rent control in the State of Oregon, there are two exceptions that the City could consider as opportunities for establishing a rent control system. The City already exercises its authority in regard to the first exception by regulating rents on any residential property that has received benefits for the purpose of providing reduced rents for low income tenants.

¹⁵ *Ibid.*

¹⁶ See ORS 91.225. Local rent control prohibited: <http://www.oregonlaws.org/ors/91.225>

The second exception, however, allows cities to impose temporary rent controls when a natural or man-made disaster occurs that materially eliminates a significant portion of the rental housing supply; these controls must be removed when the rental housing supply is restored to substantially normal levels.¹⁷ This exception may be relevant to the City as it currently experiences an extreme shortage in affordable units and as redevelopment activities continue to exacerbate the number of affordable units available to low income tenants. Until the affordable housing stock is able to meet demand, the City may have the legal grounds for implementing a rent control system. This option may require further legal counsel to determine whether the City is in a situation of a “natural or man-made disaster” and to also determine what level of affordable housing supply would constitute “normal.”

1.2 Support Just-Cause Evictions and Rental Housing Inspections as part of Comprehensive Plan Housing Access policies.

Consider simple language that prohibits no-cause evictions. Probably the most key renter protection that would immediately support those at the lowest incomes, and create improved housing stability and habitability. Increased and enhanced rental housing inspections, including the “Right Size” recommendations by the Quality Rental Housing Workgroup, should also be prioritized to ensure stable and healthy rental housing.

1.2.1 Policy Discussion

In a no-cause eviction, a tenant currently has only two possible defenses, which are retaliation or discrimination. This creates an easy avenue for landlords to practice illegal retaliation and discrimination because either of these defenses is a difficult task and a burden placed on the tenant to prove. In contrast, in the case of a for-cause eviction, the landlord must give a valid reason for the eviction and a tenant has the right to many defenses to prevent eviction.

Because of the lack of protections in no-cause eviction controls, tenants on month-to-month tenancies are constantly at risk for arbitrary eviction. Ultimately, just-cause eviction controls are laws that protect renters by ensuring that landlords can only evict with proper cause, such as a tenant's failure to pay rent or destruction of property. As a result, a just-cause eviction ordinance can help to promote healthy and stable housing. It would also advance anti-displacement efforts throughout the city, especially in conjunction with a system of rent regulation.

The QRHWG “Right Size” recommendations provide details as to the importances of increased and enhanced inspections and education, to ensure rental housing habitability. A robust inspections and education program, along with evictions protections are essential to ensure healthy and stable housing for Portland renters, especially for those with low incomes.

2.0 Anti-Displacement Measures

2.1 Regulate speculation in the real estate market.

¹⁷ Ibid

The City of Portland should create a system of penalties, including taxes and fees, for development or investment activity that focuses on profit generation *without* benefits to existing residents,¹⁸ as a disincentive to develop for displacement.

2.1.1 Policy Discussion

Implementing real estate speculation regulation would stabilize residents (renters and homeowners) and small business owners in dynamic neighborhoods that are already experiencing the negative impacts of gentrification and displacement. With decreased pressure to raise property values too quickly, dynamic neighborhoods and residents would have time to build wealth, maintain social networks, and develop stable neighborhoods of opportunity for current residents.

Traditionally, one way to accomplish this is through a Real Estate Transfer Tax on all commercial and residential property sales above a certain threshold while also including exemptions for property sales below a certain threshold, so as to avoid penalizing low-income property and homeowners. The State of Oregon, however, currently preempts local authority for implementing a Real Estate Transfer Tax. Despite this legal barrier, the City faces an opportunity to think creatively about how the current development fee system could better stabilize dynamic neighborhoods from speculative real estate activities. Washington County is currently the only local jurisdiction in Oregon with a real estate transfer tax of 0.1 percent on the sale of real property, which contributes to the county's general fund. Other cities have explored the option of an Anti-Speculation Tax, which could target specific transactions and speculative practices by investors and landowners, without affecting or bearing a cost to current homeowners who intend to use the property as their primary home, not for specifically speculative or profit-driven purposes.

2.2 Promote retail stability by requiring retail impact assessments (RIAs) and supporting innovative financing models.

Retail and commercial development can result in a wide range of economic, social, environmental, and transportation effects on various geographic scales depending on the size of the development. Traditional impact assessments focus primarily on environmental impacts, while traditional retail impact assessments focus more on economic impacts, such as trade lost or diverted. A more comprehensive retail impact assessment, however, may be a useful tool for evaluating the impact of a retail or commercial development in dynamic neighborhoods especially by looking at a wider range of impacts such as loss of social capital and cohesion.

2.2.1 Policy Discussion

The Scottish government has developed a model for conducting a comprehensive retail impact assessment that also considers the social implications of a retail or commercial development.¹⁹ This area of evaluation looks at demographic and behavioural change as well as the implications for shopper profiles for existing and new retail centers and the role of social

¹⁸ Causa Justa. (2014). Development Without Displacement: Resisting gentrification in the Bay Area.

¹⁹ The Scottish Government. (2007). Town Centre and Retail Methodologies: Retail Impact Assessment. Accessible from: <http://www.gov.scot/Publications/2007/12/24105030/7>

inclusion and exclusion. These may be reflected in changes in diversity or variety of shopping opportunities, as well as closures of local/small businesses.

In addition to evaluating impacts of retail or commercial development, there must also be a strategy to stabilize local/small businesses especially those identified as minority-owned and serving the needs of the existing neighborhood population. This may be done in the form of providing greater access to capital so that these businesses may keep their doors open as rents and service demands may be on the rise in their neighborhood. One innovative strategy for implementing this would be to incentivize local financial institutions to invest in minority-owned, community-based businesses that are integral to community and neighborhood life. The G8 offers a model that might be adaptable for such a purpose called Impact Investing.²⁰ Other strategies for promoting retail stability would also include supporting community development credit unions or resident-owned financial institutions that promote cooperative ownership, cycle investments into the local community, and who can provide or partner with organizations throughout the city to provide business development training and support to minority-owned businesses.²¹

2.3 Community Benefits with Development

Include strong language that creates community benefit for existing residents when significant public or private development occurs in a neighborhood. See Community Based Anti-Displacement Recommendations (February 2015) for details.

3. Renters and Civic Engagement

3.1 Integrate renters in a meaningful way, in city plans and projects.

Include language in Equity policies that prioritizes renters as an underrepresented voice in local decision making and planning. CAT is one of only a handful of Community Based Organizations to actively educate, engage and empower renters to participate in public processes that have impacts on their lives. We have found that often the City's public processes lack in their ability to successfully engage these communities in an effective, culturally-specific way. Please see the "Community-Based Anti-Displacement Recommendations" letter that CAT signed onto and was submitted to the PSC in February 2015, for more specifics in this area.

Conclusion:

Thank you for the opportunity to comment on this important planning document. We hope this letter will provide valuable insight into the types of challenges that renters face as they struggle to find and keep healthy, safe, stable and affordable rental housing. On behalf of the 1000+

²⁰ Vacarro, J. (2014). Impact Investing for Everyone: A blueprint for retail impact investing. Accessible from: <http://www.socialimpactinvestment.org/reports/Triodos-Bank-report-on-Impact-investing.pdf>

²¹ PolicyLink. (2002). Equitable Development Toolkit: Resident-Owned CDFIs. Accessible from: <http://www.policylink.org/sites/default/files/resident-owned-cdfis.pdf>

renters members in Portland, we believe the tenant voice plays a critical role in planning for an equitable, inclusive and sustainable Portland over the next 20 years.

Sincerely

A handwritten signature in black ink, appearing to read "Justin Buri".

Justin Buri
Executive Director
Community Alliance of Tenants



Public Health

Issue Brief

Health Effects of End of Tenancy Notice September 11, 2013

Background:

The Oregon Landlord Tenant Act (State Chapter 90) states that in a month-to-month rental, the landlord and tenant are not required to give a reason or cause for ending a tenancy and that either party may terminate the tenancy with at least 30 days written notice if the renter has lived in the rental unit for less than a year. The right for a landlord to end an eviction in this manner is legally known as a no cause eviction.¹ In a no cause eviction, a tenant has two possible defenses, which are retaliation or discrimination. No cause evictions create a simple avenue for landlords to practice illegal retaliation and discrimination because either of these defenses is a difficult task. In contrast, in the case of a for-cause eviction, the landlord must give a valid reason for the eviction and a tenant has the right to many defenses to prevent eviction. Because of the lack of protections in no cause eviction controls, tenants on month-to-month tenancies are constantly at risk for arbitrary eviction. Many tenants put off asking their landlords for necessary repairs because they fear eviction and therefore remain in unsafe and unhealthy housing in order to maintain some stability for their families. Just cause eviction controls (JCEC) are laws that protect renters by ensuring that landlords can only evict with proper cause, such as a tenant's failure to pay rent or destruction of property. As a result, JCEC promote healthy and stable housing.

Review of Existing Research:

The Health Department conducted a review of current research examining the health effects of no cause eviction and retaliation on renters in Multnomah County. Based on this review, the Health Department identified the following concerns about no-cause eviction and its impacts on healthy housing:

- The number of tenants who receive no cause evictions are underrepresented in the court's record-keeping process.
- Discrimination and retaliation are the only defenses available for a no cause eviction and are difficult to prove.
- Tenants on month-to-month leases who have lived in their property for less than a year are afraid to ask for repairs because they fear eviction.
- When tenants are afraid to ask for repairs, they often remain in unhealthy housing.
- Numerous studies show that low-income communities, women, and minorities make up a large number of individuals evicted.
- Children are vulnerable to the health effects affected by no-cause eviction.
- The abuse of no cause evictions places monetary burdens on low-income people and on society.
- By providing families with greater residential stability, just-cause eviction can reduce stress and adverse health conditions.

¹ See ORS 90.427.

The number of tenants who receive no cause evictions are underrepresented in the court's record-keeping process.

A forcible entry detainer (FED) is a court action by a landlord against a tenant to remove the tenant from the rented dwelling. FED records do not accurately depict the severity of the no-cause issue. Out of 2,166 evictions over a four-month period, 4.7% filed in Multnomah County courts were no cause evictions. However, data collected from a recent survey by the local tenant advocacy organization, Community Alliance of Tenants, demonstrates that 89% of callers who received a no cause eviction reported that they did not receive a FED notice, and 86% of those callers did not believe their no cause eviction was justified. Additionally, 50% of people that called 211, local phone service connecting people with community resources and social services, in February 2013 indicated that they had a housing issue, and 11% of those callers reported experiencing no cause eviction.

FED data reports no demographic information and therefore fails to tell the story of who is being evicted and why these evictions are happening. "In the actual legal process, tenants move out and give up the battle at many different stages," so there is no way to accurately depict the gravity of the hidden problem of no cause evictions.ⁱ

Discrimination and retaliation are the only defenses available for a no cause eviction and are difficult to prove.

Testimonials from tenants reveal that after asking for repairs, it is not uncommon to be issued a no cause eviction notice by a landlord that would rather illegally get rid the tenant than fix the issue as requested. Once the no cause notice is issued, the tenant could raise a defense of retaliation as the underlying reason behind the eviction, but this has not been an effective tool for many Multnomah County residents in the past. However, in the 2013 Elk Creek caseⁱⁱ, the Oregon Supreme Court recently held that to prove retaliation under ORS 90.385, a tenant must establish that the landlord served the notice of termination because of the tenant's complaint. Overall, if the tenants' complaints were one of the factors that the owner considered in making her decision to evict, and the owner would not have made that decision "but for" the tenants' complaints, then the owner was prohibited from making that decision. Because this is a very new decision, there is no proof that this new ruling will operate in a way that eliminates the fear associated with retaliation and no cause eviction.

Tenants on month-to-month leases are afraid to ask for repairs because they fear eviction.

211 callers during the month of February 2013 were asked the question, "[h]ave you ever delayed requesting assistance with a problem at your home because you feared being evicted?" 414 out of 4,233 (11%) of individuals who answered this question answered "yes." Additionally, individuals who were previously evicted were five times more likely to delay requests for repairs for fear of eviction. 62% of Community Alliance of Tenants (CAT) survey believed they were given no cause evictions because of retaliation. Substandard housing is the number one reason tenants call CAT's Renter Rights Hotline.

When tenants are afraid to ask for repairs, they remain in unhealthy housing.

The most recent review of the Community Asthma Inspection Referral (CAIR) database, which is used to manage family information related to housing and health, reveals that only 20% of approximately 350 families indicated that they were "very comfortable" approaching their landlord for repairs. According to this data, families who reported they were not comfortable

approaching their landlord are 30% more likely to have mold in their apartment, are twice as likely to have cockroach infestations, 60% more likely to report their housing is making them and their family sick, and twice as likely to report poor or bad health. Families who ask for repairs are often confronted with a no cause eviction. For example, a low-income family of five shared their story with the CAT Renter Rights Hotline about how they were to live in an ant and mice infested house with a shower was broken for two months and the stove burners that did not work properly for over a week. They requested that the landlord make the needed repairs, which were never completed. After sending a letter requesting a reduction in rent, the landlord responded by immediately posting a 30 day no cause move-out notice on their front door.

Numerous studies show that low-income communities, women, and minorities make up a large number of individuals evicted.

Of tenants reporting no cause eviction on a recent CAT survey, 68% were women. In a recent study in Milwaukie, Wisconsin, poor black women are disproportionately at risk for eviction; making up 30% of those evicted, but only 9.6% of the population.ⁱⁱⁱ Prior to just-cause eviction controls being passed in Oakland, “[F]our out of five ‘30 day-no Cause’ evictions (78%) [were] minority households.”^{iv}

Even though American Indian or Alaskan Native callers only made up 4.1% of 211 callers in February, they made up 18% of callers reporting eviction. According to the Coalition of Communities of Color Unsettling Profile, Native Americans and African Americans face extremely high disparities in homelessness, compared to other ethnic groups in Multnomah County.^v

Children are vulnerable to the health effects caused by no cause eviction.

Neighborhoods with a high percentage of children face increased evictions.^{vi} Children who are uprooted from their homes because of eviction face mental health problems, developmental delays, and increased levels of stress and depression, which often leads to violence.^{vii} FED court data does not include demographic information, but studies have shown that when demographic data is collected independent of court records, children are highly represented in the eviction process. In a Milwaukie, WI study, sixty-two percent of tenants who appeared in court lived with children. Over a third of them were women who lived with children and no other adults.^{viii}

The abuse of no case evictions places monetary burdens on low-income people and on society.

Besides the tremendous costs tenants face when forced to move, there are also various costs imposed on society as a result of no cause evictions. These costs include court and marshal/sheriff services, storage of tenants' property, help for the newly homeless, and even emergency foster care and hospitalization in some cases.^{ix}

By providing families with greater residential stability, JCEC can reduce stress and adverse health conditions.

No cause eviction results in a significant disruption of educational, religious, social and employment connections that tenants have created in their communities. In many cases, no cause eviction may lead to homelessness.^x Strong social relationships protect health in multiple ways. Neighbors, friends, and family offer support that “buffer[s] stressful situations, prevents damaging feelings of isolation, and contributes to a sense of self-esteem and value.”^{xi} Also, seniors and disabled individuals, or others with severe health problems are at risk of fatal

health complications if forced to suddenly move from stable living arrangements. In the 211 study, disabled and special needs households made up 14% of callers who reported eviction.

Recommendations:

Based on the Health Department's review of current research examining the health impacts of no cause eviction, it is reasonable for the Multnomah County Board of Health to consider the following policy actions:

- Change the language in the OR Landlord Tenant Act (ORLTA) so that no cause evictions are replaced with language about just cause eviction controls
- Encourage cities within Multnomah County to require landlord licensing
- Pass a city ordinance requiring mandatory reporting of evictions
- Attach a requirement to the business license that requires landlords to report evictions
- Pass an ordinance as the Board of Health requiring landlord licensing and mandatory reporting
- Increase education geared towards landlords and tenants
- Monitor the current Oregon Supreme Court ruling to identify if retaliation can be successfully tried in the court
- Fund Community Alliance of Tenants Renter's Rights Hotline

ⁱ Hartman, Chester and David Robinson. "Evictions: The Hidden Housing Problem." *Housing Policy Debate*. Vol. 14, Issue 4. Fannie Mae Foundation. (2003).

ⁱⁱ Elk Creek Mgmt. Co. v. Gilbert, 2013 Ore. LEXIS 387 (Or. May 31, 2013).

ⁱⁱⁱ Desmond, Matthew. "Eviction and the Reproduction of Urban Poverty." *AJS Volume 118 Number 1* (July 2012): pgs. 88-133.

^{iv} East Bay Housing Organizations. "Pushed Out for No Reason: Oakland Senior and Disabled Residents at High Risk for Eviction." Oakland, CA. (2002).

^v Coalition of Communities of Color. "Communities of Color in Multnomah County: An Unsettling Profile."

^{vi} Desmond, Matthew. "Evicting Children." Oxford University Press. (2013).

^{vii} Pettit, Becky. "Moving and Children's Social Connections: The Critical Importance of Context."

^{viii} Desmond, Matthew. "Evicting Children." Oxford University Press. (2013).

^{ix} Hartman, Chester and David Robinson. "Evictions: The Hidden Housing Problem." *Housing Policy Debate*. Vol. 14, Issue 4. Fannie Mae Foundation. (2003).

^x Guzman, Carolina, Rajiv Bhatia, and Chris Durazo. "Anticipated Effects of Residential Displacement on Health: Results from Qualitative Research." Research Summary. Prepared by the San Francisco Department of Public Health and South of Market Community Action Network (2005).

^{xi} Cohen, S, Underwood, LG, Gottlieb, BH. *Social Support Measurement and Intervention*. Oxford University Press. New York. 2000.

Draft Quality Rental Housing Workgroup Recommendations

February 13, 2013

Overview:

First convened in July 2007 to explore the issues of substandard housing, housing habitability, and environmental hazards in rental housing in Portland, the Quality Rental Housing Workgroup (QRHW) adopted a comprehensive suite of recommendations by consensus. These recommendations forwarded to Council in September 2008 resulted in the following achievements:

- ◆ **Code changes** to existing housing maintenance standards in Title 29 related to indoor environmental/health hazards including lead paint, mold, moisture, pests, sanitation and carbon monoxide.
- ◆ **Enhanced Inspections program pilot launched and evaluated** to show direct positive impact on landlords bringing housing conditions in east Portland up to code and enhancing health and equity for tenants.
- ◆ **Increased effectiveness of code enforcement procedures** including restructured fines and stronger collection mechanisms generating over \$2.45 million since FY 2008-2009 in additional revenue now supporting Neighborhood Inspections Team activities.
- ◆ **Clarification of rental housing as a business activity** distinct from home ownership and application of business license fees to all landlords generating an ongoing additional \$198,000 in general fund revenue.

Key stakeholders continue to collaborate effectively to address longstanding challenges using principles and relationships established in the first initial QRHW process. In July 2012, the group came together to review progress and develop recommendations to address critical elements of the 2008 package of recommendations not yet implemented. The workgroup took a hard look at finances and developed realistic estimates for a limited core set of activities. QRHW members would like Council to acknowledge these recommendations seek only essential funds that leverage partnerships, incorporate innovation gains at BDS, and maximize Citywide benefits by addressing root causes.

The recommendations institutionalize proven strategies that advance health, equity, and housing quality throughout the City. Again forwarded to Council with consensus support of the QRHW, the recommendations are designed to:

- ◆ Fill essential gaps in landlord and tenant education
- ◆ Strategically expand proven enhancements in the inspections system beyond the current pilot area, focusing resources to effectively help the most vulnerable
- ◆ Provide stable, dedicated support to rental housing inspections
- ◆ Improve overall data collection, tracking, and budget transparency regarding funding and performance on stated objectives

Recommendations

Process Description

The City of Portland contracted with Carri Munn from the consulting firm Solid Ground (formerly Decisions Decisions) to help design, manage, and facilitate the workgroup process. Over the course of five meetings, workgroup members evaluated progress, reviewed evaluation results from Oregon Public Health Institute, identified gaps and unmet needs, developed recommendations, and constructed funding scenarios supported by cost estimates for implementation.

Principles

Workgroup recommendations were developed with the following four underlying principles:

- Acknowledge responsibility of both landlords and tenants. Hold repeat offenders accountable for their behavior.
- Healthy housing is a crucial health support element of the City. Landlords engaged in the rental housing business directly impact housing quality, public health, and equity.
- Landlords and tenants need education about their rights and responsibilities, how to maintain healthy housing, and the housing maintenance requirements of Title 29.
- Funding required to enforce healthy rental housing should be provided by fines and fees levied for violations and cost recovery with additional budget gaps met by public funds.

State of Inspections Program

Caseload backlog

- The number of Housing Cases/Complaints for FY 12-13 (July-December) from FY 11-12 has increased 10% or 73 cases (from 742 to 815).
- The number of Priority 3 cases that have not been inspected as of December 31, 2012 is 110.
- The number of Housing Complaints not responded to within 1 month is 103 or 11.4%, in the Enhanced Complaint Districts the number is 82 or 29% out of 283 open cases.
- Citywide average: 17.2% of open cases not responded to within 5 business days. 104 have not been responded to within 15 days. Average response 8.5 days.
- Enhanced districts: 34.6% of open cases were not responded to in 5 buisiness days. 17.5% are more than 15 days. Some over 30 days. Average response 15 days.
- While NIT doesn't have caseload expectation for inspectors in place as a productivity measure, the program estimates the average inspector has 219 field days per year.
- A Temporary Service Level Reduction went into effect on January 7, 2013. The current number of Housing Inspectors has decreased by 1 or 14% from 7 to 6 due to a vacancy.

Expected increase in volume by 50%

- Code change effective January 2013 makes enhanced system participation no longer optional. Expected impact based on current participation rates is a 50% increase. Of those who currently qualify for enhanced inspections, only half are voluntarily participating.

Increased collections

- Collection revenue going up. Stronger collection mechanisms generated over \$2.45 million since FY 2008-2009.
- Fines to be collected. Currently there is \$8.7 million in liens receivables and the amount is growing.

Enforcement tools limited

- Current NIT code hearings policy in place to protect tenants in extreme cases is ineffective. In today's economic environment, the cost of code hearings prohibits effective access to this enforcement mechanism. This leaves inspectors with the simple recourse of fines and liens, which fails to compel action among a percentage of repeat code violators.
- Affordable alternatives are needed to provide for tenant voice and vacate option when circumstances preclude safe habitability of a rental unit.

Summary of Recommendations

A full set of recommendations along with cost estimates are attached.

Prioritize Education, Equity, Evaluation, and Expansion of enhanced inspections.

Education. Educate those who are most vulnerable. To be effective, education needs to go beyond simple conversations with inspectors to include prevention-focused materials and targeted remediation resources.

- ◆ **Provide prevention education** when it is most needed: prior to inspection so that problems are prevented and during inspection to facilitate quick, collaborative remediation of issues. Finalize existing materials and make resources available online and in Spanish, Russian, Vietnamese and Chinese.
- ◆ **Partner with aligned institutions** to support prevention. Work with SUN system to educate providers to identify situations ripe for education and distribute resources to those who need them.
- ◆ **Continue to educate during inspections.** Case management matters. Collaborative problem solving among landlords and tenants requires active involvement and follow up from inspectors.
- ◆ **Provide resources at inspection** to increase compliance and support accountability.

Equity. Collection of ethnicity data and outcomes for traditionally at risk populations is essential to assess ongoing impact of the enhanced inspection system.

- ◆ Provide equity training to intake staff to support quality data collection.

- ◆ Expand relocation funds to ensure resources are available year-round to support families moving from housing found to be unsafe and uninhabitable.

Evaluation. Evaluate efficacy of public investment and substantiate impact.

- ◆ Initiate collection of ethnicity data in TRACS.
- ◆ Provide two-year evaluation of inspections data to assess outcomes.

Strategic Expansion of enhanced inspections.

- ◆ **Target limited inspection services to vulnerable people most at risk.** As housing quality improves, demand for inspections in enhanced inspection districts will decline over time. As capacity becomes available, the enhanced inspection system can expand Citywide to provide equity for everyone based on the system.
- ◆ **Staff at appropriate levels to meet response standards.** Factoring realistic inspector workload is essential to establishing adequate response times for both initial response and certification of repairs or assessment of penalties.
- ◆ **Continue to improve system efficiency.** Neighborhood Inspections Team Stakeholder Advisory Committee (NITSAC) will consider an administrative vacate policy as an efficient alternative to the current code hearings process and continue to use existing funds to take the worst cases to the codes hearing officer.

Research Based Case for Investment

Oregon Public Health Institute's Health Impact Assessment (HIA)¹ of the City of Portland's housing inspection programs compared the standard inspection model with the pilot enhanced model for rental housing in East Portland. The study, completed in 2012, found that the enhanced model has greater potential to contribute to improved health and health equity.

The steering committee for this HIA included representatives from Metro Multifamily Housing Association, Rental Housing Association of Greater Portland, Portland Bureau of Development Services, Community Alliance of Tenants, Multnomah County Health Department, and the Portland Housing Bureau. The project received funding from the Health Impact Project, a collaboration of the Robert Wood Johnson Foundation and The Pew Charitable Trusts.

Health Impact Assessment Findings

Housing inspections and the subsequent improvements to housing conditions reduce the occurrence and severity of multiple health problems.

Healthy housing interventions are most effective when they address both housing conditions and tenant/landlord behaviors.

¹ HIAs are a policy and planning tool for providing decision-makers with information about how their proposed plans and policies will likely impact the health of the communities they serve. HIAs offer recommendations about how to maximize the health benefits and minimize negative health impacts of the decision, including an equity assessment of the relative distribution of benefits and burdens throughout the population.

- Research and best practices for housing-related health interventions demonstrate that education of landlords and tenants in combination with housing inspections is more effective than either service provided alone.
- The city's inspections program currently lacks an educational component for either for landlords or tenants. Educational materials and strategies for using them have been developed but due to the lack of funding for translation, distribution, and printing, BDS has not utilized them

The enhanced model reduces barriers to reporting and improves health equity.

The enhanced model is more effective in improving health-related housing conditions. Analysis of BDS's rental inspections data shows that a complaint made under the enhanced model produced 75% more improvements than those made under the standard model.

Inspections information and detailed data related to health outcomes would be useful to

- Help understand and quantify the health impacts of the inspections program, and help BDS and its public health partners develop educational materials and implement intervention programs.
- Help BDS determine which areas of the city would best benefit from the enhanced model and the additional staffing resources it requires.

Expanding the enhanced model will increase homes inspected and improved

- Strategically expanding the enhanced model to the three other BDS districts in North and Northeast with the highest rates of cost-burdened households would more than double the number of renter households covered.
- Enhanced inspections would not impose any additional burden on property-owners because the program is "self-limiting"

Funding Model

In accord with the QRHW's fourth principle, *Funding required to enforce healthy rental housing should be provided by fines and fees levied for violations and cost recovery and public funds*, and the additional commitment to *transparency in government*, the workgroup recommends the following means of funding investments in quality rental housing:

1. **Dedicate the business license exemption funds to NIT rental inspections program.** These revenues are the direct result of the 2008 QRHW recommendations removing exemptions for licensing for owners of 9 or fewer residential rental units. The exemption was removed for the purpose of enhancing performance standards in rental housing. These resources, or their equivalent, should be allocated directly for their intended purpose.
2. **Dedicate allocation of increased revenue from collections to increase capacity for enhanced inspectors.** NIT is still not at current or previous Service Levels with existing Housing Inspection Staff. A backlog of cases now grows larger with the end of optional participation in Enhanced Inspections. Staffing levels out of pace with the volume of violations threatens to reduce overall housing quality increasing the burden of health and equity impacts throughout Portland.

3. **Commit to convert current NIT general fund allocation from one time to ongoing funds.** Program stability and predictability play a critical role in maintaining overall quality of Portland's stock of rental housing. Reducing the capacity of inspectors results in delayed and deferred maintenance leaving more rental units out of compliance and more tenants at risk. High-performing landlords are supported by an effective system that promotes quality.
4. **Access NIT reserves to maintain capacity.** Set a threshold minimum for NIT capacity and allow NIT (and no other program) to access its reserves in excess of the 25% required by the BDS 5 year plan to maintain inspector capacity at minimum levels.
5. **Consider a limited time per-unit rental fee to meet present and future demand for Enhanced Complaint Inspections.** If the City commits to all of the above funding methods and demand for NIT services exceeds inspector capacity, one alternative may be to consider a small per-unit rental fee of \$3-\$5 to capitalize additional inspectors to manage current caseload backlog during transition to the full Enhanced Complaint inspection system and expand to North and Northeast Portland. Such a request should be approached in recognition of the financial demands placed on the Rental Housing Industry by recent or pending per-unit fee structures in adjacent municipalities.

March 13, 2015

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

Dear Chair Baugh and Planning and Sustainability Commissioners:

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

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

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

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

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

ADEQUACY OF ECONOMIC POLICY

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

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

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

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

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

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

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

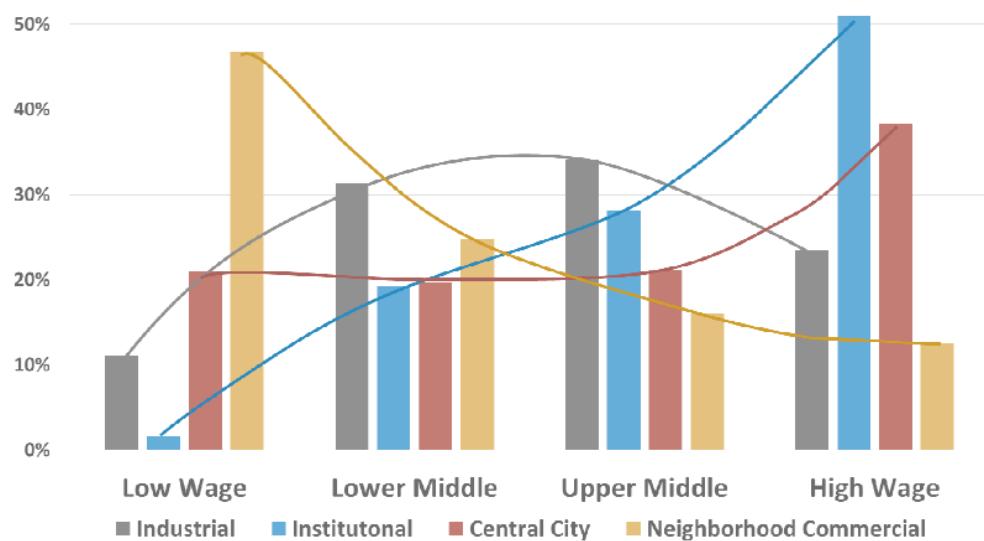
The provision for additional industrial lands, especially harbor access lands, is critical to the future of Portland. We commend staff for inclusion of several significant policies that, if properly implemented, would go a long way toward ensuring Portland's economic prosperity through greater equity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

EQUITY AND GROWTH

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

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

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



Brownfield Redevelopment

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

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

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

Transportation

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

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

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

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

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

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

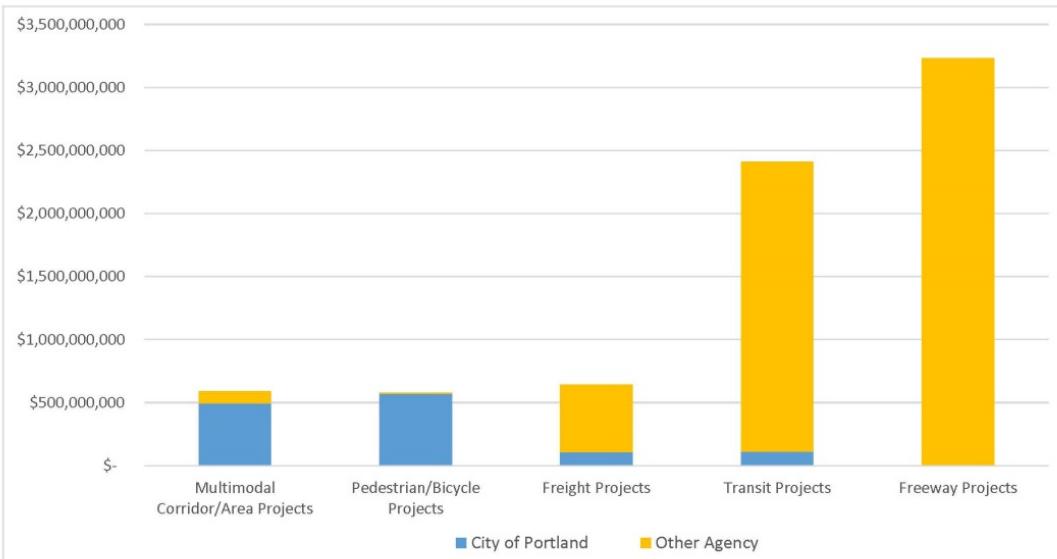
Portland's economy is far more dependent on freight movement than most other U.S. cities. The Portland region has the third highest percentage of total employment in the distribution and logistics sectors in the U.S., comprising 11% of the region's workforce. According to the Oregon Department of Employment,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

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

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

From February 24 PBOT presentation at PSC:

Constrained Investments by Mode & Agency



33

PORLAND.OREGON.GOV/TRANSPORTATION

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

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

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

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

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

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

BALANCE

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

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

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

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

Sincerely,

Susie Lahnse
Senior Manager, Transportation and Land Use Policy

Attachments

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

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

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

TSP ID 40032: Columbia/Alderwood/Cully Intersection improvements

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

TSP ID 40009: NE 47th Ave Corridor Improvements

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

TSP ID 110190: Killingsworth/I-205 Interchange Improvements

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

TSP ID 40102: Columbia Blvd. Street Widening

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

TSP ID 30055: North Portland Junction: Undoing the X

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

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

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

TSP ID 40025: 82nd and Airport Way Grade Separation

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

TSP ID 40085: Kenton Rail Line Upgrade

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

TSP ID 103750: Cathedral Park Quiet Zone

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

TSP ID 113090: Cully Blvd. Rail Overcrossing

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

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

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

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

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

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

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

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

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

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

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



Southwest Hills Residential League

P.O. Box 1033

Portland, OR 97207

www.swni.org/swhrl

swhrl@swni.org

To: Portland Planning and Sustainability Commission

psc@portlandoregon.gov

Comprehensive Plan Testimony from Southwest Hills Residential League (SWHRL)

Neighborhood Association on Proposed Zoning Changes in 2035 Comprehensive Plan

<http://www.portlandoregon.gov/bps/article/497267>

Re. Strohecker's Proposed Change #644 – From existing Neighborhood Commercial (CN2)

New proposed: Commercial Mixed Use Dispersed (CM1)

This property is located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

Our SWHRL Board was not unanimous in our thinking on the Stroheckers property, except for agreeing that we don't want to lose the commercial component of the site – currently the only grocery on the hill. We would oppose development that would raze the grocery store to install multi-residential only, which could have been permitted under the new proposed Mixed-Use CM1, if the current restrictive land use conditions of approval didn't override the new zoning. The Board also sees the need for improved infrastructure for all modes of transport to alleviate congestion and encourage use of transit, walking and biking.

The SWHRL neighborhood has very few commercial amenities within its boundaries – this one multi-service grocery on the hill, one restaurant, a gas station and a few other small shops. Since our transit service is limited to weekday commuter hours, it is especially important to preserve the few commercial areas we have. For many of those without a car, it is not feasible to shop in Hillsdale, Raleigh Hills or Zupans at the bottom of the hill and then to lug the groceries 1-2 miles back up very steep hills. Perhaps what we need is a “Food Security Overlay”!

Some Board members and residents would welcome the addition of a few more amenities - well-designed commercial or mixed-use development for the neighborhood in general, where

the site could accommodate it, though we have very little commercially zoned land, so it would be minimal. And some Board members don't believe this particular site can support an influx of new residents and cars that would aggravate the congestion in this part of Portland Heights.

Another SWHRL Board member and I met with a group of neighbors from the area around Stroheckers, and we found a strong, unanimous consensus, not just from the assembled group, but from at least 69 others who submitted comments on this issue to PSC. That is, this property should continue as a grocery as stipulated in the current land use conditions of approval (Ordinance No. 155609 adopted Feb 16, 1984), which override the underlying zoning.

We understand from BPS that this ordinance would continue to override a new Mixed-Use Zoning designation. Ref. the 3/4/15 email from Joan Frederiksen, West District Liaison, who conferred with the City Attorney and BPS staff who write the code. They concurred that current conditions continue to apply with a change from one comparable zone to another. Joan writes: "Staff has reviewed the existing zoning and proposed zoning language. We believe that the zones are comparable. However, in order to assure that there is absolutely no confusion or unintended negation of the existing conditions of approval, staff intends to do a zoning code amendment to this section to clarify/state that comparable also means "commercial to commercial or commercial mixed use."

While the grocery with its multiple services is an important asset to the neighborhood and probably adds to property values, there is not capacity there to add housing, with its additional impact on traffic and parking. Any additional height would overwhelm the neighboring homes, since the wall of the store is very close to the sidewalk and street already. It would not fit in with the surrounding low density properties. These neighbors strongly feel additional development here would detract from the livability of their neighborhood.

This comment from the Stroheckers neighbors summarizes their concerns well:

"We are all neighborhood residents/owners with homes in close proximity to this property. Whereas we value having a neighborhood grocery store near us along with its ancillary services (pharmacy, liquor store, postal service), we are strongly opposed to additional commercial development that would add more traffic and parking stress to our residential neighborhood. The through street, SW Patton Rd, that borders this property, is routinely gridlocked due to commuter traffic that has increased in recent years and safety for drivers and pedestrians is compromised on a daily basis. Entrance and egress for Strohecker's is already dangerous because the 2-way left turn lane into the parking lot forces cars to use the same lane from opposite directions simultaneously. The adjacent crosswalk is routinely ignored by speeding vehicles and often blocked by delivery vehicles.

We ask that the 1984 Ordinance No. 155609 allowing Strohecker's to expand to its current size remain intact for any future use of this property so that we can maintain the livability and safety of our residential neighborhood."

Change nos. 467, 490 – Change from Residential to Open Space on several properties

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

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



BUCKMAN COMMUNITY ASSOCIATION

c/o Southeast Uplift 3534 SE Main Portland, OR 97214 (503) 482-8252

March 13, 2015

Planning and Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97214

Dear Chair Baugh and fellow PSC Commissioners,

In discussions about Portland planned zoning changes we have had many lengthy and lively conversations about the present state of development in the City.

In areas where density is being imposed and older housing demolished, we have noticed a skyrocketing of rental rates, contrary to the notion that if there are more units, they will become more affordable.

Also, the idea of “mixed-use development” being attractive to neighborhoods has been lost as large, multi-unit developments are continually built under commercial zoning designation without any retail or commercial components at all.

Parking shortages have increased as apartment buildings are developed on transit lines without parking, yet studies show most tenants own cars.

While we are certainly not advocating for more development and have been clear about our opposition to recent and specific comp plan proposals, for areas that are being developed throughout the city as mixed use, we believe these conditions should be considered.

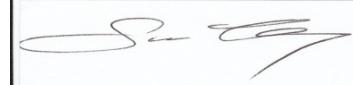
1. Require ground-floor commercial for residential building built in commercial zones. This is a must to create walkable mixed-use neighborhoods and help reduce car dependence.
2. Require inclusionary zoning when allowed to do so (pending state approval). We need to be able to increase affordable housing city-wide throughout our neighborhoods.
3. Require design review for all large-scale buildings.
4. Address historic preservation to preserve important heritage buildings, blocks and historic districts. Help low income neighborhoods preserve their historic resources by adjusting development services fees accordingly for minor repairs and renovations.

5. Create mechanisms to effectively incentivize family housing with options and room for children.

6. Respect communities regarding their efforts to maintain healthy residential fabric and reach out and involve citizens actively and meaningfully in all phases of the planning and visioning process.

Thank you all for your service and hard work,

Sincerely,

A handwritten signature in black ink, appearing to read "S. Lindsay".

Susan Lindsay
Co-Chair, Buckman Community Association



The League of Women Voters of Portland
310 SW 4th Avenue, Suite 520, Portland, OR 97204
(503) 228-1675 • info@lwvpdx.org • www.lwvpdx.org

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DATE: March 13, 2015
TO: Chair Andre Baugh, Planning and Sustainability Commissioners
FROM: League of Women Voters of Portland
Margaret Noel, Co-president
Debbie Aiona, Action Committee Chair
RE: **Comprehensive Plan Update**

The League of Women Voters of Portland appreciates the time and attention the Planning and Sustainability Commission (PSC) has devoted to updating Portland's Comprehensive Plan. The League has a long-standing interest in affordable housing and is submitting the following suggestions for your consideration.

Housing Policy: Affordability

- PSC should consider retaining the current Comprehensive Plan Housing Policy that calls for matching the citywide income profile in areas where significant housing development is anticipated, such as opportunity areas and urban renewal districts. This policy has provided a clear standard by which to measure the city's progress in meeting the community's housing needs. Because it is based on the income profile of the city as a whole, it supports the city's desire to create balanced communities.

- The proposal in the current draft plan aims to have 30 percent of housing stock affordable to households earning 0 – 80 percent of Median Family Income (MFI). Such a large range likely will result in an overabundance of housing affordable to those at 80 percent MFI and exacerbate the extreme shortage of housing for very low income households. Far and away, the city's greatest shortfall is at 0 – 30 percent MFI. Narrower and more clearly defined ranges would help focus expenditures where they are needed most and promote more accurate tracking of the city's progress in meeting the housing needs of our most vulnerable residents.

- The city's Tax Increment Financing Set Aside policy limits urban renewal spending to 0 – 60 percent MFI projects. City Council arrived at this policy because

"To promote political responsibility through informed and active participation in government."

1) the need is greatest at these income levels, and 2) most of the funds used to supplement the TIF resources are restricted to housing at 60 percent MFI and below. If the PSC decides to adopt a 30 percent goal for affordable housing in the Central City, then it should consider making the upper limit 60 percent MFI and break that down into two ranges: 0 – 30 percent MFI and 30 – 60 percent MFI. These ranges also conform to accepted tracking and reporting practices.

- In large redevelopment areas or when public funds are used for significant infrastructure improvements, we ask you to require housing developments to include 30 percent of the units affordable to households at 0 – 60 percent MFI with the split between 0 – 30 and 30 – 60 percent MFI to be based on the city's income profile.

Other Recommendations on Housing

- Require preservation of existing affordable housing, both subsidized and unrestricted affordable, as this is critical to maintaining an adequate stock that meets the needs of the city's residents.
- Add a statement stressing the importance of requiring permanent affordability for publicly subsidized housing units. Permanent affordability prevents displacement and guarantees the availability of those units to lower income households regardless of market forces.
- Add a goal calling for expanding financial resources for affordable housing. It will take more than tools to meet the city's housing needs.
- Include a statement acknowledging the importance of non-profit affordable housing developers.
- Acknowledge the importance of affordable housing as infrastructure.

Thank you for considering the League's recommendations. Again, we truly appreciate your work on this project.



Letter to Portland Bureau of Development Services in Response to Comprehensive Plan Adjustments:

This letter is in regards to the property located at the address of 6912-6926 SE 52ND AVE in Portland, OR in the Brentwood-Darlington neighborhood. **The Brentwood-Darlington Neighborhood Association would like to express disapproval of modification of this property in current zoning to commercial during the current Comprehensive Planning procedure.** The reasons for disapproval are as follows:

1) Property History: The previous restaurant at this address, known as "Nancy's Eat & Browse", was a neighborhood establishment. According to the liquor license granted to Nancy's Eat and Browse, there were several restrictions put in place that limited the nature of that establishment. These restrictions forbade the establishment from opening past 10pm or from hosting live music.

The restrictions in the previous license to Nancy's Eat & Browse were established due to problems resulting from late night drinking activity at this location. Prior to Nancy's, the location was known as the Trocadero Inn. The Trocadero had a full late night license with live music and a full liquor menu. The result was a great disruption to the livability of the neighborhood. To limit this effect, the OLCC discontinued the Trocadero's license and worked with the Brentwood-Darlington Association to prevent future abuses and recognized the area as, to quote the OLCC investigator directly, 'a sensitive and challenging area in which to operate a tavern.'

When applying for the current liquor license for the Area 52 Bar and Grill, the current applicant originally requested hours that extend until 2:30am on Friday and Saturday, 2am on Wednesday & Thursday, and midnight on Sunday thru Tuesday. The current applicant also requested live music to play until 10pm most nights; 11pm on Thursday, and midnight on Friday and Saturday. The Brentwood-Darlington association opposed this initial request due to concerns over noise and other livability factors. The concerns over noise were based on property history and complaints from nearby residents. The Portland Police department also issued a 'no endorsement' ruling at the time for similar concerns, as is mentioned in the OLCC application.

Despite this opposition, however, the OLCC was not able to provide an unfavorable ruling even though they received seven letters from nearby residents that all mentioned late night noise as a concern. The following excerpt from the liquor application for Area 52 is evidence of this:

Our (the OLCC) investigation found no applicable state statute upon which to base an unfavorable recommendation. Jacob Sherman, the Board Chair of the Brentwood-Darlington Neighborhood addressed an email to OLCC and the City of Portland in opposition for this liquor application. The City of Portland, Office of Neighborhood Involvement (ONI) has received four letters in opposition from area residents and three letters not in opposition to this liquor application. All seven of the letters from area residents cite late night noise issues as their primary concern even those not opposed to granting the liquor license.

A revised application from the Area 52 applicant limited the hours to 11pm on all nights and limited live music until no later than 10pm on Friday and Saturday. At this point, seeing these terms as more compatible with the livability concerns of the surrounding residential neighborhood and after meeting with the Area 52 bar owner (a Mr. Robert Smith), the Brentwood-Darlington Neighborhood Association agreed to rescind its unfavorable ruling. The revisions to the hours were made by the Area 52 applicant because of the zoning code limiting grandfathered bars in residential areas from operating after 11pm. Without this zoning limitation, based on the OLCC ruling made above, it is likely that the current bar would be open past the 11pm hour despite concerns from the neighborhood association, the Portland Police, and several nearby neighbors (it should be emphasized that 4 neighbors outright opposed the application, and



of the three the neighborhood members that did not oppose outright all three specifically mentioned loud music as a concern despite their lack of outright opposition).

2) Current Activity: The neighborhood association has received complaints recently that the current operators of the Area 52 Bar have operated beyond the restricted 11pm hour as recently as February 2015 and have at times been a considerable source of noise in the neighborhood. Complaints have mentioned noise complaints that have required police presence at least twice since the bar opened on August 24th of 2014. In the latest incident occurring early this year, a Portland police officer contacted a nearby resident after a noise complaint. The officer informed the resident that he would explain to the bar's staff that they must comply with the 11pm zoning code restrictions and noise ordinances. According to the nearby resident, the police showed up in person several minutes later and appeared to lecture the bar's staff and the band who were 'hanging out' outside the bar after midnight.

It should be noted that the nearby resident said that no additional late night noise or late night operating complaints have been required in the time frame since that incident. The nearby resident indicated that the zoning code requirement of 11pm closing time was 'extremely helpful' in alleviating livability concerns in that situation and that the zoning code requirements had been understood by the police officer.

In addition to these incidents, it appears that the former bar 'Nancy's Eat and Browse' was operated at late night hours and with loud music for a period of a few months after Nancy's death. This is despite the fact that the liquor license for this establishment prohibited operation past 10pm. One nearby resident's letter to the OLCC states:

I found that the noise emanating from within as well as from around the building became much louder in the evenings during the last few months before Nancy's Eat and Browse closed down. I do not know if there was a change in management or some such thing, but it was my experience that the music, crowd noise, exuberant discussion - heated or friendly - in the parking lot, and so on became much more bothersome late in the evening in those final months of Nancy's operation.

This is one of seven letters sent to the OLCC that express similar noise/livability concerns. Based on witnessed activities at the bar observed by nearby residents after Nancy Damrill's death, it appears that the individuals who were responsible for running the bar after her death may have been staff at Nancy's Eat and Browse. It also appears that members of this former staff are currently involved renting the bar to the Area 52 bar owners and are not related to Nancy Damrill. The exact specifics of this situation, however, are difficult to determine for reasons discussed in the section of this document entitled 'Unknown Ownership'.

3) Unknown Ownership: City records indicate that Nancy Damrill is the current owner of the property. Nancy Damrill has been deceased since May 2013. During this almost two-year long period since her death, no records have been filed with the Multnomah County Probate Court as of March 9th 2015. Nancy has passed, people who may not have a legal claim to operate a business on her property are doing so, and BDNA does not believe zoning changes should be made until after questions of ownership have been resolved.

4) Market Conditions and Surrounding Residential Character of the Neighborhood: The property in question has direct adjacency to three residential zoned (R5a) properties. In addition, the commercially zoned areas on SE 52nd Ave have shown a stunted level of development. Of the 9 commercially zoned properties on 52nd Ave North of Rural Ave. and South of Cooper Ave., only 3 are use for commercial purposes. Five contain single family residential development and one is an abandoned lot -- a lot which has been listed as for sale for years and appears to have not yet sold. Other nearby commercial zones



along 52nd near Flavel, Duke, and Woodstock show similar -- or worse-- levels of stunted development. Because of the low density residential character of the area and the lack of commercial development, the association feels that addition of more commercial acreage at this time is not prudent -- especially the addition of commercial property that poses a livability risk to the nearby neighborhood and would only further discourage future improvements.

In addition, residentially zoned R5 properties are in high-demand in our area. The 97206 zip code has repeatedly been the fastest selling zip code in the Portland Metro area for many quarters over the past several years according to bizjournals.portland.com. The website golocalpdx.com has stated that Brentwood-Darlington was the 'hottest' selling neighborhood in Portland in February of 2015 based on number of homes and 'percent of asking price' achieved over the previous 90 days. Redfin.com listed nearby Woodstock as the fastest selling neighborhood in the Portland metro area recently. Even on busy 52nd Ave, nearby homes have been selling quickly and at generous prices. The city must consider that it needs to find ways to increase the stock of R5 residential zones that are in character with the existing neighborhood when it is feasible to do so to meet demand -- removing the R5 designation on this lot when R5 is clearly needed in this area would be potentially irresponsible.

For these reasons, the eventual redevelopment of this lot to housing will do more to support local business as it will result in the cleanup of one of the 52nd Avenue's biggest eyesores and will send a clear signal to potential commercial investors that this portion of 52nd Ave is ready for investment. The continued presence of a tavern that presents an eyesore and has potential livability concerns will do the opposite.

Finally, for all of these reasons, the Brentwood-Darlington Neighborhood Association recommends that the City of Portland does not grant Commercial zoning status to the properties at 6912-6926 SE 52nd Ave during the upcoming Comprehensive Plan Update. The restrictions in place now play an important role in limiting the impact of livability concerns that nearby residents have complained about. In addition, the OLCC has historically shown itself to be incapable or unwilling to address these livability concerns in a reasonable timeframe -- it took almost one decade for the OLCC to shut down the previously troublesome Tracadero Inn despite numerous complaints by nearby residents. We do not wish to return to the troublesome days of the Tracadero Inn. Under Nancy Damill's ownership, this was not the case. However, since Nancy's death, recent evidence has shown a willingness by subsequent managers and bar owners to create a late night disturbance once again. It appears that the grandfathered status and 11pm limits in the zoning code provide much better protection against these abuses than the OLCC can provide. Please, do not remove these protections by changing the zoning at this time. We have reason to believe that, based on past OLCC documents and neighbor complaints from the time before Nancy's ownership, the neighborhood fought hard to keep this property from being a commercially zoned late-night establishment.

Until a verifiable owner can be established who shows clear plans to improve the property in a manner that is compatible with the reasonable neighborhood livability desires to achieve peaceful sleep and safety, and this owner presents plans to develop a commercial design that is compatible with the neighborhood's ambitions for this intersection, we ask that the residential zoning be kept in place which currently makes current quality-of-life possible to monitor and maintain.

Thank you,
Brentwood-Darlington Neighborhood Association



Trillium

FAMILY SERVICES™

Building Brighter Futures with Children and Families

March 13, 2015

RECEIVED
PLANNING BUREAU

2015 MAR 13 P 2:17

Portland Planning and Sustainability Commission
c/o Ms. Marty Stockton, Southeast District Liaison
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7000
Portland, Oregon 97201

Dear Chair Baugh and Fellow Commissioners:

A non-profit agency with roots dating back to 1867, Trillium Family Services (TFS) is Oregon's largest provider of mental and behavioral healthcare for children and families. The agency's Portland headquarters is located at the Parry Center, 3415 SE Powell Boulevard, which has provided services to the community at this location continuously since 1926. Through both its 45 residential beds dedicated to intensive on-site inpatient services and the availability of a full continuum of wrap-around outpatient services, the campus provided support to over 1100 Metro-area clients ages 5-18 years in 2014. Roughly 75% of the families that we serve are low-income and, therefore, are either insured under the Oregon Health Plan and/or receive subsidized care. As a result, TFS provides substantial community benefits.

The purpose of this letter is to request specific Comprehensive Plan and Zoning designations for the Parry Center in the final Comprehensive Plan Map that the Bureau of Planning and Sustainability will be submitting for your review this summer. Attached is our rational for requesting a unified Comprehensive Plan designation, either Mixed-Use/Civic Corridor (MU-CC) or Mixed-Use/Urban Center (MU-UC), and Zoning designation of either CM2 or CM2/CM3 for our site. Otherwise, the currently-proposed zoning, a combination of R1 and CM2/CM3, will perpetuate the current split-zoning situation to our agency's detriment.

This is a particularly timely issue as the agency initiates the planning process for a new 20-year facilities plan to improve facilities for residential patients and expand outpatient, outreach and collaborative activities with other social service and medical providers.

Thank you for your consideration of this important concern to TFS.

Sincerely,

JB Allbritton, Chief Financial Officer
ballbritton@trilliumfamily.org

www.trilliumfamily.org

Parry Center for Children &
Waverly Children's Programs
3415 SE Powell Boulevard
Portland, Oregon 97202
T 503-234-9591
F 503-205-0188

Children's Farm Home
4455 NE Highway 20
Corvallis, Oregon 97330
T 541-757-1852
F 541-750-1120

Edwards School
Day Program
1715 SE 32nd Place
Portland, Oregon 97214
T 503-963-4920
F 503-445-0602

Sender House
Young Adult Program
1715 SE 32nd Place
Albany, Oregon 97322
T 541-928-1757
F 541-928-8538

Wake Robin School
Day Program
1520 Plaza St. NW Ste 100
Salem, Oregon 97304
T 503-385-8409
F 971-273-7486

2015 MAR 13 Vol. 2,3 page 14221



PORLAND COMPREHENSIVE PLAN
WRITTEN TESTIMONY FOR TRILLIUM FAMILY SERVICES/PARRY CENTER

Applicant: JB Allbritton, Chief Financial Officer
Trillium Family Services
3415 SE Powell Boulevard
Portland, Oregon 97202
503.205.3548
ballbritton@trilliumfamily.org

Planner: Beverly Bookin, AICP
The Bookin Group, LLC
813 SW Alder Street, Suite 320
Portland, Oregon 97205
503.241.2423
bookin@bookingroup.com

Use: A non-profit social services agency operated by Trillium Family Services (TFS), the Parry Center provides comprehensive inpatient/outpatient mental health services for children, 5-18 years. The inpatient housing component is considered a **Group Living** use and the outpatient services, outreach and administrative functions as a **Community Service** use, according to the Use Classifications in Chapter 33.920 of the Portland Zoning Code.

Address: 3415 SE Powell Boulevard

Site Size: 11.9 acres

Legal Description: 1S1E12AC 5600

Existing Zoning: R1/R1 (CG), the latter on the southern 1/3 of the property (Figure I).

Current Proposed Comprehensive Plan Designation: As illustrated on Figure 1:

Southern Portion: Comp Plan: MU/CC or MU-UC; Zoning Designation: CM2 or CM3

Northern Portion: Comp Plan/Zoning Designation: No change

Land Use Status: Both Group Living and Community Services uses are Conditional Uses in the R1 zone. Parry Center has operated the last 20 years under a 1995 Conditional Use Master Plan (CUMP) (LU 95-00097 CUMS). Having recently completed a new Strategic Plan, TFS is about to begin the development of a new 20-Year Master Facilities Plan. The latter includes expanding the core program and considering community service/office and retail activities with partnering agencies.

Request: That Bureau of Planning and Sustainability (BPS) consider adopting:

- **Comprehensive Plan** designation for the entire site of either Mixed-Use/Civic Corridor (MU-CC) or Mixed-Use/Urban Center (MU-UC), based on the decision for the Powell Boulevard Corridor as a whole;
- **Zoning** designation for the entire site of either Commercial Mixed-Use (CM2) or a combination of MC2/MC3. TFS is opposed to the designation of the site for Commercial Employment (CE).

Supporting Arguments

1. **Split-zoning is bad land use practice.** The new Comprehensive Plan should address current split-zoning situations such as is the case at this site, not perpetuate the problem. It is TFS's understanding that BPS intends to address the split-zoning issue on hundreds of properties as part of the Comprehensive Plan Update.
2. **Comprehensive Plan/Zoning Decisions should recognize the existing underlying development pattern.** The Parry Center has operated continuously at this location since 1926. Having merged into TFS in 1998, the agency intends to expand the use over time. The underlying premise of the current split-zoning situation was made in the early 1980s on the assumption that the site would redevelop and be partitioned. This is not the case, which should be taken into consideration in applying new Comprehensive Plan/Zoning designations.
3. **The current/proposed zoning boundary is arbitrary.** The current R1/R1 (CG) boundary is a straight-line extension of the CG/R1 boundary through the mid-line of the right-of-way immediately to the east without regard to the site's underlying topography or building inventory. As it happens, the line is actually drawn through several existing buildings (Figure 2). The proposed residential/commercial split-zoning will perpetuate this situation.
4. **Split-zoning is especially problematic for a Conditional Use.** Under Section 33.815.070 Sites with Split Zoning

When a proposed use is located on a site which has more than one zone, and the use is a conditional use in one zone and an allowed or limited use in the other, any proposals on the allowed site are subject to conditional use review.

Thus, even if the southern portion of the site is re-zoned to CM2 or CM3, where Group Living, Community Service, Retail and Office uses will be allowed by the right according to the CM Zones Concept (BPS, 11/5/13), the more restrictive R1 zoning on the northern the site will require CU review of any development anywhere on the site.

5. **The agency's programming ensures that the uses on the site will decline in scale and intensity toward the north, to protect existing neighbors.** It is Parry Center's intent to concentrate its outpatient, administrative and collaborative-partner activities on the southern portion of the site to provide necessary visibility and access from SE Powell Boulevard. On the other hand, children living on site need a quiet, safe, private and secure environment, which is perfect for the northern half of the site. Assuming existing group living facilities are rebuilt there, they will be low-rise and residential in character with associated school, playground/playing field and garden uses.
6. **The site's topography supports this geographic separation of uses** as the site is actually a hill (Figure 2), the top of which coincides with buildings in the center of the site and then slopes downward in all directions. The slope to SE Powell Boulevard is relatively steep, allowing opportunities to build some buildings and possibly structured parking in the slope. From the top of the hill, the site slopes downward, in some cases dramatically, to the northwest, north and east, which abuts single-family residential development. This places the site's neighbors below and at some distance from current and most future development and presents significant opportunities for successful screening.
7. **Full CM zoning for the whole site is not out of character with other SE Powell Boulevard landowners.** Both currently and as proposed, there is a significant depth of commercial zoning immediately to the south of SE Powell Boulevard. This includes a proposed CM2 or CM3 zoning designation that is as much as 330' deep. As illustrated in Figure 1, at its deepest point, the Parry Center site is 450' from SE Powell Boulevard to its back property line. Therefore, it is not such a stretch to re-zone the entire depth of the Parry Center site, especially since there is a high probability that the site will remain in single ownership for many years to come.
8. **The CM2/CM3 compromise.** If BPS proposes the more intense CM3 zoning for the SE Powell Boulevard Corridor, TFS would be willing to accept split CM3 zoning in the southern portion and CM2 zoning in the northern portion, using an east/west boundary slightly to the north of existing buildings as the new boundary. The lower development height/bulk standards, setback and screening requirements of the CM2 will provide ample buffer for neighboring properties, which, as described above, are significantly lower in grade. This two-zone solution does not engender the split-zoning problem created by Section 33.815.070, because Group Living and Community Service uses would be allowed in both CM zones. The zoning boundary would simply require that new development would be subject to different development standards depending where it is located on the site.

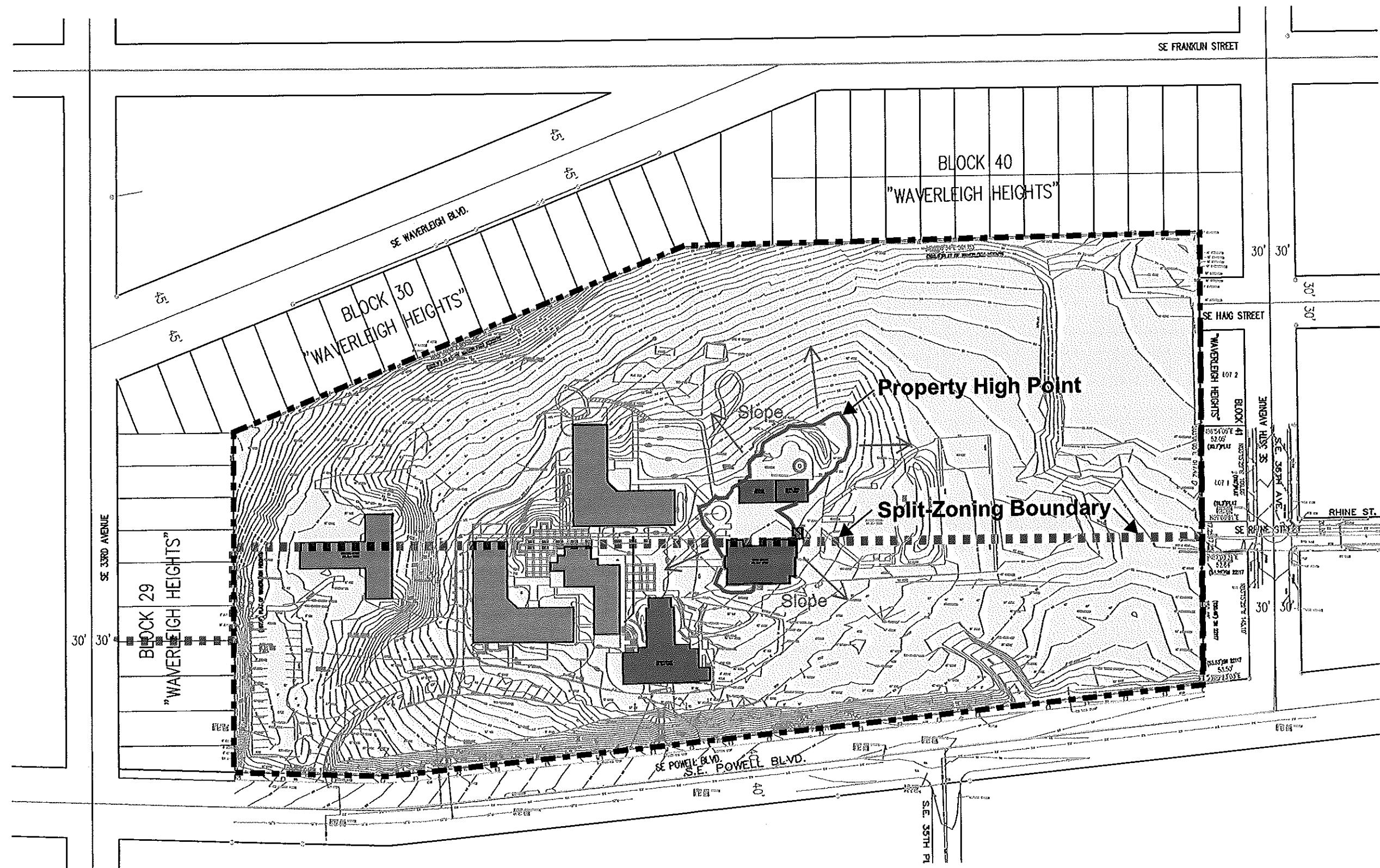


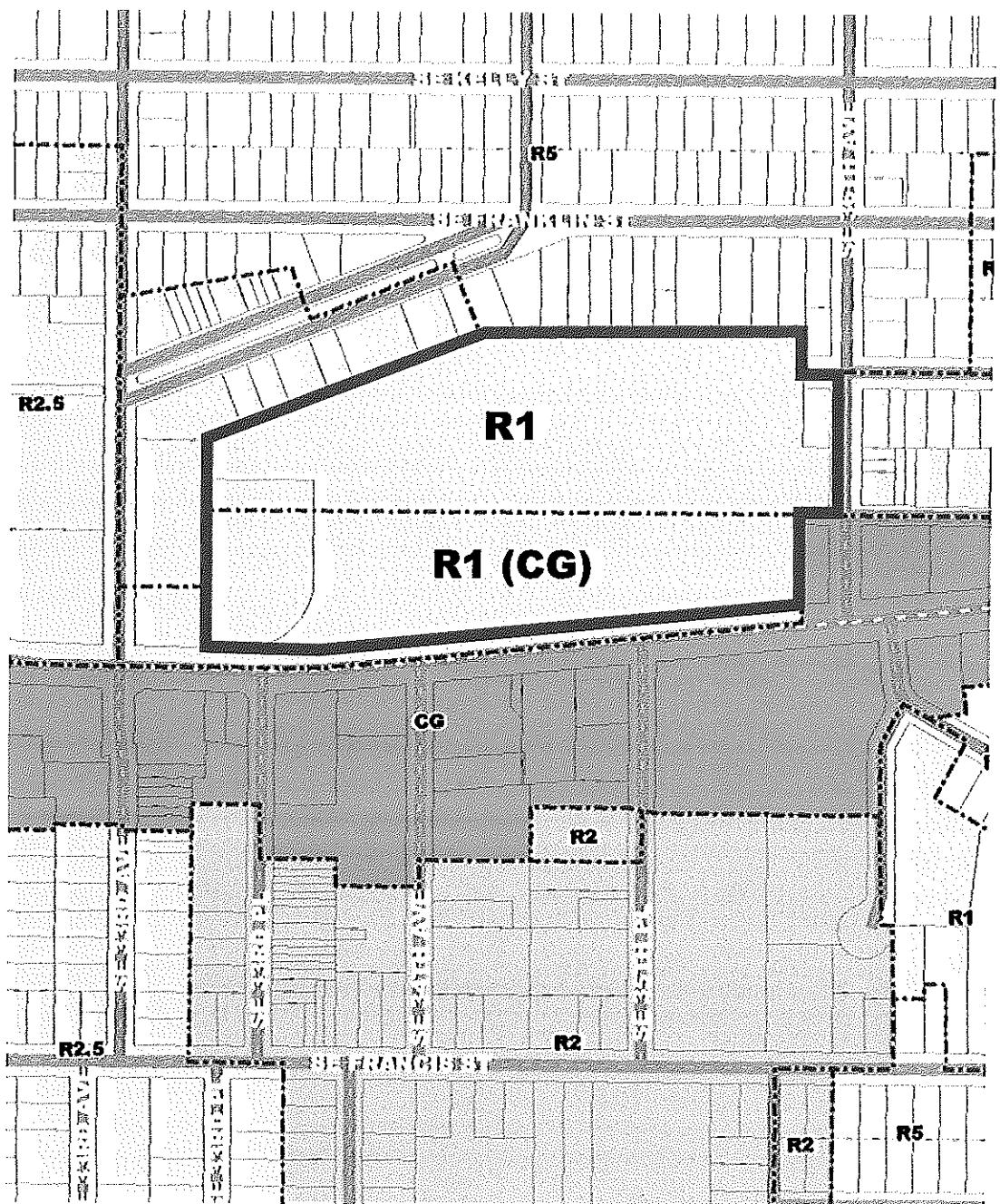
FIGURE -2

IMPACT OF CURRENT/PROPOSED SPLIT-ZONING BOUNDARY

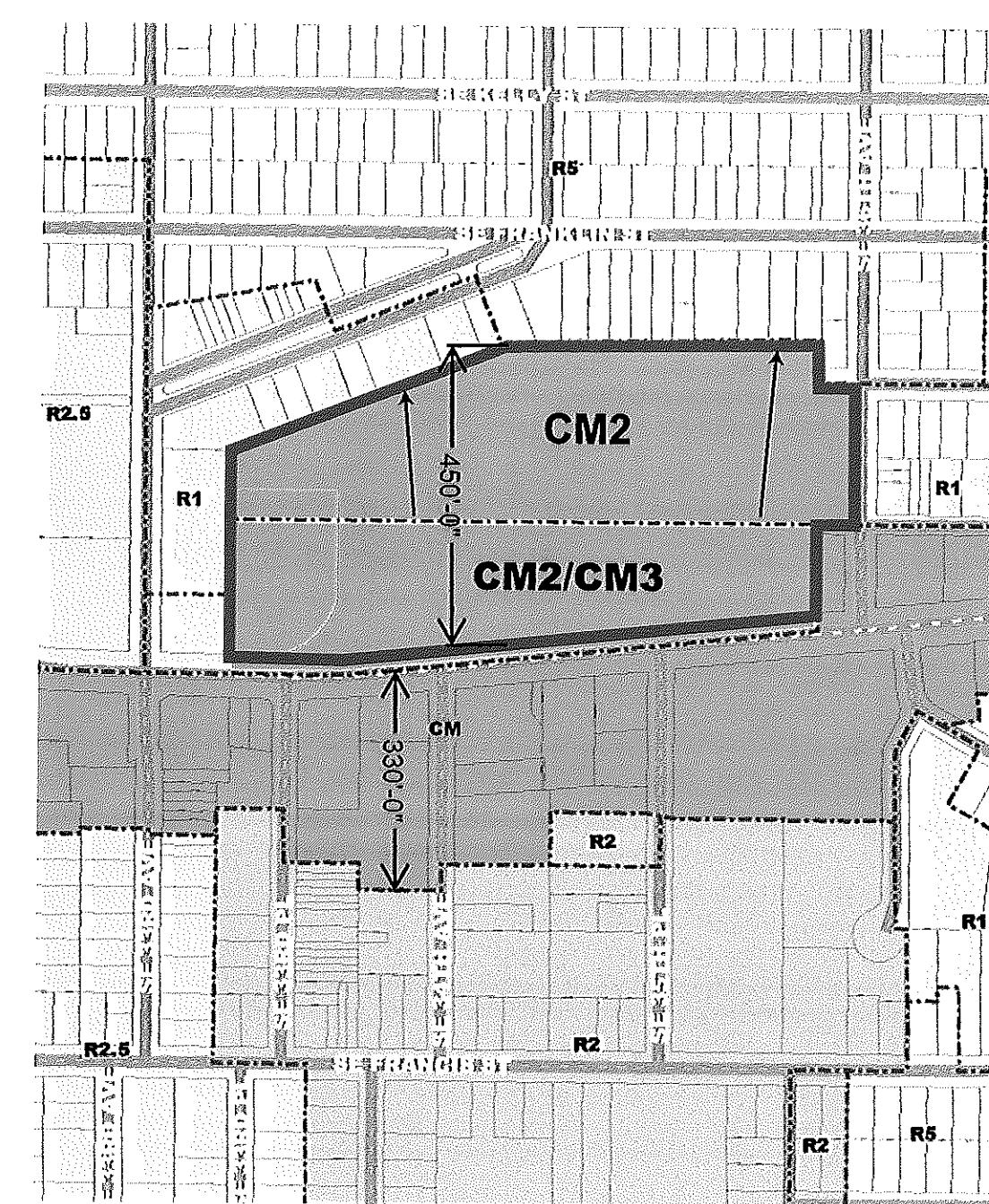
Trillium Family Services | Parry Center

3416 SE 36th Avenue Portland, OR





EXISTING ZONING



PREFERRED PARRY CENTER ZONING

SRG

Trillium Family Services | Parry Center
3416 SE 36th Avenue Portland, OR



FIGURE - 1

Ord. 187832 Vol. 2.3.B, page 14226



PORLAND PUBLIC SCHOOLS

Jason Lee K-8

Lenichtka Reed, Principal

March 13, 2015

RECEIVED
PLANNING BUREAU

2015 MAR 13 P 2:36

Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 2500A
Portland, Oregon 97201-5380

Re: Support for TSP Project #40020 – NE 92nd Avenue Ped/Bike Improvements

To whom it may concern:

As a neighbor in the Madison South neighborhood, I'd like to thank you for including several projects in the recommended draft TSP list that could benefit our neighborhood in the future.

I support the projects listed in the recommended draft list. There is nobody on the east side of Portland who could deny the need for improvements to the entire 82nd Avenue Corridor. Most of the other projects recommended in Madison South have a regional focus and will move people, mostly cyclists, through our neighborhood. Unfortunately, nearly half of our neighborhood (North of NE Russell Street) will still not have safe access to these recommended bicycle improvements proposed for NE Tillamook, NE Halsey, the I-20S undercrossing, or Sullivan's Gulch Trail. It's also troubling that we won't have a safe pedestrian route to access new multi-modal paths (Sullivan's Gulch Trail and J-205 undercrossing).

I ask you to prioritize **TSP Project #40020-NE 92nd Avenue Ped/Bike Improvements** or find a way to fund the project through the Safe Routes to Schools or other pedestrian and bicycle focused programs. Improvements to NE 92nd Avenue would benefit our immediate neighborhood, the diverse population of families at our neighborhood school, and regional users of the City's growing bike network.

In terms of comfortable and safe bicycle and pedestrian travel, Madison South is limited by man-made and natural barriers: I-84 on the south, Rocky Butte/Grotto on the north, Rocky Butte/I-205 on the east, and NE 82nd Avenue on much of the west. Additionally, the center of our neighborhood includes over 20 acres of land that greatly limits north-south bike or direct pedestrian access. Only NE 82nd and NE 92nd allow north-south travel to our neighbors.

Why are pedestrian and bicycle improvements on NE 92nd Avenue important?

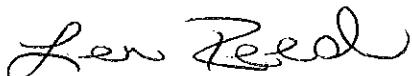
- Many students of Jason Lee K-8 School cannot currently walk or ride bicycles to this neighborhood school—even if they are within ½ mile to 1 mile distance (north of NE Russell Street).
- There is no alternate route to this busy neighborhood street or the neighborhood school. For many, the school will be a frequent destination and we need to make sure all arrive and depart safely.
- Many neighbors, especially families, youth, or new riders (especially north of NE Russell Street) do not feel comfortable accessing the NE Tillamook bikeway due to the unsafe stretch of NE 92nd Avenue.
- There is a unique opportunity to encourage school-aged children and their families to walk and bike within their neighborhood and begin using the greater Portland cycling network.

- NE 92nd Avenue is served by TriMet. Walking to and from bus stops can feel unsafe in the narrowest areas. The buses can create safety/visibility concerns for other pedestrians and cyclists.
- The neighborhood will likely see increases in housing infill over the next decades, so the multi-modal demands and safety conflicts on NE 92nd Avenue will likely increase.
- NE 92nd Avenue provides access to the popular cycling destination of Rocky Butte and will aid in increased eastbound bicycle travel from other inner NE neighborhoods via the proposed 1-205 undercrossing.

I understand the \$5M+ cost makes this project difficult to envision in the foreseeable future. If it could be done in phases, the pinch point that has no refuge for pedestrians is between NE Benjamin and NE Russell. The remainder of the stretch does have some narrow shoulders and some sections of sidewalk.

Please find a way to fund improvements on NE 92nd Avenue. Without improving safety on NE 92nd Avenue, we are failing to encourage multi-modal travel for most of the neighborhood. Creating future pedestrians and cyclist in our City is a necessity to realize the benefits of this long list of transportation investments.

In the Service of Children,



Lenichtka (Len) Reed, Principal
Jason Lee K-8 School
2222 NE 92nd Avenue
Portland, Oregon 97220
503.916.6144

BLYTHE OLSON • 2719 SW Old Orchard Road • Portland, Oregon 97201 • (503) 294-7141

RECEIVED
PLANNING BUREAU

March 13, 2015

2015 MAR 13 A 10:48

Planning and Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97201-5380

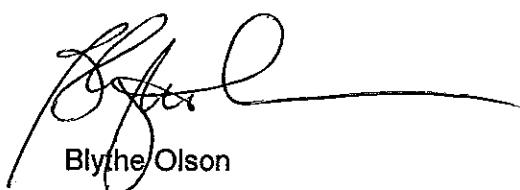
Re: Comments on City of Portland 2035 Comprehensive Plan
Proposed Change #644

Dear Commission Members:

Attached are comments endorsed by individuals from our Portland Heights neighborhood. Please consider them in your Comprehensive Plan update process. We gathered these endorsements in the last few days from close neighbors after learning more details of the proposed changes and, given more time, could have gathered many more. At least 98% of our neighbors had not heard anything about the Plan until we started knocking on doors less than a week ago.

Thank you for your careful consideration of our input.

Sincerely,



Blythe Olson

Attach: Comments (4 pages)

Comments for the City of Portland 2035 Comprehensive Plan

March 13, 2015

These comments are intended to address Proposed Change #644 relating to the property located at 2855 SW Patton Road, Portland 97201, historically referred to as Strohecker's Market.

We are all neighborhood residents/owners with homes in close proximity to this property.

Whereas we value having a neighborhood grocery store near us along with its ancillary services (pharmacy, liquor store, postal service), we are strongly opposed to additional commercial development that would add more traffic and parking stress to our residential neighborhood. The through street, SW Patton Rd, that borders this property, is routinely gridlocked due to commuter traffic that has increased in recent years and safety for drivers and pedestrians is compromised on a daily basis. Entrance and egress for Strohecker's is already dangerous because the 2-way left turn lane into the parking lot forces cars to use the same lane from opposite directions simultaneously. The adjacent crosswalk is routinely ignored by speeding vehicles and often blocked by delivery vehicles.

We ask that the 1984 Ordinance No. 155609 allowing Strohecker's to expand to its current size remain intact for any future use of this property so that we can maintain the livability and safety of our residential neighborhood.

Thank you. The following individuals endorse these comments:

Blythe Olson	2719 SW Old Orchard Rd
J. Mary Taylor	2718 SW Old Orchard Rd
Faith Emerson	2730 SW Old Orchard Rd
Dan Rogers	2730 SW Old Orchard Rd
Sarah Hurley	2770 SW Old Orchard Rd

Steve Anderson	2770 SW Old Orchard Rd
Joanne Klebba	2766 SW Old Orchard Rd
Betsy Rickles	2754 SW Old Orchard Rd
Norm Rickles	2754 SW Old Orchard Rd
Christine Colasurdo	2776 SW Old Orchard Rd
Thomas Scanlan	2776 SW Old Orchard Rd
Kathleen Callahan	2788 SW Old Orchard Rd
Norman Hotz	2788 SW Old Orchard Rd
Maryann Mackinnon	2792 SW Old Orchard Rd
Frances Barnes	2731 SW Old Orchard Rd
Mary Reimers	2751 SW Old Orchard Rd
Susan Corso	2721 SW Old Orchard Rd
Brian McDonagh	2710 SW Old Orchard Rd
Megan McDonagh	2710 SW Old Orchard Rd
Kent Weaver	2736 SW Montgomery Dr
Brigitte DeWolfe	2752 SW Roswell Ave
Peter Miller	2775 SW Montgomery Dr
Sally Miller	2775 SW Montgomery Dr
Anthony Mantione	2842 SW Patton Rd
Kelly Mantione	2842 SW Patton Rd
Elisa deCastro Hornecker	2959 SW Montgomery Dr
Mary Lynne Chambers	2860 SW Montgomery Dr
Adam Chambers	2860 SW Montgomery Dr
Jeanne Windham	2753 SW Roswell Ave

Wilmer Windham	2753 SW Roswell Ave
Janet Conklin	2635 SW Montgomery Dr
Bob Conklin	2635 SW Montgomery Dr
Laura Chang	2727 SW Montgomery Dr
Laurel Clausen	2737 SW Montgomery Dr
Kevin Clausen	2737 SW Montgomery Dr
James Craycroft	2750 SW Montgomery Dr
Barbara Mounger	2750 SW Montgomery Dr
Mary Ann Chang	1128 SW Davenport St
Tami Jewett	2681 SW Montgomery Dr
Alan Jewett	2681 SW Montgomery Dr
Kathryn Scribner	2707 SW Homar Ave
Dan Scribner	2707 SW Homar Ave
Doug Coates	3040 SW Periander St
Marcia Hille	3040 SW Periander St
Jordan Lubahn	2907 SW Periander St
Jessica Lubahn	2907 SW Periander St
Ed Wagner	2728 SW Montgomery Dr
Barbara Wagner	2720 SW Montgomery Dr
Teresa Wirkkala	2798 SW Old Orchard Rd
Susan Dierauf	2783 SW Roswell Ave
Tim Dierauf	2783 SW Roswell Ave
Luis (Ed) Valencia	2738 SW Old Orchard Rd
Sarah McDonald	2850 SW Fern St

Camilla Hunt	2656 SW Upper Drive Place
Gutmann family	2841 SW Fern St
John McFee	2930 SW Periander St
Jane Guyn	2744 SW Montgomery Dr
Jim Guyn	2744 SW Montgomery Dr
Jerome Schiller	2742 SW Old Orchard Rd
Juliet Ching	2742 SW Old Orchard Rd
Eric Butler	2851 SW Montgomery Dr
Alice Rogan	2724 SW Old Orchard Rd
Ken Dale	2960 SW Montgomery
Leslie Dale	2960 SW Montgomery
Lauren Jacobs	2933 SW Periander St
Zach Fruchtengarten	2933 SW Periander St

Three additional endorsers of Comments added after initial submission:

Annie Dolle	2791 SW Montgomery
Christopher Dolle	2791 SW Montgomery
Julie Neupert Stott	2896 SW Patton Road
	2775 SW Old Orchard Rd

All of the above addresses are in the 97201 zip code for Portland

Submitted by Blythe Olson
2719 SW Old Orchard Rd
Portland, OR 97201
503-294-7141
503-849-9616 cell
blytheolson@gmail.com

Planning and Sustainability Commission (PSC)

1900 SW 4th Avenue, Suite 7100

Portland, Oregon 97201-5380

Subject: The Portland Comprehensive Plan 2035

Economic Opportunities Analysis

Climate Action Plan

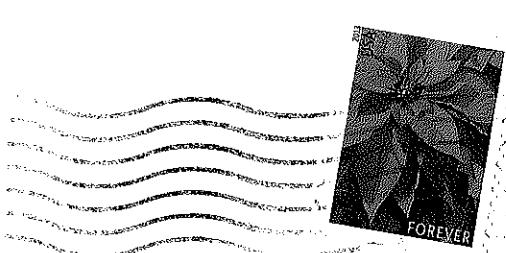
Name: Cathy Spofford

Address: 6130 SW Nevada Ct Portland 97219

Contact Information: Cathy Spofford 503-970-2305 Cspof1@gmail.com

I am writing about the Pembina Propane Plan for Portland. Neither Pembina nor the Port has analyzed the environmental risks associate with this facility or the trans port of propane. Transportation would not only endanger sensitive environmental areas but people living along the train routes. The source of the propane will be from fracked gas which is linked to serious health and environmental impacts and climate destabilization. I don't believe this facility is in keeping with the Portland Comprehensive Plan nor the Climate action Plan.

Spofford
SW Nevada Ct
Portland, OR 97219



Planning + Sustainability Commission
1900 SW 4th Ave Suite 7100
Portland, OR 97201-5380

97201-5380

100-100-100-100-100-100-100-100-100-100

To: Portland Sustainability commission, PBOT
From: Terrence and Krystofer Dublinski-Milton
6111 East Burnside Street, Portland, 503 867-7723

Here are our personal comments on the Comprehensive Plan,

Our personal property at 6111 east Burnside should be zoned R1 as it butts up to a commercial, mixed use zone and is on a bus and bike corridor.

The transportation hierarchy, and keeping freight included I enthusiastically support, do NOT separate freight out. Biking and walking safety should always take precedence, so if that means central distribution centers that move deliveries to smaller trucks, nighttime deliveries or bike cargo hauling, the private sector will adjust accordingly.

20 minutes neighborhood town centers, and the active transportation requirements to get to them, should be prioritized alt all times in the planning process and implementation.

The City should have a plan for developing the **substandard roadways** that run throughout the outer neighborhoods, but only in VERY targeted manners. Short residential roadway connections of substandard roadways should FIRST be studied for bike-walkway connections and park/ community garden needs before a full build out. The residential roadways that SHOULD be targeted are those directly next to main corridors intended for mixed use development and higher density affordable housing.

82nd or Woodstock for instance. The roadways directly north and south of Woodstock are perfect places for higher density but the roadways currently cannot support it. Either vacate the road and plan for full developments that includes large amounts of workforce and low income housing, or find a way to allocate funds to build out the street grid so SAFE development will follow. Personally, I would prefer large workforce housing developments with central plazas and have the city vacate the ROW assuming full bike and pedestrian connectivity.

Inclusionairy Zoning: Portland should include as much workforce housing as economically feasible without damaging environmental building standards. We need workforce housing...and lots of it. Rents need stabilization or Portland will become unaffordable. If only wealthy people, with cars, can afford to live in the inner neighborhoods then we will never reach our 2030 bike mode share goals: we will not come even close.

There should be an **overlay where Tiny houses, garage conversion and cooperative ownership** of homes can be made easy. Parking requirements should be eliminated in favor of conversion for no car household and younger individuals who bike as their priority mode of transport. We should be building ONTO houses already there.

My Personal Top Five Projects of Support for PBOT

- 1) **East Burnside #70010.** This Project, in my view, should be the PREMIER Bike Highway to and from Downtown on the east side. Everything from the Burnside Bridge to the city limits should be redesigned over time to make bicycling the primary mode. We should start with the bike lane gap between 68th and 41st where parking could be limited or completely eliminated through much of it and make Burnside less of a speedway, and more of a bikeway. Please, take

our parking away. I have seen too many accidents in front of my house. Nine out of ten neighbors on my block agree that parking should be removed in favor of high quality bike facilities.

- 2) **60's Neighborhood Greenway 70071.** My neighborhood east of 60th does not have a safe way to get south to our only close park: Mount Tabor, this would build a South active transportation alternative to 60th in a cost effective way. Long term, a path could be built to connect 62nd and Belmont to Yamhill and the Salmon and run just east/over the lowest reservoir. Short term, the alignment in the comprehensive plan would work well due to its gentler grade past Stark.
- 3) **The 70's and 80th Greenway In Montavilla and central East Portland #70052.** This neighborhood is ripe for bicycling improvements and we should have a north-south Greenway based on PCC SE. This greenway starting at 79th and Division should continue south to Brentwood-Darlington so there is a clear route to PCC SE. Long Term a northbound crossing of the gulch from 80th north to Madison High School should be part of the plan to connect our lowest income school district together. This would pay for itself long term in workforce development through access to PCC SE.
- 4) **the North Portland Greenway Trail from Downtown to Kelly Point Park (Multiple Projects).** This not only would provide much needed access to Swan Island from each direction currently lacking, Once the Willamette Falls Legacy Project develops Oregon City, this would become part of a World Class bikeway running the length of the Metro area. The TOURISM DOLLARS long term will pay for the project, not to mention the local benefits.
- 5) **Inner Barbur Improvements #90016,** solely because I spent five years commuting this stretch of Babur and this is where I came the closest to death in my entire life. If the bike lane was eight feet wide or had a buffer that tree limb that knocked my off my bike would NOT have thrown me into traffic. I got out of the lane just seconds before a car would have run me over at 50 MPH. My helmet saved my life in this case, by luck...others have not been so lucky. This is the most dangerous stretch of roadway in the city and needs to be road dieted NOW, with the added space devoted to a wide buffered bike and pedestrians space including the bridge overpasses.

Items that should be DROPPED from the TSP/ or active planning at this time:

- 1) **The travel/acceleration lanes on I 205 Phases I, II north and southbound #113690, #113990,#113700.** Freeway expansion induces demand, we should lobby for CONGESTION PRICING instead. If this money was spent locally on north-south improvements bike/mass transit improvements including to the I 205 bike path, then the congestion could be relieved through local trips. Instead, using the Main Street Overpass as a starting point, a direct and unbroken Multi-use commuting path could be built that is NO STOP with over or underpasses and connections at Stark, Washington, Burnside and Glisan. Instead of the terrible connections we currently have.
- 2) **West Hayden Island Railyards Expansion #30062. We should protect West Hayden Island as a wildlife preserve FOREVER and DROP this.**
- 3) **Sullivan's Gulch Phase 1 and 2:** Living near there I would prefer to see the railroad VACATE the property instead. We can hold out until the other needed paths in the city are built. This is a multimillion dollar path I used to WHOLE HARDHEARTEDLY support, but have now changed my mind. We need to bring the rest of the city up to snuff first, and I do not think spending 50 million to subsidize on street parking or travel lanes on Halsey and Burnside, which is really what we are talking about here, is worth it. The Red Electric Trail on the west side, the North Portland Greenway trail, connecting the I 26 path to PSU to the Tilikum and fixing the I 205 path like just described are higher priorities as they do not have good alternative

routes. **Leave it as constrained, but combine them into ONE project** (excluding the I 205 under-crossing which NEEDS to be built) and include complete slope restoration and good connections throughout the length, and come back to the public with a real price estimate and railroad buy in.

- 4) **John's Landing Streetcar Extension #116390.** Though I like streetcars, this is not a good choice as they keep saying no. Stop studying this and look into a Multi-Use path instead.
- 5) **Portland Bike Share #113610.** Though I support it, I think that it should be treated as a mass transit system and thus be paid for through the private sector, payroll taxes or general funds....NOT transportation money, Oregon has some of the strictest restrictions on what gas tax money can be used for, so this should not come from Federal grant money....or if it is, then general funds should be used to augment the transportation funding to the same amount....and funnel this money into bikeways in undeserved regions of the city. Bike share should also be expanded to the commercial corridors, MAX stations and ALL 20 minute neighbors as fast as economically feasible. This is how we leverage our MAX investments.

Project NOT on the TSP and should be added:

- 1) **A multi-use path without stops from SE Main north to Gateway paralleling I 205.** This would fix the AWFUL intersection at Glisan and sidewalk riding on Washington and Stark plus the Burnside crossings (least important other than the train tracks there which are scary when wet). The west side path can be left for local access.. If this is not feasible, then upgrade all the I 205 crossings from Main north to Gateway so they are all no-stop for commuters.
- 2) **A multi-use-path from Beaverton through the west hills to Vancouver,** to and through the NW industrial district attached to the railroad bridges, as they are retrofitted one by one, through the NW industrial district to the North Portland Greenway trail then eventually to Vancouver when that project gets retrofitted and the lift span is moved. This would be another critical tourist bike link, especially if combined with the Vancouver system, west Portland Metro's improvements to the Banks-Veronia Trail and eventually the coast. The international tourist dollars would bring in more revenue long term than a Propane export terminal ever could, without the environmental damage.
- 3) **78th-80 Greenway south from PCC SE from Division to the Springwater.** The fact that a 48 million dollar community college expansion was done without connecting bike facilities confuses me. The school had a pedestrian plan, an automobile plan and a mass transit access plan, but no bike plan. This makes me think there is a gap in the law somewhere that needs to be fixed for the next big institutional expansion.
- 4) **A bike/pedestrian overpass at 92nd from the end of the 80's Bikeway at Hassalo over/under I 205 to Gateway.** This would connect to the I 205 path, the above connection south to Main and the new 205 under-crossing to Hancock. All of these connections together would make for an interconnected community centered on gateway, and Gateway Green.
- 5) **A Multi-Modal retrofit of 20th/21st from the Layfette Bridge north to Tillamook** including protected bike lanes and an inner east bus route. This would require parking removal.

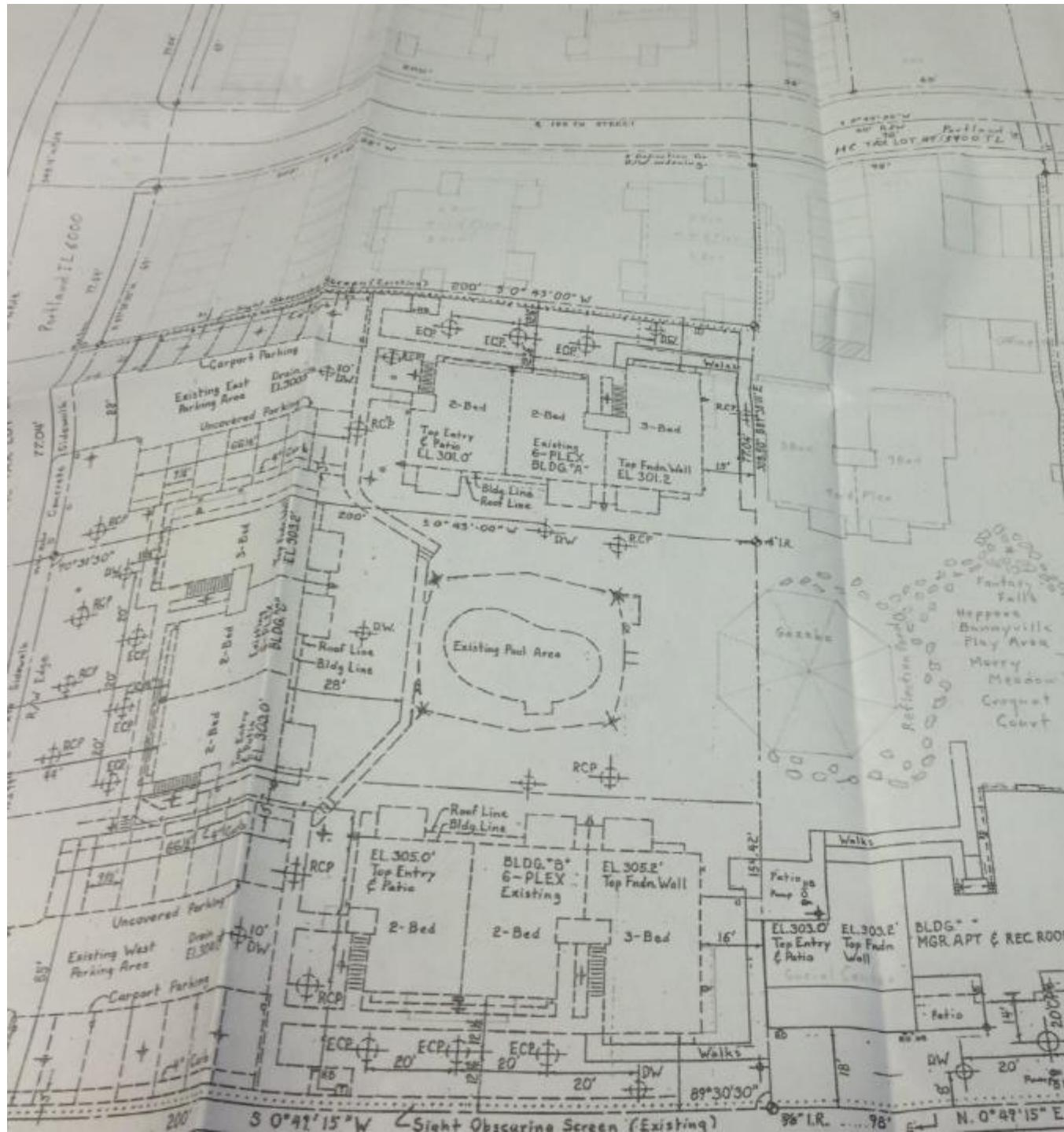
Thank you for your time and work,

Terrence and Krystofer Dublinski-Milton
6111 East Burnside Street Portland, 97215

From: Aebi, Andrew
Sent: Friday, March 13, 2015 3:21 PM
To: Planning and Sustainability Commission
Cc: Ocken, Julie; Scarzello, Christina; Frederiksen, Joan; Bob Rosholt (rgrosholt@gmail.com)
Subject: 323 NE 156th Avenue: Comp Plan Testimony Received by Bob Rosholt

To Whom it May Concern:

I have been working with Bob Rosholt on possible formation of a local improvement district (LID) to improve NE 156th Avenue south of Glisan. We are awaiting an estimate from PBOT's Civil Design Section (CDS) as a perquisite to petitioning this LID to Mr. Rosholt and other property owners. He has indicated his interest to PBOT in getting the zoning for his area changed to make infrastructure improvements more financially feasible. He dropped off this written testimony to me today. I spoke with Joan Frederickson today in Chris' absence, and Joan suggested that I sent this testimony to you electronically with the hard copy to follow, which I will place in an interoffice envelope and will mail to Julie. I have scanned most of Mr. Rosholt's written testimony (attached above in a *.pdf file) except for a site development plan or proposal which is larger than 11 x 17 inches and which I cannot scan. I am attaching a screen print taken with a camera phone to provide a rough idea what that looks like, and will let you scan it once it arrives to you via interoffice mail. If you have any questions, please contact Mr. Rosholt at 503-341-4582.



The scan and camera phone shot aren't perfect; I see that the date stamps of today (3/13/15) didn't quite show up, but you will see them when the hard copies arrive.

Respectfully submitted,

Andrew Aebi
PBOT

13 Mar. 2015

Andrew Aebi

City of Portland
Bureau of Transportation
1120 SW 5th Ave., Suite 800
Portland OR 97204

Re: 323 NE 156th Ave.

With adjacent property owners able to submit objections by e-mail and me thereby being unable to have the information needed to respond, I submitted the attached letter dated Nov. 3, 2014.

Objections I was hearing at the meeting, with the Portland Planning and Sustainability Commission caused me to submit the letter dated today and attached.

If Ford doesn't move on his property, I may take it on and that will get the ~~road~~ street improvement further.

Current concept also attached.

I hope what I've submitted helps us both.

Bob Rosenthal
503 341 4582

March 13, 2015

Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW 4th Ave. Suite 7100
Portland, OR 97204

Re: A couple comments on street improvement and down zoning

A short drive on NE 157th from Glisan St. to E Burnside will put these comments in vivid perspective.

A person who lived on NE 157th was an obstructionist that pushed for down zoning. In your meetings that were open to the public I heard several individuals push for down zoning of multifamily property. I share this view if the density is extremely high and the parking so limited that the surrounding residential property is adversely impacted. Lower density multifamily with adequate off street parking does not adversely impact the surrounding residential area.

Street improvement should be seen as an investment that overtime will increase the value of exiting residential development, encourage development of undeveloped property and encourage the replacement of sub standard dwelling units with new. All of this would result in an increase to the tax base. Resistance comes from residents that cannot afford the expense. Use the same investment phycology that is used to attract commercial business interest, such as tax abatement. Allow quasi tax abatement in residential areas. Use existing tax to be used to fund repayment of street improvement until paid in full or the property is sold. Improvement costs would be a lien on property and collected at time of sale. Owner could expect to receive a higher value for property at time of sale due to the street improvements. Then a higher tax would kick in after the sale and you achieve a multiple win. Higher taxable income for the city. Higher property value for the owners. Improved neighborhoods. No need for urban renewal expense to fix a neighborhood that may otherwise have disintegrated.

I am a resident of this area who is concerned about our neighborhood and the inability of people to pay the costs of street improvement. Hopefully, if this has not already been considered my hope is that this need will be considered in your plan review.

Sincerely,



Robert G. Rosholt
409 NE 156th Ave.
Portland, OR 97230
503-341-4582

November 3, 2014

Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW 4th Ave, Suite 7100
Portland, OR 97230

Re: Proposed zone change at 323 NE 156th Ave.

The attached letter and preliminary drawings of a Site Plan and Street view elevation are provided in support of this zone change. If you don't receive any mail or e-mails objecting to your proposed change you don't have to bother reviewing this dissertation.

The zone change will provide the unit density needed to make it economical to develop and also make street improvements feasible.

My transition to 55 and older will keep this Garden Court complex of multi-family flats from over burdening the adjacent school, while still allowing children for 20% of the units and very important, provide for Grandparents that have the responsibility of raising their grandchildren



Robert G. Rosholt
409 NE 156th Ave
Portland, OR 97230

November 3, 2014

Proposed Zone Change at 323 NE 156th Ave, Portland, OR. 97230

In the late 60's my wife and I built the first 6 units of an eventual 18 unit Garden Court Multi-family complex on three Multnomah County Tax lots (TL 18,19,20) This was at a time when landlords openly discriminated against single mothers an couples with children. These lots were adjacent to Glenfair Grade School and these families were the very individuals we intended to serve.

In 1968 we purchased ¾ acres immediately south of our TL 18,19,20 and also adjacent to the Glenfair Grade School). This property at 403 NE 156th Ave was zoned multi-family and we planned to build a Management and Social Activity unit as well as another 6 unit multi-family building. Construction for the management unit and the complex's social activity unit was completed in 1976. Life got in the way of our proceeding with the additional 6-unit expansion of our Garden Court development for almost 40 years. During this period we continued to acquire adjacent property with plans for expansion of our original project. These included 411 N.E. 156th Ave, then 15606 N.E.Glisan, followed by 323 NE 156th Ave. Both 411 NE 156th and 15606 NE Glisan are currently zoned R2 which is ideal for Garden Court development. The 323 NE 156th property is proposed for a change to R2 on your Comprehensive Plan.

Your plan to change the zoning of 323 N Glisan from R7 to R2 is key to how and if this processes continues for several reasons.

Note: I will attempt to purchase 408 NE 156th if it is rezoned R2. Combining the square footage with my lot at 15606 NE Glisan would yield enough units to make street improvements doable for that side of NE156th Ave.

1. I am committed to multi story flats (Woody Walk-Ups)
 - a. Flats are less of a problem for the aged or handicapped. Negotiating internal stairs all day within a unit. (i.e. bedrooms up and living area down.) is quite an impediment. For these folks.

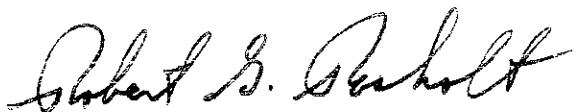
- b. The infrequent trip up or down a flight of stairs to gain access to a unit is desired by many who feel this provides added security. They get on a waiting list to move to a lower unit when it becomes physically necessary
- c. Garden Courts allow for a sense of community to develop. The back yard get togethers that used to exist and welcomed all the surrounding neighbors is restored by a shared back yard (the center court.)experience.

Note: For 45 years we have enjoyed a community that encompasses all ages, many cultures and races. A very positive environment to live in and raise your children. The sense of community that develops results in a stabilizing affect. We are up to 4 generations living here. Many tenants who have left due to job or marriage have come back. Children who grew up here have come back as adults. We have had tenants live here more than 2 decades and one analysis my wife discovered our average tenancy lasted 17 years.

2. We live in a time when ,even with low interest rates on debt, it will cost more to build new units than my existing units are worth.
 - a. This dynamic drives higher and higher density developments that usually fail to achieve affordable units. These virtual mausoleums for individuals still alive merely warehouse people and disrupt adjoining neighborhoods with their cars.
 - b. The ability to stay at the low end of market is achieved in Garden Court Multi-family due to cost savings achieved from low turnover.

3.I started the process to develop this property last spring. I planned to accomplish this with a Planned Unit Development and spread the amenity bonus units I would achieve on my R2 property onto my R7 property and retain an enlarged center court. I was told I would still be limited to only 5 units on my property at 323 NE 156th. This didn't pencil out even before you added the street improvement costs. I was forced to abandon development on 323 NW 156th. I then proceeded with a plan to develop only my existing R2 property and avoid getting involved with the additional expensive street development I could no longer afford.

Your proposed zone change makes it possible to proceed with development of 323 NE 156th. I intend to focus on a transition to 55 and older. This allows Grandparents raising grandchildren and up to 20% non 55 and older tenants. This should eliminate any increase pressure on the Glenfair Grade School from an increase student population, provide increased dwelling units for elderly and handicapped that do not want home ownership and are under served by desirable flats in the available market.



Robert G. Rosholt

409 NE 156th Ave.

Portland, OR. 97230

Portland Planning and Sustainability Commission
1900 SW 4th Ave.
Portland, OR 97201-5380

RE: Concerns about the Portland 2035 Comprehensive Plan

Dear Commissioner:

We are writing to express our concern regarding current the 2035 Comprehensive Plan to change the present zoning classification of Rossi farmland and other under-utilized property from its existing R-3 status, and would urge the City of Portland to instead restrict future construction on these properties to single-family homes (R-5 or R-7). As property owners and residents of the Argay-Parkrose neighborhood, we have become very invested in this community and its surrounding areas over the past eight years, and hope that the area continues to flourish. Subsequently, we have several qualms about introducing either business or multi-family structures into our neighborhood.

Our primary misgiving is a result of the proliferation of existing apartment complexes and industrial buildings in the area. An abundance of apartments already inhabit the space between NE Shaver St. and NE Sandy Blvd., many in various states of disarray; coupled with Garden Crest Apartments on 122nd and multi-family homes on Rose Parkway, further multi-family residences or mixed employment structures designed for industrial or office use will over-saturate the neighborhood. We are particularly apprehensive that the subsequent increase in residents will result in crowded street-parking and make neighborhood roads less safe for pedestrians and motorists alike by decreasing visibility while increasing traffic. Additionally, the lack of sidewalks in many parts of the neighborhood would mean that more street parking would force residents to walk, jog, and cycle closer to traffic. Currently, the Argay-Parkrose area is a safe and pleasant place to walk; on sunny days, people are often seen taking a stroll with their children or dogs. Additionally, the close proximity of Shaver Elementary School, Parkrose Middle School, and Parkrose High School makes pedestrian safety a serious concern. Furthermore, with easy highway access to 205 and 84, commuter traffic on 122nd has become an ever-increasing obstacle to neighborhood residents and emergency vehicles—in fact, NE 122nd has already been classified by the City of Portland as one of the top ten crash corridors (<https://www.portlandoregon.gov/transportation/article/439832>). An influx of new high-density residences or large number of new employees will only exacerbate the problem, and would be particularly unwelcome in a neighborhood that will grow to have limited street parking.

Another concern is the number of vacant commercial buildings already in place on 122nd, approaching NE Airport Way, many of which have been unoccupied for several years. For example, the former Harry's Deli (prior to its relocation to the other side of 122nd) has been "For Lease" for at least four years. The under-utilized Kmart complex has also contributed negatively to the aesthetics of the area. After watching the slow and unsightly decline and abandonment of the former Albertson's on NE 122nd and Halsey St. prior to its demolition and the construction of the Goodwill, we are reluctant to introduce the potential for even more empty (and, consequently, under-maintained) buildings into the neighborhood. Urban blight has not yet made a significant impact on our neighborhood, and it is definitely unacceptable.

Apartments rarely attract long-term residents, meaning that the current, established appeal of the neighborhood could rapidly change with the sudden introduction of a large number of new, impermanent residents. This would have a potentially disruptive influence on the local schools, as the frequent introduction and departure of students could cause social and academic discord. With 90.4% of Shaver Elementary School students receiving free or reduced-cost lunches, and 90% considered economically disadvantaged (according to statistics published in the Oregonian), the school seems ill-equipped to welcome an increase in (temporary) student population. The same holds true for Parkrose Middle and Parkrose High School, whose free lunch and economically disadvantaged student percentages are similarly dire. Furthermore, the self-evident under-performance of these schools as demonstrated by low test scores suggests that adding further short-term students would create an additional burden. Northeast Portland's reputation as a progressive and highly ethnically and economically integrated community is one of its most attractive features, and the balance of a wide range of income levels within the Argay-Parkrose neighborhood is unquestionably part of its appeal. The transitory nature of apartment residency, once increased with the construction of even more multi-family units, would be more likely to negatively impact the existing equilibrium than the aforementioned single-family homes that we would prefer.

It is the nature of neighborhoods to evolve over time, and vitality and liveability are essential to maintaining a healthy community. New construction is welcome here, but the nature of that construction must be in harmony with the existing area. Consequently, the existing multi-family (R-3) and proposed "light-industrial" zoning do not adequately meet the needs of the neighborhood. Therefore, it is most fitting that the City of Portland reclassifies these areas as R-5 or R-7 category for single-family homes.

Thank you for your consideration; we eagerly await the announcement that these changes have taken place.

Regards,

Ross, Valorie, and Amanda Perry
3330 NE 130th Ave.
Portland, OR 97230

To whom it may concern,

We are writing as concerned neighbors to support the reduction of density in East Portland that the Comprehensive Plan suggests. We urge you to make additional zoning changes to reduce density even further. Specifically, we would like you to include our street, 118th between Division and Powell in the list of areas being down-zoned.

Living in the Powellhurst Gilbert neighborhood, we witness daily the negative impacts of inadequate basic services in this part of town. Our roads are not safe for pedestrians, drivers, or bicyclists, lacking sidewalks and sufficient crosswalks. There are not enough parks or community centers for the density of the population. Public transportation options don't currently satisfy the needs of our neighbors. Our neighborhood schools are overcrowded and overwhelmed. The current infrastructure does not support the density we currently have. We hope that the city will work to greatly slow this growth until improvements to infrastructure can be made.

Our street is currently zoned R2.5a, even though neighboring streets are zoned R5 or bigger. It has many historical houses on large lots with grand old-growth Douglas Fir trees. The character of our neighborhood and the value of our homes are threatened every time our neighbors' properties are sold and potentially land in the hands of people who want to subdivide and develop. We are not sure of the reason or history of why our street is zoned differently from the streets to the east and west of us.

We commend the Comprehensive Plan for attempting to address the issues of population density and lack of infrastructure in East Portland. Please consider making even more changes to reduce density, including our street in the rezoning. Thanks for your consideration.

Sincerely,
The Undersigned

Name	Address	Signature
Robert KAHLER	3217 S.E. 118 TH Ave	Robert Kahler
Leslie Talarico	3223 S.E. 118 TH Ave	Leslie
Stephen Karmol	3223 SE 118 TH Ave.	Stephen Karmol
Debby Smith Rumbold	3040 SE 118 TH Ave	Debby Smith Rumbold
Dave Rumbold	3040 SE 118 TH Ave	Dave Rumbold
Donna Bunn	3058 SE 118 TH Ave	Donna Bunn
Randy Nelson	3117 SE 118 TH Ave	Randy Nelson
Judith Neumann	2825 S.E. 118 TH Ave	Judith Neumann
Christy Burza	2719 S.E. 118 TH Ave.	Christy Burza

Patricia Langdon	3315 SE 118 th Ave	Patricia Langdon
Robert DeKlerk	3226 SE 118 th Ave	Richard DeMerkert
Kyle S	3228 SE 118 th Ave	Simon Frumkin
Sarah Frm	3228 SE 118 th	Sarah Frumkin

Allen Field
3290 SE Grant
Portland, Oregon 97214
allen_field@yahoo.com

March 13, 2015

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201
psc@portlandoregon.gov

Re: Testimony on Comprehensive Plan Update Issues

Dear Planning and Sustainability Commission:

This testimony is being provided on a variety of issues relating to the Comprehensive Plan Update.

Neighborhood Center Designation for Belmont-Hawthorne-Division Area

The Belmont-Hawthorne-Division area should be designated as a Neighborhood Center, not a Town Center as proposed in the 2035 Comprehensive Plan Update.

The current Comprehensive Plan Policy Framework focuses on compact development and density defined by transit streets, main streets, town centers, and transit centers. A new policy direction represented in the draft Comprehensive Plan is the Healthy Connected City Strategy, which has at its core, the Complete Neighborhoods Objective: “By 2035, 80% of Portlanders live in a complete neighborhood with safe and convenient access to goods and services needed in daily life.”

This new policy direction is centered on a typology of centers, places of focused activity, services and housing, having varying sizes with differing roles. These include: Major Centers (Central City, Gateway), Town Centers, Neighborhood Centers, Local Centers, and Corner Markets.

Town Centers¹ are defined as having the following characteristics:

- Serve a broad area of the city and a number of area neighborhoods and districts, with some regional function;
- Substantial employment component;
- High-capacity transit/light rail;
- Room for 7,000 households;
- Mid-rise scale buildings (5-10 stories tall); and
- Play an important role in accommodating growth

Neighborhood Centers have the following characteristics:

1 “Town Center” and “Neighborhood Center” definitions are from the Comprehensive Plan Update Proposed Draft Summer 2014, Section II - Urban Design Framework, January 2013, page GP3-11 to GP3-12.

- Smaller centers that primarily serve adjacent neighborhoods;
- Frequent bus service;
- Room for 3,500 households;
- Low-rise scale buildings (3-5 stories tall); and
- “Neighborhood Centers have a central role in helping us achieve more “complete communities” – where Portlanders have the option of meeting many of their daily needs within walking distance of home.” Comprehensive Plan Update: Working Draft (January 2013), page II-4.

The definition of “Neighborhood Center” is a more accurate description of the Belmont-Hawthorne-Division area. This area primarily serves the adjacent neighborhoods, not a broad area of the city, it does not have a regional function; it has frequent bus service but not high-capacity transit or light rail; it has room for 3,500 households but not 7,000 households (in 2010 there were 4,000 households with a housing capacity of 6,200 households²) and there are low rise buildings 2 - 4 stories tall, not 5 - 10 story mid-rise buildings.

Historic Resources

The city should update the historic resources inventory to analyze key historic resources in Richmond and identify buildings which may warrant preservation. The existing historic resource inventory has not been updated since the mid-1990’s.

Preserving the Division Main Street Overlay

The Division Main Street Overlay should be preserved and expanded. The current Mixed Use Zones Project should not eliminate the Main Street Overlay when new mixed use zones and standards are adopted. This Overlay is one of the few existing frameworks that provide for context-specific design standards for Division Street and other main street corridors.

Much of Division St. is designated under the proposed CM2 zoning, which would allow structures up to 35'-45' to possibly 55' with amenity bonuses (or 3/4 to 5 stories). This would eliminate the current 4-story height limit established in the Division St. Overlay in 2006 and amount to an up-zoning on Division St, which has experienced intense development the past few years, adding approximately 500 new apartment units and another 120+ units are planned at SE Division and 50th Ave.

Further exploration of retaining and amending this Main Street Overlay should be considered as a

² Households figures are from US Census 2010 and ESRI Business Analyst , as listed in BPS’ July 18, 2012 Neighborhood Centers Study Areas.

means of increasing more neighborhood specific design standards for the special and often neighborhood-defining character that exists along main street corridors in Portland.

Increased Neighborhood Notification

The notification requirements for new developments should be strengthened to include a broader notification area, as well as earlier notification to the community.

Current notification requirements are too open-ended and often do not allow adequate time or notice to affected community members to have meaningful or timely input. A visit to the community by developers in the conceptual phases of a project proposal, as well as earlier visits to the neighborhood association prior to submittal for permits, would facilitate more effective community input, help reduce conflicts, and support opportunities for creative solutions to be identified and negotiated to meet the goals of both the neighborhood and the project applicant.

Three-Story Height Limit on SE Division St.

There should be a three-story height limit on SE Division for those properties that are not already four-stories.

There is significant community backlash against the extensive development that has changed the look and feel of SE Division in just a few short years. There have been eight 4-story apartment buildings built the past 2 years between SE 31st Ave and 39th Ave/Cesar Chavez Blvd and a new 27-unit, 4-story apartment building (without parking) is planned for 3021 SE Division. In addition, a 72-unit building, without parking, was recently completed at SE Division and 48th Ave. and a 120+-unit building, with parking, is planned for SE Division and 50th Ave.

This backlash has been frequently expressed at RNA meetings, including Land Use meetings, and has been voiced through an online survey created by the Division Design Initiative (“DDI”).³

The Division Design Committee, in partnership with Portland State University students, developed a “Division Perceptions Survey” (<http://divisionperception.suprmap.org>) to get a

³ The DDI is a project of the inter-neighborhood Division Design Committee (DDC), initiated to make recommendations for addressing community design concerns and to inform future development patterns and planning along Division. Formed in spring 2014, the DDC includes representatives from key neighborhood and business organizations in the inner SE Division community (RNA, HAND, Division Clinton Business Association, SE Uplift, South Tabor Neighborhood Association, and Sustainable Southeast). The DDI is currently drafting design guidelines for SE Division from SE 11th Ave. to SE 60th Ave. This project furthers the work of the Division Vision Coalition and the 2006 Division Main Street/Green Street Plan. The design guidelines are expected to be completed by summer 2015.

“better understanding on how the residents along the Division Street corridor feel about the rapid changes that have taken place in the last 18 to 24 months, design preferences, and their vision for the future of Division.” In the survey, 83% of respondents expressed a preference for 2 and 3 story buildings, while 90% overall stated a preference for “smaller” buildings.

Mixed Use-Dispersed Designation for SE Clinton St.

The proposed Comprehensive Plan designation for the business nodes on SE Clinton St at 16th, 21st and 26th Aves. (“Clinton business nodes”) should be revised from Mixed Use-Urban Center to Mixed Use-Dispersed.

The current draft of the Comprehensive Plan proposes to designate the Clinton business nodes as MU-Urban Center. Such designation “is intended for areas that are close to the Central City and within Town Centers where urban public services are available or planned including access to high capacity transit, very frequent bus service, or streetcar service,” and will allow development that will be “from low-rise to mid-rise in scale.” Comprehensive Plan Update at GP10-12. The Mixed Use Zones Project currently lists the corresponding commercial zones for this designation as CM1, CM2, CM3, and CE. CM2 would allow structures up to 35’-45’ to possibly 55’ with amenity bonuses (or 3/4 to 5 stories), and CM 3 would allow structures up to 45’-65’ to possibly 75’ with amenity bonuses (or 4/6 to 7 stories)⁴. Though CM3 is not presently planned for Clinton or Division, property owners in a CM2 zone could petition to up-zone their property to CM3.⁵

The MU-Dispersed designation is much more appropriate for the Clinton business nodes. Such designation allows development that is “small in scale, have little impact, and provide services for the nearby residential areas. Development will be similar in scale to nearby residential development to promote compatibility with the surrounding area.” Comprehensive Plan Update at GP10-11. MU-Dispersed would allow only CM1, which would allow structures up to 35’ (or 3 stories). (There is no CG zone at these nodes, which would correlate to the new CE zone.)

The defining character and charm of the Clinton business nodes is the small scale and older buildings at these sites. Allowing a MU-Urban Center Designation would likely lead to development that is of a much greater scale than the businesses and nearby residences at these nodes, development similar to what has been occurring on SE Division. Using the Comprehensive Plan definition for MU-Urban Center, these nodes are not within any UDF designated Town Center.

Another concern is the impact that such designation would have on the Clinton Bike Boulevard,

⁴ Mixed Use Zones Project: Preliminary Zoning Concept – DRAFT, p.3, November 5, 2014.

⁵ At the RNA meeting, Marty Stockton. BPS Southeast District Liaison. explained that BPS staff is considering adopting approval criteria for up-zoning property from CM2 to CM3. The Board expressed interest in having such criteria and will further explore this issue at its March meeting.

which is already being impacted by the growing density and conflict of use along Clinton. Allowing CM2 and possibly CM3 zoning and the corresponding development along Clinton would have a huge impact on the Clinton Bike Boulevard.

Request for Design Overlays

There should be Design Overlays MU-Urban Center designations, historic streetcar routes, and main streets.

Prioritize Pattern Area Standards

The City should prioritize the Pattern Area Standards project for 2015 in its staff work plans and budget, and not wait for final approval of the Comprehensive Plan in 2017, and these Standards should incorporate the current guidelines of the Boise-Elliott Neighborhood Association and the forthcoming design guidelines of the DDI.

The DDI is currently creating design guidelines for SE Division from SE 11th Ave. to SE 60th Ave. This project furthers the work of the Division Vision Coalition and the 2006 Division Main Street/Green Street Plan, and is the result of a year of public meetings, research, design tours, surveys, and community outreach and engagement events. The design guidelines are expected to be completed by summer 2015.

SE Caruthers between SE 35th Pl. to 38th Ave.

The Long Range Comprehensive Plan Designation for SE Caruthers between SE 35th Pl. to 38th Ave. should be changed from a Commercial designation to R5, or at a minimum to R2.5. This area is currently zoned R5 and consists of single family residences. These properties have a Comp Plan designation of “Urban Commercial”, which will be renamed “Mixed Use – Urban Center”.

A petition signed by most of the residents on SE Caruthers in the subject area favor changing the designation to R5. This area of Caruthers (which is one block north of Division), from 35th Pl to 38th, is the only portion of Caruthers that has a Commercial Comp Plan designation. Allowing commercial development to occur on Caruthers would not be well suited for this street; such development should be isolated to Division St.

Very truly yours,



Allen Field

March 13, 2015

Portland Planning & Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, Oregon 97201

Dear Members of the Planning and Sustainability Commission,

The Board of the Hosford-Abernethy Neighborhood District Association (HAND) appreciates all the staff and volunteer work that has gone into preparing the draft Comprehensive Plan, and of your thoughtful efforts to review the many comments from the public.

The HAND board has been on record for several years regarding our concerns about climate change and the need to decrease our collective carbon foot print, as well as support of the Urban Growth Boundary. We look forward to continuing to play a part in the region's efforts to address those issues. There is recognition of the need for increased density, increased use of alternative forms of transportation, and decreased use of the automobile as tools toward that end.

We are pleased with much of the language in the Plan, but find ourselves concerned about how some of the policies will be implemented.

Our comments below address the portion of HAND located east of SE 12th Avenue, primarily residential and commercial in use. The portion of HAND between the Willamette River and SE 12th Avenue is included in the Central Eastside Industrial District and addresses in the SE Quadrant segment of the Central City 2035 Plan.

Zoning

We support neighborhood-scale commercial endeavors already in place without adding significantly more automobile traffic on a major bikeway. We would request that the lowest-intensity commercial zoning (CM-1, Commercial Dispersed) be applied to sites of existing buildings in commercial use within nodes along SE Clinton Street at SE 16th, 21st, 26th, 34th, 41st Avenues with surrounding residential zoning remaining unchanged..

Similarly we support the requested zone changes from R1 to CM2, Commercial Mixed Use along the south side of Hawthorne Boulevard between SE 12th and SE 30th Avenues, again to support the businesses that are there now, and to allow additional housing to develop over time.

We support the proposed change to CM-1 for the commercial property on Ladd Circle currently zoned R5.

Some of the most affordable housing in HAND is located near the southwestern edge of the neighborhood, within a few blocks east of 12th Avenue between SE Division Street and the Union Pacific Railroad line. Many

of these homes are century-old, predating the current EG1 zoning designation, and, exist under conditional-use status. Under current Comp Plan proposals, housing in EG1 zones would be prohibited, leaving owners potentially unable to obtain financing for a major remodel or a sale of their houses to another homeowner. We would like to obtain protection for these more affordable houses while curtailing future residential development in the EG zones. We hope this important consideration will be heard.

We have not had an opportunity to discuss a proposal to change the zoning on the parcel near SE 15th and Clinton from R2.5 to Mixed Use.

The affordability of residential and commercial properties in our community remains an area of great concern for our neighborhood. We appreciate the work of Tom Armstrong and Lisa Bates on the gentrification matrix, but we would like to see more tools being actively employed to address this issue. We wish to keep HAND a mixed income neighborhood and do not wish to see it written off as already gentrified and beyond help.

Guiding Growth

We think every neighborhood should have a meaningful way to guide growth and development within its area, which cannot be done with a general one-size-fits-all plan or zoning. We support a range of housing types, context-sensitive infill, and the adaptive reuse of existing buildings that will allow us to preserve district identities while increasing densities. However, to accomplish this we need new tools to encourage better quality design and construction along with appropriate regulations and incentives to encourage preservation and adaptive reuse, such as a design review overlay, pattern area standards, a neighborhood or area plan, or a similar mechanism.

We prefer the use of the “Inner Ring” concept to guide future growth in our area rather than a Town Center designation that spans the inner Eastside corridors (Belmont-Hawthorne-Division). Because of the linear nature of the corridors it is difficult to create a “center” that spans multiple blocks without impacting the differing patterns of the surrounding neighborhoods. Instead of trying to get neighborhoods with divergent opinions to agree on just what type of “center” should go where — before BPS does a plan for the area — we would suggest that BPS do an Inner Southeast Plan first, complete with design guidelines. This approach would help neighbors and businesses to agree on how to create a shared vision for incorporating future growth, while preserving some of the small-town feel that currently exists on the east/west commercial corridors. We suggest a place to start a SE Plan could be the area along and around Cesar Chavez Boulevard, which has received scant planning attention to date.

As the Comprehensive Plan specifies, future development should take into account neighborhood context, solar access, and the preservation and/or adaptive reuse of historic buildings. The latter cannot be accomplished if we do not update the Historic Resources Inventory as soon as possible. In addition we would ask that public view corridors be considered in development schemes. Such corridors have not been updated since 1989, and on the Eastside none have been identified east of 12th Avenue. It would be nice to avoid situations like the partial loss of views of the Hollywood Theater marquee as a result of a neighboring development.

We are concerned with the mass and scale of the new development along Division in the Richmond neighborhood. In order to reduce the "canyon effect", we would request that heights of buildings be tied to street width, and that narrower streets like Division and Belmont Streets have lower height limits (38') than would be appropriate for larger, wider streets such as Hawthorne or Powell Boulevards. We are not opposed to adding additional floor(s) using a bonus system that encourages community amenities, such as affordable housing, plaza spaces, green space, extra green features, but believe there should be rules regarding set-backs and step-backs of additional floors above the base height to avoid loss of light, air and view for existing lower buildings. The surrounding community should be consulted the propriety of planned amenities and the amount and design of added height.

Infrastructure Needs

To successfully accommodate the projected increase in population expected in the next twenty years, HAND, not for the first time, emphasizes the need for more open space areas, community gardens, and a community center for inner Southeast.

We question the Mixed Use Zoning Committee recommendation that landscape standards be reduced in the inner neighborhoods. Corridors without a tree canopy or other greenery tend to function as heat islands. We need more and/or larger trees, rather than fewer and smaller ones. Where there is a requirement to build to the lot line we recommend looking for creative ways to add greenery. Consider green walls and roofs, and creating space for trees.

We must find a way to align increased density more closely with infrastructure development than our city has done in the past. Recalling that it took over 10 years to redo the streetscape on SE Division, and the effects of that project, it would be unfair to ask neighborhoods to take on additional growth without the streets, transit and open space to support that growth. And, of course, the right mix of goods and services is essential..

Public Involvement Concerns

We advocate for a requirement that neighborhoods be given notice of large-scale commercial or mixed-use development proposals in their neighborhoods and the opportunity to meet with developers whether or not a land use review is required. The notification and meetings with developers should occur both at the pre-app stage, and again when the developer is ready to apply for required permits. Such meetings can provide opportunities for meaningful communication between developers and residents, and often lead to better projects for all concerned. Following such meetings a list of suggestions and concerns should be compiled and the architects/developers should be asked to supply a written response as to how the concerns and ideas will be addressed.

We are proponents of a robust, freestanding, advisory body that is adequately funded and supported to oversee public involvement during the ongoing implementation of the Comprehensive Plan. Many of our comments indicate we are concerned about the lack of appropriate tools and safeguards for implementing the Plan's Goals and Policies.

As timing and structure allow, members of the HAND board have been participating in the work of the Mixed Use Zoning Committee, which could have significant impacts on our neighborhood. We hear rumors of work on pattern area standards, special considerations for “Inner Ring” neighborhoods with regard to design standards, and historic preservation, the potential creation of area-based “Design Review Commissions” to review large scale development proposals, and other concepts, any or all of which could become effective when the plan is adopted in 2017, but there is no guarantee.

These ideas all seem to have merit, but there is a dire need for a better system of design guidance before 2017. Judging by what has occurred on SE Division in just the past two years, more of our neighborhoods could see major changes in character in the immediate future while the community (neighborhood and business associations), lacking any meaningful tools to respond to and shape proposed development, are shut out of the process. There has to be a way to address this dilemma before final adoption of the Plan by the State LCDC in 2017, even though such measures may be stop-gap in form and would be superseded when the final plan is adopted.

In Closing

We applaud the Comprehensive Plan’s emphasis on moving our city toward a more equitable future. We do consider an increase in green space, transit, access to goods and services, and community gathering spaces that are close (walkable) to residential areas as key strategies for reducing our carbon footprint. However, although these ideas are reflected in the draft Plan we lack confidence in the City’s ability to implement them without undoing many of the very things that currently make significant contributions to the livability of our neighborhoods.

We would especially like to express our appreciation for the support we have received from Marty Stockton, our Liaison Planner, for helping us navigate the Comprehensive Plan content and process.

Thank you for considering our recommendations.

Sincerely,

Susan Pearce, HAND chair

March 13, 2014

To: The Planning and Sustainability Commission

When I compared the current Comprehensive Plan to the proposed Draft of the 2035 Comprehensive Plan, I found a stark contrast. The layout of the Current Plan is more straightforward than the Draft Plan. The way the Current Plan lists each goal and then follows it with its related policies makes it clear how the goals are meant to be reached. I recommend that the policies in the 2035 Plan be listed individually and followed by their applicable policies.

This issue of verifying progress towards achieving goals is rarely addressed in the Draft Plan. I recommend that metrics be added for each goal. It is my understanding that such metrics exist and that they are included in standard best practices for urban planning. This would provide a tool for informing the periodic review and amendment process.

Finally, I recommend that the contents of the 2035 Plan be edited to remove language from the beginning of each chapter that might offensive to the reader, such as "What is this chapter about?" or "Why is this important?" I find this language presumptuous and even condescending. I suggest removing these introductory paragraphs entirely because it is confusing whether they are opinion or whether they are actually part of the plan and therefore carry weight in its application.

Please add this to the record.

Thank you,

Carol McCarthy
4311 SW Freeman St.
Portland, OR 97219

Your Last Chance to Help Decide the Future of Argay

The City of Portland Comprehensive Plan is the master development plan for the City for the next 20 years. Now being revised, it will determine how all of the yet to be developed land areas in Argay will be zoned and developed in the future. Current City plans are for office buildings, warehouses, repair facilities, and more apartments to fill these areas. Single family homes like those now in Argay would not be allowed. Your Argay Neighborhood Association disagrees and wants to see Argay continue as a family friendly neighborhood of primarily single family homes.

Under any plan, Argay's family farms can continue. Only when farming ends and new development takes place will the actual zoning direct how those lands will be developed. The City now proposes that the area at the southeast corner of 122nd and Shaver be developed with office and light industrial properties and with apartments (all up to three stories high) to the east and south – right up to the new Beech Park. The proposed new plan also designates the area from NE 147th west to the backyards of the existing homes in Argay for offices and light industrial uses, as well.

The Argay Neighborhood Association has met with planners and has submitted the official Neighborhood Association hearing testimony. Other residents have submitted their comments. Even if you disagree with the Argay Neighborhood Association and support the City's changes, you have a right to comment. Either way, make your voice heard!

Below is a sample comment. Write your own or use what is there. The Comprehensive Plan email address and regular mail address are provided. The more people who comment, the more the City has to listen. The Comment deadline is March 13, 2015; but the sooner the better. To prevent "loading" or "skewing" the results and because these comments are treated as hearing testimony, the City wants to be able to verify that each comment comes from an Argay resident or property owner and only one comment is received from each person. That is why they need your name and address.

For more information check the ANA website at: www.argay.org under the "Comp Plan" or "Land Use" headings or contact Al Brown, ANA Land Use Chair: Email: alanibrown@msn.com or by phone: 971-271-8097.

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 R-3 zoned land in the Argay Neighborhood be reclassified to R-5 or R-7 single-family residential, and the proposed Mixed Employment areas (Change Numbers 287, 288, 289 located at the SE corner of NE 122nd and Shaver and 290, located at the SW corner of NE 147th and Sandy Blvd.) also be reclassified to R-5 or R-7 single-family. Also, I support the City's similar change #688 along NE 148th Avenue north of I-84.

X I want to keep Argay a family friendly neighborhood

Name:

Mary A. Carroll

Address:

13838 N.E. Miller 97230

Very limited housing choices already -

NE 140th AVENUE NORTH OF I-84.

I want to keep Argay a family friendly neighborhood.

Name: JoAnne Heintz-Ling

Address: 14325 NE Fremont Ct

48 yrs

EDWARD F. WAGNER
1836 N. W. Couch Street
Portland, OR 97209

to:
BUREAU OF PLANNING AND SUSTAINABILITY

10-MAR-2015

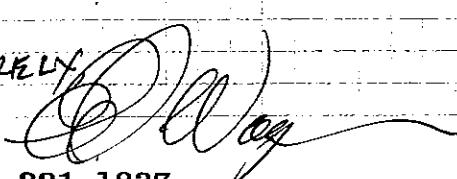
RE: 2035 COMPREHENSIVE PLAN

I HAVE OWNED THE SINGLE FAMILY RESIDENCE (SFR) @ 2728 S.W.
MONTGOMERY DRIVE, PORTLAND, OR FOR OVER FOUR DECADES.

MY CONCERN FOR THE 2035 COMPREHENSIVE PLAN ARE FOCUSED SPECIFICALLY
ON THE WEST HILLS NEIGHBORHOODS (I.E. PORTLAND HEIGHTS, RILL HILL, ARLINGTON
HEIGHTS, KINGS HEIGHTS, ETC.). SPECIFICALLY, THE STROHECKER'S GROCERY SITE
IS BEING CONSIDERED FOR MODIFICATION FROM "COMMERCIAL ZONE" TO "COMMERCIAL
W/MIXED-USE". THIS MUST NOT LEAD TO MEDIUM OR HIGH DENSITY HOUSING
OR OTHER ABUSES AS WE SEE ON PORTLAND'S EAST SIDE. DEVICES & STRATEGIES
THAT HAVE LED TO THE DEVASTATION OF TRADITIONAL EAST SIDE NEIGHBORHOODS MUST
NOT BE PERMITTED ON PORTLAND'S WEST HILLS!

WE ARE OPPOSED TO THE STRATEGIES & MEASURES OF THOSE WHO
WANT PORTLAND TO EMULATE BOSTON OR NEW YORK CITY. THOSE
ADVOCATES SHOULD MOVE TO THOSE REGIONS & LET PORTLAND REMAIN PORTLAND.

THE 2035 COMPREHENSIVE PLAN MUST INCLUDE LANGUAGE & STRATEGIES
TO NURTURE AND PROTECT OUR ~~OUR~~ TRADITIONAL NEIGHBORHOODS AS "HISTORICAL
HERITAGE NEIGHBORHOODS" - RARE TREASURES IN PORTLAND'S URBAN FABRIC;
TOTALLY EXEMPT FROM ALL ATTEMPTS TO DIMINISH THEIR INTEGRITY. SPECIFIC
LANGUAGE MUST PROHIBIT MEDIUM OR HIGH DENSITY HOUSING IN SFR
AREAS SUCH AS PORTLAND HEIGHTS AND ESPECIALLY THE STROHECKER SITE.
DEMOLITION, McMANSIONS, SHORT-STAY HOME HOTELS AND OTHER ALIEN ATROCIITIES
MUST BE FORBIDDEN.

SINCERELY


YOUR FIRST & GREATEST
CHALLENGE MUST BE: TO STOP
DOING HARM TO OUR BEAUTIFUL
Portland, OR.

(503) 221-1837
RES: (503) 228-0007

Rodger Eddy
2582 NW Lovejoy Street
Portland, Oregon 97210
Phone (503) 223-3606
March 10, 2015

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

Dear Members:

Carol McCarthy's article in the Tribune today inspired me to comment to you with another objection to the trend of government in destroying Portland's livability and attraction to those who continue to swell its population.

Virtually unlimited building heights are destroying the pleasant scale of Portland's skyline that was once ruptured only by the monstrosity bank buildings. And yet the city council with a single exception is willing to denigrate Portland's tone-setting bridges with high rises.

No-parking garages, and unlimited height apartment buildings will add no charm, but will allow more "rats in the maze." To echo McCarthy, where exactly is the "sustainability" in the plans. Giving developers the inside track, and providing subsidies to those who reduce the quality of Portland, are historic failures that are proliferating. Where is the effort with planning to reduce (and why not eliminate?) the homeless problem with an isolated and inconvenient shelter city rather than the city's obsession to keep the attendant repulsive problems in the inner city for some undefined convenience.

If the city really desires sustainability, why are not local jurisdictions not protesting the burgeoning legal and illegal immigrant problems dumped on us by federal fiat? Historically, small immigrant populations are assimilated, but now floods of immigrants challenge our very heritage.

As an 85 year old native Portlander and college graduate, I grant that Portland is an attractive destination and must accommodate growth. Please heed Tom McCall's prescient admonition for folks to visit Oregon. Let's not subsidize growth for tax base, nurture faddish alternative transportation and energy sources, and destroy our history by demolishing commercial and residential buildings for quick profit.

I am for free enterprise and a healthy economy, but cannot see how gruesome growth benefits us. Many European cities have preserved their attractiveness and density without sacrificing pleasant and controlled-height skylines. Our vital neighborhoods of Belmont, Mississippi, Broadway, Sandy have thrived because of their charm, and have preceded the resultant density by opportunistic developers. For my children and grandchildren, save the city.

Sincerely,

 Rodger Eddy

Ord. 187832 Vol. 2.3.B, page 14262

University Park Neighborhood Association

Along trail, change request from IG2 to OS.

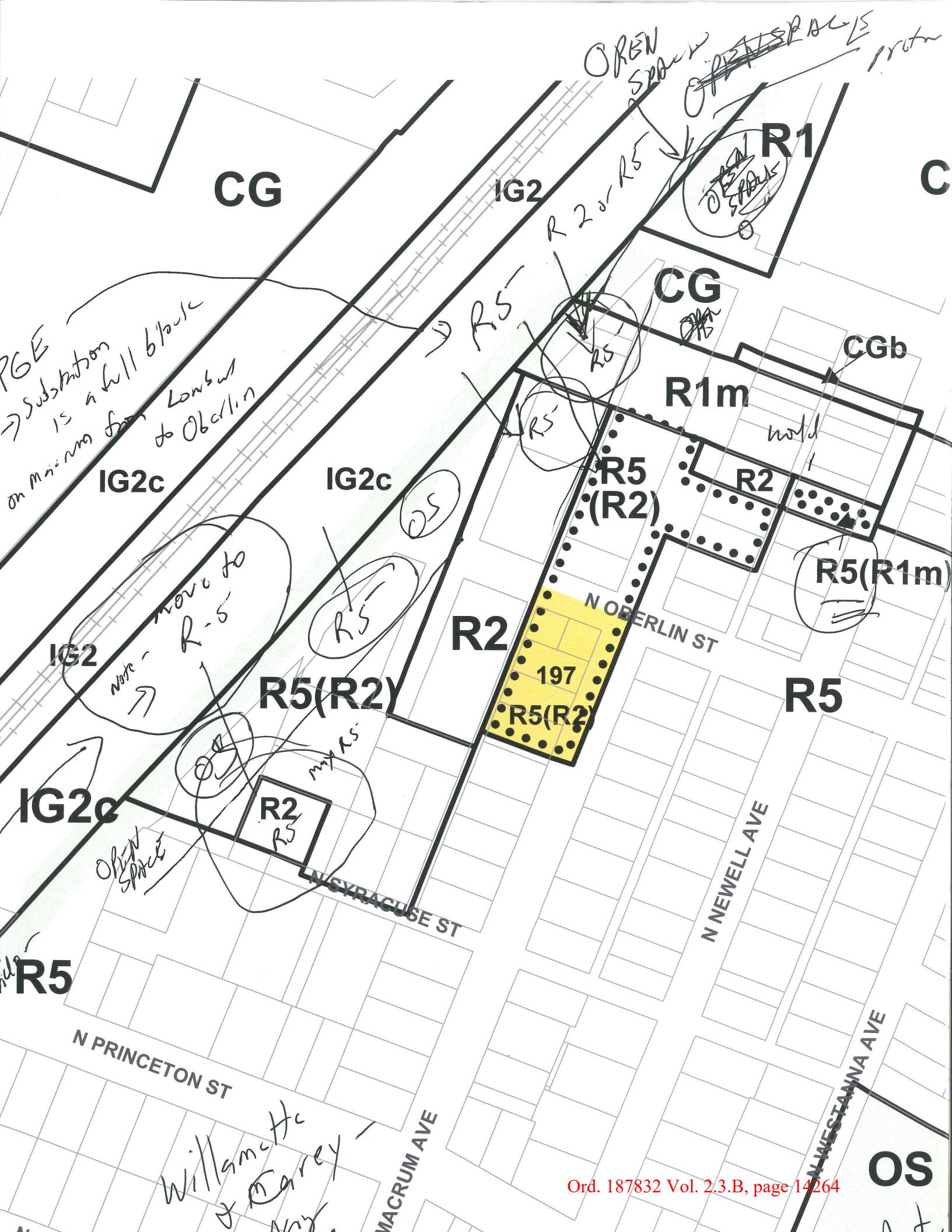
PGE site west of substation, change request from R1 to R2 or R5.

PGE site west of substation, change request from R2 to R5.

Water bureau land site east of trail on N Syracuse, change request from R2 to R5.

Privately owned properties from N Macrum east to N Newell, change request from R2 to R5.

Privately owned properties from N Macrum east to N Newell, change request from R2 and R1 to R5.



From: BPS Mailbox
Sent: Friday, March 13, 2015 9:17 AM
To: Planning and Sustainability Commission
Cc: Lum, Leslie
Subject: FW: Comprehensive Plan Testimony

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

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Subscribe to the [BPS Enews](#)
Like us on [Facebook](#)

From: David Littlewood [<mailto:davidltx@gmail.com>]
Sent: Friday, March 13, 2015 9:07 AM
To: BPS Mailbox
Subject: Comprehensive Plan Testimony

ATTN: Leslie Lum

My name is David Littlewood, I own the property on NE Levee Rd, listed as Property# R171714 on Portland Maps. I support the attached proposal for an R-20 zoning change request of my residential farming property by removing the Industrial Sanctuary designation. I believe this offers the most realistic way to find a creative, future balance that truly respects residential livability and real biodiversity of natural habitat, both of which are grossly undermined now when there has been no attempt to address the past planning/development failures that led to such relentless, negative impact produced by 24-hour trucking operations

While I do not personally stand to benefit to the proposed r20 zone change request, as I am only permitted a single family residence by the conservation easement held by The Wetlands Conservancy on my 2.16 acres zoned residential farming, I do believe it offers an opportunity for a group of property owners in a unique area of Portland to begin a conversation on how to find a solution to what I have witnessed from afar to be an incredibly disheartening and lack of good faith effort by the City of Portland to respect residential property rights or conservation values.

My late wife and I bought this property for our family when my stepson bought the property at 8850 NE Levee Rd. He grew up near an airport in a ranch house with mimosa trees and a green space to explore as a kid. Needless to say, he was thrilled to find the same experience for his kids. Airport noise with its somewhat limited hours and doppler effect was par for the course with the windows open in our Austin home without AC. My understanding is the nearby trucking noises from two trucking yards that occurs at all hours with no doppler effect, means leaving the windows in his home invites explosive and disruptive noises, often even when closed. In short, I know he has struggled with finding a partner in the City of Portland with enforcing noise issues and that engaging planning or development staff has been similar battle where there is no one who embraces the concept of public service in address the situation.

So, Justin has informed me of this seemingly simple change request. He shared that the last land use planning process, (Airport Futures?), resulted in wetland delineations on this wetland parcel but not on the nearby industrial one owned by Oak Harbour which the drainage district staff verified flood ours and a nearby horse pasture owned by the Ron and Sally Beck. So, when Justin does work as the local steward of this property, he gets subjected to 70db semi honks for 5+ seconds or explosive hitching while weeding the weeds that come from the same trucking yard's non-wetland property that floods mine? Justin, also tells me that in his communication with planning staff that although our conservation easement prohibits industrial use, that you claim this as part of your available industrial inventory? Please help me understand how

2.16 acres is part of your industrial inventory when it is prohibited by a conservation easement or even the wetland delineations you put on only our property and not theirs that make it illegal to build an earthen weir to keep Oak Harbour from flooding our property?

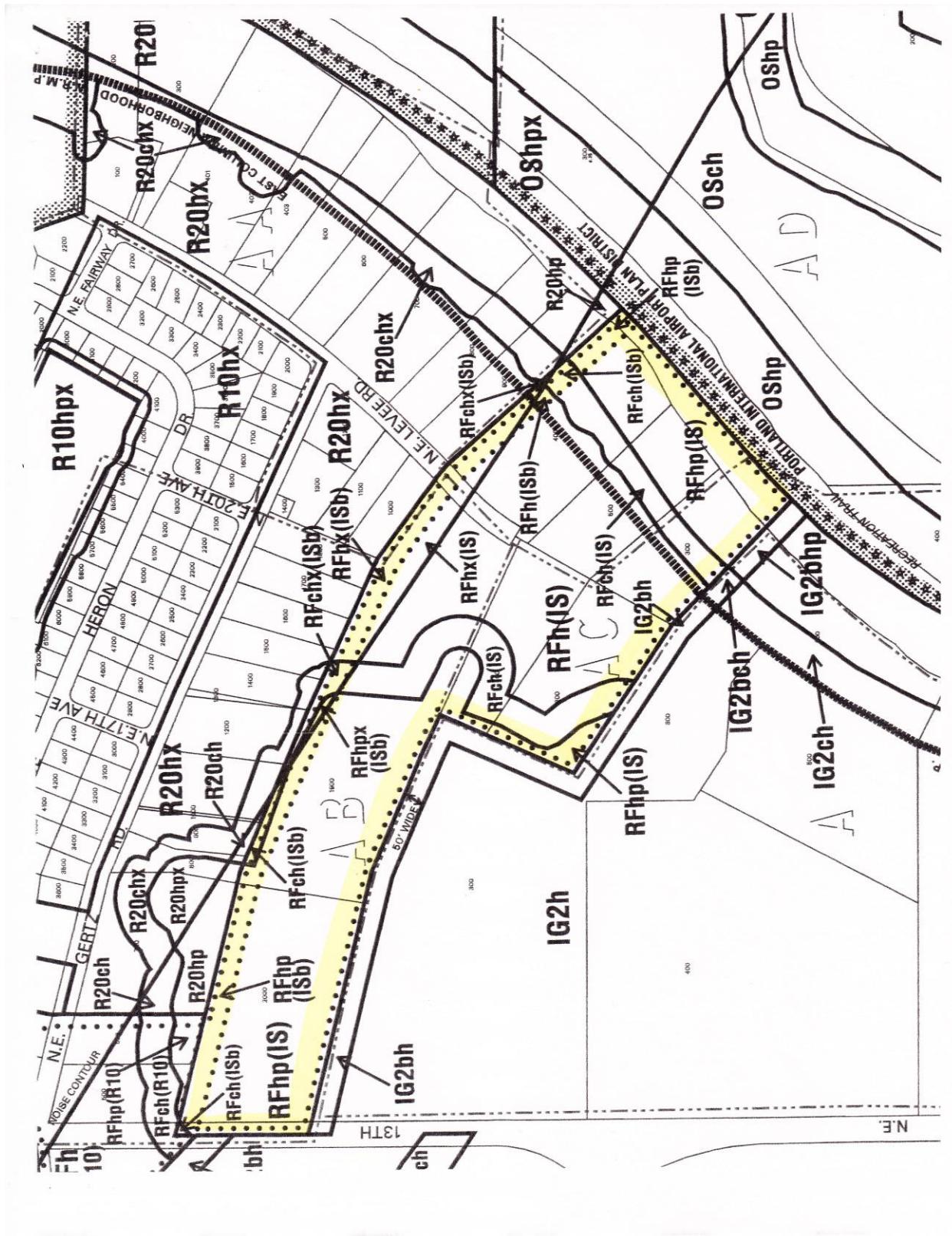
--

David Littlewood
4103 Lullwood Rd

Austin, TX 78722-1115

home phone: 512-451-4760

cell phone: 512-451-2344



"Land Use Request" for Plan Map Designation Change from Industrial Sanctuary to Residential (R-20) as Part of the Comprehensive Plan Update

Location: East Columbia Neighborhood; abutting or using access to NE Levee Road and unimproved NE 13th Avenue

Property IDs: R171711 (9009 NE Levee Rd); R171707 (9000 NE Levee Rd); R171713 (8855 NE Levee RD); R171708 (8916 NE Levee Rd); R171709 (8850 NE Levee Rd); R171714 (vacant, no address); R171716 (vacant, no address, same ownership as abutting lot R17119 to the north)

Existing Zoning: RFhp (RF: Residential Farm/Forest, h: Aircraft Landing Overlay Zone, p: Environmental Protection Overlay Zone); RFch (c: Environmental Conservation Overlay Zone); RFhpX (x: Portland International Airport Noise Impact Overlay Zone); RFchx; RFhx; and RFh

Existing Plan: IS: Industrial Sanctuary; ISb (b: Buffer)

Considerations:

- I. "Change in Circumstances" since enactment of the Industrial Sanctuary Designation
 - A. In 2011, as part of the Middle Columbia Corridor/Airport Natural Resources Inventory, this area received substantial coverage of the Environmental Overlay Zoning of "p" protection and "c" conservation (see zoning map included). That map shows the "p" and "c" overlay zones covering: approximately one-half of four of the properties; one-third of one property; two-thirds of one property; and all of one property.
 - B. The extensive coverage of the "p" overlay zone is important for future development potential. As characterized in the Zoning Code website "Zone Summaries": "The Environmental Protection zone provides the highest level of protection to the most important resources and functional values. . . . Development will be approved in the environmental protection zone **only in rare and unusual circumstances.**" [Emphasis added]. The environmental zoning appears to have taken the majority of this area out of potential development in the future. As such, any development, in particular industrial development with its large buildings and extensive paving associated with heavy truck traffic, would not be anticipated to be approved or occur in the majority of this area with the Plan designation of Industrial Sanctuary.
 - C. The portion of the lots not covered by environmental zoning is where there are five houses with a total improvement value of over \$655,000. A reasonable expectation is that these homes outside the environmental zoning would be less likely to be developed for industrial uses due to the existing improvement values and the relatively small acreage not in the "p" or "c" zones.

II. R-20 Zoning Request

- A. R-20 zoning would match and be compatible with the zoning to the immediate north.
- B. R-20 residential zoning would protect environmental resource values by not developing those areas and yet add a few additional new home sites concentrated in the area of NE Levee Road outside the “p” and “c” zones. In addition, there could also be the possibility of application by individual property owners for small Planned Development lots located outside the environmental zones. A Planned Development can result in a lot density closer to the development potential of their entire property.
- C. A buffer between industrial and residential uses already exists in the abutting industrial zoned (IG2h) property to the south. Along the industrial property’s northern boundary is a 50-foot wide buffer strip zoned IG2bh. The “b” buffer zone was a condition of approval of the industrial development and was enacted to serve as a “buffer” to reduce adverse effects between incompatible land use attributes, such as noise, lights, and views.
- D. It is recognized that there is a “need” to maintain adequate planned areas for future industrial growth. However, continuing to include this area in the inventory of acreage to fulfill future industrial need could be viewed as representing a false acreage number in that inventory. That is because the majority of the acreage is covered by undevelopable environmental zones and, except for one smaller lot, the remaining acreage is already developed with housing, significantly reducing the conversion to industrial land use.

III. Transportation and Access Issues

- A. The homes in this area gain access to the public road system only through NE Levee Road to NE Gertz Road, which are both narrow, two-lane, local streets without full improvements. There is no outlet to the east because of a major drainage slough; to the west, NE Gertz Road contains a major truck barrier (tight radius traffic circle) constructed to keep large industrial truck traffic from the nearby residential neighborhoods; and NE 13th Avenue is posted with “no truck” signs at NE Marine Drive. Therefore, there is no legal large truck traffic route to this area from the north.
- B. The industrial property to the south has existing frontage and access necessary for truck traffic on a portion of NE 13th Avenue south of the unimproved part of NE 13th which effectively disconnects the industrial traffic from the residential streets to the north. To the west, the industrial road system connects via NE Fazio Way and NE Gertz Road, to NE Vancouver Way.
- C. In summary, the road system to the north of this area does not allow industrial truck traffic and the property owner to the south does not appear to have the incentive to provide a road system through the property to reach the small developable (not environmentally zoned) part of the subject ownerships.

IV. Environmental Zoning Placed on Industrial Sanctuary Planned Properties Was Contrary to Directives to the City of Portland in the Gunderson, LLC vs. City of Portland LUBA Decision (affirmed by the Oregon Court of Appeals and Oregon Supreme Court)

- A. In January 21, 2011, three months before the “Airport Futures” Comprehensive Plan Update and associated zone changes were adopted in April 2011, the Land Use Board of Appeals (LUBA) ruled that the adopted environmental restrictions (in this case Willamette River Greenway zoning provisions) placed on industrial properties In the “North Reach River Plan” were overturned because such environmental restrictions in effect reduced the amount of industrial lands without taking that reduction into account in accordance with Division 9 Administrative Rules for Statewide Planning Goal 9 Industrial Development. The Gunderson vs. City of Portland LUBA decision stated on page 11, lines 13 through 24 the following:

Because the likely result of applying the new regulations is that the city's supply of land potentially available for new or expanded industrial development would be effectively reduced, perhaps significantly so, it is incumbent on the city to consider the impact of such potential reductions on the city's industrial land supply and determine, based on an adequate factual base, whether any such impacts on the inventory are consistent with the city's Goal 9 obligation to maintain an adequate supply of industrial land. To do so, the city must necessarily (1) undertake to quantify to the extent necessary the number of acres the new regulations will likely remove from potential industrial development, compared to the existing acknowledged regulations, and (2) evaluate the impact of any net reduction in land supply on the city's Goal 9 inventory of industrial lands. The second step will entail making at least some determinations regarding the adequacy of the city's industrial land supply, before and after application of the new regulations.

- B. In recognition of the Gunderson decision, industrial property owners within the “Airport Futures Plan Area” demanded in hearing testimony that the proposed environmental zoning overlay zones be removed from their properties prior to the Comprehensive Plan and Zoning Map amendments being adopted. The “Airport Futures” plan and zoning changes were adopted soon after (April 2011). The request by industrial land owners for the city to remove the environmental overlay zones was followed/complied with for all non-governmental industrial lands **except** the subject NE Levee Road properties. Within the “Airport Futures” area, the NE Levee Road Industrial Sanctuary properties were the only privately owned properties in the industrial lands inventory that had environmental restrictions placed on them. No analysis of the developable industrial acreage lost due to the environmental zoning was ever done, in blatant disregard of the Gundersun vs. City of Portland requirements.
- C. Since the City of Portland chose to not comply with the requirement to determine the amount of acreages lost and the resulting impact on the industrial lands inventory as a result of the extensive environmental overlay zones mapped on the NE Levee Road properties, then we must conclude that the city never intended to actually ensure that the properties were available for later industrial development. The city cannot have it both ways: count the properties in the industrial inventory and also apply environmental zoning to severely restrict their later use as industrial properties.
- D. In conclusion, the Industrial Sanctuary Comprehensive Plan designation for the subject properties should be removed.

From: Justine Saudan [<mailto:jsaudan@kyhumane.org>]
Sent: Friday, March 13, 2015 3:29 AM
To: BPS Mailbox
Subject: ATTN: Leslie Lum Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission

Property Owner: Justine Saudan
Mailing Address: 1519 E Breckinridge Street
Louisville, KY 40204

ATTN: Leslie Lum,

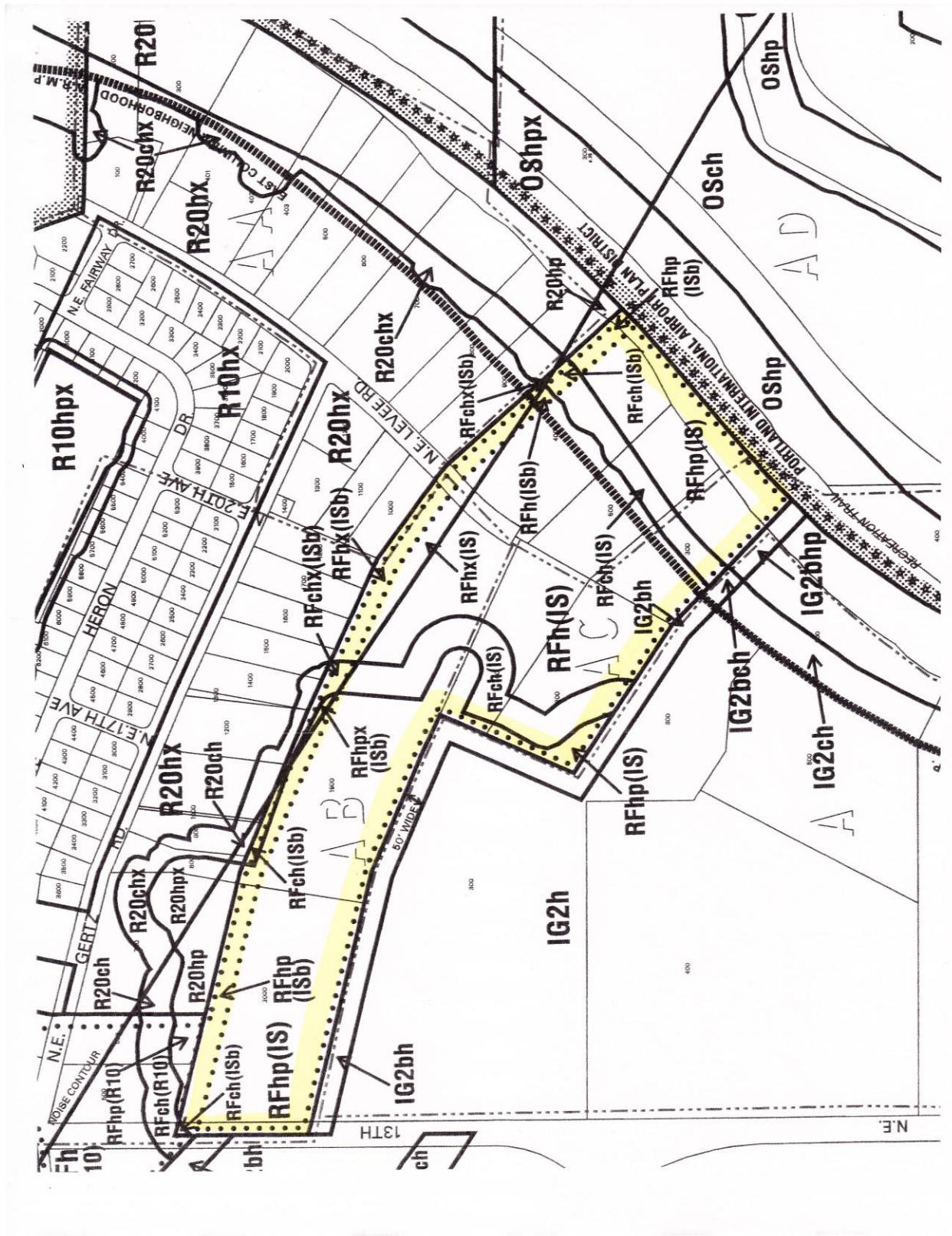
My name is Justine Saudan, I own the property at 1410 NE Gertz Rd (or property ID for lots through Portland Maps ([R171716](#))). I support the attached proposal for an R-20 zoning change request of my residential farming property by removing the Industrial Sanctuary designation. I believe this offers the most realistic way to find a creative, future balance that truly respects residential livability and real biodiversity of natural habitat, both of which are grossly undermined now when there has been no attempt to address the past planning/development failures that led to such relentless, negative impact produced by 24-hour trucking operations on nearby industrial properties.

Thanks,

Justine Saudan
Strategic Initiatives Director
Office 502.515.3141
Cell 503.442.5443
www.kyhumane.org



Adoptions • Spay/Neuter • Behavior • Pet Resorts • Education



"Land Use Request" for Plan Map Designation Change from Industrial Sanctuary to Residential (R-20) as Part of the Comprehensive Plan Update

Location: East Columbia Neighborhood; abutting or using access to NE Levee Road and unimproved NE 13th Avenue

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- D. In conclusion, the Industrial Sanctuary Comprehensive Plan designation for the subject properties should be removed.

WorldView

March 13, 2015

*Portland Planning and Sustainability Commission
c/o Ms. Marty Stockton, Southeast District Liaison
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7000
Portland, Oregon 97201*

Subject Property: 6012 SE Yamhill Street (1S2E06AA 14600)

Dear Chair Baugh and Fellow Commissioners:

The purpose of this letter is to request specific Comprehensive Plan and Zoning designations for the subject site on the final Comprehensive Plan Map that the Bureau of Planning and Sustainability (BPS) will be submitting for the Commission's review later this year. The Institute of International Christian Communications, Inc. (IICC) has owned the subject property at 6012 SE Yamhill Street since 1995, where it operates a Christian Missionary training institute and residence. Under the provisions of the Portland Zoning Code, the organization has been approved as a Conditional Use (CU) as a combination of Group Living and School use classifications (LU 95-514 CU).

As illustrated in Figure 1, the site currently has a split-zone designation, Single-Dwelling Residential 5,000 (R5) with an underlying Comprehensive Plan designation of Multi-Dwelling Residential 2,000 (R2) on approximately 90% of the 30,200-square foot parcel with the remaining 10% in the southeast corner having only an R5 Comprehensive Plan/Zoning designations. IICC requests that the final Comprehensive Map designate the entire site for Multi-Dwelling Residential Development with a companion Zoning Designation of R2. In so doing, the action will remove the split-zoning condition. The latter is justified for two reasons:

- *The portion of the site without the underlying R2 Comprehensive Plan designation is land-locked. As illustrated in Figure 1, it obviously is an artifact of the extension of a zoning boundary that did not take into consideration underlying tax lot configuration.*
- *Split zoning is considered to be a poor planning device, as it complicates the use and/or redevelopment of property. It is our understanding that the Bureau of Planning and Sustainability (BPS) has been directed to address the split-zoning issue on hundreds of properties as part of the Comprehensive Plan Update and we want to insure that this site is included in this review.*

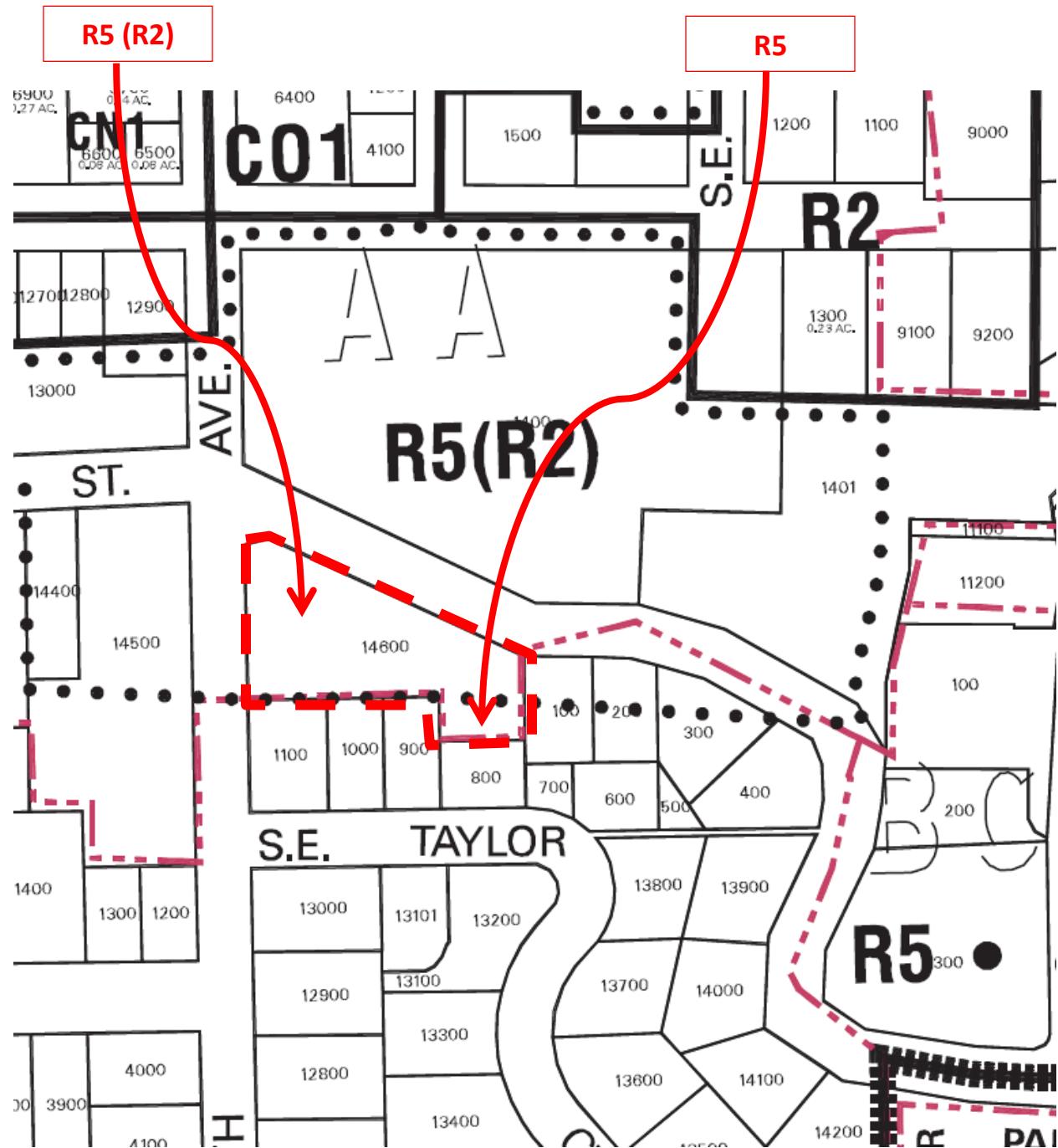
Thank you for the Commission's consideration in this matter.

Sincerely,



*Mark Hedinger
Institute of International Christian Communications, Inc.
6012 SE Yamhill Street
Portland, Oregon 97215
mark.hedinger@iiccworldview.org*

Figure 1: 6012 SE Yamhill Avenue - IICC/Worldview (14600)



Testimony for Proposed Draft of the Comprehensive Plan

March 13, 2015

Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Re: Draft Comprehensive Plan Testimony

Dear Portland Planning and Sustainability Commission:

Thank you for this final opportunity to comment on the draft Comprehensive Plan. This letter supplements previous comments I submitted on December 2, 2014.

First, as I attended the PSC worksession on March 10, 2015, I was quite pleased to learn of two recent inter-bureau and inter-agency agreements. The PBOT-BES Coordination Charter and the PBOT-BPS-TriMet Letter of Intent are two examples where better planning will very likely lead to better outcomes, as was illustrated in the TriMet Service Enhancement Plan discussions. At the neighborhood level, we are frequently frustrated when we work with bureaus in silos, and we hope that this approach can be sustained over the long run across a wide range of projects.

Second, while I understand that this is a technical update of the TSP, I believe a more thorough update is needed right away. In general, I found the sequencing of tasks for the Comp Plan Update quite confusing, and am concerned that policies will be locked in place before we learn from studies that have only recently begun, such as the parking policy study. Many of our volunteers spent time submitting comments on the TSP projects and I hope the comment database will be used in a more complete TSP update, so that their time will not have been wasted.

Third, as a member of the Transportation Expert Group and PBOT Budget Advisory Committee, I shared comments with staff that may not have been captured in the TEG comments. I am a proponent of using performance measures and support the city's approach of using seven outcomes to prioritize investments. However, there need to be performance measures tied to the outcomes to enable citizens to evaluate whether the investments are accomplishing the outcomes. I reviewed the scoring criteria (as a TEG member) and had questions about how some of the scoring was applied to many of the projects. I commented last October that the proposed TSP project schedule did not allow enough time to provide meaningful comments on the project rankings, and I continue to be concerned that they need more vetting. I hope the public gets a closer look at the scoring and staff accepts comments on how to improve the scoring and ranking of the many transportation needs citywide in the near future.

TSP Projects

Many projects in SW Portland have not been re-scoped since 2002 and are frequently more than two miles in length with no curbs nor stormwater management system. They

Comp Plan Comments

March 13, 2015

Page 2

are expensive to build and ranked low in terms of "cost-effectiveness". Areas with high percentages of people of color, low income and seniors were averaged out since the projects often covered multiple census tracts. Many individuals and neighborhood associations have submitted comments regarding how they could be phased, segmented or re-scope to prioritize the most needed improvements, such as segments leading to town centers and frequent service bus stops. Many neighborhoods have experienced significant infill without the necessary street and stormwater improvements because the City granted thousands of "waivers of remonstrance" over the last 20 years, exacerbating the problem.

The following projects are my top priority projects, with notes about how they might be re-scope or segmented to make them more competitive.

Capitol Highway (Multnomah to Taylors Ferry) - TSP Project #90026:

Capitol Highway is the highest priority needed improvement in all of SW Portland, and this segment has the most potential for allowing people to walk and ride bikes and not rely completely on the automobile. It serves as an important route for reaching Multnomah Village in the north and the West Portland Town Center and Barbur Boulevard Transit Center to the south, with no alternative routes nearby. Today, the road consists of a 24-foot wide two lane asphalt roadway, with wider asphalt or unpaved shoulders in some areas providing informal vehicle parking. For most of this segment, pedestrian, bicycling and parking improvements are nonexistent. The bus stops are generally unimproved, and travel to and from the bus stops often entails walking on narrow roadway shoulders adjacent to motor vehicle traffic, including frequent service bus and truck delivery vehicles. Bicyclists today must share the travel lane with motor vehicle traffic, but the 2030 Bike Plan designates it a Major City Bikeway. The segment also lacks stormwater treatment and detention facilities which likely contribute to stream degradation of Fanno and Tryon Creeks, both identified as Essential Salmonid Habitat by the Oregon Dept. of State Lands. Because this is such a significant route through our community without nearby alternatives, it needs the full build-out as envisioned in the Capitol Highway Refinement Plan. We hope PBOT and citizens can work together to create context-sensitive solutions that benefit a wide range of stakeholders, including the local and regional users of the roadway and the stormwater management issues.

Outer Taylors Ferry Road (Barbur Blvd to 60th) - TSP project #90064:

PBOT gave it a low score--in the "unconstrained" list-- likely because it is two miles long with no shoulders or stormwater management system. It should be in the "constrained" list because it supports the SW Corridor Plan and is the only way for anyone to get to West Portland Crossroads (intersection of SW Barbur Blvd and Capitol Hwy) from the west, whether by motor vehicle, bicycle or on foot, because of the presence of Woods Creek and I-5 as major barriers nearby. It suffers from a lot of motor vehicle traffic from Washington County and the I-5 ramps leading to Portland Community College. PBOT could "segment" it to prioritize the segment from Capitol Highway to SW 48th, and could "re-scope" it to build just a sidewalk on the south side and an uphill bike lane on the

Comp Plan Comments

March 13, 2015

Page 3

north side, but full improvements all the way to SW 65th would also lead to more people walking and biking in the neighborhoods.

Pedestrian and bicycle facilities from SW 61st and Pomona to SW 64th and Barbur (portion of TSP 90011). This project is ranked in the unconstrained list, likely due to its long length and lack of curbs and stormwater management system. The segment between SW 61st and Pomona and SW 64th and Barbur (a “jog” on the map) is the most critical segment due to the multifamily residences in this area, including a Home Forward property (Ash Creek Commons) but no sidewalk for the residents to walk to the nearby frequent service bus stop at SW 64th and Barbur and nearby shops and services. In fact, since cars are usually parked on the shoulders, the residents are forced to walk in the street along a street with high traffic volumes. Even a small segment of this project could go a long way to improving safety in a very unsafe area.

Markham Pedestrian Bridge (from SW 48 over I-5 to Markham School) - TSP Project #90048: The Ashcreek and Crestwood Neighborhoods have some of the lowest “walkscores” in the entire City of Portland, in large part because of the presence of the Interstate Highway as a major barrier. A pedestrian and bicycle bridge would enable people to access the Capitol Hill Library, Markham Elementary School, Jackson Middle School, and frequent transit service on Barbur Blvd. as well as the future SW Corridor transit service.

SW 45th (Cameron to Taylors Ferry) - TSP Project #90008:

PBOT ranked it in the 11-20 year constrained list, but this is a much lower priority than the above projects. It needs to be re-scoped and segmented in order to build the most important segments that actually lead to places (i.e. Southwest Community Center and Gabriel Park, or commercial businesses on Multnomah Blvd.) at a lower cost. In fact, without building Projects 90033, 90050, 90064, and 90067 it would not lead to any improved facilities.

There are also several neighborhood “greenway” projects in SW Portland that, in my opinion, are a low priority because of the greater need to improve busy arterials due to the topography and lack of a grid system in our neighborhoods. I also question the high priority given the Johns Landing Streetcar Extension and the Red Electric Trail given their limited local benefits; instead, segmenting or phasing other projects could provide interim solutions in strategic places where SW Portland needs the transportation improvements the most, providing greater mobility to large numbers of people to access transit, commercial areas, shops and services without relying on individual cars.

Finally, I’d like to emphasize a comment that I made in my December 2, 2014 letter, because I saw recent materials in the Mixed Use Zone project that indicated no change in the draft plan.

“Western Neighborhoods”, and in particular, Centers and Corridors, need sidewalks and bicycle facilities. Not trails. The transportation system in Centers

Comp Plan Comments

March 13, 2015

Page 4

and Corridors needs to be safe and accessible to people of all ages and abilities.

Trails such as those built by SWTrails PDX are not accessible in many places, and are not maintained well enough to be safe. They are also not very safe to use in the dark in unlit places. The City needs to evaluate each Center and Corridor to determine what pedestrian, bicycle and transit facilities, and streetlights and other services each Center and Corridor needs to function as envisioned in the plan.

Sincerely,

//s//

Marianne Fitzgerald

10537 SW 64th Drive

Portland OR 97219

(503) 246-1847

Fitzgerald.marianne@gmail.com

Cc: Eric Engstrom, BPS
Joan Frederickson, BPS
Art Pearce, PBOT

March 13, 2015

Planning and Sustainability Commission
1900 S.W. Fourth Ave.
Portland 97201-5380
Email: PSC@portlandoregon.gov

To the Commission:

I am commenting in regards to the proposed 2035 Comprehensive Plan.

Proposed Change #88 - SE 14th and SE Stark

I don't believe this is a good change because all it does is allow for a developer to tear down the current commercial space and build a taller building. The new height allowance would create a burden on the existing homes on that block by increasing traffic, and decreasing sunlight. On an overall note, subjecting any block to drastic height allowance variations is not residentially friendly and should not be allowed at any time when residential homes are affected.

Propose Change #62 - Belmont and Morrison Corridor from SE 12th to 30th

I am completely opposed to this change in that it divides Buckman Community into two more separated areas. As it is, Buckman already is divided by east and west, please don't split it up more by rezoning the Belmont/Morrison Corridor into a commercial thoroughfare. I think this is a particularly important place to maintain a residential feel to connect the community and to provide safe travel passage for our children attending Buckman Elementary School coming from the southern end of Buckman neighborhood. Generally, any zoning changes that split neighborhood's access between its residential areas should be avoided.

Proposed Change #348 - 17th to 20th/Stark to Washington

The only purpose I see in this proposal is to encourage developers to purchase the few homes on larger lots, demolish them, destroy the historical feel and history of the neighborhood, and make money. Only the neighborhood suffers with this proposal.

Please consider all comments from neighbors. This is our community and we want to keep it livable and safe for our children.

Lornie McCormick-Goodhart
2015 SE Salmon Street
Portland, OR 97214

Hi Susan,

Thanks for your note. I look forward to getting involved in the neighborhood association around this and other topics.

In short, my future plans for the 15th / Clinton parcel are undetermined at this point. I acquired the property in late 2013, so it's still fairly new for me. A few things I can say:

- I'm committed to long-term ownership of the property. I'm excited to have gotten the chance to own this property in a very unique inner SE location - near the convergence of Hwy 26, SE Division, 11th/12th and the new MAX line - and look forward to contributing to the well being of the neighborhood
- In the near-term, very little will change. The property was a substantial purchase for me, and my focus right now is having high quality tenants, making minor repairs / system upgrades to preserve the long-term health of the structures and coming up with a more thoughtful long term plan
- In the long-term, I'm an advocate for density planning. As Portland continues to grow over the next 20 years and beyond, I believe in the sustainable development that has made Portland one of the most desirable places to live and a model for urban planning. For this property, I could see a variety of potential uses
 - o #1: Keeping as single family residences, finishing the basements/attics to create more living space
 - o #2: Finishing and separating the basements off as separate living units, creating an 8 unit
 - o #3: Using the existing structures for commercial / retail services
 - o #4: Removing the structures (either via demo or relocating them), opening up the land for future development to include higher density residential and retail amenities for the neighborhood
- I submitted a written testimony to the PSC supporting a change to CM zoning, with the key reasons being
 - o Long term density planning / neighborhood amenities
 - o Compatibility with the adjacent ExD industrial land to the west and south
 - o Flexibility for future use

Realistically, #1, #2 or #3 are the more likely mid-term (5-10 year) alternatives and #3 is a longer range possibility. With the MAX line opening up, and density/traffic to continue to increase along Clinton, I believe having some small retail services over the next several years between 12th and 21st would be accretive to the neighborhood.

I look forward to getting involved in the community discussion, so please keep me informed on how I can do so.

Best,

Matt Brischetto



Petitioning Portland OR Planning and Sustainability Commission

This petition will be delivered to:

Portland OR Planning and Sustainability Commission

**Remove the restrictive and punitive
Pleasant Valley "V" and "P" overlays
from our property at 5557 SE Jenne Ln**



Joyce Montgomery

Portland, OR

My husband and I are experiencing overwhelming difficulties with the city of Portland. We do not live in the city of Portland, so it is mind boggling to us that they control our every move or decision on our personally owned property in unincorporated Multnomah County.

We are not sure when, but Portland at some time placed what is "called" the Pleasant Valley "V" Overlay on approximately 90% of our property. There is also a "P" overlay on what we think is a small section of our property, but we haven't been able to get anyone to confirm just where this area is, or exactly why either of these overlays were put on our property. We have also not been told exactly when they were placed on our property, or why we were never notified of this massive change in how we would be allowed to utilize our property going forward.

We do know that we have been cited for zoning violations for doing what any normal citizen would consider to be their right to do on their own property. These include terracing a gentle slope on the side yard of our home to provide two flat areas, the lower one in which we built a patio/fire pit and the upper one in which we planned to plant a small orchard, berry plants and a grape arbor.

We also built a series of "cowboy steps" on our lower property as a place to train my horses. These consist of three steps approximately one to two feet high by about eighteen feet square with the top "stair" with about a three foot drop on one side, for the horses to jump up to and down from.

We have now been informed by the city of Portland, that because of the overlays they have placed on our property we will have to remove these area's and put them both back to there original condition plus plant many native species of trees bushes and ground cover. There were no native trees bushes or ground cover in these areas before we improved them for our personal enjoyment and safety, but that doesn't matter. Our property has been continually used for farming for at least 50 years before I purchased it in 1989. The previous owner raised sheep and I have used it to raise and train horses since two years before I purchased it.

We are supposed to be grandfathered in for our horse breeding and training, but only for those things we had already completed before they put these overlays with all their restrictions on us. For anything we had merely planned to do in the future, they are denying us the right to complete our long term goals , such as building a training area to prepare our horses to be safely ridden on the Springwater corridor (which borders our property) or fencing our back corner which goes down to Johnson creek, with an illegal trail off the springwater corridor that allows homeless transients and others (including children) to trespass on our property as they make their way to Johnson creek, which I believe would be considered an attractive nuisance, and if anyone were to be injured

while trespassing on our property we would be held liable, but the city of Portland won't allow us to put up a fence.

We also won't be allowed to plant an orchard, berry bushes or grape arbor, I'm not entirely sure if we can even plant a garden, as the restrictions on our property only allow us to plant "native "species".

We still don't know what all the restrictions on our property entail, when we first learned of the overlays three years ago we thought they only applied to building, and we wanted them to be removed so that we would be able to build an indoor horse arena in the future. We were told at that time that Portland would be redoing it's comprehensive plan in about six months and that we could apply to have this restrictive zoning removed (we still don't know the reason it was put on in the first place). It was about three years until we received an email from Christina Scarzello letting us know it was time to submit our testimony to have the overlay zoning removed. We have sent in our testimony, but have no idea if or when it will be looked at or a decision made, and in the meantime, we have learned through receiving a notice of violations some of the other restrictions that have been placed on our property.

Every inch of our property is used to grow pasture to feed our horses (excluding where the buildings and driveways are) we even use the area around our house to graze horses. We are very confused about this extremely restrictive zoning and the fact that they say we are grandfathered in on the one hand, but aren't allowed to complete our long range plans and goals on the other. We are also told that everything we do must be done by hand, even though we have always used our tractor in maintaining our property and should be grandfathered in to continue using it as it is a vital piece of equipment to maintain our horses and land.

To add to the confusion and worry, where my house is located and where my barn is located, I would not be allowed to build today. I don't know what would happen if either building were destroyed, but I don't believe I would be allowed to replace them.

We would appreciate any help or advice you could provide us with, and we beg you to please write or email the Portland Planning and Sustainability commission with testimony backing our request to have this restrictive and punitive overlay zoning removed from our property. Please email Portland Planning and Sustainability PSC@portlandoregon.gov include the word testimony and support us in demanding our property rights not be held hostage. Please also sign our petition to send a message that peoples rights can not simply be taken away by any government entity that has their own agenda for land that doesn't belong to them. Steve and Joyce Montgomery 5557 SE Jenne Ln Portland OR 97236 503-661-3157

Letter to
Portland OR Planning and Sustainability Commission
Remove the restrictive and punitive Pleasant Valley "V" and "P" overlays from our property at 5557 SE Jenne Ln

Updates

Keep your supporters engaged with a news update. Every update you post will be sent as a separate email to signers of your petition.

[Post an update](#)

1. 5 days ago

25 supporters

2. 6 days ago

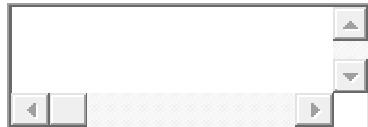
Joyce Montgomery started this petition

[Flag as inappropriate](#)

Share this petition

with 33 supporters

67 needed



Portland OR Planning and Sustainability Commission:...

- Invite friends
- [Twitter](#)

March 13, 2015

Dear Commissioners and Staff:

This letter pertains to the proposed rezone of SE Morrison/Belmont between Se 15th/19th.

The need to rezone the existing R1 and R2.5 is circumspect because the current zoning allows for affordable family housing and is compatible with the existing neighborhood zoning. Rezoning these properties to CS only creates a nightmare for the existing neighborhoods, by creating dense studio apartments. These apartments, with their transient tenants can fragment a neighborhood that is already fighting to save its neighborly feel. Remember that Buckman is the oldest eastside neighborhood. The Buckman Neighborhood Plan of 1991 has as one of its goal a need to save single family homes, this rezoning is not within the neighborhood plan.

The lack of a requirement for any commercial space means that the neighborhood suffers the impact with no gain in services.

Also the cities unconscionable parking requirements mean that the existing residential streets are flooded with cars in a chaotic mess. PBOT's own studies show that 65% of apartment dwellers own cars. They may only use them for recreation but still need a place to park. I know that developers say it cost 40,000 dollars per space...please require more parking so they don't steal my 40,000 dollar space and put the money in their pocket.

Furthermore there is ample EX zoning in the CEID to build high rise apartments. If you need dense apartments build them there.

Finally this process is being driven by planning bureau managers and has not been promoted by the neighbors or the property owners. Having a zoning change of this magnitude with little direct discussion between the city and the neighborhood is wrong and against the values of an open and transparent society.

Thank you for your consideration,

Rick Johnson

1414 SE Oak Street

Portland, Oregon 97214

Hi,

Appreciate the opportunity to comment on the plan and thanks for listening. I realize you hear many different voices so thanks for reading my comments. I applaud the overall effort to cost effectively build the region's infrastructure and undertake a prioritization effort, it is not easy. I wanted to specifically comment on a theme I saw in the projects. It was a surprise to me that many valuable projects in SW & NW were not prioritized (not funded or within the revenue constrained project lists). It seems that SW & NW are highly underserved in this plan. This is even more striking given that lack of multi-modal infrastructure here compared to the rest of the city. I'd request a number of projects in SW&NW be prioritized (moved to the funded and revenue constrained budgets).

It seems SW&NW didn't get their fair share of projects funded compared to the rest of Portland. I'm not sure how the city rated their transportation priorities. If you use the Portland plan themes (<http://www.portlandonline.com/portlandplan/index.cfm?c=52256>) of 20 min neighborhoods (<http://www.portlandonline.com/portlandplan/index.cfm?c=52256&a=288547>), walkability, pedestrian network (<http://www.portlandonline.com/portlandplan/index.cfm?c=52256&a=288555>) and bike-ability (<http://www.portlandonline.com/portlandplan/index.cfm?c=52256&a=288557>) as the metrics you're measuring against, then projects improving them in NW, SW and outer east should be prioritized due to their low scores today and noted challenges over the many projects prioritized in N, NE&SE that already have high scores.

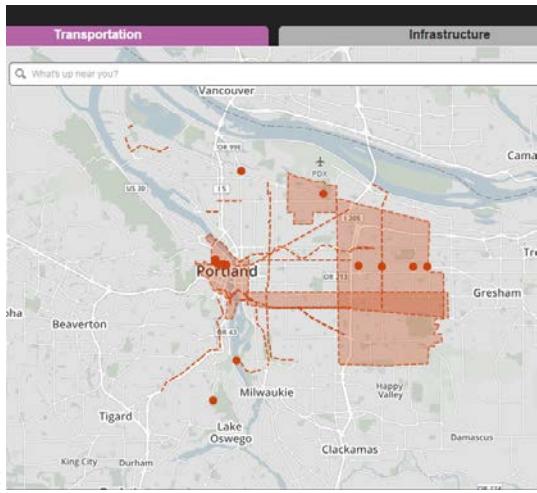
While the city lists funding projects in outer east portland they seem to have ignored NW&SW to a large extent. The Portland plan comments, "the lack of sidewalks and street connectivity in eastern and western parts of the city compromise Portland ability to foster walking as an attractive option in these areas. This plan seems to do little to address this inequity in West Portland and is highly disappointing. I'd request this be rectified.

Below I've provided additional detail to explain what I'm seeing in the plan.

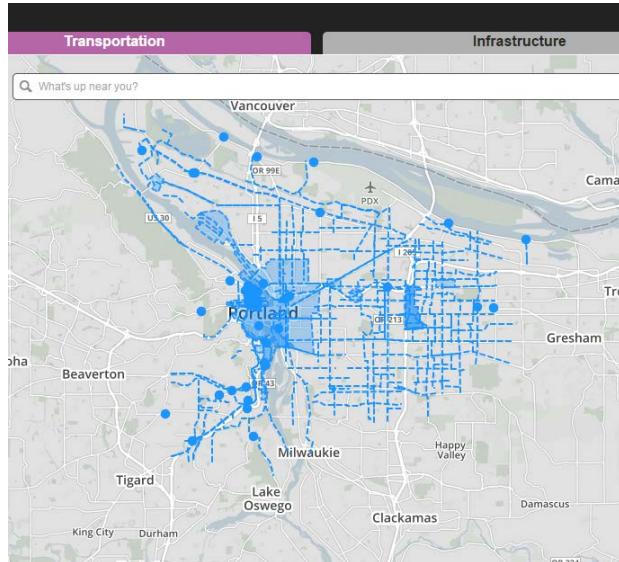
1. Equity: If you look at funded vs constrained vs unconstrained it appears a majority of the unfunded projects are in NW & SW. This is easily seen when you visually look at the projects lists on the map app and are shown below. I'm unsure why SW & NW projects were not priority and many projects in N,NE & SE are prioritized when their walkability and bike-ability scores are high and pedestrian networks built-out.

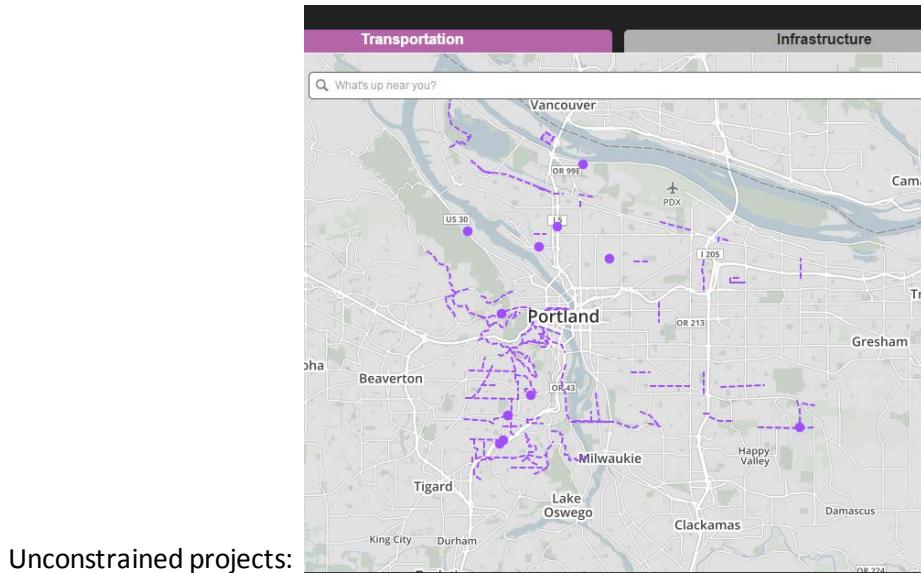
I'd request the city relook at the number and funding allocation of multi-modal projects across the city to ensure a balanced portfolio. Given the visuals below I'd request additional projects be funded in SW & NW while projects in N, NE & SE be un-prioritized.

Funded projects:



Constrained projects:





2. Safety: NW & SW are seriously deficient in sidewalks as shown in the city pedestrian system map. This is a huge safety hazard and discourages walking. While this plan address outer east Portland this plan seems to do little to address this for NW&SW while funding numerous projects in neighborhoods with sidewalks and high walk-ability scores. Projects that complete the pedestrian system in NW&SW should be funded within the next 1-10yrs.

The NW & SW have some of the lowest cycle zone ratings in Portland yet this plan does little to improve them and instead places heavy investment into improving areas that already have high bike-ability, especially in N, NE & SE. This not only impacts those in the neighborhood but impacts the many from surrounding areas would like to travel west or easy over the hills to commute or the many cyclists using the routes for rides around town.

To make matters worse, there are few alternate routes in SW & NW. This means there are little to no alternative routes or low traffic roads for folks to bike and walk. This is further impacted by the windy roads and blind corners. Bottom Line it is seriously unsafe to get around by foot or bike in SW & NW. I think, and have heard from many, that the lack of multi-model infrastructure are serious impediments and discourages the use of alternative transportation or walking/biking with your family. I think the bottom line is that much of SW & NW is a walking and biking safety hazard with the lowest ratings in town and this plan does little to address that.

3. Requested projects to fund. Move to revenue constrained

Years 1-10:

- 90054 SW Patton Rd Ped/Bike Improvements
- 90024 SW Broadway Dr Pedestrian Improvements
- 90038 SW Humphrey Blvd Ped/Bike Improvements
- 90031 SW Dosch Rd Ped/Bike Improvements

- 90034 SW Hamilton Ped/Bike Improvements

Years 11-20:

- 90094 Fairmount Blvd Bikeway
- 90095 Montgomery Bikeway
- 60015 Skyline Bikeway
- 90067 Vermont St Ped/Bike Improvements
- 90001 Montgomery to Vista Bikeway
- 20027 South Portland Connectivity Improvements.

4. Projects to de-prioritize. Move to revenue unconstrained.

- First, I would request some equity be restored by reducing the number of multi-modal projects in N, NE, SE.
 - Including de-prioritizing bikeways in SE & NE. there are many side streets you can take on the east side to walk/bike safely. This is in stark contrast to the SW & NW where there are limited to no alternative routes for people to use.
 - Funding multi-modal transportation projects in NW & SW should be prioritized over multi-modal projects in N, NE, SE.
 - Numerous others
- 116390 Johns Landing Streetcar Extension
- 101640 Moody Ave Extension

I expect there would be large pushback from the streetcar lobby and developers on the last two projects. These projects seem of high cost and dubious value to SW Portland. I think an overwhelming amount of SW&NW Portlanders would rather see the projects listed in #3 in their neighborhood than the Johns Landing and Moody Ave projects yet their voices aren't heard over a few interested parties.

The residents of SW & NW need their basic infrastructure needs met, with sidewalks in particular, before additional dollars are spent on south waterfront "nice to have" expansions or "nice to have" bikeways in neighborhoods that are already highly walkable and bikeable.

Residents in SW & NW Portland pay proportionately higher property taxes than much of Portland (due to measure 50 among other reasons:

http://www.oregonlive.com/portland/index.ssf/2014/10/how_do_your_property_taxes_com.html) yet they suffer from lacking the most basic of infrastructure. This plan seems to ignore the needs of SW & NW Portland while our dollars flow elsewhere. To me this is about equity and appropriately prioritizing projects across all of Portland's residents.

I've talked to a number of long time neighbors who were not responding simply because they've lost faith the city hears them and would invest in SW & NW Portland. We're requesting the city listen and meet our basic infrastructure needs by prioritizing multi-modal transportation projects for SW & NW Portland.

From: HUG, EZRA [<mailto:eh9938@att.com>]
Sent: Friday, March 13, 2015 5:27 PM
To: BPS Mailbox
Subject: Levee Rd. Comprehensive Plan R-20 Change Request Proposal comment submission
Importance: High

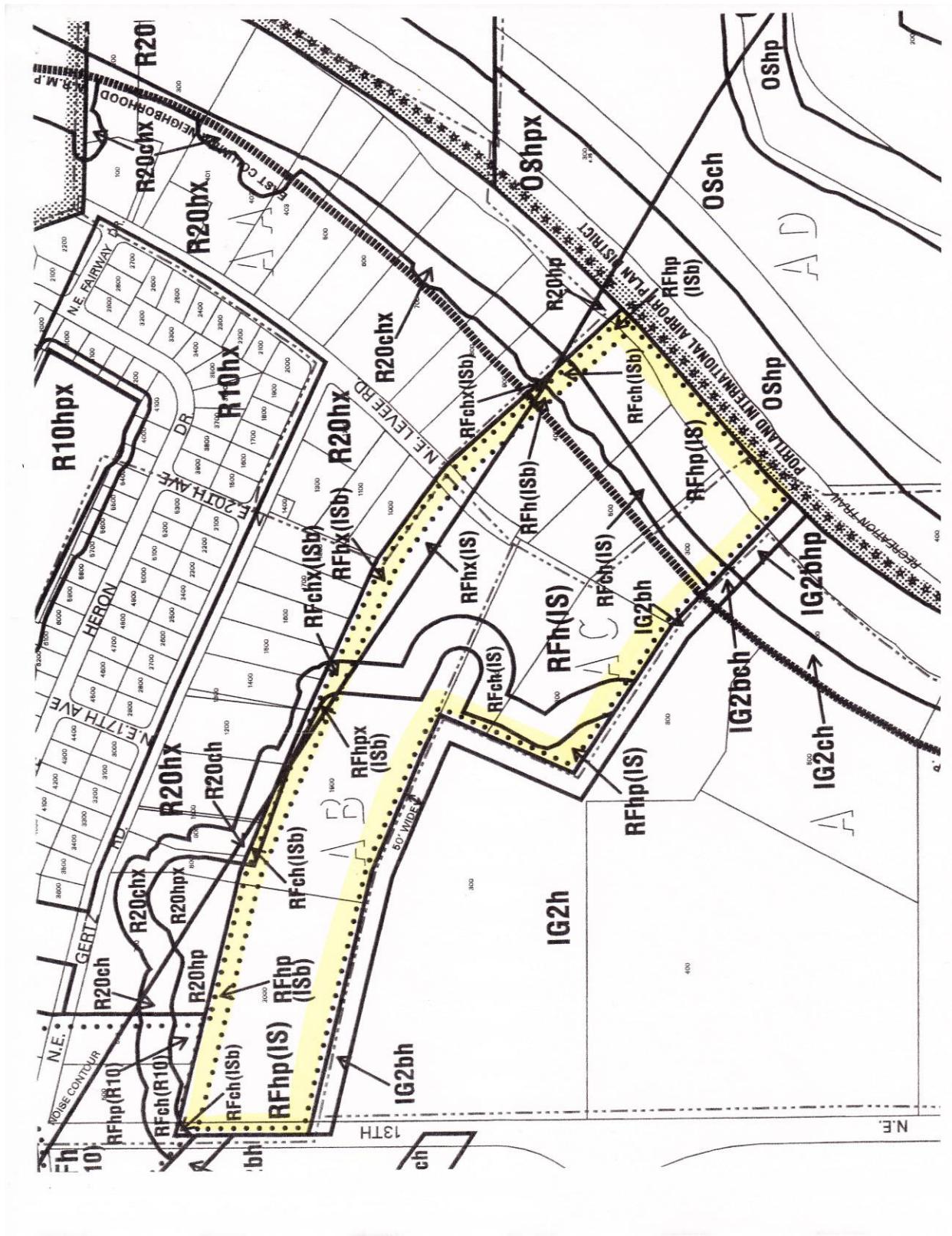
Dear Ms Lum,

My name is Ezra Matthew Hug and I own the property at 8855 NE Levee Rd. I'm fully in support of the attached proposal for an R-20 zoning change request of my residential farming property by removing the Industrial Sanctuary designation.

I specifically purchased the property in 2006 because it was zoned IF (I valued the relatively lax zoning restrictions) and request that the zoning be returned to IF, converted to R-20, or reimburse me for the decrease in equity that resulted from the zoning change.

Respectfully yours,

Ezra M Hug
8855 NE Levee Road
Portland, OR
917-991-9290



"Land Use Request" for Plan Map Designation Change from Industrial Sanctuary to Residential (R-20) as Part of the Comprehensive Plan Update

Location: East Columbia Neighborhood; abutting or using access to NE Levee Road and unimproved NE 13th Avenue

Property IDs: R171711 (9009 NE Levee Rd); R171707 (9000 NE Levee Rd); R171713 (8855 NE Levee RD); R171708 (8916 NE Levee Rd); R171709 (8850 NE Levee Rd); R171714 (vacant, no address); R171716 (vacant, no address, same ownership as abutting lot R17119 to the north)

Existing Zoning: RFhp (RF: Residential Farm/Forest, h: Aircraft Landing Overlay Zone, p: Environmental Protection Overlay Zone); RFch (c: Environmental Conservation Overlay Zone); RFhpX (x: Portland International Airport Noise Impact Overlay Zone); RFchx; RFhx; and RFh

Existing Plan: IS: Industrial Sanctuary; ISb (b: Buffer)

Considerations:

- I. "Change in Circumstances" since enactment of the Industrial Sanctuary Designation
 - A. In 2011, as part of the Middle Columbia Corridor/Airport Natural Resources Inventory, this area received substantial coverage of the Environmental Overlay Zoning of "p" protection and "c" conservation (see zoning map included). That map shows the "p" and "c" overlay zones covering: approximately one-half of four of the properties; one-third of one property; two-thirds of one property; and all of one property.
 - B. The extensive coverage of the "p" overlay zone is important for future development potential. As characterized in the Zoning Code website "Zone Summaries": "The Environmental Protection zone provides the highest level of protection to the most important resources and functional values. . . . Development will be approved in the environmental protection zone **only in rare and unusual circumstances.**" [Emphasis added]. The environmental zoning appears to have taken the majority of this area out of potential development in the future. As such, any development, in particular industrial development with its large buildings and extensive paving associated with heavy truck traffic, would not be anticipated to be approved or occur in the majority of this area with the Plan designation of Industrial Sanctuary.
 - C. The portion of the lots not covered by environmental zoning is where there are five houses with a total improvement value of over \$655,000. A reasonable expectation is that these homes outside the environmental zoning would be less likely to be developed for industrial uses due to the existing improvement values and the relatively small acreage not in the "p" or "c" zones.

II. R-20 Zoning Request

- A. R-20 zoning would match and be compatible with the zoning to the immediate north.
- B. R-20 residential zoning would protect environmental resource values by not developing those areas and yet add a few additional new home sites concentrated in the area of NE Levee Road outside the “p” and “c” zones. In addition, there could also be the possibility of application by individual property owners for small Planned Development lots located outside the environmental zones. A Planned Development can result in a lot density closer to the development potential of their entire property.
- C. A buffer between industrial and residential uses already exists in the abutting industrial zoned (IG2h) property to the south. Along the industrial property’s northern boundary is a 50-foot wide buffer strip zoned IG2bh. The “b” buffer zone was a condition of approval of the industrial development and was enacted to serve as a “buffer” to reduce adverse effects between incompatible land use attributes, such as noise, lights, and views.
- D. It is recognized that there is a “need” to maintain adequate planned areas for future industrial growth. However, continuing to include this area in the inventory of acreage to fulfill future industrial need could be viewed as representing a false acreage number in that inventory. That is because the majority of the acreage is covered by undevelopable environmental zones and, except for one smaller lot, the remaining acreage is already developed with housing, significantly reducing the conversion to industrial land use.

III. Transportation and Access Issues

- A. The homes in this area gain access to the public road system only through NE Levee Road to NE Gertz Road, which are both narrow, two-lane, local streets without full improvements. There is no outlet to the east because of a major drainage slough; to the west, NE Gertz Road contains a major truck barrier (tight radius traffic circle) constructed to keep large industrial truck traffic from the nearby residential neighborhoods; and NE 13th Avenue is posted with “no truck” signs at NE Marine Drive. Therefore, there is no legal large truck traffic route to this area from the north.
- B. The industrial property to the south has existing frontage and access necessary for truck traffic on a portion of NE 13th Avenue south of the unimproved part of NE 13th which effectively disconnects the industrial traffic from the residential streets to the north. To the west, the industrial road system connects via NE Fazio Way and NE Gertz Road, to NE Vancouver Way.
- C. In summary, the road system to the north of this area does not allow industrial truck traffic and the property owner to the south does not appear to have the incentive to provide a road system through the property to reach the small developable (not environmentally zoned) part of the subject ownerships.

IV. Environmental Zoning Placed on Industrial Sanctuary Planned Properties Was Contrary to Directives to the City of Portland in the Gunderson, LLC vs. City of Portland LUBA Decision (affirmed by the Oregon Court of Appeals and Oregon Supreme Court)

- A. In January 21, 2011, three months before the “Airport Futures” Comprehensive Plan Update and associated zone changes were adopted in April 2011, the Land Use Board of Appeals (LUBA) ruled that the adopted environmental restrictions (in this case Willamette River Greenway zoning provisions) placed on industrial properties In the “North Reach River Plan” were overturned because such environmental restrictions in effect reduced the amount of industrial lands without taking that reduction into account in accordance with Division 9 Administrative Rules for Statewide Planning Goal 9 Industrial Development. The Gunderson vs. City of Portland LUBA decision stated on page 11, lines 13 through 24 the following:

Because the likely result of applying the new regulations is that the city's supply of land potentially available for new or expanded industrial development would be effectively reduced, perhaps significantly so, it is incumbent on the city to consider the impact of such potential reductions on the city's industrial land supply and determine, based on an adequate factual base, whether any such impacts on the inventory are consistent with the city's Goal 9 obligation to maintain an adequate supply of industrial land. To do so, the city must necessarily (1) undertake to quantify to the extent necessary the number of acres the new regulations will likely remove from potential industrial development, compared to the existing acknowledged regulations, and (2) evaluate the impact of any net reduction in land supply on the city's Goal 9 inventory of industrial lands. The second step will entail making at least some determinations regarding the adequacy of the city's industrial land supply, before and after application of the new regulations.

- B. In recognition of the Gunderson decision, industrial property owners within the “Airport Futures Plan Area” demanded in hearing testimony that the proposed environmental zoning overlay zones be removed from their properties prior to the Comprehensive Plan and Zoning Map amendments being adopted. The “Airport Futures” plan and zoning changes were adopted soon after (April 2011). The request by industrial land owners for the city to remove the environmental overlay zones was followed/complied with for all non-governmental industrial lands **except** the subject NE Levee Road properties. Within the “Airport Futures” area, the NE Levee Road Industrial Sanctuary properties were the only privately owned properties in the industrial lands inventory that had environmental restrictions placed on them. No analysis of the developable industrial acreage lost due to the environmental zoning was ever done, in blatant disregard of the Gundersun vs. City of Portland requirements.
- C. Since the City of Portland chose to not comply with the requirement to determine the amount of acreages lost and the resulting impact on the industrial lands inventory as a result of the extensive environmental overlay zones mapped on the NE Levee Road properties, then we must conclude that the city never intended to actually ensure that the properties were available for later industrial development. The city cannot have it both ways: count the properties in the industrial inventory and also apply environmental zoning to severely restrict their later use as industrial properties.
- D. In conclusion, the Industrial Sanctuary Comprehensive Plan designation for the subject properties should be removed.

CAROLYNN D. AND JOHN R. LOACKER
6135 SOUTHWEST MILL STREET
PORTLAND, OREGON 97221-1451

RECEIVED
PLANNING BUREAU

2015 MAR 13 P 3:18

March 13, 2015

Planning and Sustainability Commission (PSC)
1900 S.W. 4th Ave., Suite 7100
Portland, Oregon 97201

Ms. Fredrickson,

We are writing to express our displeasure with the request for a zoning change at 6141 S. W. Canyon Court from R20 to Multi Family 2000 and the development at 6400 S.W. Canyon Court, case file number LU 14-241892 AD, requesting a variance to allow building heights in excess of the stated limits. Both of these requests will have a significant impact on the quality of our neighborhood. Both of these proposed developments, with a concentrated high density of residents West of 61st on Canyon Court, will double the number of residents in the entire neighborhood known as Sylvan Highlands.

With regard to the request for a zone change at 6141 S.W. Canyon Court, a change to Multi Family 2000 could result in 27 additional residents, most likely being accommodated by constructing apartments. With ingress and egress onto 61st Avenue, as is now the case, this would put considerable pressure on a narrow road with no curbs or sidewalks. The intersection at 61st and Canyon Court would only become more congested and dangerous for drivers, cyclist and walkers. With an apartment complex on this narrow road, the neighborhood structure and character would be significantly changed.

As for the development request at 6400 S.W. Canyon Court, this would take density in a residential neighborhood to a new level. This proposal itself could add close to 500 additional residents, with parking for 240 cars, without easy access to public transportation, and the necessary infrastructure such as safer roads and sidewalks. This proposal would lead to an extraordinary increase in density in an otherwise sparsely populated neighborhood.

We hope the City of Portland will look closely at these proposals in light of decreasing the density within our city through down-zoning, especially in neighborhoods such as Sylvan Highlands.

Sincerely,



John R. Loacker



Carolynn D. Loacker

To: Planning and Sustainability Commission

From: Alice Blatt, 15231 NE Holladay, Portland OR, 97230

Re: tsp 50009

We have been led to believe that the City may be looking favorably on helping Wilkes resolve our difficulties on 148th, about which we would be most pleased. For years the Wilkes Community Group has been concerned about sidewalk and bike lane inadequacy along NE 148th, from Glisan to Marine Dr. – first, involving access to the highly popular Glendoveer Golf Course walking trail; second, access to Margaret Scott School in the south west quadrant of the Sacramento and 148th intersection; and third, the whole safety issue under and north of the railroad overpass (I-84), which is one of only three access streets under I-84 (122nd , 148th , 162nd) from Halsey St. to Sandy Blvd..

Safety factors under and north of the railroad bridge on 148th include –

- 1) No traffic control signals between Halsey and Sandy (distance 1.25+ miles) or crosswalks, regulated or otherwise (one flashing light warning of Rose Parkway from east)
- 2) Northbound on 148th, downhill compression from four to two lanes under overpass, generally generating increased vehicular speed.
- 3) No paved sidewalk or bike lane on east side, from Sacramento under overpass to Klickitat; also Fremont to Sandy. Walkway under overpass is unlit, unpaved, and frequently muddy.
- 4) No paved sidewalk or bike lane on west side from Stanton Ct. to Sandy.
- 5) The visibility (line of sight) problem was brought to our attention with a recent development proposal at 3001 NE 148th (see accompanying photo, taken from driver's level at proposed development exit point, of the UP railroad overpass to the south). Additional developable property currently exists north of the Parkrose Chateau to Sandy Blvd., with its potential for much increased traffic.
- 6) The streets and group driveways north of I-84 connect with 148th mostly in an alternating pattern, making addition of a traffic control signal problematic:
 - a. From west:
Stanton Ct. (Argay Downs) = approx. 43 homes
Parkrose Chateau
two driveways from Rivercrest Church
Nam-Quang Temple
147th intersection
 - b. From east:
148th Pl. - approx. 46 homes
Rose Parkway and Siskiyou Ct. - approx..300 condominium units
Klickitat
Fremont – approx. 140 homes

Is alteration of the street configuration to improve the line-of-sight problem possible?

Thank you for your consideration.



Mission: To enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.



March 13, 2015

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

Dear Chair Baugh and Planning and Sustainability Commissioners:

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

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

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

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

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

ADEQUACY OF ECONOMIC POLICY

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

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

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

Trade and transportation is of critical importance to the Portland-Vancouver region. While investment in harbor businesses has continued to be robust following the deepening of the Columbia River shipping channel, the Comprehensive Plan and Economic Opportunity Analysis (EOA) downplay and may even impact the viability of this investment. The level of investment in new, expanded or more efficient facilities in the Portland-Vancouver Harbor and on the entire Columbia suggests that there is a much greater demand for Harbor Access Lands than is being accounted for or planned for. While the City's initial draft EOA used a medium forecast based land demand, the January 2015 Proposed Draft EOA assumes a low forecast based land demand. We believe this is not supported by the facts of actual harbor demand and will leave the City and state behind the curve of economic upturns restricting opportunities for growth and greater job diversity.

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

A supportive West Hayden Island annexation policy also has a direct connection to other policies contained in the Comprehensive Plan, including land supply, traded sector competitiveness, equitable household prosperity, industrial and employment districts, preservation of open space, and enhancement of various habitat types critical to listed species.

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

EQUITY AND GROWTH

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

Strengthening every element of the Comprehensive Plan that addresses job growth, especially middle-income job growth continues to be a priority for the Port.

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

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



BROWNFIELD REDEVELOPMENT

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

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

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

TRANSPORTATION

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

As reinforced by statewide shippers' reaction to the recent departure of Hanjin container service to Asia, the Portland freight hub is critical to the state and local economy. Distillers depend on glass bottles shipped by low-carbon methods from factories in Asia, while blueberry growers depend on the same mode to export perishable products to Japan. Having direct-calling service (both ocean and air) for moving cargo adds to the quality of life in our region. Local exporters have reduced shipping costs and are more competitive in the marketplace, creating jobs for Portland residents. Lower costs are also enjoyed by importers such as Fred Meyer and Les Schwab. In turn, they are able to reduce prices to their customers, affording greater access to consumer goods to a wider range of Portland residents. Decisions in Portland have implications for other counties in the region and state that rely on the Portland freight hub. This rural-urban economic linkage should be acknowledged in the Comprehensive Plan.

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

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

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

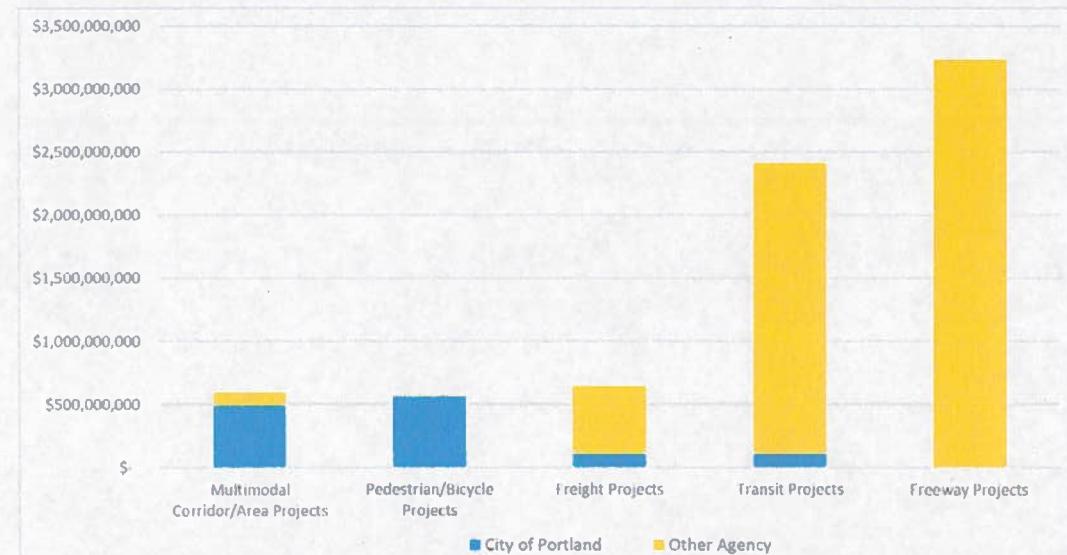
Portland's economy is far more dependent on freight movement than most other U.S. cities. The Portland region has the third highest percentage of total employment in the distribution and logistics sectors in the U.S., comprising 11% of the region's workforce. According to the Oregon Department of Employment,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

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

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

From February 24 PBOT presentation at PSC:

Constrained Investments by Mode & Agency



33 PORTLAND.OREGON.GOV/TRANSPORTATION

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

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

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

Andre Baugh
March 13, 2015
Page 7

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

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

Please see attached TSP list changes.

BALANCE

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

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

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

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

Sincerely,



Susie Lahsene

Senior Manager, Transportation and Land Use Policy

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

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

TSP ID 40032: Columbia/Alderwood/Cully Intersection improvements

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

TSP ID 40009: NE 47th Ave Corridor Improvements

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

TSP ID 110190: Killingsworth/I-205 Interchange Improvements

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

TSP ID 40102: Columbia Blvd. Street Widening

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

TSP ID 30055: North Portland Junction: Undoing the X

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

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

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

TSP ID 40025: 82nd and Airport Way Grade Separation

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

TSP ID 40085: Kenton Rail Line Upgrade

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

TSP ID 103750: Cathedral Park Quiet Zone

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

TSP ID 113090: Cully Blvd. Rail Overcrossing

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

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

Bonneville Rail Yard Build Out

Construct two interior yard tracks and complete the double track lead from the wye at the east end of the yard to Barnes Yard. Add rail staging capacity for South Rivergate.

Cost: \$3,600,000

Widen Airport Way Outbound east of 82nd

Add new lane to provide additional capacity for anticipated growth in passenger traffic.

Cost: \$3,335,000

Deplaning Curbside Roadway Lanes

Add new lane to provide additional capacity for anticipated growth in passenger traffic.

Cost: \$2,976,000

Airport Way Westbound Approaching Return Road

Add new lane to provide additional capacity for anticipated growth in passenger traffic.

Cost: \$1,080,000

Terminal Exit Roadway at Post Office Curves

Add new lane to provide additional capacity for anticipated growth in passenger traffic.

Cost: \$1,500,000

Terminal Exit Roadway at Parking Plaza

Add new lane to provide additional capacity for anticipated growth in passenger traffic.

Cost: \$1,104,000

PDX Light Rail Station/Track Realignment

RTP# 10364 Realign light rail track into terminal building.

Cost: \$16,330,700

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

Willamette River Channel Deepening

Deepen the portions of the Willamette River with deep draft infrastructure to -43' where appropriate. Allow Willamette River terminals to also benefit from the Columbia River's new controlling depth.

Cost: \$200,000,000

To: Planning and Sustainability Commission
psc@portlandoregon.gov
1900 SW Fourth Ave
Portland, Oregon 97201-5380

Re: Corner Lot Development

I am requesting that the specific language shown below be removed from the general description of land use designations on page GP10-8 the Proposed Draft 2035 Comprehensive Plan:

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 am also requesting that Section 33.110.240.E of the zoning code, that allows corner lots that are zoned RS or R7 to be rezoned to R2.5 if they are larger than 50 feet by 110 feet, be removed from the zoning code associated with the Proposed Draft 2035 Comprehensive Plan.

The Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted similar requests.

Please add this to the record.

Thank you,

Carol McCarthy
(Name)
4311 SW Freeman St.
(Address)
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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The Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted similar requests.

Please add this to the record.

Thank you,

(Name) *William F. Killhorn*
(Address) *4311 SW Freeman St., 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

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Please add this to the record.

Thank you,

(Name) *Emily Polansiek*
(Address) *3841 S.W. Canby St. (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

To: Planning and Sustainability Commission
psc@portlandoregon.gov

1900 SW Fourth Ave
Portland, Oregon 97201-5380

Re: Multnomah Village as Neighborhood Corridor

I am requesting that the Planning and Sustainability Commission change the designation of Multnomah Village from a Neighborhood Center to a Neighborhood Corridor in the Draft 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 Capital 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) leaving little room for the existing single-family zoning. According to the BPS, the number of households projected to be located in the Village in 2035 is less than zoned for in the current plan. The BPS has projected a 28% increase in capacity in Multnomah Neighborhood's corridors through the Mixed Use zoning project, thus there is no need for the Neighborhood Center designation. 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,

(Name) *Emily Polanshek*
(Address) *3841 SW Canby St. (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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City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov
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(Name) *William S. Kielhorn*
(Address) *4311 SW Freeman St., Portland OR*
cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
Commissioner Amanda Fritz, Amanda@portlandoregon.gov
Commissioner Nick Fish, nick@portlandoregon.gov
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Susan Anderson, Susan.Anderson@PortlandOregon.gov .
97219

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Community
4311 SW Freeman St.
(Name)
Portland, OR 97219
(Address)

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To: Planning and Sustainability Commission

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1900 SW Fourth Ave.

Portland, Oregon 97201-5380

**Re: Environmental Zone Regulation Plans
Proposed Draft 2035 Comprehensive Plan**

I am requesting that Policies 8.9 through 8.17 (listed below) of the current Comprehensive Plan be added to Chapter 7, Environmental and Watershed Health, of the Proposed Draft 2035 Comprehensive Plan and that the existing environmental zone plans referenced in these policies be in full force and effect after the 2035 Comprehensive Plan is adopted.

Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted similar requests.

Please add this to the record.

Thank you,

Charlene Cuttin

(Address)

*4311 SW Freeman 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

Susan Anderson, Susan.Anderson@PortlandOregon.gov

To: Planning and Sustainability Commission

psc@portlandoregon.gov

1900 SW Fourth Ave.

Portland, Oregon 97201-5380

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Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted similar requests.

Please add this to the record.

Thank you,

(Name) *Emily Polanshek*

(Address) *3841 S.W. Canby St. (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,

(Name) *William F. Kilhorn*

(Address) *4311 SW Freeman 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
Susan Anderson, Susan.Anderson@PortlandOregon.gov

To: Planning and Sustainability Commission

psc@portlandoregon.gov

1900 SW Fourth Ave

Portland, Oregon 97201-5380

Re: The Role of Neighborhood Associations

Proposed Draft 2035 Comprehensive Plan

I am requesting that the following policies be added to Chapter 2, Community Involvement, in the Proposed Draft 2035 Comprehensive Plan:

New Policy #1: *Neighborhood Associations are Portland's acknowledged Citizen Involvement Program.*

New Policy #2: *All of the policies adopted in the current comprehensive plan concerning neighborhood plans, area plans, neighborhood livability, neighborhood character, and neighborhood stability must be included in the proposed draft.*

I am also requesting the following changes to the glossary to be consistent with the City Code 3.96:

Neighborhood: *A geographically contiguous self-selected community. A Neighborhood is defined by the geographic boundary as established by the Neighborhood Association and as accepted by the City.*

Neighborhood Association: *A Neighborhood Association is the basis of Portland's acknowledged Citizen Involvement Program. It is an autonomous organization formed by people for the purpose of considering and acting on issues affecting the livability and quality of their Neighborhood, formally recognized by the Office of Neighborhood Involvement, and subject to Portland Code Chapter 3.96.*

Both the Multnomah Neighborhood Association and Southwest Neighborhoods, Inc. have made similar requests.

Please add this to the record.

Thank you,

(Name) *William J. Kilhorn*

(Address) *4311 SW Freeman St., 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

97219

To: Planning and Sustainability Commission
psc@portlandoregon.gov
1900 SW Fourth Ave
Portland, Oregon 97201-5380

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Proposed Draft 2035 Comprehensive Plan**

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Please add this to the record.

Thank you,

(Name) *Charlie Hales*
(Address) *4311 SW Freeman 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

Susan Anderson, Susan.Anderson@PortlandOregon.gov

Charlie Hales, Portland Mayor

mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

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

Re: Request for PSC Timeline Changes
2035 Comprehensive Plan

I am requesting that the Planning and Sustainability Commission change the timeline as shown in Figure 1. The timeline modifications allow citizens to comment on the complete 2035 Comprehensive Plan before it goes to City Council. This permits the citizens to comment on the adopted definitions from the Campus Institutional Project and the Mixed Use Zone Project before they are incorporated into the Comprehensive Plan. These changes, as shown in Figure 1, revise the City's timeline as follows:

- 1) Remove the PSC vote in March 2015.
- 2) Change the July 2015 City Council hearings on the Comprehensive Plan Goals and Policies to PSC hearings which allows citizens the chance to comment on revisions made by the PSC before the Goals and Policies are incorporated into the Comprehensive Plan.
- 3) The November 2015 City Council hearings would be changed to PSC hearings to allow citizens an opportunity to comment before the Comprehensive Plan and the Implementation Package move forward to City Council.
- 4) Reschedule the City Council hearings on the Comprehensive Plan and Implementation Package to February 2016.

The modified timeline would need to be slightly condensed to meet the December 31, 2015 deadline or an extension would need to be requested. Extending the deadline of Task 4 would require State approval from the DLCD. It is our understanding that the DLCD would grant these timeline changes and extension requests. The timeline changes would make the process to adopt the 2035 Comprehensive Plan consistent with the provisions of Goal 1 Citizen Involvement of the Oregon's Statewide Planning Goals and Policies OAR 660-015-0000(1).

Please add this to the record.

Thank you,

Chris McCarthy
(Name)
4311 SW Freeman St
(Address)
Portland, OR 97219

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

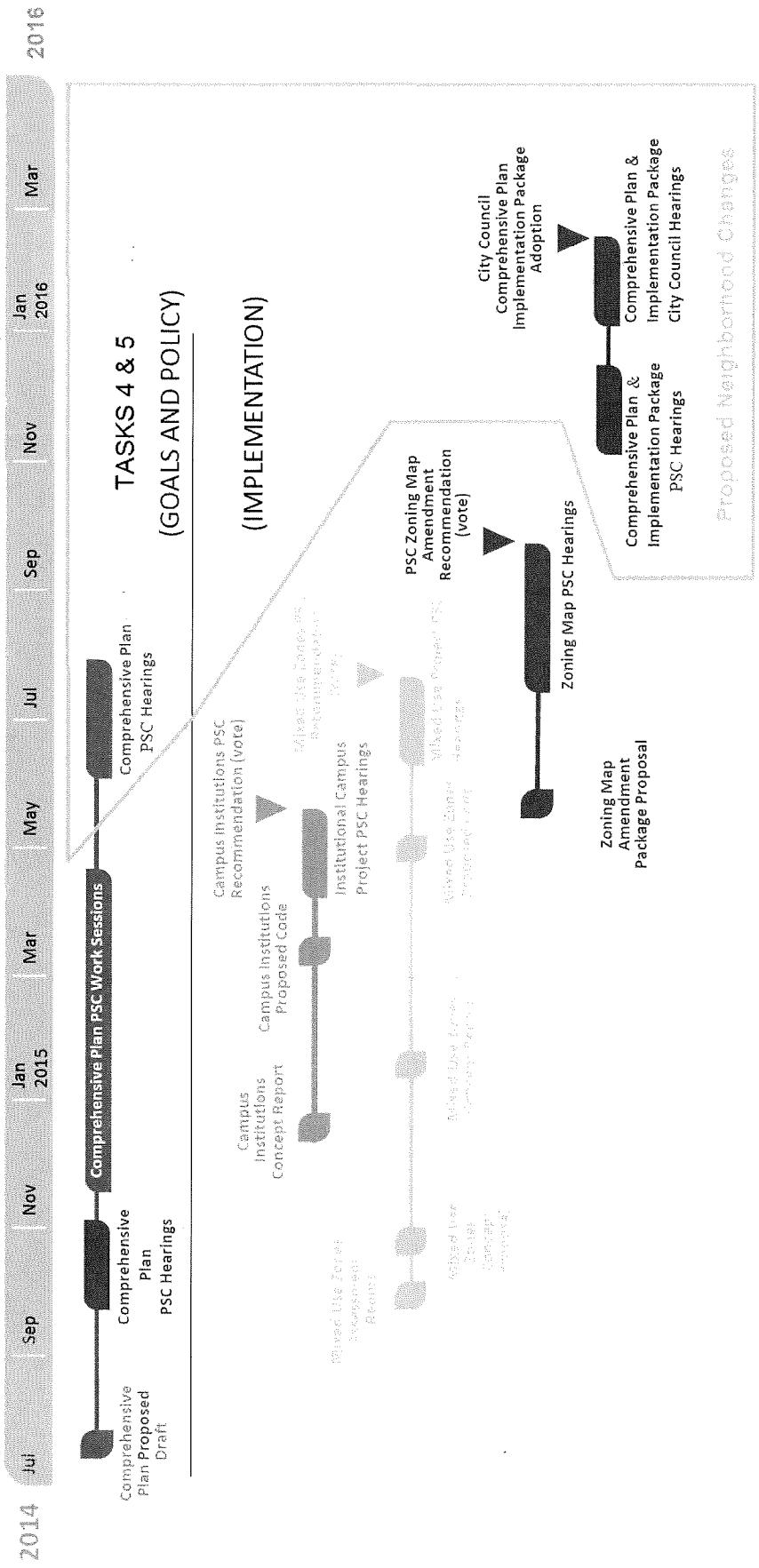
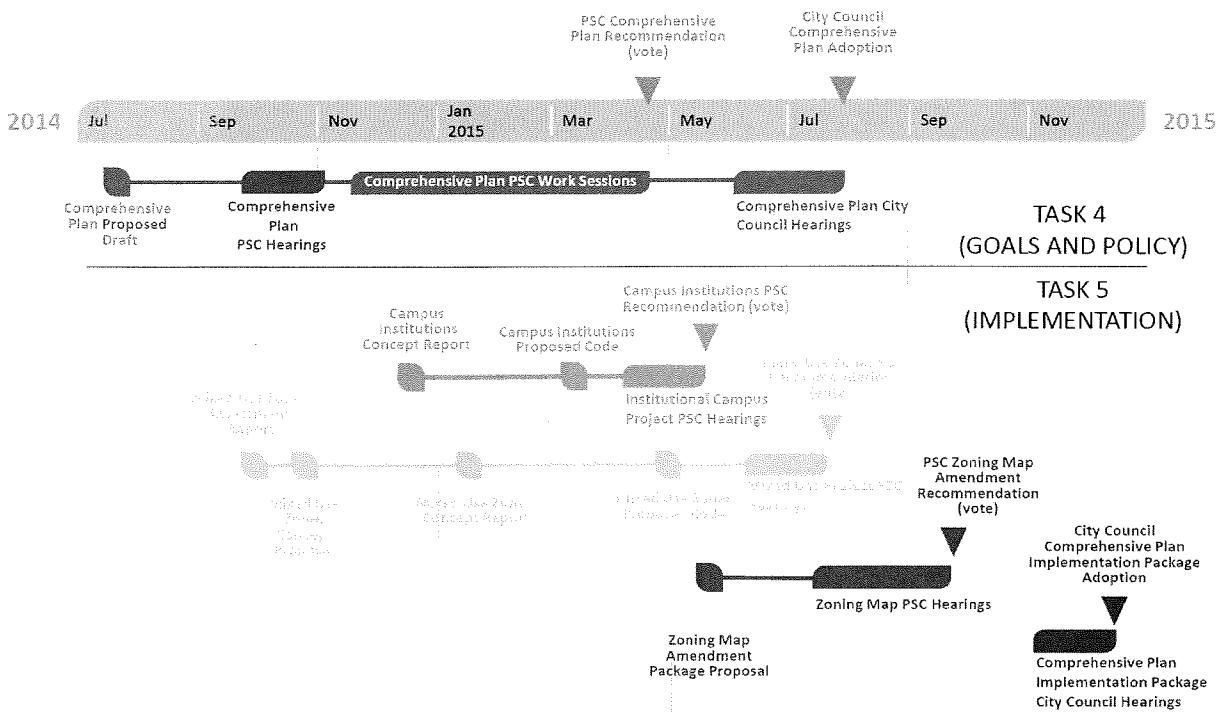


Figure 1 – Neighborhood Modified Timeline



Charlie Hales, Portland Mayor

mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

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

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Please add this to the record.

Thank you,

(Name) *Emily Polanshek*

(Address) *3841 S.W. Camby St. (97219)*

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

Charlie Hales, Portland Mayor

mayorcharliehales@portlandoregon.gov

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Please add this to the record.

Thank you,

(Name)

William F. Kellhorn

(Address)

4311 SW Freeman St. 97219

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

To: Planning and Sustainability Commission
psc@portlandoregon.gov

1900 SW Fourth Ave
Portland, Oregon 97201-5380

Re: Requesting for Comment Period Extension and Additional Hearings

I am requesting that the record be left open to allow comments on the Proposed Draft 2035 Comprehensive Plan for at least 90 days after the definitions of the mixed use zones and campus institutional zones have been made public. Both the Multnomah Neighborhood Association and Southwest Neighborhoods Inc. have submitted similar requests. Without the definitions and the deadline extension, the citizens and Neighborhood Associations will not be able to evaluate the impact of the new zoning designations.

I would also like to request that additional hearings on the Proposed Draft be scheduled, including one in Southwest Portland out of the central city.

Please add this to the record.

Thank you,

(Name) *Emily Polanshek*
(Address) *3841 S.W. Canby St. (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

To: Planning and Sustainability Commission
psc@portlandoregon.gov

1900 SW Fourth Ave
Portland, Oregon 97201-5380

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Please add this to the record.

Thank you,

(Name) *William T. Kielhorn*
(Address) *4311 SW Freeman St., 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
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Please add this to the record.

Thank you,

*Carol McCatty
4361 SW Freeman 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
Susan Anderson, Susan.Anderson@PortlandOregon.gov

Comment #4112

Please protect us from industrial waste. We don't need to look like West Virginia! We are Oregon! We are green! We want to stay green and in fact become more green.

Thank you.

Brenda & Bryan Brown

1614 5th St

Tillamook Oregon 97141

541-41-2351

Brenda Brown <karambabrown@gmail.com>

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:26 AM
To: Kovacs, Madeline
Subject: FW: Proposed Change #88 SE 14th and Stark

Follow Up Flag: Follow up

Flag Status: Flagged

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

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

From: ken Diener [mailto:kjdarch.com]
Sent: Friday, March 13, 2015 9:02 AM
To: Planning and Sustainability Commission
Subject: Proposed Change #88 SE 14th and Stark

Proposed Change #
88

Pasted from <<http://www.portlandmaps.com/bps/cpmapp2/>>

Absolutely the WRONG change and the MOST unfair situation for zone splitting a block for the existing neighbors. That block is R2.5 and R1 the neighbors, THE OAK St residences bought their property with that contract with the city and government trust. A change to any commercial allowing 45' high mixed use or 4 stories of residential towering over their back yards to the SOUTH is a total change of the quality of life and VALUE to their home. Adding allowed height to the North side of a street, backing up to a split block residential to the NORTH creates a absolute THIEVERY of sun and sky access that NO PLANNER SHOULD ALLOW.

Ken Diener
KJD Architecture PC
536 SE 17th Ave
Portland Or 97214

p.503-231-2884
f. 503-231-9521

Kend@kjdarch.com
www.kjdarch.com

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 8:53 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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From: Daniel Campbell [mailto:campbell.danieljames@gmail.com]
Sent: Friday, March 13, 2015 8:45 AM
To: Planning and Sustainability Commission; Transportation System Plan; Stockton, Marty
Subject: Comprehensive Plan Testimony

ATTN: BPS, PBOT, the City of Portland and other concerned individuals,
March 12, 2015

At its March 9, 2015, general meeting, the Foster Powell-Neighborhood Association (FPNA) voted to support the following projects for the Portland Transportation System Plan.

70071 Portland Sixties Neighborhood Greenway. Design and implement bicycle facilities.
60s Aves, NE/SE (Hancock - Springwater Trail)
70052 SE Seventies Neighborhood Greenway. 70th to 80th Ave, NE/SE (i-84 – Clatsop) Design and implement a bikeway using neighborhood greenway and/or separated in- roadway treatments, with crossing improvements as needed at major streets. Project includes parallel segments on both 76th and 80th through the Montavilla neighborhood.

The Foster Powell Neighborhood Association believes that it is important to include all three of the Holgate Blvd projects as we consider them as one whole project (Buffered Bike Lanes on Holgate, I-205 to SE 17th).

70031 Middle Holgate Bikeway, Holgate Blvd, SE (52nd - I-205). Design and implement bicycle facilities.

70032 Holgate Blvd Corridor Improvements, Holgate Blvd, SE (39th - 52nd). Reconstruct pavement structure and stormwater drainage facilities, improve corner curb ramps to ADA standards, improve pedestrian crossings, and add bicycle facilities.

70033 Inner Holgate Bikeway, Holgate Blvd (Se McLoughlin – 39th). Design and implement bicycle facilities. Project design will consider freight movement needs, consistent with policies, consistent with policies, street classification(s) and uses.

40013 82nd Ave Corridor Improvements, 82nd Ave, NE/SE, (Killingsworth - Clatsop)
Design and implement multimodal improvements to sidewalks, crossings, transit stops, striping, and signals to enhance ped/bike safety, access to transit, and transit operations. Project design will consider freight movement needs, consistent with policies, street classification(s) and uses. Foster Powell Neighborhood Association also recognizes another project that is not on the TSP, The 80th Greenway. This project is important not only from an equity standpoint, but can also be beneficial from a workforce development and as an economic growth strategy.
Feel free to contact me at campbell.danieljames@gmail.com or 503-459-8125.

Sincerely,

Dan Campbell
Transportation Chair, Foster-Powell Neighborhood Association
3927 SE 64TH Ave
Portland, OR 97206

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:03 AM
To: Kovacs, Madeline
Subject: FW: 2035 Comprehensive Plan Comments - put the Burnside-Couch couplet money towards capping I-405

I am 100% positive we have her address somewhere.

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
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www.portlandoregon.gov/bps

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From: mvogelpnw@gmail.com [mailto:mvogelpnw@gmail.com] On Behalf Of Mary Vogel
Sent: Thursday, March 12, 2015 6:09 PM
To: Planning and Sustainability Commission
Cc: Dingfelder, Jackie
Subject: 2035 Comprehensive Plan Comments - put the Burnside-Couch couplet money towards capping I-405

Th
is comment deals with the 2035 Comp Plan's List of Significant
Projects: <http://www.portlandoregon.gov/bps/article/497133>.

While I support this one dealing with W. Burnside, I believe the portion of W. Burnside from the bridge to 15th also needs such treatments.

Burnside, NW 15th to NW 23rd
Boulevard design improvements including pavement reconstruction, wider sidewalks,
curb extensions,

safer crossings,
traffic signals at 20th Pl and 22nd, and traffic management to limit motorist delays. \$18 M.

I strongly oppose this couplet project (below) and urge you to instead spend that money on the City's portion of a cap for I-405 between the Downtown and Goose Hollow neighborhoods

Burnside/Couch,W/NW (Burnside Bridge ? NW 15th): Couplet and Street Improvements, Phase I Implements a one ? couplet design including new traffic signals, widened sidewalks, curb extensions,bike lanes, on?street parking and street trees.

This project will be coordinated with ODOT to address potential impacts to the I?405 interchanges, overcrossings and ramp. \$75,895,353

Mayor Hales himself told me that the westside couplet was off the table.

At first, I thought that these

Significant Projects left out all of the West Quadrant, but there are several projects in Old Town /Chinatown on the list.

So there is nothing regarding capping I-405--not even money to explore the idea.

I know the City is saying that any such capping will be done by the private sector, but the public sector will obviously have to have some skin in the game. I urge you to put the Burnside-Couch couplet money towards capping I-405.

Mary
Vogel

Downtown resident, small business owner and member of the Downtown Neighborhood Association Land Use and Transportation Coommitee

Mary Vogel, CNU-A

Bringing services nature provides to community design & planning
A Woman Business Enterprise/Emerging Small Business in Oregon

503-245-7858

mary@plangreen.net
<http://plangreen.net>

Blog: A Perspective on Riverwalks

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

From: Mary Vogel <mary@plangreen.net>

Date: Thu, Mar 12, 2015 at 5:40 PM

Subject: I urge you to comment by tomorrow 11:29 PM - 2035 Comprehensive Plan

To: Beth Hansen <bethatmarys@gmail.com>, Daniel Friedman

<daniel.friedman.portland@gmail.com>, Felicia Williams <flw14@hotmail.com>, Jennifer

Geske <jennifergeske@gmail.com>, Jim Werner <jimw1601@yahoo.com>, "Linda H. Mantel"

<crablady@teleport.com>, Marv Mitchell <Marv@juliawest.org>, Michael Caputo

<michael.l.caputo@gmail.com>, Rani Boyle <iboyle@pdx.edu>, Robert Wright <wright-stuff@comcast.net>, Travis Walker <travis.walker@cadmusgroup.com>, Ty Symroski

<ty@centurylink.net>, Wendy Rahm <Wwrahm@aol.com>, David Newman

<md.newman@comcast.net>, Elaine Winters <ewint7@yahoo.com>, Father James Mayo

<Pastor@stmichaelportland.org>, Michelle Southpark <rn4women@yahoo.com>, Mona Sanger

<msanger102@gmail.com>, Ruth Ann Barrett <ruthannbarrett@mac.com>, Sandra Trainer

<sandrateeltrainer@gmail.com>, Steve Trujillo <stevetru@gmail.com>, Deanna Mueller-Crispin

<Deanna@involved.com>, Gunnar Sacher <gsacher@yahoo.com>, Steve Pinger

<steve@katsommo.com>

The 2035 Comp Plan's List of Significant Projects can be found

here: <http://www.portlandoregon.gov/bps/article/497133>. There are several that deal with W. Burnside, but mostly from SW 15th up. (There is one about bridge connection

improvements.) Here are a couple:

Burnside, NW 15th to NW 23rd

Boulevard design improvements including pavement reconstruction, wider sidewalks, curb extensions, safer crossings, traffic signals at 20th Pl and 22nd, and traffic management to limit motorist delays. \$18 M.

I do wonder if the Preserve the Pearl folks know about this one:

Burnside/Couch, W/NW (Burnside Bridge ? NW 15th): Couplet and Street Improvements, Phase I Implements a one ? couplet design including new traffic signals, widened sidewalks, curb extensions, bike lanes, on?street parking and street trees.

This project will be coordinated with ODOT to address potential impacts to the I?405 interchanges, overcrossings and ramp. \$75,895,353

I had thought that the westside couplet was off the table.

Only one other one that I could find dealt with I-405, but that was near the Ross Island Bridge. At first, I thought that these projects left out all of the West Quadrant, but there are several projects in Old Town /Chinatown on the list.

So there is nothing regarding capping I-405--not even money to explore the idea.

Comments are due tomorrow on the 2035 Comprehensive Plan

<http://www.portlandoregon.gov/bps/65310>. Probably the easiest way to make those comments are to write psc@portlandoregon.gov or make them directly on the MapApp.

I know the City is saying that any such capping will be done by the private sector, but the public sector will obviously have to have some skin in the game. I urge you to comment about capping I-405--both on the Map App and to the PSC.

Mary

Mary Vogel, CNU-A

Bringing services nature provides to community design & planning
A Woman Business Enterprise/Emerging Small Business in Oregon

503-245-7858

mary@plangreen.net

<http://plangreen.net>

Blog: A Perspective on Riverwalks

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:09 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony: Traffic Calming on SE 72nd Avenue in Foster Powell Neighborhood

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

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From: Daniel Campbell [mailto:campbell.danieljames@gmail.com]
Sent: Thursday, March 12, 2015 8:39 PM
To: Planning and Sustainability Commission; Stockton, Marty; Hurley, Peter T. (PDOT); Jennings, Rodney (PLN); Howard, Alexandra
Cc: Li Alligood; Jennifer Merrill; Vicki Wilson; Meg McHutchison; Erica bjerning; nierika@gmail.com; Christian; info@fosterunited.org; fosterpowellneighborhood@gmail.com; Ben Hedstrom
Subject: Comprehensive Plan Testimony: Traffic Calming on SE 72nd Avenue in Foster Powell Neighborhood

March 11, 2015

At its March 9, 2015, general meeting, the Foster Powell-Neighborhood Association (FPNA) voted to support prioritizing traffic calming efforts on SE 72nd Ave between Foster Rd and Powell Blvd as part of the proposed 'SE Seventies Neighborhood Greenway' (Transportation Project ID 70052).

In the case that the 'Seventies Greenway' alignment changes from what is proposed in the current Draft 2035 Comprehensive Plan (along 72nd between Powell and Foster), traffic calming is still a high need for this neighborhood street and the Foster-Powell Neighborhood Association supports assessing this action soon to encourage safe pedestrian access and alleviate increased vehicle usage in the future.

SE 72nd Avenue between Powell and Foster is a significant pedestrian access connecting several neighborhood amenities for Foster-Powell and adjacent neighborhoods:

- * Mount Scott Park and Community Center, Mt. Tabor, Essex Park, and Kern Park.
- * Businesses on Foster Avenue and Powell Boulevard
- * Neighborhood schools including Arleta Elementary (the neighborhood school for much of the Foster-Powell Neighborhood), Marysville Elementary, Wild Lilac Child Development Community, Youngston School at Pioneer, Franklin High School, Atkinson Elementary, and the Kellogg Middle School Property.

- * Major TriMet lines on Powell, Foster, Holgate and Division.
- * The Holgate Public Library
- * Portland Mercado (72nd and Foster)
- * The Jade District
- * North/South Connections to the Lents Neighborhood
- * Connections to the Springwater Corridor Trail, as well as existing Neighborhood Greenways, utilized by many residents for commuting across the city.
- * Farmers Markets and businesses in the neighborhoods of Montavilla and Woodstock

The importance of this neighborhood pedestrian connection is strongly identified in the current Portland Comprehensive Plan update as not only an ‘Enhanced Greenway Corridor’ but north portions are a ‘Potential Habitat Corridor’ between Mount Tabor and Lents Park (Urban Design Direction p 30-32, 2014). It is unacceptable to see this important residential street continue to be prioritized for automobiles.

The Problem: SE 72nd Avenue falls along an increasingly common North/South roadway alignment. Cars can virtually cut-through the entire length of the city, from NE Columbia Boulevard to Johnson Creek, switching between NE 57th, NE/SE 60th, and SE 72nd Avenues. Drivers use these neighborhood streets to bypass congestion on I-205 or 82nd, traveling between North Portland and Clackamas County and all points in between.

While portions of this street configuration have been designed for a higher speed and capacity (or are at least wide enough to separate traffic from pedestrian use) the blocks of SE 72nd between Foster and Powell constitute narrow neighborhood streets that are not designed to handle the speeds or capacity of current usage. Cars and commercial trucks are often seen and heard traveling at speeds of 30-40 miles an hour, much higher than the posted 25 mph, especially at rush hour and in the morning as children are heading to neighborhood schools.

Adding to the traffic speeds, SE 72nd between Powell and SE Center is identified as a city emergency route and does not contain any traffic calming measures. Vehicles traveling North and South from adjacent stretches of SE 72nd (where the streets are designed for a higher capacity, or contain speed humps) are able to suddenly fly through the Foster-Powell neighborhood, unencumbered by calming measures. The street is only three car-widths wide, so high speed vehicles are constantly weaving and pausing around parked cars and bicyclists, waiting for on-coming vehicles, thus increasing driver frustration, unpredictable traffic patterns, and aggressive driving. Frequently drivers feel the need to speed up, hurrying so vehicles traveling in the opposite direction can pass when paused behind a parked car.

No one could argue that neighborhood blocks should be an alternate route to I-205. Action should be prioritized to discourage usage of these blocks for cross-city cut-through traffic. The current condition of this street is one that is not safe or inviting to pedestrians, children, pets, or the many families that call this street home.

Potential Solutions:

- * The ‘Seventies Greenway’ proposal is identified in the current Draft 2035 Comprehensive Plan. While a safe, dedicated North/South pedestrian connection through the heart of Foster Powell is a desired amenity connecting pedestrians to the several locations listed above, it is understood that there is an effort to shift the Neighborhood Greenway alignments to the North and South (67th and 80th avenues). While many residents on SE 72nd have expressed the desire for this bikeway, in the case that the city determines that the ‘Seventies Greenway’ is not the best alignment, traffic calming measures still need to be taken to benefit pedestrians and residents along this street.

A draft greenway proposal by the SEUL Bikeway group includes a Greenway for a stretch of SE 72nd between SE Lafayette and SE Center. The FPNA supports prioritizing this stretch of 72nd as a Neighborhood Greenway connecting pedestrians in Foster-Powell to adjacent amenities listed above, to be considered in conjunction of the development 60's Bikeway as this route provides a more direct route to neighborhoods north of Mt Tabor. Traffic calming measures should be included in any Neighborhood Greenway proposal involving this stretch of SE 72nd.

- * Semi-diverters as seen as part of the 50's bikeway (52nd and Division, 52nd and Burnside) would be an effective measure against the similar type of cut through traffic seen at these locations and emergency vehicles would still be able to use the street. Properly designed diverters would send vehicles making longer North/South trips around the neighborhood at proper avenues (39th, 50th, and 82nd) while making the street available only for local traffic, as the street was designed.
- * Emergency vehicle-friendly speed reduction devices as PBOT is testing throughout the city.
- * Speed reduction. Currently speed is posted at 25. Vehicles traveling at this speed are routinely tailgated.
- * Increased speed-limit signs While some 25 mph signs are currently posted, neighbors have reported at least one sign that was removed.
- * Increased enforcement. Residents have notified the Portland Police Department of safety issues on these blocks and have seen an increase in police presence on the street as promised, however this hasn't successfully calmed traffic on this street.
- * Increased street trees and stormwater retention facilities. Green street improvements have been shown to reduce speeds on neighborhood streets. Friends of Trees has been doing incredible outreach in the neighborhood to add new trees on 72nd and throughout Foster-Powell. New stormwater facilities would be a positive next step for the neighborhood.

Supporting City Plans and Strategies Associated with this Proposal:

- * Portland's Draft 2035 Comprehensive Plan
- o Several comments on the Map App echo the need for traffic calming on SE 72nd.
- o Urban Design Direction: <https://www.portlandoregon.gov/bps/article/497442>
- * PBOT Bike Plan For 2030
- o <https://www.portlandoregon.gov/transportation/44597>
- * Portland Transportation System Plan (2007)
- o "Operate Neighborhood Collectors in Southeast Portland to function primarily as circulation for district traffic rather than as regional streets, even where they carry a significant amount of regional traffic." (Ch. 2d, p. 2-69)
- o <https://www.portlandoregon.gov/transportation/52495>
- * Foster Road Transportation and Streetscape Plan
- o <https://www.portlandoregon.gov/transportation/57866>
- * Inner Powell Boulevard Streetscape Plan
- o <https://www.portlandoregon.gov/transportation/article/477972>
- * Safe Routes to Schools
- o <http://www.portlandoregon.gov/transportation/article/478702> (SE 72nd between Powell and Center is labeled a preferred route, the Neighborhood Association would argue that until traffic calming is installed, this is not true. The same goes for 67th at Holgate, where there is a need for pedestrian crossing improvements.)
- * Powell Division Transit Project
- o <http://www.oregonmetro.gov/public-projects/powell-division-transit-and-development-project>
- o As public transportation stops are identified along this project (likely at 72nd and Powell) there is a potential for identifying funding for pedestrian improvements on adjacent streets. As this is a key pedestrian access for public transportation, we hope the city can work with Metro and TriMet to identify and prioritize pedestrian improvements as part of this planning process.

- * Metro's Climate Smart Strategy
- o "Make biking and walking safe and convenient."
- o "Make streets and highways safe, reliable and connected."
- o <http://www.oregonmetro.gov/public-projects/climate-smart-strategy/strategy-elements>

Feel free to contact me at campbell.danieljames@gmail.com or 503-459-8125.

Sincerely,

Dan Campbell

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:15 AM
To: Kovacs, Madeline
Subject: FW: TSP Neighborhood Project Rankings: Parkrose Heights (EPNO)

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
503-823-6041
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From: david hampsten [mailto:david_hampsten@yahoo.com]
Sent: Friday, March 13, 2015 1:23 AM
To: Planning and Sustainability Commission; Transportation System Plan
Cc: Hurley, Peter T. (PDOT); Bauer, Linda; Gray, Karen; Tom Badrick (PHAN/EPN); Bixby, Richard; Scarzello, Christina
Subject: TSP Neighborhood Project Rankings: Parkrose Heights (EPNO)

March 12th, 2015

Dear Portland Planning & Sustainability Commission,

PBOT asked that the East Portland neighborhood associations rank all TSP projects in their area.

On behalf of the Parkrose Heights Association of Neighbors (PHAN) in East Portland, I am forwarding their results to you.

David Hampsten
Hazelwood NA Transportation Chair
302 SE 105th Ave Apt 26
Portland OR 97216
david_hampsten@yahoo.com
971-322-6599

CC: PHAN Board; Linda Bauer, EP LUTC Chair; Karen Gray, PSC; Richard Bixby, EPNO; Peter Hurley, PBOT; Christina Scarzello, BPS East Portland District Liaison

Rank	
TSP #	
Parkrose Heights TSP Project Title	
1	
50038	
Parkrose Heights Pedestrian Improvements	
2	
50049	
122nd Ave Multimodal Improvements	
3	
50048	
NE 111th Pedestrian Improvements (Halsey to Klickitat)	
4	
50019	
Gateway Street Improvements, Phase I	
5	
50020	
Gateway Street Improvements, Phase II	

From: Planning and Sustainability Commission
Sent: Friday, March 13, 2015 9:00 AM
To: Kovacs, Madeline
Subject: FW: Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Follow Up Flag: Follow up
Flag Status: Completed

Julie Ocken
City of Portland
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From: Adam Gross [mailto:adam@theotherhouse.com]
Sent: Thursday, March 12, 2015 5:16 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Planning and Sustainability Commission; Susananderson@portlandoregon.gov
Subject: Re: The continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

The neighborhood of Concordia was established around 1900 and was soon thereafter fully built out with many grand Craftsman style homes interspersed with humble Bungalows and elegant Tudor homes. In the Forties, remaining regions near Fernhill park and along Rosa Parks became stretches of tasteful Ranch homes. All of the development was completed when the R5 (residential 5000 square ft lots like 50x100) designation for zoning meant a minimum 5000 square ft lot. Much of the neighborhood was platted in 25 x 100 lots. It was the practice of the day to elect to own two, three or four such lots for your property. This established a neighborhood "character" of a less crowded nature where trees had room to grow without their bottom branches limbed, and gardens were the norm.

Today, because City policy allows development of these side yards and

gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their back yards, taking away the sunlight that the neighbors took for granted. Saddest of all, with the "a" overlay, each place where a skinny house is built is a place where an ADU (additional dwelling unit, "granny apartment") no longer can be. Hence, the destruction by skinny homes doesn't even improve the number of units the neighborhood can support they just trash the place. This is a neighborhood which could easily be a "Conservation District." It is a Portland treasure that requires measures to protect its historic "character" from any further destruction.

Because of the very beauty of the 25 x 100 subdivided portions of the neighborhood and because of their open form of development, we are particularly harmed by "historic lot" development practices in the R5 areas of our neighborhood. The definition of R5 has been so diluted by this City that it is now only R2.5, particularly when you consider that every lot in these regions is 25 x 100, and they are now all available to develop within the current code. To allow these lots to be developed is a slap in the wallet to everyone who has purchased a home in an R5 neighborhood. First, the State does not recognize them as lots. They are only lots if they meet the zoning requirements for the standard of size. In the case of R5 you would need two 25 x100 lots to meet our zoning! To change the code to allow R2.5 development is to change our zoning! You have up zoned us to R2.5. Everyone in this neighborhood is suffering continued devaluation of our historic place from this development practice.

In response to this City having tacitly up zoned the finest portions of our neighborhood, the Concordia Neighborhood Residents ask that these historically platted and historically developed portions of our neighborhood be afforded the protection of R7 zoning. These subdivisions, like "Irvington Park" surrounding Concordia University, are the historic core of our community. Many homes were established with 10,000 sq/ft lots, many more with 7,500. Of course there are also 5000 square foot lots, but until the 2003 policy package 2A, there was never a 2500 square foot lot. As a neighborhood region historically developed with a character of larger lots interspersed in the fabric, and as that is the property of our neighborhood which we intend to defend, this methodology is akin to any other embattled neighborhood being granted similar protections by down zoning.

Concordia has a portion of our neighborhood which is Zoned R2.5 which is bounded by Alberta and Killingsworth and 22nd ave to the West and 33rd ave to the East. 30th Ave from Killingsworth to Ainsworth is similarly zoned. These are designations that are vestiges of the street car era which ended in 1949. These neighborhoods are built out with R5 construction practices and significant early architecture. The current designation of R2.5 leaves these neighborhood homes as targets of demolitions for the to building lots beneath. The character of this portion of our neighborhood is that of an R5 neighborhood as that was the style of the day. We value this region as it is historically built today. There is no compelling reason for this

area to be zoned R2.5 as it does not abut a transit corridor. As an R5 neighborhood, all empty lots may still be developed with infill housing. We want to afford protection to the existing homes in this historic "Street Car" neighborhood region. This portion of the neighborhood will be protected to our satisfaction with an R5 designation.

Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,

Adam Gross

3569 NE Simpson St
Portland, OR 97211

theotherhouse.com
917.403.7522

FROM: George Diamond and Nicholas Diamond

RECEIVED
PLANNING BUREAU

March 13, 2015

2015 MAR 11 P 2:36

Portland Planning and Sustainability Commission
c/o Ms. Marty Stockton, Southeast District Liaison
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7000
Portland, Oregon 97201

Subject Property: 7601 SE Division Street (1S2E05DC 2400)

Dear Chair Baugh and Fellow Commissioners:

George N Diamond and Nicholas G. Diamond (Diamond) has a contract to purchase this 0.92-acre site at the corner of SE 76th Avenue/SE Division Street. The purpose of this letter is to request specific Comprehensive Plan and Zoning designations for the site on the final Comprehensive Plan Map that the Bureau of Planning and Sustainability (BPS) will be submitting for the Commission's review this summer.

Currently, the site has a split-zone designation, Neighborhood Commercial (CN) 2 on the southern $\frac{3}{4}$ and Multi-Dwelling Residential 2,000 (R2) on the northern $\frac{1}{4}$ of the parcel. This split-zoning is an artifact of a 1989 quasi-judicial Comprehensive Plan/Zone Change (Ordinance 162165) that conditioned the site's sole use as an accessory parking lot to the Kaiser Permanente Clinic at 7705 SE Division Street, one block to the east; the latter facility was sold to Portland Community College (PCC/Southeast (SE) in 2011 and was recently demolished. The intent was to permit the parking lot to occupy the southern portion of the site, which required re-zoning of the site to a commercial designation, but left the upper $\frac{1}{4}$ as a buffer to the R2-zoned property to the north. As the narrow configuration of remaining R2-zoned property does not lend itself to residential development, the current split-zoning would not permit full and flexible redevelopment of the site now that Kaiser Permanente has abandoned its use.

Diamond request had two components:

- Remove the split-zoning situation. It is our understanding that the Bureau of Planning and Sustainability (BPS) has been directed to address the split-zoning issue on hundreds of properties as part of the Comprehensive Plan Update and want to insure that this site is included in this review.
- Adopt the more intense CM2 rather than the CM1 zoning designation. According to the Mixed Use Zone Project: Preliminary Zoning Concept (BPS, 11/5/14), the proposed conversion of the CN1/2 zones is to the least-intense proposed Commercial Mixed-Use (CM) 1 zone. However, SE Division Street in this location is designated as a Major Transit Priority Street, City Bikeway and City Walkway. Moreover, the Powell-Division Transportation Project currently is underway to determine the route for high-capacity transit between Gresham and Downtown Portland along the SE Division Street/SE Powell Boulevard Corridor. The point at which the new route transitions from SE Division Street to SE Powell Boulevard still is under consideration, but could run adjacent to the site before turning southward. For these reasons, BPS is considering the more intense CM2 zoning for the site. Given that the site is one block west of

PCC/SE and surrounded by moderate-intensity zoned properties – R2, R1 and CO1 – the higher CM designation is warranted.

Letter to the Portland Planning and Sustainability Commission

March 13, 2015

Page 2

Thank you for the Commission's consideration in this matter.

Sincerely,



Nicholas Diamond
Principal Broker
Real Estate Investment Group
2839 SW 2nd Ave
Portland, OR 97201
(503) 222-1655
(503) 222-2655 Direct
ndiamond@reig.com

University Park Neighborhood Association

Along trail, change request from IG2 to OS.

PGE site west of substation, change request from R1 to R2 or R5.

PGE site west of substation, change request from R2 to R5.

Water bureau land site east of trail on N Syracuse, change request from R2 to R5.

Privately owned properties from N Macrum east to N Newell, change request from R2 to R5.

Privately owned properties from N Macrum east to N Newell, change request from R2 and R1 to R5.

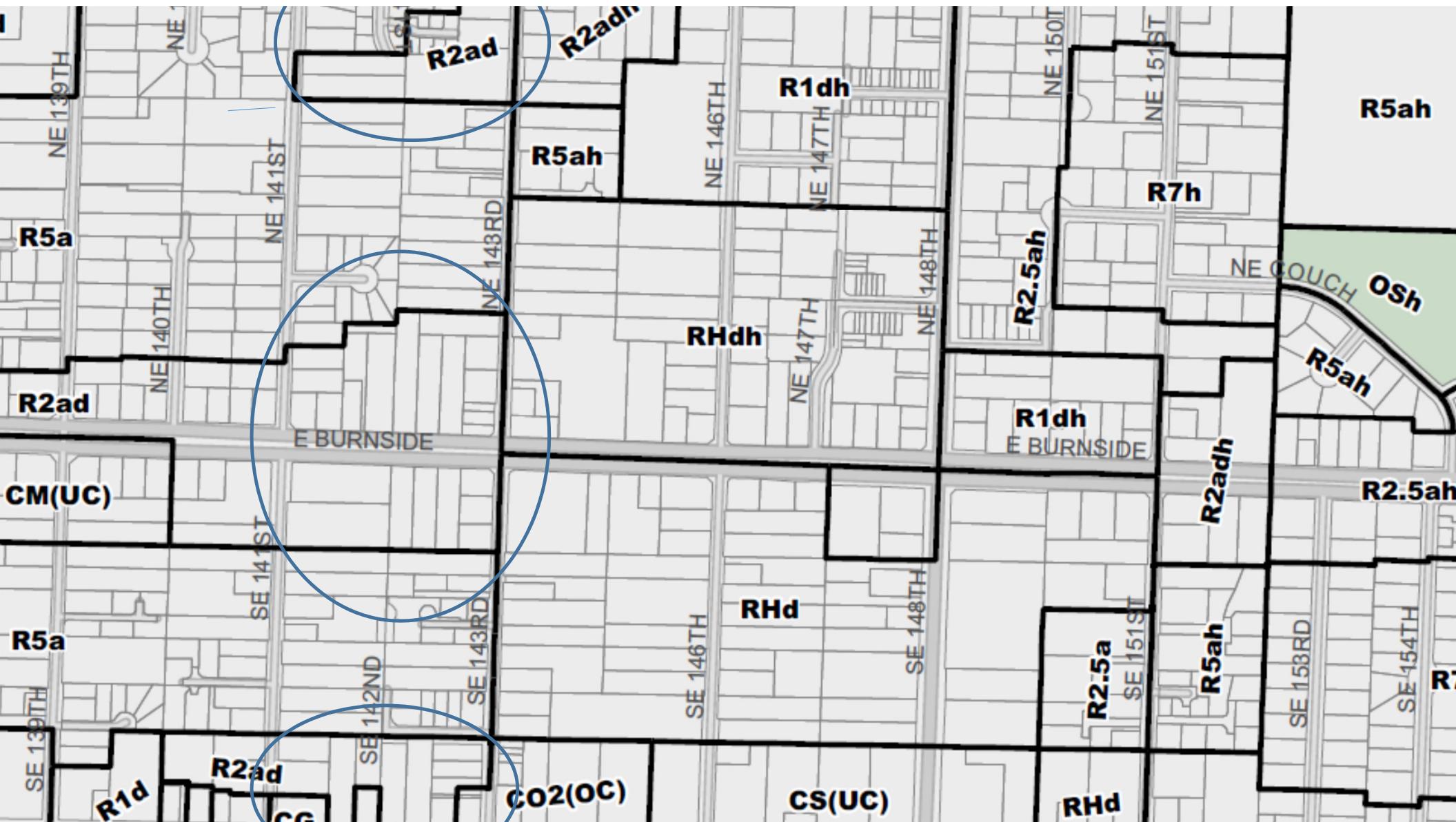
From: Karen Gray [mailto:karen_gray@parkrose.k12.or.us]
Sent: Thursday, March 12, 2015 5:03 PM
To: Glascock, Bob
Cc: ©
Subject: [Approved Sender] Re: Karen Gray's request from R2 to R1

Dear Planners,

The goal is to be able to place more new affordable construction within the boundaries of the Parkrose SD. We are especially interested in affordable housing with multifamily, multi bedroom housing that is sustainable and livable. This allows our families to remain stable and decrease mobility which hurts children's educations. I dont know if I want both the Comp Plan designation and zoning changed. I just know that the current zoning is R2 and R1 would allow for more units. The group that built Irish Moss did a great job and more of those would be nice. Districts can always do Inter District Transfer requests for students wanting to move from district to district with school districts providing approval or denial. I do not plan on providing any additional testimony so the email string with maps should be good.

Make sense?

Karen Gray



From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 2:16 PM
To: Kovacs, Madeline
Subject: FW: continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Follow Up Flag: Follow up
Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
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From: Scott Atherton [mailto:scotta@karott.com]
Sent: Thursday, March 12, 2015 8:48 AM
To: Planning and Sustainability Commission; Susananderson@portlandoregon.gov; Hales, Mayor;
Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick
Cc: scotta@karott.com
Subject: continuing destruction of our North East Portland Neighborhood thanks to City policy regarding development of substandard lots

Dear Mayor Hales, Commissioner Dan Saltzman, Commissioner Nick Fish, Commissioner Amanda Fritz, and Commissioner Steve Novick,

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Today, because City policy allows development of these side yards and gardens, Concordia is particularly targeted by construction interests bent on replacing these historic and tranquil spaces with Skinny houses. The most fortunate kind of historic neighborhood and the most unfortunate development loop hole that this City has ever implemented have combined to create a construction nightmare for our residents. The 100 year old trees are disappearing along with the nature that they supported. Expensive Skinny houses selling for more than \$600,000 are lording over even the biggest bungalows and their

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Thank you for hearing and comprehending our concerns. The Neighborhood Association is willing to entertain a tour for our elected officials any time. Please join us and helps us all to find this solution.

Your neighbor,

John Atherton
6037 NE 32nd Place, Portland OR 97211

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 2:18 PM
To: Kovacs, Madeline
Subject: FW: Opposed to zoning variance request

Follow Up Flag: Follow up

Flag Status: Flagged

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

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From: Joel Levy [mailto:joelrlevy@yahoo.com]
Sent: Thursday, March 12, 2015 10:32 AM
To: joanfredricksen@portlandoregon.gov; Planning and Sustainability Commission; Commissioner Fritz
Subject: Opposed to zoning variance request

Dear Planning and Sustainability Commission:

I am writing to personally echo and reiterate the objections of the Sylvan-Highlands Neighborhood Association (“SHNA”) concerning two zoning variance requests:

- 1) 6141 SW Canyon Court, from R20 to Multi-Family 2,000.
- 2) 6400 SW Canyon Court, requesting a height variance on currently CN2 zoning to allow 266 apartment units (does CN2 even allow multifamily?)

I urge the Commission to deny the proposed zoning change requests for the following reasons:

Comprehensive Plan Conflicts. SHNA notes that the zoning change would allow over 290 more dwellings to be built on the properties beyond current zoning limits. If permitted, such changes would significantly increase local density and traffic without the benefit of any significant public planning or infrastructure improvements. A prime goal of the new Comprehensive Plan is development along corridors and centers. If permitted, this zoning changes would allow unplanned development away from the existing local hub and neighborhood corridors and promote private vehicle use as the properties are far from public transit. While the properties are adjacent to US 26, the only access is through small local streets, through residential neighborhoods and through school zones.

Minimal Public Transit. There is no public transit near the properties. The #58 bus stop at the

Highway 26 westbound onramp at SW Skyline Boulevard is the closest transit connection. There are no local transit connections to the north, west and south. Other local transit connections are to the east (the #63 bus line and Washington Park MAX station), almost 2 miles away.

Neighborhood Character Conflicts. Although the property at 6141 has a SW Canyon Court address, its only access is via SW 61st Avenue due to a 20'+ tall retaining wall along Canyon. The property at 6400 SW Canyon court is currently commercial, but does not follow the guidelines of CN2, commercial supporting the neighborhood. Regardless, allowing 266 units at 6400 SW Canyon will only increase density without adding any infrastructure to support the neighborhood, compounding the existing problem. All other nearby neighborhood dwellings (on 61st and nearby streets) are single family homes. Rezoning the properties from its existing single family home and CN2 to a apartment complexes conflict with the current neighborhood character.

Increased Neighborhood Traffic. 61st is a small, winding neighborhood street that lacks normal improvements like sidewalks and storm drainage. If permitted, the zoning changes would certainly increase cut-through traffic on 61st, a street that can least afford it. SW 61st is the only connector to Burnisde/Barnes, points in Northwest, the closest available groceries (QFC on Barnes, almost 2 miles away), etc. This street already suffers from significant cut-through traffic, connecting Forest Heights to US26. The zoning changes would also aggravate traffic at the bottlenecks of SW 58th Avenue at both SW Montgomery Street and Skyline. These two bottlenecks, about 200' apart (one small block) are greatly burdened by cut through traffic to and from northwest Portland and (much more) Washington County. Additionally, the 58th/Montgomery intersection is aggravated by traffic to and from East Sylvan Middle School during morning commute and mid-afternoon times.

Decreased Neighborhood Safety and Livability. For decades SHNA experienced safety and livability issues from excessive traffic and underdeveloped infrastructure. Due to topography, many SHNA streets are small and winding, with many blind curves. Some were logging roads 100+ years ago that are paved today. People walk in streets like 61st because there usually isn't a shoulder (and no sidewalk) to use. Drivers normally speed through SHNA streets; commonly at twice the posted speed limits. For as long as SHNA experienced traffic safety issues, police enforcement has been lacking. Naturally, this creates safety and livability issues for pedestrians and cyclists. Permitting the zoning changes would certainly worsen safety and livability around the properties and in the neighborhood.

Summary. This requested zoning changes will probably benefit the Property owner financially and certainly harm the neighborhood. This is the wrong place for such zoning changes. I strongly urge the Commission to deny the requested zoning changes. Thank you

Sincerely,

Joel R Levy
6124 SW Barnes Road (corner of SW Barnes & SW 61st)

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 2:19 PM
To: Kovacs, Madeline
Subject: FW: Zoning changes to Buckman

Follow Up Flag: Follow up
Flag Status: Flagged

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

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

From: Harriet Bing [mailto:16thavellc@gmail.com]
Sent: Thursday, March 12, 2015 12:02 PM
To: Planning and Sustainability Commission
Subject: Zoning changes to Buckman

To Whom It May Concern:

Buckman is one of Portland's most historic neighborhoods, and offers a uniquely livable inner city experience. I have lived here for 30 years, raised 5 children here - some of whom went to Buckman School. My adult children are considering returning to this neighborhood to raise their children.

We naturally are going to see some changes over time, but even so, it is important to balance change with what already works very well.

From the bottom of my heart, it is my belief that retaining the general character of this community is good for us here and good for the City of Portland as well. It is what makes Portland Portland.

Please Please Please do not "upzone" our neighborhood.

Thank you,

Harriet Bing
Homeowner
717 SE 16th Ave.

Portland, OR 97214
503 236-5342

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 2:22 PM
To: Kovacs, Madeline
Subject: FW: My Input on Zoning Changes in the Buckman Neighborhood

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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From: Sheila Baraga [mailto:sheilabaraga@gmail.com] Sent: Thursday, March 12, 2015 1:52 PM To: Planning and Sustainability Commission Subject: My Input on Zoning Changes in the Buckman Neighborhood

Dear City of Portland Planning & Sustainability Commission:
I am submitting comments regarding proposed comp plan changes in Buckman in the following 3 areas:

14th & se Stark

The proposal is to change the zoning from R1 to CS on a currently non-conforming commercial property at 1403-1415 SE Stark. The current use for this lot is 1-story commercial creative space. The scale allowed by CS would disrupt the existing neighborhood severely. Immediately to the north of these lots are R2.5 single family residential backyards which would lose their access to sun and privacy. A more appropriate zoning would be CN1, or one of the new CM zones, still in the process of being defined. Stark Street east of 12th Avenue is a primarily residential street with a node of commercial development surrounding Washington High School. This commercial development consists of either 1-story commercial or 1-story commercial with 1-story residential above.

Changing this lot to CS would drastically change the character of this neighborhood commercial node. This quiet, mixed use neighborhood is already being heavily impacted by the loss of historic designation that happened with the (seemingly impulsive) Landmarks Commission

change to all commercial zoning at Washington High School. If the object of Portland Planning & Sustainability is to create walkable neighborhoods, CS is not the appropriate zoning for this location. It does not foster the development of residential units above commercial spaces, which would serve those residential units. The intention of any proposed zoning change should be to encourage "...the provision of small scale retail and service uses for nearby residential areas....Development is intended to be pedestrian oriented and compatible with the scale of surrounding residential areas." [Title 33.130.030.A]

The current R1 and R2.5 zoning works and allows housing that is affordable and with existing historic homes. R1 development works and, as townhouses or larger apartments built in R1 allow for families with children, this supports the school and maintains children in Buckman.

1900 Block between Alder and Washington

The western half of this block is proposed to be zoned from R5 to R2.5 to make it "match" the rest of the block. This zoning is being proposed despite the fact that 3 of the 5 properties (612 & 624 SE 19th & 1915 SE Alder) currently have single family homes on 5000 SF lots, and would be out of conformance with the new underlying zoning. The conversion of these 3 true R5 properties to R2.5 is not consistent with the current use, and would destroy the current block character in what it would allow. There are other half-blocks in the neighborhood, which are built to R2.5 density and which are keeping their R5 zoning. What would be appropriate is to correct the zoning for those properties and to not change zoning for properties which are currently conforming.

Blocks from 15th to 19th between Belmont & Morrison

These blocks are currently zoned a mix of R1, R2.5, CM and CS. The proposed zoning is all CS. As already discussed for 14th & Stark, CS zoning allows unlimited density of residential units with no requirement for providing commercial space on the ground floor. The end result will be monolithic buildings, built to zero setbacks, with a high density of small, high-rent units. They will be displacing family-friendly housing, affordable duplexes and quadruplex rentals, and some retail commercial and warehouses.

These blocks are currently between the Belmont-Morrison couplet and on the number 15 bus line. The end result of assigning CS zoning to this area will be to create 4 blocks of high density, high rent, small apartments unsuitable for families and with no guarantee that the necessary commercial spaces to support this high density of residential use will be developed. In addition, because CS zoning allows zero property line development, with up to 4 stories 45 feet high, resulting development will divide the Buckman neighborhood visually and functionally in half, making a perceptual barrier between north and south Buckman. This will only reinforce the splitting of the neighborhood which occurs because these streets are designated collector streets and form a couplet.

In conclusion, I'd like to point out that the neighborhood elementary school, Buckman Elementary already has issues with kids walking or riding their bikes safely to school. A more appropriate zoning change would be to support the existing single and multi-family housing by leaving their zoning intact, changing the zoning of current non-

conforming uses (such as the telecom building at 17th) and then implementing zoning which will allow for a mix of residential and commercial for a truly walkable neighborhood that supports families and renters of all incomes. And additionally, this proposed change is not coming from the property owners, nor the neighborhood, but is being promoted by Planning Bureau managers. It also seems there is ample EX development areas all along 12th Avenue. Plenty of room to build there. Thanks you so much for your hard work and consideration.

Respectfully,
Sheila Baraga

423 se 15th Avenue (and 512-518 se 16th Avenue)
503.318.8338

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 2:24 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan testimony-Argay Neighborhood

Follow Up Flag: Follow up
Flag Status: Flagged

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

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From: npinkston [mailto:npinkston@comcast.net]
Sent: Thursday, March 12, 2015 2:15 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan testimony-Argay Neighborhood

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

I am among those who are requesting that all the vacant or undeveloped R-3 zoned land in the Argay Neighborhood be reclassified to R-5 or R-7 single family residential and the proposed mixed employment areas, change numbers 287, 288, 289 located at the SE corner of NE 122nd and Shaver 290 located at the SW corner of NE 147th and Sandy Blvd. Also be reclassified tp R-5 or R-7 single family. Also I support the city's similar change #688 along NE 148th avenue north of I-84

I want to keep Argay a family friendly neighborhood.

Dorothy Pinkston

3005 NE 143rd ave
Portland, Oregon 97230

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 4:19 PM
To: Kovacs, Madeline
Subject: FW: Encroachment permits

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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From: Don q Baack [mailto:baack@q.com]
Sent: Thursday, March 12, 2015 4:03 PM
To: Frederiksen, Joan; Stein, Deborah; Transportation System Plan; Planning and Sustainability Commission
Cc: gbridger@teleport.com; 'Sam Pearson'
Subject: Encroachment permits

For background on this issue, see <http://swtrails.org/right-of-way-on-sw-coronado/>

The web site link above contains the 17 month journey SWTrails has taken to get an encroachment removed from the Coronado Right of Way. Note that the last letter specifies that if we cannot justify a built trail in the right of way, the City of Portland will issue an encroachment permit to the landowner. There is no appeal process that we have been informed of to follow and there is no process to follow to grant what in effect is a de fact street vacation. The adjacent property owner does not even have to pay taxes on the additional property included in his fence. The public should be able to use the rights of ways at any time without be obstructed.

If the property owner on the other side of the right of way chooses to follow the same course, the entire right of way will be fenced and there will no longer be public access to this right of way.

A similar situation exists along many other rights of way throughout the city where vegetation becomes the fence.

We need some way to maintain a walkable pathway along those rights of way that we choose to walk without having to fight the adjacent property owners vegetation.

Thanks for listening to this important issue. Please insert policy into the Comp Plan to prevent either of these situations from occurring.

Don Baack

Don Baack

6495 SW Burlingame Place

Portland OR, 97239

baack@q.com

503-246-2088 call if you need an answer w/in 24 hours

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 4:38 PM
To: Kovacs, Madeline
Subject: FW: Trails Policy in the Comp Plan and TSP

Follow Up Flag: Follow up

Flag Status: Flagged

Julie Ocken
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Ave, Suite 7100
Portland, OR 97201
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From: Don q Baack [mailto:baack@q.com]
Sent: Thursday, March 12, 2015 4:36 PM
To: Transportation System Plan; Planning and Sustainability Commission
Cc: Frederiksen, Joan; Stein, Deborah
Subject: Trails Policy in the Comp Plan and TSP

I have been given mixed signals on the latest trails policy. Courtney Duke told our SWTrails group in late January the trails policy will not be available to discuss until April 2015 or later. Sara Schooley told me Monday a new trails policy was contained in the final report from staff for the TSP. I can only find a couple comments about making trails transportation rather than just recreation parks facilities. I find no trails policy to comment on.

Since this is the last opportunity to comment on the nonexistent trails policies, here are some essential elements that I and SWTrails have been fighting to get for over 10 years.

1. An overlay of the entire 40+ mile SW Urban Trails system that is a part of our planning documents so that when a house being built on a trail, the trail is protected. We have had cases in the last 10 years where our constructed trail has been destroyed by the house builder and not repaired or replaced in a reasonable manner. This provision should apply to all additional urban trail systems that may be developed across the City of Portland.

2. That the entire SW Urban Trail system be classified as Neighborhood Greenways. This is needed because pedestrians need to be protected by traffic calming and 20 mph speed limits as much or more than bicyclists. In addition, that would also qualify for funding in the neighborhood greenway category! All new Urban Trails should be given the same classifications.

3. I applaud the effort to emphasize the importance of low cost facilities in the comp plan. The facilities constructed by SWTrails are low cost, and have done a great deal to improve our pedestrian infrastructure in SW Portland. The SW Urban Trail System needs to be maintained. To date there has been no effort on the part of PBOT to arrange the maintenance of these key facilities. "Not my problem" is the attitude. In addition, the current city proposed "SW Trails Policy" seems to make it extremely difficult for a non profit such as ours to get permits to maintain the Urban Trails, and even harder to maintain the hundreds of little, mostly very short, cutoffs in all neighborhoods in SW as well as the rest of the City of Portland. Permits are a key provision in the 2011 State of Oregon Law which the City of Portland supported by SWTrails Personnel, got passed that provides a waiver of liability to the adjacent property owner if a non profit secures a permit to do the maintenance or construction from the City. The current city proposal will require extensive paper work to do each of these if the adjacent property owners are to be relieved of liability and a neighborhood non profit such as SWTrails takes over the maintenance. Rather than reduce the demand for staff time, it may radically increase it. We need to find a way to make this a very simple and easy to accomplish procedure.

Any help you can provide to make the process simple and easy to accomplish will help to improve our care and nurture of our existing and future citizen built infrastructure.

Thanks

Don Baack
6495 SW Burlingame Place
Portland OR, 97239

baack@q.com

503-246-2088 call if you need an answer w/in 24 hours

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 4:41 PM
To: Kovacs, Madeline
Subject: FW: R2.5 rezoning in NE Portland

Follow Up Flag: Follow up
Flag Status: Flagged

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

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From: Paul Carrier [mailto:paul.carrier@gmail.com]
Sent: Thursday, March 12, 2015 4:38 PM
To: Planning and Sustainability Commission
Subject: Re: R2.5 rezoning in NE Portland

Most certainly.

3597 NE Simpson ST
Portland Or 97211

Thanks

Paul Carrier
49. Not allowed to trade military equipment for "magic beans".

On Thu, Mar 12, 2015 at 4:36 PM, Planning and Sustainability Commission <psc@portlandoregon.gov> wrote:
Hello Paul,

Thank you for your comments. So that I may include them in the record and forward the message to the Planning and Sustainability Commission members, can you please email me your mailing address? That is required for all testimony.

Thanks,
julie

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

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From: Paul Carrier [mailto:paul.carrier@gmail.com]
Sent: Thursday, March 12, 2015 4:36 PM
To: Hales, Mayor; Commissioner Saltzman; Commissioner Fish; Commissioner Fritz; Commissioner Novick; Planning and Sustainability Commission
Cc: Paul
Subject: R2.5 rezoning in NE Portland

Greetings,
I'd like to register my strong objection to the rezoning of R5 lots to R2.5 in NE Portland.
The city tried this game back in the 1980's and was rebuked by the residents.

The reality is people move to these neighborhoods in NE Portland for the existing aesthetics, the mixture of bungalows and larger houses. Houses with yards and a place to have a garden.
If we wanted to live in an area with increased density we would have chosen to live in another part of town that has that lifestyle already.
But we didn't, we chose here.

You may call me a NIMBY but if this is such a good deal we have to ask ourselves "is the city council rezoning where they live" to allow these skinny houses ?

Paul Carrier
49. Not allowed to trade military equipment for "magic beans".

March 12, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

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

**Re: Request for Design District Plan for Multnomah Village
2035 Comprehensive Plan**

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission protect the character of Multnomah Village by including the following language in the 2035 Comprehensive Plan:

Policy 3.43 Design District Plan for Multnomah Village. The City Planning staff shall collaborate with Multnomah Neighborhood Association, the Multnomah Village Business Association and property owners to develop a new Design District Plan and implementing standards for the Commercial area of Multnomah Village before any revisions are made to commercial zone districts presently in effect in Multnomah Village.

Please add this to the record.

Thank you,


Carol McCarthy

Multnomah Neighborhood
Association Chair
mnachair@gmail.com

cc: Anne Debbault, DLCD, Portland Regional Representative, adebbaut@dlcd.state.or.us
Elissa Gertler, Metro Regional Planning Director, elissa.gertler@oregon.metro.gov
Amanda Fritz, Commissioner, amanda@portlandoregon.gov
Nick Fish, Commissioner, nick@portlandoregon.gov
Steve Novick, Commissioner, novick@portlandoregon.gov
Dan Salzman, Commissioner, dan@portlandoregon.g



COALITION FOR A LIVABLE FUTURE

Portland Planning and Sustainability Commission
sent via email to psc@portlandoregon.gov

March 12, 2015

RE: Draft Portland Comprehensive Plan

Dear Chair Baugh and Planning and Sustainability Commissioners:

Over the past two decades, the Coalition for a Livable Future (CLF) has united a diverse group of organizations to promote healthy, sustainable, and equitable communities in the Portland metro region. Through the use of research, policy analysis, and convening, CLF supports communities to take action for equitable development, prosperous and livable communities, and a healthy environment.

CLF has partnered and worked with the City of Portland on numerous policies and plans, and we know that the city is committed to creating a livable city for all Portlanders. Nevertheless, we are concerned that the current draft of the Comprehensive Plan does not highlight the urgency nor adequately address the issues related to economic displacement that have increasingly affected low-income families and communities of color in Portland.

The Comprehensive Plan's vision for improving Portland's neighborhoods will come with a devastating cost to Portlanders if preemptive measures and structures are not in place to address issues of affordability and access that such improvements will inherently bring. Deliberate and early efforts to address these issues will stabilize communities and prevent our most vulnerable populations from experiencing the distressing impacts that displacement brings upon children, families, and communities.

Many local organizations have presented thoughtful, intelligent solutions to strengthen the Comprehensive Plan so that it can better prepare Portland to address future displacement. CLF recommends that strong anti-displacement strategies be incorporated into the Comprehensive Plan and that the general language around anti-displacement be bolstered so that it is recognized as a priority.

The current shortage of over 23,000 affordable homes for families with incomes below 50% median family income in Multnomah County underscores the urgency around affordability and access in Portland. The Comprehensive Plan presents an important opportunity to address major burdens experienced by our most vulnerable communities and prevent a Portland that is only accessible to those who can afford it. Together we can create a healthy, accessible, well-connected, and economically vibrant Portland for everyone.

Thank you for the consideration of our comments,

Sincerely,

A handwritten signature in black ink that reads "Mara Gross".

Mara Gross, Executive Director
Coalition for a Livable Future

March 12, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

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

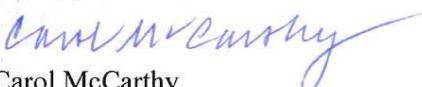
**Re: Role of Neighborhood Associations and Coalitions
2035 Comprehensive Plan**

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission include the attached language in the 2035 Comprehensive Plan. This language will formalize the role of these organizations in implementing Goal #1, Citizen Involvement, of Oregon State Statute 660-015-0000(1). The 2035 Comprehensive Plan is being implemented to fulfill this statute and without providing for a meaningful Citizen Involvement program, the City will fall short of meeting its obligations under the statute.

The goals and policies in Chapter 2 of the draft plan that address community involvement are consistent with Goal #1, but they are insufficient to meet the requirements of the statute. The city must provide for citizen involvement and we are requesting that you recognize the neighborhood associations and coalitions as the organizations that fulfill that role.

Please add this to the record.

Thank you,



Carol McCarthy

Multnomah Neighborhood
Association Chair
mnachair@gmail.com

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

IMPLEMENTING CITIZEN INVOLVEMENT THROUGH NEIGHBORHOOD ASSOCIATIONS AND NEIGHBORHOOD COALITIONS

GOAL: Develop a Citizen Involvement program based on neighborhood associations and neighborhood coalitions that insures the opportunity for citizens to be involved in all phases of the comprehensive planning process consistent Oregon State Statute 660-015-0000(1), "Goal 1: Citizen Involvement". The program will provide the method for geographically-based citizen involvement in the on-going land use decision-making process and provide equal opportunities for citizen participation in the implementation, review and amendment of the adopted Comprehensive Plan.

POLICIES & OBJECTIVES:

1-Citizen Involvement Coordination

Involve citizens in land-use planning and decision making through active coordination with the neighborhood associations and neighborhood coalitions. Provide neighborhood associations and coalitions with sufficient advanced notice of planning meetings and public hearings. Allow them adequate timeframes for meaningful involvement at all stages of land-use planning and decision making. Make planning documents available to them.

2-The Role of Neighborhood Associations and Coalitions

Engage the neighborhood associations and neighborhood coalitions as active participants in the land-use process by incorporating their adopted positions into land-use planning and decisions.

3-Funding of Neighborhood Associations and Coalitions

Fund adequate staffing levels and other direct costs for neighborhood associations and neighborhood coalitions.

4-Comprehensive Plan – Major Revisions

Implement a process for complete review of the Comprehensive Plan on a five-year basis that provides opportunities for significant and meaningful involvement by the neighborhood associations and neighborhood coalitions.

5-Comprehensive Plan Amendment

Implement a process that allows for the periodic review and amendment of the Comprehensive Plan by the neighborhood associations and neighborhood coalitions.

6-Intergovernmental Cooperation

Promote the involvement of the neighborhood associations and neighborhood coalitions in land-use processes initiated by other governmental agencies.

7-Neighborhood Coalition Representation

Designate a voting position for an elected representative from each neighborhood coalition on the Planning and Sustainability Commission, the Community Involvement Committee, and all land-use planning committees that advise the City Council.

March 12, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

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

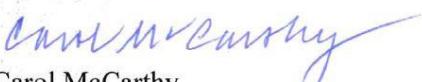
**Re: Request for Design District Plan for Multnomah Village
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Please add this to the record.

Thank you,


Carol McCarthy

Multnomah Neighborhood
Association Chair
mnachair@gmail.com

cc: Anne Debbault, DLCD, Portland Regional Representative, adebbaut@dlcd.state.or.us
Elissa Gertler, Metro Regional Planning Director, elissa.gertler@oregon.metro.gov
Amanda Fritz, Commissioner, amanda@portlandoregon.gov
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Steve Novick, Commissioner, novick@portlandoregon.gov
Dan Salzman, Commissioner, dan@portlandoregon.g

March 12, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

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

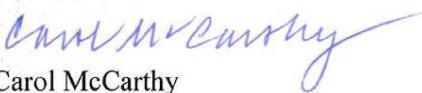
**Re: Light Pollution
2035 Comprehensive Plan**

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission amend Goal 7.D and Policy 7.1 to include the following language regarding light pollution in the 2035 Comprehensive Plan. We further request that attached Proposed Zoning Code be incorporated in the implementation phase of the Plan to address light pollution.

The illumination of residential, commercial and public areas must be commensurate with the need for lighting while minimizing lighting impacts from human activity on the natural phases of light and darkness throughout the 24-hour cycle with its seasonal variations.

Please add this to the record.

Thank you,


Carol McCarthy

Multnomah Neighborhood
Association Chair
mnachair@gmail.com

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

Goal 7.D: Environmental equity

All Portlanders have access to clean air and water, the natural state of illumination, can experience nature in their daily lives, and benefit from development designed to lessen the impacts of natural hazards and environmental contamination.

Policy 7.1 Environmental quality. Protect air, water, the natural state of illumination, and soil quality and associated benefits to public and ecological health and safety.

Proposed Zoning Code (From Deschutes County)

Chapter 15.10. OUTDOOR LIGHTING CONTROL

- 15.10.010. Purpose and Intent as Relates to Residential, Commercial and Public Area Lighting.**
- 15.10.020. Purpose and Intent as Relates to Street Lighting.**
- 15.10.030. Conformance With Applicable Codes.**
- 15.10.040. Approved Materials and Methods of Construction or Installation/Operation.**
- 15.10.050. Definitions.**
- 15.10.055. Definition-Outdoor Light Fixtures.**
- 15.10.065. Definition-Exempt Light Fixtures.**
- 15.10.070. Definition-Individual.**
- 15.10.075. Definition-Installed.**
- 15.10.080. Definition-Shielding.**
- 15.10.085. Definition-Fully Shielded.**
- 15.10.090. Definition-Partially Shielded.**
- 15.10.095. Definition-Directed Shielding.**
- 15.10.100. Definition-Unshielded.**
- 15.10.105. Definition-High Intensity Discharge Lamp Sources.**
- 15.10.110. Definition-Luminous Tube Lighting.**
- 15.10.120. Requirements for Installation of Outdoor Lighting.**
- 15.10.130. Submission of Plans and Evidence of Compliance With Code-Subdivision Plats.**
- 15.10.140. Shielding.**
- 15.10.150. Prohibitions.**
- 15.10.160. Externally Lighted Outdoor Advertising Signs, Billboards.**
- 15.10.170. Exemptions.**
- 15.10.180. Violations and Penalties.**
- 15.10.190. Violations Constitute Public Nuisance.**
- 15.10.200. Code Requirements Tables for Shielding.**

15.10.010. Purpose and Intent as Relates to Residential, Commercial and Public Area Lighting.

The purpose of 15.10 is to affirm the right of citizens to illuminate residential, commercial and public areas with lighting fixtures appropriate to the need while utilizing such illumination in a way that preserves rural and urban vistas and is confined to the property from which it is generated.

15.10.020. Purpose and Intent as Relates to Street Lighting.

The purpose of 15.10 is to affirm that citizens have a right to the safety of well-lighted streets and highways and that such illumination by nature cannot be confined to the property from which it is generated. Thus, certain high wattage and low wattage applications for the propose of highway safety as defined below are allowed under these provisions.

15.10.030. Conformance with Applicable Codes.

All outdoor electrically powered illuminating devices shall be installed in conformance with the provisions of this code, the building code, the electrical code, and the sign code of the jurisdiction. No provision of this ordinance are intended to pre-empt applicable state codes.

15.10.040. Approved Materials and Methods of Construction or Installation/ Operation.

The provisions of this code are not intended to prevent the use of any design, material, or method of installation or operation not specifically prescribed by this code, provided any such alternate has been approved. The building official may approve any such proposed alternate that: Provides an equivalent alternative design that does not exceed 1800 lumens nor project light off-site of the subject lot or parcel.

15.10.050. Definitions.

Whenever appropriate in applying the provisions of 15.10, the following words and phrases are defined as set forth in 15.10.055-110.

15.10.055. Definition-Outdoor Light Fixtures.

"Outdoor light fixtures" means outdoor artificial illuminating devices, outdoor fixtures, lamps and other similar devices, permanently installed or portable, used for flood lighting, general illumination or advertisement. Such devices shall include, but are not limited to, search, spot and flood lights for:

1. Buildings and structures;
2. Recreational areas;
3. Parking lot lighting;
4. Landscape lighting;
5. Billboards and other signs (advertising or other);
6. Street lighting;
7. Product display area lighting;
8. Building overhangs and open canopies;
9. Holiday lighting.

15.10.065. Definition-Exempt Light Fixtures.

"Exempt light fixtures" means outdoor artificial illuminating devices which are exempted by 15.10.170.

15.10.070. Definition-Individual.

"Individual" means any private individual, tenant, lessee, owner or any commercial entity including but not limited to companies, partnerships, joint ventures or corporations.

15.10.075. Definition-Installed.

"Installed" means initial installation of outdoor lighting fixtures following the effective date of this ordinance. Projects with approved construction plans prior to effective date of this ordinance are excluded from compliance with the ordinance in the initial installation only.

15.10.080. Definition-Shielding.

"Shielding" for the purpose of this ordinance is provided for a lighting fixture by design of such fixture or by an externally applied device such as a shroud or hood of metal, wood or painted glass that does not allow transmission of light.

15.10.085. Definition-Fully Shielded.

"Fully shielded" means outdoor light fixtures shielded or constructed so that light rays emitted by the fixture are projected below the horizontal plane.

15.10.090. Definition-Partially Shielded.

"Partially shielded" means shielding so that the edge of the shield is at or below the centerline of the light source or lamp so as to limit light emission above the horizontal plane to 10 percent or less.

15.10.095. Definition-Directed Shielding.

"Directed shielding" means shielding by design or external application that directs light downward and limits direct line-of-sight of a fixture's lamp to the property upon which the fixture is installed.

15.10.100. Definition-Unshielded.

"Unshielded" means light fixtures lacking any means to restrict the emitted light to below the horizontal plane.

15.10.105. Definition-High Intensity Discharge Lamp Sources.

"High intensity discharge lamp sources" means high pressure sodium, mercury vapor, metal halide, low pressure sodium, and other similar lamps.

15.10.110. Definition-Luminous Tube Lighting.

"Luminous tube lighting" means gas-filled tubing which, when subjected to high voltage, becomes luminescent in a color characteristic of the particular gas used, e.g. neon, argon, etc.

15.10.120. Requirements for Installation Of Outdoor Lighting.

Except as exempted by provisions of this ordinance, as of the date of adoption, the installation of outdoor lighting fixtures shall be subject to the provisions of this ordinance.

15.10.130. Submission of Plans and Evidence of Compliance With Code-Subdivision Plats.

All proposed subdivisions and partitions within Deschutes County that include outdoor lighting fixtures or street lighting shall be subject to the provisions of this ordinance.

15.10.140. Shielding.

All nonexempt outdoor lighting fixtures shall have shielding as required by the tables set forth in 15.10.200.

15.10.150. Prohibitions.

- A. Laser Source Light. The use of laser source light or any similar high intensity light for outdoor advertising or entertainment, when projected above the horizontal is prohibited.
- B. Searchlights. The operation of searchlights for advertising purposes is prohibited between eleven o'clock P.M. and sunrise the following morning.
- C. Recreational Facilities. No outdoor recreational facility, public or private, shall be illuminated after eleven o'clock P.M. except to conclude a specific recreational or sporting event or any other similar activity conducted at or in the facility which was in progress under such illumination prior to eleven o'clock P.M., except that any outdoor recreational facility, public or private, which is illuminated with outdoor lighting fixtures conforming to this code may operate any time with such illumination.

15.10.160. Externally Lighted Outdoor Advertising Signs, Billboards.

All externally lighted advertising signs and billboards will be illuminated by one of the following manners:

- A. Top mounted fixtures in which case such fixtures will conform to the shielding requirements as set forth in 15.10.140.

B. Bottom mounted fixtures in which case such fixtures shall be shielded either by application of external device or manufactured in such a way that upward and side directed light is confined to an area within four inches of the outermost surface of the sign's top and sides. Shielding will be constructed in such a manner that no reflective surface of the lighting fixture will extend past the limit of the shielding in the vertical plane when viewed from directly above. (See typical drawings - Table 1 and Table 2 attached.)

15.10.170. Exemptions.

- A. Nonconformance.
 - 1. All other outdoor light fixtures lawfully installed prior to and operable on the effective date of the requirements codified in this ordinance are exempt from all such requirements except those regulated in 15.10.150(A), (B) and (C) or as follows:
 - a. All replacement of outdoor lighting fixtures, as of the date of adoption, shall be subject to the provisions of this ordinance.
 - 2. Fossil Fuel Light. All outdoor light fixtures producing light directly by the combustion of natural gas or other fossil fuels are exempt from all requirement of 15.10.
- B. Airport operations lighting and aircraft navigational beacons as established by the Federal Aviation Administration are permanently exempt from these provisions. All other airport outdoor lighting must conform to the intent of this ordinance.
- C. Correctional Institutions. Exterior lighting for County correctional institutions shall be shielded high pressure sodium except at the immediate entry area, in which case other lighting may be used that conforms to the intent of this ordinance.
- D. Lights used for holiday decorations for no more than 45 days are exempt from the requirements of this ordinance.
- E. Carnivals and Fairs that require the use of temporary outdoor lighting fixtures are exempt except that permanent installations at dedicated sites must conform to the requirements of this ordinance.
- F. Historical areas as designated by proper authority are exempt from the requirements of this ordinance. Use of the minimum illumination necessary to maintain public safety is encouraged.
- G. Motion detector lights that operate automatically for periods of less than 20 minutes.
- H. U.S. flags displayed by top mounted lighting on a 24 hours basis.
- I. Internally lighted advertising signs.
- J. Temporary exemptions to the provision(s) of DCC Title 15 for five days per calendar year.
- K. Television or movie film productions are exempt except that permanent installations at dedicated sites must conform to the requirements of this ordinance.
- L. Customary agricultural practices are exempt except that permanent installations at dedicated sites must conform to the requirements of this ordinance.
- M. Construction necessary for an allowed use are exempt except that permanent installations at dedicated sites must conform to the requirements of this ordinance.

15.10.180. Violations and Penalties.

For any person, firm or corporation to erect, construct, enlarge, alter, repair, move, improve or convert any lighting structure, or cause the same to be done, contrary to or in violation of any provision of this ordinance shall constitute a code violation.

15.10.190. Violations Constitute Public Nuisance.

Any outdoor lighting fixture erected, constructed, enlarged, altered, repaired, moved, improved, or converted, contrary to the provisions of this ordinance shall constitute a code violation.

15.10.200 Code Requirement Tables for Shielding.

See attached Table 1, 2 and 3.

March 12, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

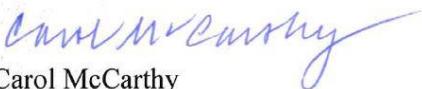
Susan Anderson, PBS Director
susan.anderson@portlandoregon.gov

**Re: Request for
2035 Comprehensive Plan**

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission include the following goal and policy language regarding noise impacts on human health in Chapter 7 of the 2035 Comprehensive Plan.

Please add this to the record.

Thank you,



Carol McCarthy

Multnomah Neighborhood
Association Chair
mnachair@gmail.com

cc: Anne Debbault, DLCD, Portland Regional Representative, adebbaut@dlcd.state.or.us
Elissa Gertler, Metro Regional Planning Director, elissa.gertler@oregon.metro.gov
Amanda Fritz, Commissioner, amanda@portlandoregon.gov
Nick Fish, Commissioner, nick@portlandoregon.gov
Steve Novick, Commissioner, novick@portlandoregon.gov
Dan Salzman, Commissioner, dan@portlandoregon.g

NOISE IMPACTS ON HUMAN HEALTH

GOALS

GOAL 1: Adequately fund our nationally-recognized noise-enforcement and education agency, the Portland Noise Control Office, and empower the leadership and innovation of the Noise Officer with administrative staff and an environmental enforcement field person to assign to each neighborhood coalition office area of the City. Add a full time administrative person to staff the citizen based Noise Review Board under the management of the Nosie Control Officer.

GOAL 2: Recognizing that noise is a growing environmental health issue in Portland, zoning and planning regulations will be more carefully adopted in coordination with the Noise Control Officer to facilitate and support the work of the Portland Noise Office.

GOAL 3: Recognizing that noise regulations are ineffective unless they are enforced and having adequate staffing to educate noise polluters at the front end of the development cycle, Office of Neighborhood Involvement staffing levels for noise will be increased to better align with the development and planning staff in the Bureau of Planning and Sustainability and the Bureau of Development Services.

For example, the current staffing in the Noise Office is 3 staff. This is the same number of staff as were present in the office under Dr. Paul Herman's Leadership in 1976. Development staff have increased 8 to 12 fold in the time from 1976 to present. Additional staff in the Noise Office to represent the communities' environmental needs is reasonable.

POLICIES & OBJECTIVES

1-Noise Emission Standards. Noise-level standards for noise emitted from unregulated machines and sources will be identified and rules for enforcement will be adopted. Particular attention will be given to leaf blowers, lawn mowers, pressure washers, nail guns, and HVAC systems, but all noise emitting devices and processes will be considered.

2-Operating Hours and limits for weekends. Hours for allowed operation of noisy devices and processes will be identified and rules should be different on weekends.

For example, on Saturday and Sunday, use of noisy devices may be restricted to the hours between 10 am and 2 pm. This will allow Portlanders to complete noisy tasks during those hours and leave other parts of the weekend quiet and restful.

3-Construction Noise. Since Comprehensive Plan growth targets are for the construction of half again as many households as currently exist in Portland, stringent rules will be implemented to restrict and mitigate construction noise.

Note: The City should help support the recent improvements the Noise Control Officer has been able to spearhead at the Office of Neighborhood Involvement in issuing as many noise citations in one single year, as had been issued at the Bureau of Development Services in the previous 6-plus year period.

4-Noise Mitigating Zoning. Zoning standards will be enacted to minimize nighttime noise by disallowing incompatible night uses in areas zoned for mixed use that are in close proximity to residential areas. Restrictions will be placed on business operating hours, for example for patio portions of bars and restaurants, or for gas station service hours, to respect the necessity for providing quiet times for healthy and restful sleep. Further limitations for construction operating hours will also be researched and applied.

March 12, 2015

Charlie Hales, Portland Mayor
mayorcharliehales@portlandoregon.gov

André Baugh, PSC Chair
psc@portlandoregon.gov

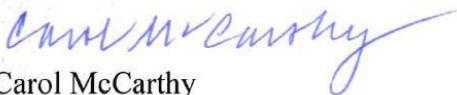
Susan Anderson, PBS Director
susan.anderson@portlandoregon.gov

**Re: Parks Goals and Policies
2035 Comprehensive Plan**

The Multnomah Neighborhood Association supports the position adopted by the SWNI Board that the Planning and Sustainability Commission include the attached amendments and additions to the policy language in the 2035 Comprehensive Plan regarding Parks.

Please add this to the record.

Thank you,



Carol McCarthy

Multnomah Neighborhood
Association Chair
mnachair@gmail.com

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

Proposed Amendments

Policy 8.72 Acquisition, Development, and Maintenance

Increase the supply of parks, natural areas, community gardens, and recreational facilities, giving priority to: **1)** areas where serious geographical and service level deficiencies exist, **2)** acquisition of lands appropriate for parks, natural areas, community gardens, and recreational facilities that have been declared surplus by other public agencies, or that have been foreclosed for tax delinquency, and **3)** acquisition of environmentally unique areas and watersheds.

Policy 8.73 Service Equity

Invest in acquisition and development of parks, natural areas, community gardens, and recreational facilities making continuing progress toward equitable service level goals.

Policy 8.75 Capital Programming

Maintain a long-range park capital improvement program that balances acquisition, development, and operations; and provides a process and criteria for capital improvement project selection.

Policy 8.76 Park Planning

Improve parks, natural areas, community gardens, and recreational facilities in accordance with current master plans. Where there are no master plans, develop them with public input.

Policy 8.7 Park Trails

Establish, improve, and maintain a citywide system of park pedestrian trails that are a component of a larger network of pedestrian pathways.

The committee recommended moving Policy 8.78 to Transportation.

Policy 8.79 Natural Areas

Manage natural areas and resources to protect and improve their ecological health, in accordance with both the natural area acquisition and restoration strategies, and provide compatible public access.

Policy 8.80 Recreational Facilities

Provide a wide variety of recreational facilities and services that contribute to the health and well-being of Portlanders of all ages and abilities, as called for in Vision 2020, page 29.

Policy 8.81 Specialized Recreational Facilities

Establish and manage specialized recreational facilities with the park system to respond to identified public needs.

Policy 8.82 Enterprise Facilities

Maintain existing special recreational facilities (such as golf and motorsports) as enterprises to meet public needs and ensure maximum use and financial self-sufficiency.

Policy 8.83 Public-private Cooperation

Encourage cooperation with the private sector to provide recreational activities that meet identified public needs.

Proposed new policies from the current Comprehensive Plan (1980, rev. 2011)

11.38 Master Development Plans

Maintain master development plans for city parks that address user group needs, development priorities, development and maintenance costs, program opportunities, financing strategies and citizen involvement.

11.39 Maintenance

Provide programmed preventive maintenance to all city parks and recreational facilities in a manner that reduces unplanned reactive maintenance and emphasizes the use of scheduled service delivery.

11.41 Improvements

Base the priorities for improvement and development of parks, natural areas, community gardens, and recreational facilities on documented needs and the following criteria: low long-term maintenance costs, location in deficient areas, broad community support, location adjacent to schools and other public facilities, support of neighborhood stabilization and community development projects and policies according to with park master development plans.

11.46 Recreation Programs

Provide recreation programs and services including cultural, educational, historical, health and physical fitness, and sports (competitive and non-competitive) as required to meet a balanced program that includes the needs of the especially handicapped and the elderly within existing resources.

Proposed new policies from Parks 2020 Vision

Parkland population ratio

Maintain the current ratio of parkland to population—20 acres per thousand people.

Cultural arts facilities

Provide a full range of cultural arts facilities.

Recreation fees

Reduce the reliance on recreation fees through general fund revenues.

Protect existing resources

Acquire sufficient lands to protect existing resources (e.g., land along the Willamette and Columbia rivers) to complete natural resource areas (e.g., Forest Park, Kelly Butte), and to protect locally significant natural areas (e.g., Rosemont Bluff).

Civic involvement

Apply and refine the public involvement processes outlined in Planning for Southwest Parks and in Planning & Development Division Policies and Procedures when planning, developing and programming city parks, natural resources, and recreation programs.

Community gardens

Provide community gardens and expand the number of community gardens to meet the demand. There should be a community garden site within walking distance of every resident who needs one. Make sure there are a variety of garden types for people to learn from (e.g., culinary and medicinal herbs, fruit, and habitat or ethnic gardens).



4207 Southeast Woodstock Boulevard, PMB #130
Portland, Oregon 97206

March 12, 2015

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

RE: 2035 Comprehensive Plan Comments

Dear Planning and Sustainability Commissioners:

When Portland began talking about “Twenty minute neighborhoods” several years ago, Woodstock was already on its way. We already have many of the goods and services that meet people’s daily needs. Groceries, hardware, gas station, bike shops, library, coffee shops, even a world class college -- we have all of this, surrounded by a solid, established neighborhood.

Yes, we think Woodstock is pretty terrific -- and now so do many others. Woodstock, like many neighborhoods in Portland, is changing rapidly. New houses are going up and new businesses are moving in. Exciting businesses like New Seasons and Grand Central Bakery are now or will be sitting next to more established businesses like

Papaccino's and Bi-Mart. Combined with an almost zero commercial vacancy rate, we are under market pressure to create more out of less.

The proposed changes under the new Portland Comprehensive Plan would take Woodstock Boulevard from Commercial Storefront - and in some cases Residential - to Mixed Use and would create a more continuous business district with many more opportunities for new businesses and residents to become part of our neighborhood.

In order to respond to the Portland Comprehensive Plan with a clear voice, the WCBA teamed with the Woodstock Stakeholder's Group, the Woodstock Neighborhood Association, and Reed College to commission the National Charrette Institute (NCI), to facilitate a conversation between the many different stakeholders in our neighborhood. With the goal of creating a workable vision for the future of our business district, City of Portland planners were also invited to help anchor the discussion in current zoning realities and anticipated changes.

The Woodstock Charrette was a success on many levels. Work sessions were held for the many diverse interest groups including residents, business owners, non-profit leaders, and commercial property owners. Unique to this process was the use of keypad polling to quantify the conclusions of the work sessions. The attached report with its supporting data is the result of this work, and in light of it, we feel we are able to support the proposed zoning changes as suggested by the current draft of the Comprehensive Plan.

It is, however, difficult to have this conversation in a vacuum and the comprehensive plan is just one piece of the puzzle. At the same time we are discussing the question of mixed use zoning, the codes determining what that means are also up for redefinition. Before making final recommendation on whether to support a wholesale change in our business district's zoning, we must know what that zoning will mean. Much of the Woodstock Charrette Report focuses on appropriate building heights, building massing transitions in context of surrounding buildings and residential zones, and desired development of unimproved roads. In addition, the report also addresses current and future parking needs in creative ways that resolve access issues in the near future and not only after optimum density is reached in the distant future.

We need the City to work hand in hand with us -- to partner with us -- using the comprehensive plan as just one tool to revitalize *and* protect our business district and

March 12, 2015

page 3

neighborhood, in essence to “keep Woodstock Woodstock,” while managing growth and increased density. By writing a mixed-use code that creates a toolbox of choices that right sizes development for the size of property, the width of the right of way, and the aesthetics of the neighborhood, the City can ensure that our neighborhood continues to retain its historical flavor while taking advantage of growth opportunities. We look forward to continuing the conversation with the City of Portland as the rezoning process continues, and we will continue to work within our community to strengthen the valuable partnerships we have created with the Woodstock Neighborhood Association and Woodstock Stakeholder’s Group.

Sincerely,

Ann Sanderson
Woodstock Community Business Association

**Woodstock Stakeholder Group
4410 SE Woodstock Blvd. Suite #250
Portland, Oregon 97206**

March 12, 2015

Dear Portland Planning and Sustainability Commission,

The Woodstock Stockholders Group is comprised of commercial property owners in the Woodstock business district. Today, we are providing testimony toward the 2035 Portland Comp Plan.

In the fall of 2014, the Woodstock neighborhood participated in an intense charrette process in order to help form community ideas on the future of the business district. The Woodstock Stakeholders, Woodstock Community Business Association, Woodstock Neighborhood Association and Reed College commissioned the expertise of the National Charrette Institute, which included urban planners, an economist and architect to guide this process. Other participants were City of Portland planners and non-profits leaders. Even Mayor Hales dropped in to see our progress and give feedback.

The main purpose for this project was to find a collective voice and vision that the Woodstock Community could support development and for future growth of the Woodstock business district.

As a result, the following recommendations, as indicated with green dots on the enclosed zoning map, were supported by the Woodstock Community which included the neighborhood Land Use Committee, residents, businesses and stakeholders and as indicated by Charrette polling completed on December 4, 2014. The polling results can be found on page 29 of the Charrette Report. Specifically;

- The community supported businesses who own their land and the residential property adjacent to their business to expand with a change of the residential property to mixed-use zone. MapApp proposal #'s 441, 732 and 55.
- The community supported small unbuildable residential zoned parcels (often just a part of a parking lot) to be cleaned up with a change to mixed-use zoning consistent with the adjacent commercial property zone. MapApp proposal #'s 54 and 739.
- The community supported that the R1 zoned property on the north side of Woodstock and east of SE 50th to be rezoned mixed-use which will connect the business district and support increased residential density in the district. MapApp proposal #355.
- In addition, there are two properties on the enclosed map that are marked with blue dots. These properties were not included in the polling and are still being discussed. The Stakeholders support a mixed-use zone change for these properties if the Portland Planning Commission agrees with the property owners' proposals.

Subsequent to the final Charrette Report, the Stakeholders learned that the Woodstock Neighborhood Association's Land Use Committee supported a change to mixed-use zone for a full block depth south of

Woodstock Blvd (Woodstock Blvd to Martins St) for all properties from SE 40th to SE 52nd. If this proposal is considered, The Woodstock Stakeholders support this change for the following reasons:

- The change to mixed-use will provide opportunities for the business district to expand and attract new businesses for a more complete neighborhood. With zero vacancy and high leakage as described on pages 13 to 15 in the report, additional commercial space and higher density near the business district will increase the vitality of the business district.
- This expansion of the mixed use zone would also provide opportunities for SE Martins to be improved through redevelopment since Martins is a mostly unimproved roadway and not passable in many sections. This is detrimental to the business district as drivers find it difficult circle the blocks and reenter the business district. Businesses identified this as a challenge in their individual charrette meetings. This would also increase value to the residents who live along unimproved sections of Martins St.
- Improvements of SE Martins south of the business corridor could also provide a connection for bicycle commuters with bike lanes that are currently lacking on Woodstock from SE 41st to 52nd Ave. Improvements to Martins would further enhance the attraction of Woodstock and could be designed with built-in buffer elements by using non-traditional street improvements. See illustrations on pages 27-28 of the Charrette Report.
- The expansion of the mixed-use from Woodstock to Martins would clean up the gap toothed line of commercial zoning adjacent to residential homes that does not easily allow for adequate or attractive buffering that a full street separation would.

Thank you for considering this testimony. We are proud to have been a part of the Woodstock Charrette and visioning of Woodstock's future. The Woodstock Neighborhood Association was invaluable in this process. As a result, we find that the charrette report accurately depicts the challenges and concerns of our entire community. We understand that this testimony is specific to zoning, but we would welcome the opportunity to engage with the City of Portland on future matters in shaping our business district.

Respectfully,

Representatives of Woodstock Stakeholders Group

Angie Even

Angie Even
4410 SE Woodstock, Suite #250
Portland OR 97206

Eugene Dieringer

Eugene Dieringer
4138 SE Lambert
Portland OR 97202

Woodstock Blvd

40th Ave to 57th Ave

Changes to Comprehensive Plan Designations

- Yellow: Single-Dwelling 7,000
- Light Green: Single-Dwelling 5,000
- Light Blue: Multi-Dwelling 2,000
- Orange: Institutional Campus
- Pink: Mixed Use – Neighborhood
- Magenta: Mixed Use – Dispersed
- Zoning Lines
- Comp Plan lines
- Parks
- School Sites
- Right-of-Way



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 Feet

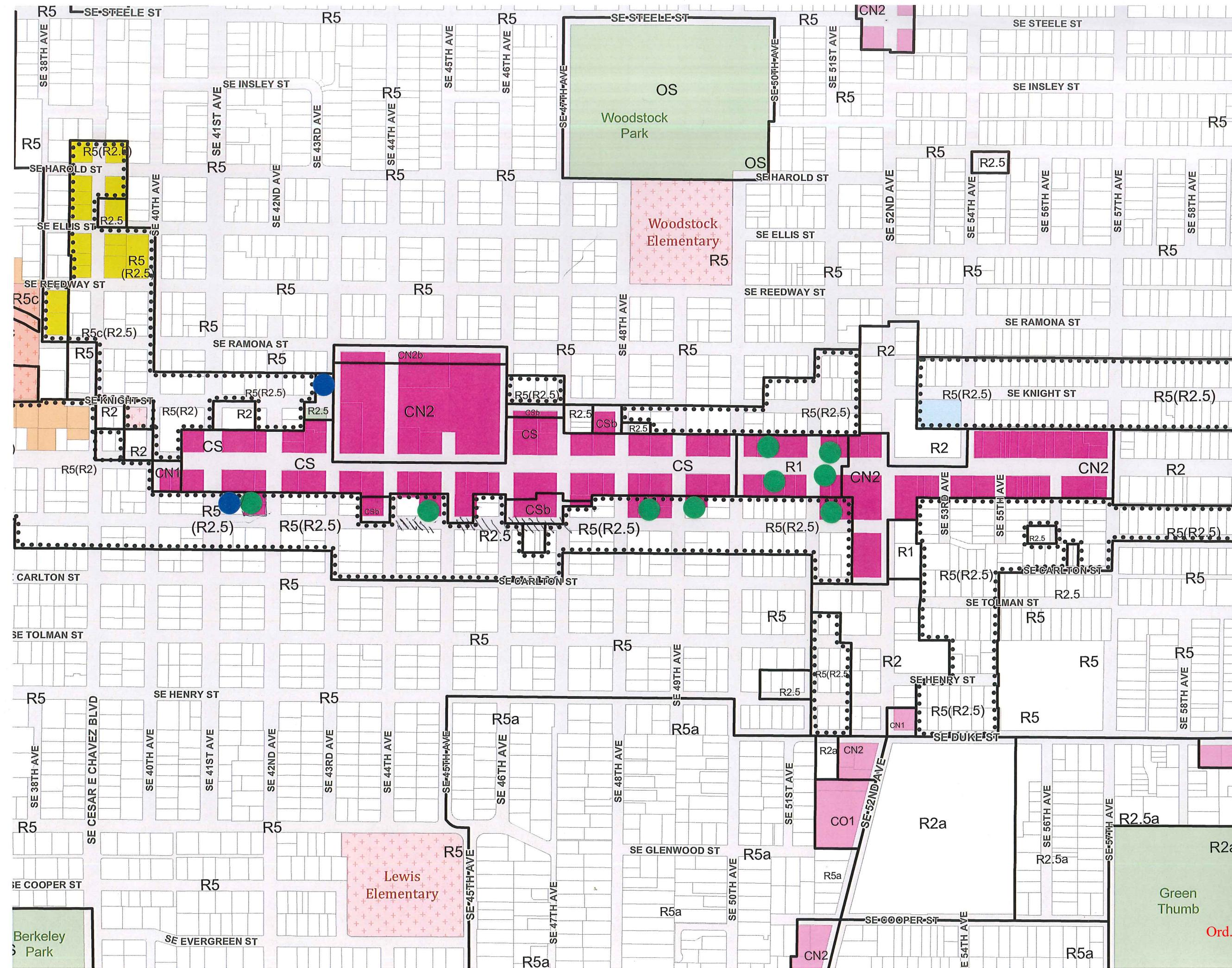
The information on this map was derived from City of Portland GIS databases. Care was taken in the creation of this map but it is provided "as is". The City of Portland cannot accept any responsibility for error, omissions or positional accuracy.



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

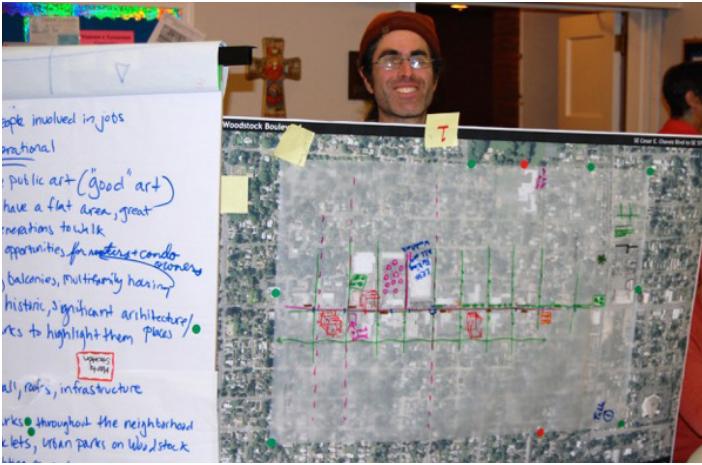


Ord. 187832 Vol. 2, 3, B, page 1489
 City of Portland, Oregon
 Charlie Hales, Mayor Susan Anderson, Director





THE WOODSTOCK BOULEVARD COMMUNITY VISION



CHARRETTE REPORT



January, 2015

THE WOODSTOCK BOULEVARD VISION CHARRETTE REPORT

Sponsors:

Woodstock Community Business Association
Woodstock Neighborhood Association
Woodstock Stakeholders Group
Reed College
Individual members of the Woodstock community

Project Committee

Angie Even
Becky Luening
Gene Dieringer
Terry Griffiths
Kevin Myers
Ann Sanderson
Krista Connerly
Mike Teskey

City of Portland:

Marty Stockton, Bureau of Planning and Sustainability

Charrette Team

Bill Lennertz, National Charrette Institute
Ed Starkie, Urban Advisors
Marcy McInelly, Urbsworks
Joseph Ready, Urbsworks
Laurence Qamar, Qamar Associates
Carol Maurey Bellows

TABLE OF CONTENTS

Introduction 1

Comments by Kevin Myers, Reed College 1

Woodstock: One Neighborhood, Many Voices 2

About the Portland Comprehensive Plan Update 4

The Woodstock Vision Charrette Summary 9

Market and Development Analysis by Urban Advisors 12

Strong Places/Weak Places 18

Influencing the Character and Scale of Woodstock Main Street through Design 18

Unimproved Streets 26

Keypad Polling 29

Site Specific Studies 30

Executive Summary 34

Appendix 37

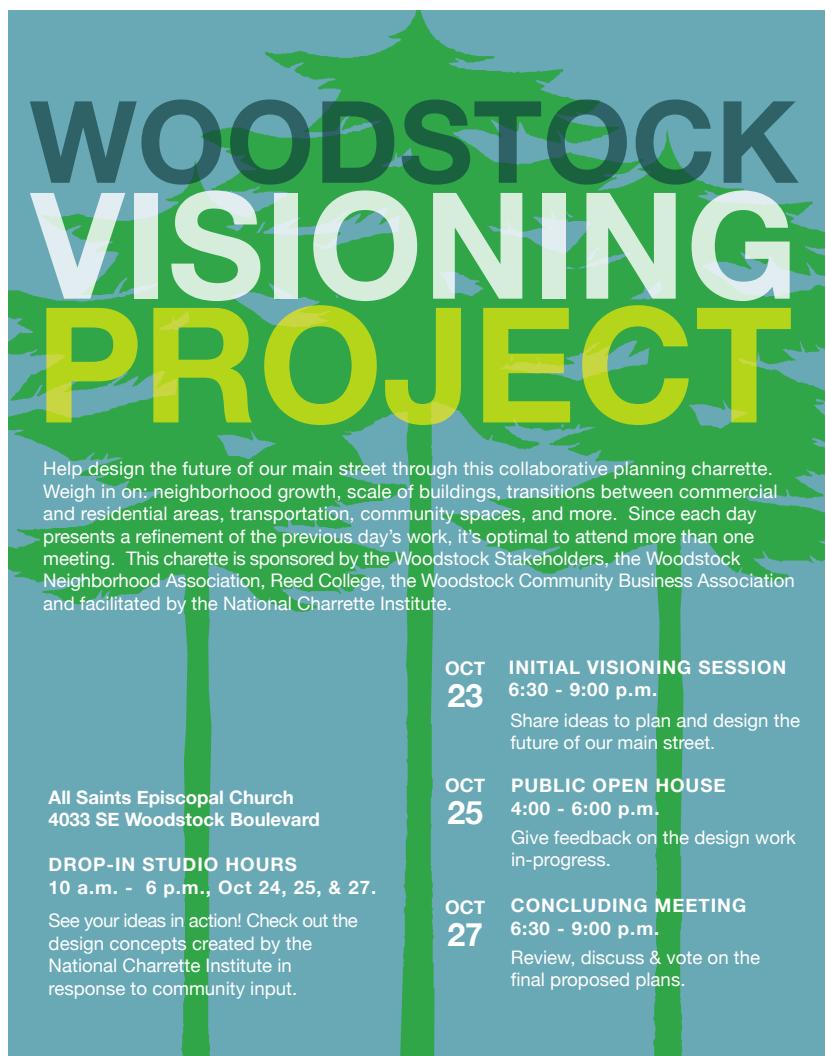
Appendix A - Meetings 37

Appendix B - Charrette Comments 41

Appendix C - Strong/Weak Places 46

Appendix D - Table Visioning 49

Appendix E - Vision Wall Comments 53



All Saints Episcopal Church
4033 SE Woodstock Boulevard

DROP-IN STUDIO HOURS
10 a.m. - 6 p.m., Oct 24, 25, & 27.

See your ideas in action! Check out the design concepts created by the National Charrette Institute in response to community input.

OCT 23 **INITIAL VISIONING SESSION**
6:30 - 9:00 p.m.

Share ideas to plan and design the future of our main street.

OCT 25 **PUBLIC OPEN HOUSE**
4:00 - 6:00 p.m.
Give feedback on the design work in-progress.

OCT 27 **CONCLUDING MEETING**
6:30 - 9:00 p.m.
Review, discuss & vote on the final proposed plans.

INTRODUCTION

In early 2014, the Woodstock Stakeholders Group, Woodstock Community Business Association, Woodstock Neighborhood Association and Reed College contacted the Portland based National Charrette Institute seeking advice on a visioning project for the core business district along Woodstock Boulevard. The intent was to bring the residential and business community together to create a vision for how Woodstock Boulevard should grow. The Portland Bureau of Planning and Sustainability saw the visioning as an opportunity to engage the community in the current Comprehensive Plan Update. In late summer it was decided to conduct a vision charrette or community design workshop. The public visioning charrette was held on October 23, 24, 25 and 27, 2014 at the All Saints Episcopal Church on Woodstock Boulevard. A wrap-up public meeting was held on December 4th. Members of city staff attended multiple meetings before, during and after the charrette. In all, over 100 people participated in the meetings with over half attending multiple events.

This report is meant to serve as a resource for the Woodstock community to use in providing input and testimony to the Comprehensive Plan Update and in seeking to influence future developers.

Comments by Kevin Myers, Reed College

There are people on the visioning planning team that have been working to make Woodstock a better place for decades. They have worked, lived and raised their children in Woodstock, and put in thousands of hours of community service to put on parades, picnics, movies in the park, and holiday events. They've written grants, and petitions, organized meetings and testified before city hall—they've fought to get crosswalks, improve unimproved roads, get planters in the median strips, worked to make things more bike and pedestrian friendly, they negotiated to preserve the Woodstock Community Center and they work equally hard to keep it open—all to make Woodstock a great place to live, raise families, and do business. For me, these folks symbolize everything I love about Woodstock. I've been attending meetings with these people for the last 5 or 6 years.

So I was very happy for this community when things along the boulevard really started to pick-up. We were all excited following last summer's announcement that New Seasons was coming, and then Grand Central Bakery, Portland Fish Market, and Dick's Kitchen—all great additions to the neighborhood. Then came the talk, rumor, and fear that next would be Pet Co, Walgreens, and 45-foot-tall, boxy buildings like those that have popped up on streets like Division, and that those would push up rents and push out family owned businesses and middle-income families—and frankly change the character of Woodstock.

That's when we started meeting with the City to see what we could do to help manage the growth while retaining the diverse demographics and character of the neighborhood, and open up new spaces for the types of business that were desired—allowing growth for existing business we love that anchor the neighborhood like Otto's and the Joinery. What would that look like as Portland grows? In other words, how do we accommodate growth in a way that still feels like Woodstock?



Woodstock: One Neighborhood, Many Voices

By Becky Luening, Chair of the Woodstock Neighborhood Association; Ann Sanderson, President of the Woodstock Community Business Association; and Angie Even, Chair of the Woodstock Stakeholders Group

A neighborhood is made up of many different voices. Residents, business owners, property owners, schools and community organizations; each group has its own unique needs and concerns. In times of rapid change, how can a whole community come together to help shape the future of its business district, ensuring that each group is well represented while recognizing that individuals often have differing opinions?

Woodstock recently took up this challenge, as local leaders recognized the need to get out in front of the changes affecting our commercial district rather than just waiting to see what market forces would bring. Reed College representatives spoke of wanting a vibrant "downtown." Neighbors spoke of their desire for buildings and businesses that were different from the new ones suddenly popping up on main streets in nearby neighborhoods like Division Street.

Community advocates began to focus on two strategies for shaping changes in Woodstock's town center. One would be the development of a plan or a set of guidelines which could then be used to make recommendations that might influence the decisions of property owners and those undertaking commercial development projects in our district. The other would be to provide strong collective input to the City of Portland's Comprehensive Plan, a document that will influence Portland's growth and development for the next two decades.

Both of these strategies would require extensive community input, and thus the Woodstock Charrette was born. Facilitated by the National Charrette Institute (NCI), an internationally recognized nonprofit organization led by Bill Lennertz and based in Portland, the Woodstock Charrette (also referred to as the Woodstock Visioning Project) brought all the different neighborhood interest groups together in a community design process. Included were commercial property owners (represented by the Woodstock Stakeholders Group), business owners (represented by the Woodstock Community Business Association), neighborhood residents (represented by the Woodstock Neighborhood Association), Reed College representatives, and City of Portland staff with expertise in planning, transportation, and economic development.

The primary work of the Woodstock Charrette with the greatest intensity of public participation was held for four intensive days and evenings of October 23, 24, 25, and 27, 2014. A final recap and finale was held on the evening December 4th. The visioning process engaged hundreds of Woodstock neighbors, and the results of their collective consideration and discussion has the potential to strongly influence the shape of future development of the Woodstock neighborhood's commercial district. NCI team members worked with neighborhood volunteers to gather ideas from attendees and facilitate whole-neighborhood conversations around specific topics, which are reflected in this final report. Some of the questions considered included:

- How far and in what direction (north, south, east, west) should commercial zoning be expanded?
- How big should multi-story buildings that may be constructed in the future be, and what kinds of zoning options should guide commercial development?
- How can we soften transitions between commercial and residential sections of our neighborhood?
- How important is it to include community gathering places, pocket parks or art features in our business district?
- How does traffic flow and transportation issues—auto, pedestrian, bicycle, public transport, parking play into the design of the commercial district?

The Woodstock Charrette grew out of conversations between Kevin Myers, Director of Strategic Communications at Reed College; Mike Teskey, head of Alumni Relations at Reed, who has a background in historic preservation; and commercial property owners Angie Even and Gene Dieringer, who head up the Woodstock Stakeholders Group that represents commercial property owners in our district. Woodstock Neighborhood Association's Land Use Chair Terry Griffiths was also involved in these early conversations about how to get ahead of, and help shape, the changes that were already coming to our neighborhood.

Teskey had a connection with Bill Lennertz, Executive Director of NCI, and when Lennertz led a charrette training in Portland attended by city planners and community organizers from around the world, Reed sponsored the participation of two Woodstock residents, Dan "DK" Chin and Kenny Heggem. Additionally, NCI used Woodstock as one of the case studies for that training.

The Woodstock Charrette was funded by old-fashioned grassroots fundraising. Each interest group contributed financially, creating an atmosphere of shared “skin in the game” and added commitment to the success of the project. Volunteers from all these groups were involved in planning, preparation, hosting and facilitation roles. In addition, many businesses made in-kind donations to support the effort. All of the public meetings were held at All Saints Episcopal Church on Woodstock. We are deeply grateful to all who contributed, including the many residential neighbors who turned out to participate in the process.

As with any project that creates a shared vision, implementation is the plan’s most important element. The Woodstock Visioning Project brought together and energized a neighborhood around considerations of the future of its business district. We were able to demonstrate that people really care about their neighborhood, and while we didn’t address or settle every question and concern that was brought to the table, we were able to consider and vote on several key questions. The outcome of the process will be used to influence those constructing future development in our community and the city departments that guide and regulate that development. We are confident that our work on this project has already influenced that future.

ABOUT THE PORTLAND COMPREHENSIVE PLAN UPDATE

By Marty Stockton, Bureau of Planning and Sustainability

The Comprehensive Plan is a 20-year plan for the growth and development of Portland. It provides a framework for the City to create opportunities for more jobs, affordable housing, a low-carbon economy, a clean environment, increased mobility and greater equity among Portlanders.

What are the parts of the Plan?

The Comprehensive Plan includes the components that work together to guide the City of Portland's land use and infrastructure investment decisions.

- **Goal and Policies**

Long-term aspirations for Portland and descriptions of the work that must be done to achieve them.

- **List of Significant Projects**

Planned public facility investments.

- **Comprehensive Plan Map**

Land use designations for growth, development and conservation.

- **Transportation System Plan**

Transportation policies, street classifications and street plan maps.

Goals and Policies – Chapter 3: Urban Form within the Comprehensive Plan

The draft Comprehensive Plan policies call for fostering a network of mixed-use centers across Portland that will be a focus of activity, services, and housing and employment growth. Centers will range in scale from the Central City's downtown to small neighborhood centers, providing local access to services and allowing Portlanders across the city to live a healthy, active lifestyle. Examples of existing centers include the Hollywood, St. Johns, Hillsdale, and Lents town center.

What are centers?

Centers are compact places that serve as anchors to connect neighborhoods, providing concentrations of:

- Neighborhood businesses, including grocery stores and other essential goods and services
- Community services, libraries, schools, community centers, places of worship, etc.
- Housing
- Employment opportunities
- Parks or other public gathering places

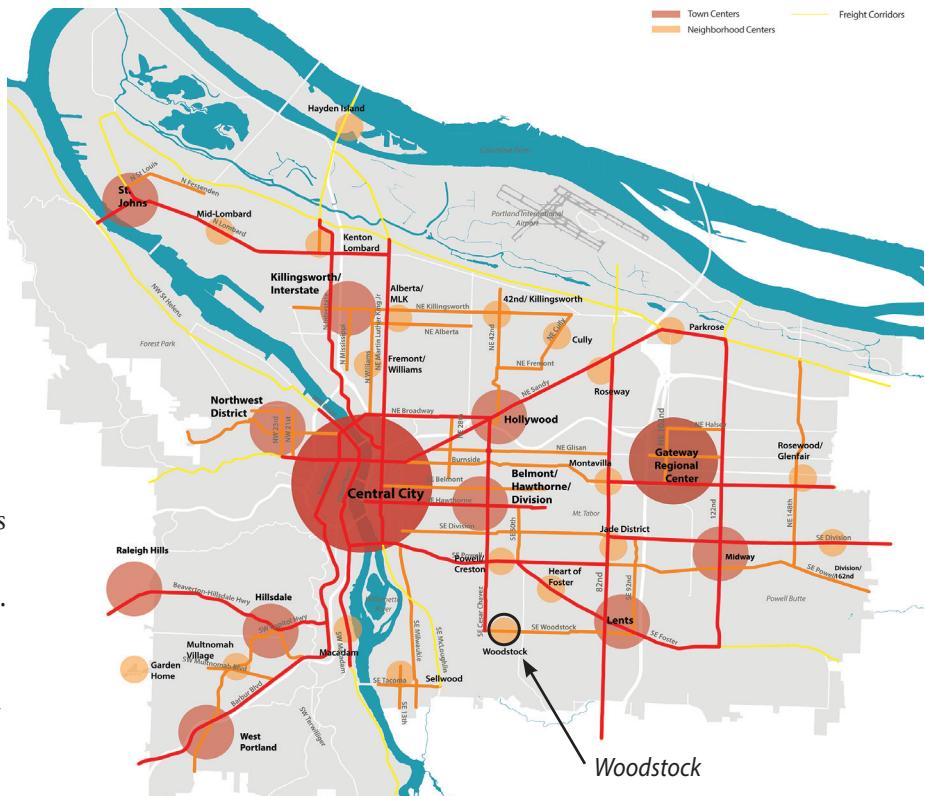
Centers will be priorities for improvement as connected, accessible places that are:

- Hubs for active transportation (walking, bicycling and transit)
- Physically accessible for people of all ages and abilities
- Connected to other centers and to key destinations by frequent transit
- Linked to surrounding neighborhoods by quality pedestrian and bicycle connections.

Why centers?

Clustering destinations within compact, walkable centers makes access by transit, walking, wheelchair, and bicycle more practical and reduces the amount of driving needed to access services. Creating a citywide network of centers will be critical to achieving Portland Plan goals for making it possible for the majority of Portlanders (80%) to live in complete neighborhoods by 2035, and for achieving sustainability goals for increasing travel by transit, walking, and bicycling.

Neighborhood Center: Neighborhood centers are hubs of commercial services, activity, and transportation for surrounding neighborhoods. They typically include small parks or plazas that support local activity and gathering. These smaller centers provide housing capacity within a half-mile radius for about half the population needed to support a full-service business district (surrounding neighborhoods provide the rest of this population base).



The Woodstock core area is proposed as both a Neighborhood Center and a Neighborhood Corridor as illustrated in the Centers and Corridors Diagram.

Neighborhood Corridor: Neighborhood Corridors are narrower main streets that connect neighborhoods with each other and to other parts of the city. They support the viability of neighborhood business districts and provide locations for additional housing opportunities close to local services, amenities and transit lines.

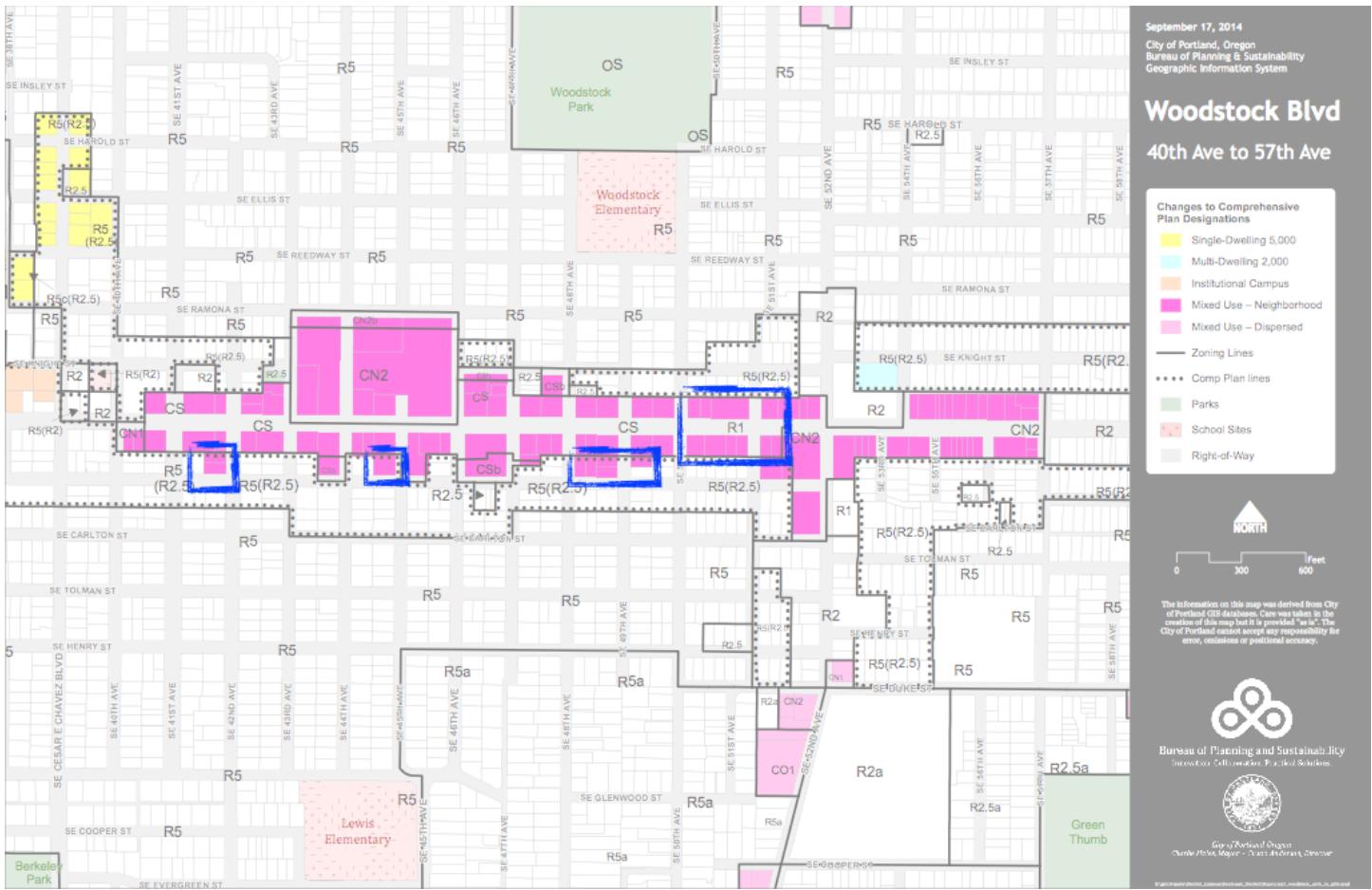
The Comprehensive Plan Map

This map establishes land use designations for all land in Portland's Urban Services Boundary. It shows desired development intensity and where various uses (residential, mixed-use, employment, etc.) will be allowed. It is the basis for the Zoning Map.

Proposed Comprehensive Plan Map Changes

Proposed map changes carry out draft goals and policies of the Plan, and respond to community input. The purpose of the proposed map changes along Woodstock Boulevard:

- Increase housing opportunity in transit-accessible neighborhoods close to the Central-City
- Emphasize new neighborhood center and corridor designations
- Address nonconforming-use issues and split designated parcels in several corridors
- Add mixed-use designations in selected locations



The circled areas in the map above show the areas that are proposed to change from residential to mixed-use neighborhood zoning.

Proposed Zoning Map Changes

The proposed draft of the Comprehensive Plan is currently under review by the public and the Planning and Sustainability Commission (PSC). The new Comprehensive Plan Map proposes land use changes for a number of properties across the city, and many people are eager to talk about the zoning details for those places – particularly in the mixed-use zones.

The Mixed Use Zones Project will revise Portland's Commercial and Central Employment zoning codes applied outside the Central City. These zones (CN1/2, CO1/2, CM, CS, CG, CX, EX), in which mixed uses are allowed, were created over 20 years ago when auto-oriented uses and low intensity commercial uses were more common.

The Bureau of Planning and Sustainability is considering a new framework of zones to replace the city's existing Commercial and Central Employment zones. The working concept would reduce the current array of nine zones to a set of four. The new framework would include zones that allow small (CM1), medium (CM2) and large (CM3) scale commercial mixed-use development, as well as a medium-scale zone that would allow a broader array of employment uses (CE).

- Commercial Mixed-Use 1 (CM1)
- Commercial Mixed-Use 2 (CM2)
- Commercial Mixed-Use 3 (CM3)
- Commercial Employment (CE)

One of four Mixed Use Zones will be specifically assigned to each area designated mixed-use on the Comprehensive Plan Map.

Table 1: Preliminary Zoning Concept: Comprehensive Plan and Zoning Relationships (dated November 2014)

New Comp Plan Designation	Future Implementing Zones	Existing Implementing Zones
Mixed-Use Dispersed	CM1, CE	CN1, CN2, CO1, CO2, CM, CS, EX
Mixed-Use Neighborhood	CM1, CM2, CE	CN2, CO2, CM, CS, EX
Mixed-Use Civic Corridor	CM1, CM2, CM3, CE	CN2, CO2, CM, CS, CG, CX, EX
Mixed-Use Urban Center	CM1, CM2, CM3, CE	CN1, CO1, CM, CS, CG, CX, EX

The new zones will be initially be applied to properties based on a combination of factors, including the Urban Design Framework (UDF, Comprehensive Plan designation and current zone. The Mixed Use Zones Project will propose a conversion system that recommends mapping/application of new zones. As shown in the preliminary concept table (dated November 2014) below, in most cases the new recommended zone for a particular parcel will be the most similar to the current zone, in terms of scale and general use allowances, In some cases more than one option exists. New zones will have new development and design standards that result from the Mixed Use Zones Project.

Table 2: Preliminary Zoning Concept Conversion (dated November 2014)

Proposed Comp Plan Designation	Current Zone						
	CN1/2	CO1/2	CM	CS	CG	EX	CX
Mixed Use Dispersed	CM1	CM1	CM1	CM1	CM1 [#] CE [#]	CM2	n/a
Mixed Use Neighborhood	CM1	CM1	CM1* CM2*	CM1* CM2*	CM2 [#] CE [#]	CM2	n/a
Mixed Use Civic Corridor	CM1 [^] CM2 [^]	CM1 [^] CM2 [^]	CM2	CM2	CM2 [#] CE [#]	CM3	CM3
Mixed Use Urban Center	CM1	CM1 ⁺ CM2 ⁺	CM2	CM2	CM2 [#] CE [#]	CM3	CM3

* CM1 may be proposed for UDF Neighborhood Corridors; CM2 may be proposed for UDF Neighborhood Centers

[^] CM1 may be proposed for isolated locations; CM2 may be proposed for areas contiguous to larger scale mixed-use zones

+ CM1 may be proposed for CO1 zones; CM2 may be proposed for CO2 zones

TBD: CM zones may be applied to UDF Centers; CE may be applied to UDF Corridors.

What this means for Woodstock

The Woodstock Core Area is designed a Neighborhood Center and the boulevard is designated a Neighborhood Corridor. Using Table 2 above, existing CN2 and CS zoning would convert to CM1 and CM2 respectively.

The Mixed Use Zones Project will work closely with the City's District Liaisons to publish a map of the proposed zoning. This process will help fine tune the mapping/application of new zones where specific circumstances may warrant application of different zones than recommended through the conversion table. Examples of these circumstances could include areas: of unique topography or natural resource impacts; with significant resources; where transitions to a different development pattern may be desired (e.g., less auto-oriented or more employment focused).

The Planning and Sustainability Commission will hold public hearings on the new zoning codes, proposed conversion table approach, and proposed Zoning Map in mid-2015. Adjustments may be made based on public testimony. The PSC recommendations will be forwarded to City Council for final public hearings and adoption in late 2015 to early 2016.

Where basic infrastructure is not in place to accommodate the desired intensity indicated on the Comprehensive Plan Map, the property will be shown as "designated" for the desired future zone. The desired zoning will be allowed when the necessary infrastructure is in place or is guaranteed to be in place at such time as the desired use will be allowed.

What is the difference between the Comprehensive Plan Map and Zoning?

The Comprehensive Plan Map is about the future: It depicts a long-term vision of how and where the city will grow and change over the next 20 years to accommodate expected population and job growth. The comprehensive plan map identifies what land can generally be used for (e.g., residential, employment, open space). Should it be light industrial or manufacturing? Multi-family or single-family? Specific rules about how buildings can look or how tall they can be are developed once these general land uses are defined and mapped.

The Zoning Map is about what is allowed today: Decisions about the Comprehensive Plan Map guide decisions about zoning. The City's Zoning Map tells us how land can be used and what can be built on any given property today. Zones are more specific than the Comprehensive Plan designations and come with a set of rules described in the City's zoning code. The zoning code addresses the details; height, setbacks, floor-area ratio (FAR) and other design characteristics for each property.

What happens next?

Step 1: Planning and Sustainability Commission

Starting in September 2014, the Planning and Sustainability Commission (PSC) hosted a series of public hearings. The PSC will review and listen to public input, including all letters, map comments and in-person testimony. This feedback will help the PSC develop a better and more complete plan to recommend to City Council for adoption.

Step 2: City Council

City Council is expected to hold hearings and vote on the new Comprehensive Plan by mid-2015. They will likely hold hearings and vote on related zoning changes by the end of 2015.

Step 3: State of Oregon

After City Council adoption, the new plan must be approved (Acknowledged) by the State of Oregon. That process can take as long as a year.

To read the full Comprehensive Plan, its goals and policies, project list and comprehensive plan map, please visit: www.portlandoregon.gov/bps/pdxcompplan or call the Bureau of Planning and Sustainability at (503) 823-7700.

THE WOODSTOCK VISION CHARRETTE SUMMARY



A charrette is a series of design-based meetings held over multiple consecutive days. The Woodstock Vision Charrette kicked off on the morning of Thursday, October 23, 2014 with a walking tour of Woodstock's commercial strip for the NCI charrette team, led by members of the neighborhood's project committee. A team comprised of architects, urban designers and economists began the visioning process by listening to the community at a kick-off meeting held that evening at All Saints Episcopal Church. Over subsequent days, members of the community participated in the charrette through a series of topical meetings. People also participated by dropping by the design studio at the church to view and discuss the work with members of the design team. During the charrette there were three formal public meetings, seven topical meetings, two technical reviews, a public open house and three public meetings. In total, the charrette provided over 40 hours of meeting time with community members.



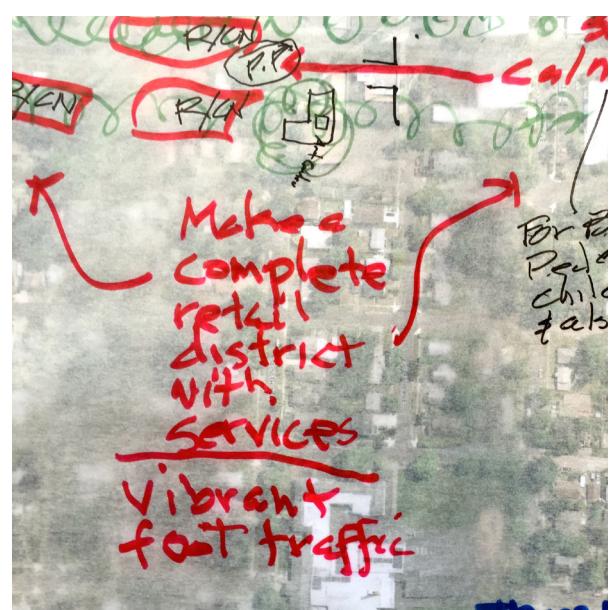
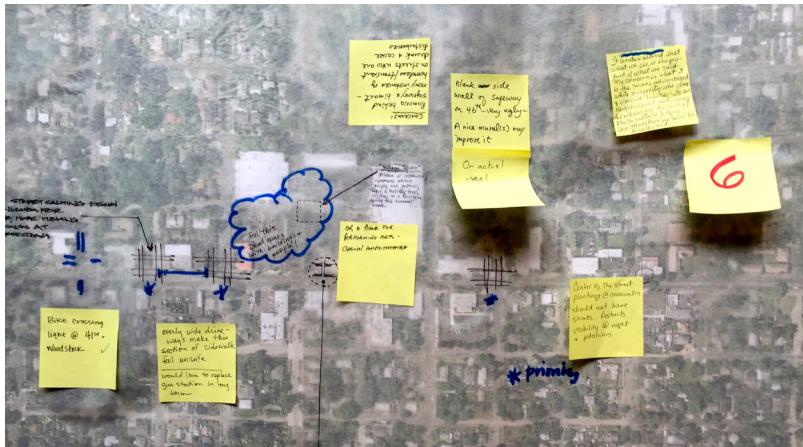
Charrette Activities

On the evening of October 23rd approximately 90 people gathered at the All Saints Church for the opening public meeting of the charrette. The meeting began with a presentation by the charrette team about the project purpose and process. The central activity of the evening was a set of exercises that engaged the community in describing aspects of a vision for the future of Woodstock Boulevard. People worked in small groups on a "hands-on" exercise to draw ideas on an aerial photograph of the study area. At the end of the evening a representative from each group reported on their top vision items. This exercise allowed all participants to see the common vision ideas as well as the disagreements. This information was then given to the charrette design team as a starting point for the development of design alternatives starting the next day.

Woodstock Blvd. Charrette Schedule TEAM SCHEDULE (9/30/14)				
Location: All Saints Episcopal Church, 4033 SE Woodstock Blvd. Charrette studio open to the public: Friday, Saturday, Monday 10 AM - 6:30 PM				
Thursday, October 23 DAY ONE	Friday, October 24 DAY TWO	Saturday, October 25 DAY THREE	Sunday, October 26 DAY FOUR	Monday, October 27 DAY FIVE
9:00 AM Walking Tour: Designers and Committee 9-11am	Meeting with City 9-10:30am			Meetings as needed: City, committee, property owners 9-10:30am
10:00 AM	Meeting with neighborhood reps., churches, community advocates	Meeting with nearby neighbors		
11:00 AM		10:30am-12pm	10:30am-12pm	
12:00 PM Lunch Out	Lunch In		Lunch In	Lunch In
1:00 PM Meeting with realtors, property owners, Reed 1-2:30pm	Meeting with business owners 1-3pm			
2:00 PM Meeting with property owners			Design in Studio	
3:00 PM NCI Charrette 101 Lecture 3:30-5pm				Day Off - No Activities
4:00 PM Meeting with property owner 3:30-5pm			Public Open House 4pm-6pm	
5:00 PM Facilitator Training Dinner In	Team Design in Studio			
6:00 PM				
7:00 PM Public Kick-off Meeting 6:30pm-9pm			Design in Studio	
8:00 PM				
9:00 PM				

Table Drawings from Thursday Workshop

Drawings by small groups of community members completed at the Charrette Public Kick-off Meeting:



One-word Card Responses: Now

During the charrette, community members filled out “one-word surveys.” This diagram shows the most common words used to describe “Woodstock Boulevard now.”



One-word Card Responses: Future

This diagram shows the most common words used to describe “Woodstock Boulevard in the future.”



The above “word clouds” give greater prominence to words that appear more frequently in the source text.

Larger words= more frequent responses, small words= less frequent responses.

Topical Meetings

Members of the charrette design team conducted a series of meeting with community members and city staff during the charrette. The purpose of these meetings was to gather comments and ideas from the participants about vision and design concepts for Woodstock Boulevard. The meetings were held with:

- Commercial property owners
- Neighborhood representatives
- Churches and community advocates
- Business owners
- Reed College
- Nearby neighbors on SE Martins and SE Ramona
- City of Portland staff

See appendix A for meeting results.



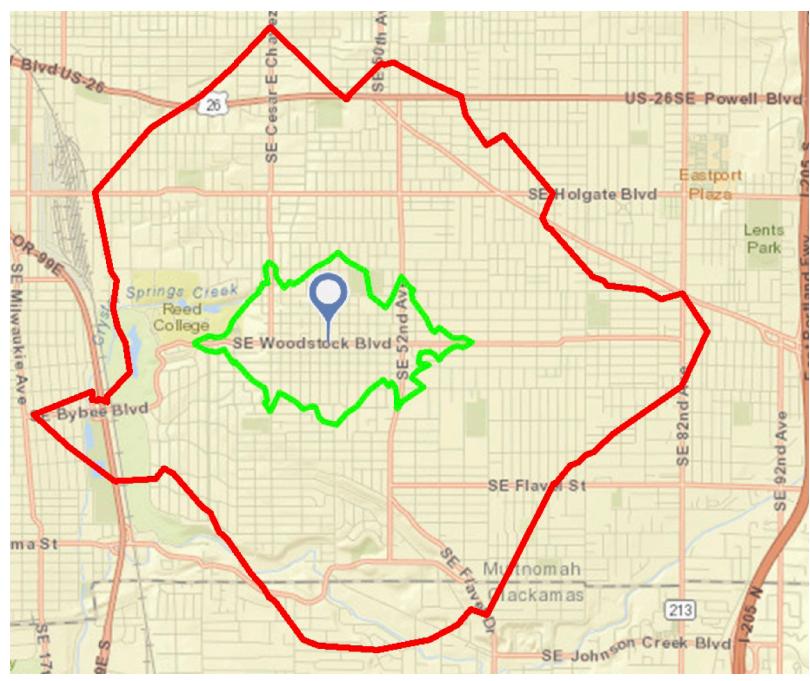
Market and Development Analysis by Urban Advisors

Context

Woodstock Street between SE Cesar E Chavez Boulevard and SE 52nd Avenue is a historic main street for the Woodstock neighborhood. The Woodstock neighborhood started as the town of Woodstock with its own post office and remained a town until 1912. The existing commercial district was centered on the streetcar line that traveled from the Hawthorne district and that served the neighborhood from 42nd Avenue to 57th Avenue where the line terminated.

This historic main street is in the center of an area of perceived barriers that define its market area (see the map at right) including: the railroad to the west; I-205 to the east; Powell Boulevard to the north; and, Johnson Creek to the south. (More historical context at: www.pdxhistory.com/html/portland_neighborhoods.html)

The goal for the project team was to evaluate the potential for better retail and services in the area. To evaluate the potential for change on the Woodstock corridor we mapped local drive times. A two-minute drive, shown with the green boundary in the map,



corresponds roughly to a walk shed for the retail district from SE 45th and SE Woodstock. A five-minute drive time, shown with the red boundary, corresponds roughly to the actual physical barriers that define the Woodstock local market.

Market Demographics

Demographic estimates and trend-based projections for the two drive-time areas in the map are shown in the following tables.

SE Woodstock and SE 45th

2 Min. Drive (Walk Shed)	2014	2019	Change
Population	3,160	3,289	129
Households	1,325	1,384	59
Families	751	779	28
Non Families	574	605	31
Average Household Size	2.28	2.28	0
Owner Occupied Housing Units	961	1,001	40
Renter Occupied Housing Units	364	384	20
Median Age	38.2	39.2	1.0
Median Income	\$67,537	\$79,164	\$11,627

Within the very local market, the walk shed, there are slightly over 1,300 households. Owner occupied units are approximately 73 percent of the occupied units in this area.

SE Woodstock and SE 45th

5 Min. Drive	2014	2019	Change
Population	44,946	46,724	1,778
Households	18,651	19,429	778
Families	9,893	10,246	353
Non Families	8,758	9,183	425
Average Household Size	2.34	2.34	0
Owner Occupied Housing Units	10,838	11,286	448
Renter Occupied Housing Units	7,813	8,143	330
Median Age	36.7	37.4	0.7
Median Income	\$50,930	\$58,436	\$7,506

The five-minute drive time in which Woodstock is centered contains over 18,600 households. As compared to the Woodstock walk shed, median incomes are approximately 25 percent lower and the proportion of owned homes is lower, approximately 58 percent as opposed to 73 percent.

A Note About Projections

The projections shown in the demographic tables are trend based; they do not take into account the planning in the proposed comprehensive plan for the city. The comprehensive plan allocates future growth and density to specific nodes or town centers, and to specific corridors. Woodstock is one of the corridors chosen for neighborhood mixed-use that will accommodate future retail, services, jobs and housing over the next 20 years. As such, trend-based projections do not reflect the likely outcome that the Woodstock corridor will add housing and retail. Trend-based projections only reference past growth, while the comprehensive plan dictates where growth can occur, making past trends an unreliable indicator of the location of new housing. New housing will also act as an incentive for new retail space in proximity.

The Current Market for Retail

Woodstock has a very small market in its walk shed, but a rather large market in the area contained within the physical

boundaries noted above. For instance, the area within walking distance contains only about one-third of the households necessary to support a grocery. The major businesses located on the corridor, such as Safeway, Bi-Mart, and New Seasons are relying on the wider market area rather than the walk shed. With that in mind, we looked at leakage within a five-minute drive.

Leakage in the following table is equal to sales less demand. When sales are less than area demand, then the excess demand is being spent elsewhere. For the five-minute drive from 45th and Woodstock there is currently about \$151 million in demand, not including motor vehicle or gasoline and oil sales, that is not being supplied with the five-minute drive. The table “Woodstock and 45th Drive Time Leakage’ on the following page lists each retail category, but among them are candidates for main street retail businesses that could add to the vitality of the Woodstock neighborhood, including:

- Clothing: \$20 million
- Restaurants, all types: \$15.7 million
- Shoes, Jewelry, Other Shop types: \$11.9 million
- Electronics, Appliances: \$9.4 million
- Building Materials, Supplies: \$7.8 million
- Special Food Services: \$1.8 million

Altogether, there appears to be short-term demand for retail space of between 100,000 to 150,000 square feet.

Retail/Service	Leakage in Black	
	2 Minute	5 Min Total
Department Stores Excluding Leased Depts.	2,829,822	36,004,479
Other General Merchandise Stores	(15,099,720)	12,255,932
Clothing Stores	1,337,717	20,064,983
Food Services & Drinking Places	(4,112,717)	13,917,232
Limited-Service Eating Places	(52,070)	9,168,846
Electronics & Appliance Stores	383,644	9,442,806
Full-Service Restaurants	(2,144,979)	6,571,112
Bldg Material & Supplies Dealers	(598,371)	7,841,800
Nonstore Retailers	(1,696,744)	4,899,851
Auto Parts, Accessories & Tire Stores	563	5,676,270
Office Supplies, Stationery & Gift Stores	288,751	4,219,990
Other Motor Vehicle Dealers	528,108	3,891,193
Electronic Shopping & Mail-Order Houses	(2,051,197)	1,115,943
Jewelry, Luggage & Leather Goods Stores	175,218	2,987,899
Sporting Goods/Hobby/Musical Instr Stores	743,650	3,335,564
Other Miscellaneous Store Retailers	4,722	2,338,018
Shoe Stores	341,475	2,427,724
Special Food Services	170,384	1,826,923
Used Merchandise Stores	(528)	1,553,712
Lawn & Garden Equip & Supply Stores	228,550	1,549,882
Book, Periodical & Music Stores	176,294	145,136
Florists	(265,476)	(533,558)
Specialty Food Stores	(359,767)	(956,250)
Drinking Places - Alcoholic Beverages	(2,086,051)	(3,649,649)
Beer, Wine & Liquor Stores	320,683	(1,253,485)
Home Furnishings Stores	(901,113)	(3,278,511)
Furniture Stores	335,191	(5,780,577)

Furniture & Home Furnishings Stores	(565,922)	(9,059,087)
Health & Personal Care Stores	1,509,255	(17,846,623)
Grocery Stores	(36,599,128)	(71,946,726)

Source: ESRI BIS

There are two other factors that will affect the market viability for retail on Woodstock—the fact that there is currently no vacant retail space, and the fact that most of the current building stock, even if it were vacant, is outdated for modern retailing. Because of the lack of vacancy, new space will need to be built and new space will cost more than existing space and will require higher sales per square foot to enable feasibility.

To summarize, the challenges beyond retail demand include:

- Current retail vacancy close to zero
- Most space in retail zones is obsolete
- Households within retail walk shed only ±1300
- Street acts as commuter corridor, not pedestrian corridor

To meet these challenges, new space is needed, but to support new space:

- Retail capture needs to increase
- Foot traffic to raise sales needs to increase
- Residential intensity on the corridor needs to increase to raise capture
- Woodstock needs traffic calming to ±20 mph (which can increase business revenue by ±15%) to increase capture
- A more complete retail district is needed to increase the value as a destination neighborhood

Making the retail district more complete means providing a mix of goods and services that satisfy most community needs in a walkable compact district. A more complete district:

- Has higher value as a destination
- Draws from a wider radius
- Achieves higher market capture
- Makes property more valuable

Woodstock can, by careful programming of mixed-use, achieve market support for this, but it requires all of the elements: a better street for walking, more aggregated retail to make a higher utility walking district, and more residential on the corridor to create a higher capture local market.

Finally, it is very important that the small village character of the district is maintained so that Woodstock, as a destination, is distinct from other mixed-use districts. Retaining its historic quality through careful design of buildings and street amenities will be critical in differentiating Woodstock as a desirable location.

Woodstock Capacity for Change

If Woodstock could redevelop, how much building square footage can be added, while maintaining village character without costly or ugly parking solutions and at a scale achievable by local owners and developers or businesses?

Right now, Woodstock is an auto-oriented location and the ability to add retail will depend in part upon parking. With this in mind the team looked at the potential for adding new parking without adding structures or large lots in addition to what is there now. We determined that Woodstock, with managed on-street parking, could support an urban form that yields 150,000 square feet of new storefront commercial parked on-street, and 1,000 new housing units with on-site and on-street parking.

Parking solutions, as recommended by the charrette team, can include:

- Head-in parking on SE Martins, one side of street only = up to 160 spaces (pertains to full-block commercial areas, see illustration page 31)
- Improving parallel parking on Woodstock with elective curb cut removal = ±38 to 76 spaces
- Parallel parking that can be accommodated for one block along the north/south side streets off Woodstock = ±550 spaces
- New project on-site parking = ±1,000 spaces
- Total new spaces available for new development = ±1,600 to 1,700

Trade Offs

During the charrette, the community proposed goals to achieve a more vital district for the future of the corridor. Each of these goals has a number of trade-offs, and sometimes the trade-offs are in conflict.

A major goal was increasing the viability of the retail district, but residents also expressed a desire to keep the current scale of buildings. Achieving this goal with the current one- to two-story auto-oriented model:

- Requires much more parking since everyone arrives by car, which...
- Requires a choice between business intensity or residential intensity due to parking removing development space, and...
- Fails to increase residential density due to new height restrictions and ensures auto orientation for the future and thus
- Increases traffic problems, and
- Also removes existing property rights

The last point on removing property rights is not trivial. Most of this corridor has been zoned for four-story buildings for the last thirty years. In the past, the market did not support that, but in the future it will without question. Removing the current right to build structures up to 45-feet in height will require compensation for property owners as a taking.

Another desire expressed during interviews and at the public workshop was to increase vitality and nightlife. Any adding of retail and services requires an increase in businesses, which...

- Requires new space—old space is full, which...
- Will raise space cost, which must be offset by...
- Higher local density to raise capture, which...
- Ensures mixed-use buildings higher than two stories

A goal desired by both businesses and residents was to calm traffic and convert pass-through trips to destination trips that might increase local business revenue and provide better services for residents walking on Woodstock. This goal requires a shift from auto orientation to a walkable orientation which:

- Requires higher local use and capture, which...
- Requires increase of walk shed population, and more business clustered in walk shed, which...
- Requires three to four-story mixed-use buildings in central location, and two- to three-story apartments as infill around central location

Another major goal from interviews and public meetings was the desire to maintain the Woodstock corridor as a multigenerational and affordable place to live and work. Achieving this goal requires:

- The most feasible density for getting the most affordable leasing
- Walkable retail/services for seniors
- Buildings with elevators
- Calm traffic, walkable district
- Night occupation for public safety

Evaluating building performance with community goals in mind is complicated because of the many factors involved in any urban setting for each differing use type to achieve feasibility not just by itself but in concert with all of the uses together as a working neighborhood. In regard to affordability and feasibility, we looked at building feasibility at various heights by building type and use. Five story mixed-use was tested and yielded less feasibility and less affordability than three and four story, and was dropped from the table

We have summarized the factors that interact with building type and neighborhood viability in the following tables:

Mixed Use Table

Goal	2 Story MU	3 Story MU	4 Story MU	2 story Com'l
Support Retail Market	Red	Yellow	Green	Red
Increase Vitality at Night	Red	Yellow	Green	Yellow
Retail Needs Auto	Red	Yellow	Yellow	Red
Retail Traffic Impact	Red	Yellow	Green	Red
Parking Impact	Yellow	Green	Green	Green
Rent at Median Income	Red	Yellow	Yellow	NA
Disabled Access	Yellow	Green	Green	NA
Feasibility Now	Red	Yellow	Green	Yellow
Future Feasibility	Red	Yellow	Green	Red

These tables show that 3- to 4-story mixed-use development is both supported by the market and supports the community goals.

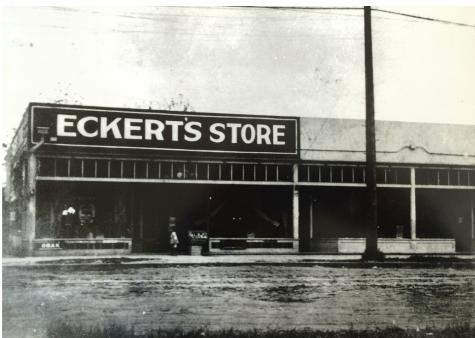
Infill Apartment Table

Goal	2 Story Apt	3 Story Apt	4 Story Apt	Horizontal MU*
Support Retail Market	Yellow	Green	Green	Green
Increase Vitality at Night	Yellow	Green	Green	Green
Retail Needs Auto	NA	NA	NA	NA
Retail Traffic Impact	Yellow	Green	Green	Green
Parking Impact	Green	Green	Yellow	Yellow
Rent at Median Income	Green	Green	Yellow	Green
Disabled Access	Green	Green	Green	Green
Feasibility Now	Green	Green	Yellow	Green
Future Feasibility	Yellow	Yellow	Green	Green

Performance by criteria ratings

- Red = poorest performance
- Yellow = neutral
- Green = best

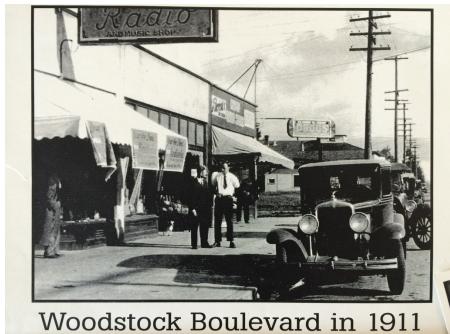
* Horizontal mixed-use (MU) means retail and residential side-by-side, not stacked.



Pre-World War II photos of Woodstock Boulevard

Woodstock Boulevard has a history of modest, utilitarian main street buildings. Key features are buildings built to the sidewalk with expansive retail storefronts. As with many Portland neighborhood main streets, these simple storefronts had high ceilings and operable transom windows to allow light and circulation into the retail spaces. These storefronts were designed to provide maximum exposure for goods and services to the customers passing by on Woodstock.

Not much has changed in the world of storefront retail since these pictures were taken. The most successful storefronts are built to the sidewalk and feature high ceilings with plenty of glass. During the charrette, community members repeatedly said that this tradition of Woodstock retail storefront building should be continued. "Keep Woodstock, Woodstock."



Woodstock Boulevard in 1911

Strong Places/Weak Places

During the charrette community members participated in an exercise to identify the strong and weak places along Woodstock Boulevard.

Top three strong places were:

- The business area along Woodstock between 44th and 45th
- The Library
- Otto's

Top three weak places were:

- The corner of 52nd and Woodstock
- The convenience store/gas station at 43rd and Woodstock
- The unimproved streets off Woodstock

Influencing the Character and Scale of Woodstock Main Street through Design

Parking Analysis

When asked what they would like to see improved on Woodstock Boulevard's retail main street, charrette participants said that the boulevard works better for drivers than for pedestrian shoppers walking along the boulevard. Some said that it had a little of



Blue dots indicate strong places, red dots indicate weak places

82nd Avenue's auto-oriented feel, and needs more of a slow-moving, pedestrian character.

One of the most effective ways to enhance the pedestrian experience for shoppers is to reduce the amount of parking lots exposed to the main street along the sidewalk, and replace them with storefronts to establish a continuously stimulating retail experience of storefronts, shops, cafes, and restaurants.

Currently parking lots take up about 31% of all block faces within the commercial study area from SE 41st to SE 57th. The remaining approximately 69% of block faces consist of existing shop fronts and house fronts. All of these parking lots have curb cuts that allow driveways to cross the pedestrian sidewalks so that pedestrians not only cross streets every 200 feet but also need to watch for cars entering and leaving parking lots in the mid-blocks.

The highest valued commercial shopping districts have a few basic attributes in common. Above all, they function as a complete sensory experience that keeps shoppers engaged and entertained to linger longer than only fulfilling a single commercial exchange. Rather than merely a collection of stores, Woodstock needs to come together as a cohesive shopping and entertainment experience.

By filling in existing parking lots with new, vibrant shop fronts, the commercial businesses on the whole will see an increase in retail sales and combined success.



Building Form along Woodstock Boulevard

Zoning has been in place for over 30 years that would allow most Woodstock Boulevard commercial property owners to build up to 45 feet straight up from the sidewalk property line.



While charrette participants expressed concern over the “bulky, looming and boxy” new buildings that have been developed along other east-west streets like Division, these buildings result from the same Storefront Commercial (SC) zoning that currently exists on much of Woodstock Boulevard.



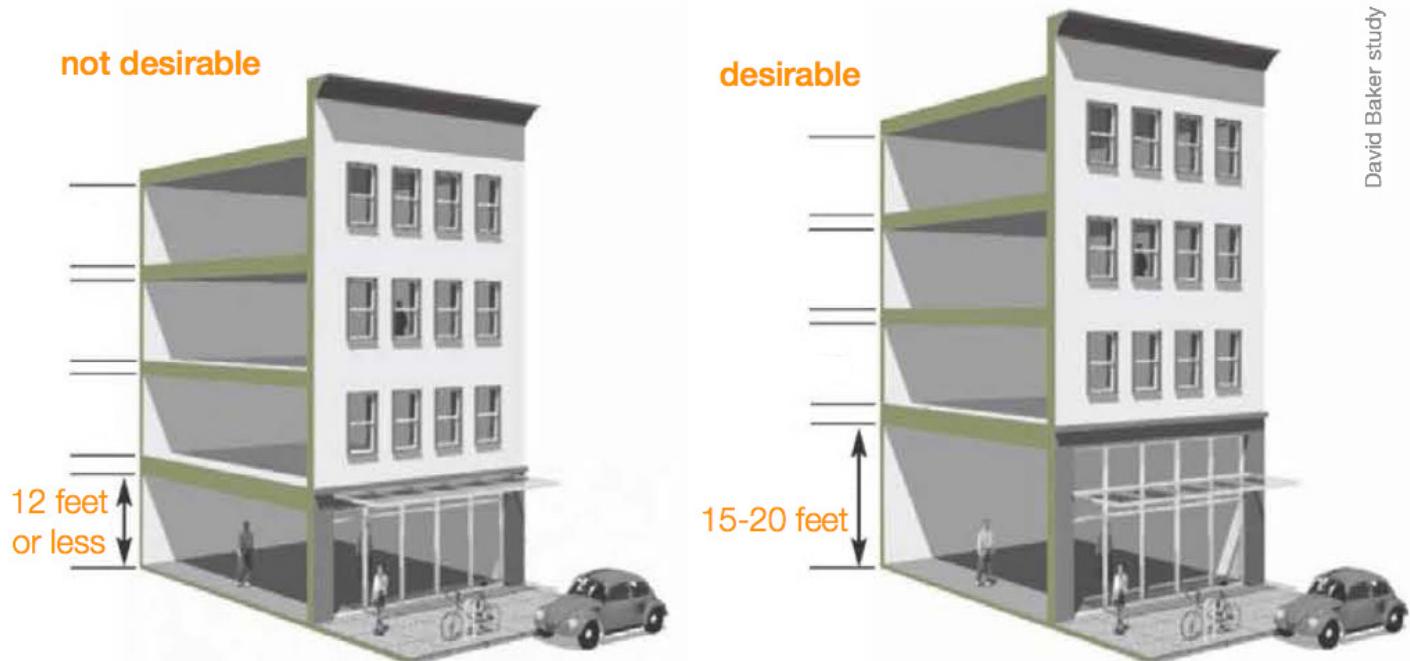
The New Seasons on Woodstock is just over 40 feet at the highest point.



This view of current development along another Portland main street with the same zoning show 45-foot buildings.

High Quality Four-story Mixed-use Buildings

As shown in the market analysis tables starting on page 12, four-story mixed-use buildings are economically supported and provide the needed amenities that the neighborhood hopes for. The trade-off of the 45-foot height limit is that it can result in short first floor retail ceiling height. For desirable residential and desirable retail, it is better to focus on the number of stories rather than overall building height.



Fitting four stories within the current 45-foot height limit requires short ceiling heights.

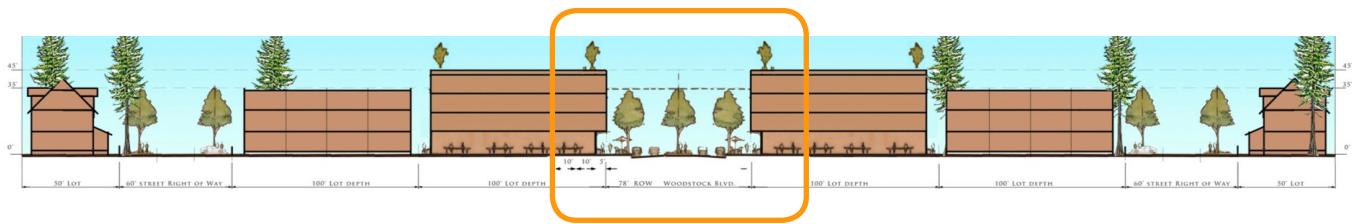
Zoning according to number of stories allows more generous ceiling heights required for quality retail.

Stepbacks can Soften Height

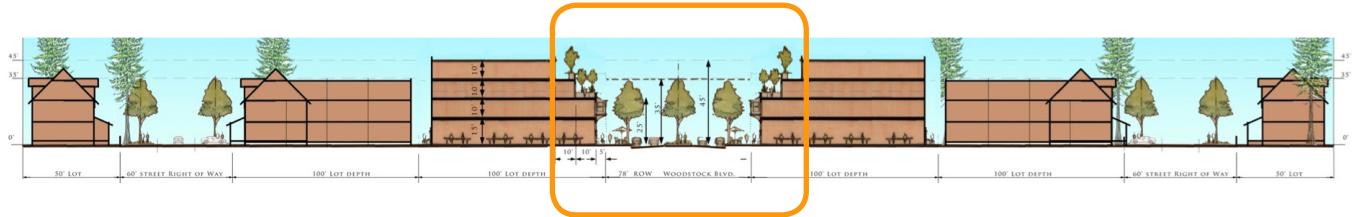
In response to the community's concerns over the potential for a 45-foot street facade on Woodstock, the charrette team illustrated an alternative for shaping new buildings' heights in a way that would reduce the appearance of buildings when viewed from the surrounding sidewalks, while still maintaining the commercial property owners' long-vested rights to build to the 45-



foot maximum height. The above perspective rendering shows a proposed adjustment to the City's mixed-use building height maximum. Instead of allowing building front facades to be 45-feet at the street front, "stepbacks" of the upper stories of the building would be required along the main street.



The circled area in the above drawing shows how buildings along Woodstock could be built according to current code.



The circled area above shows the proposed stepbacks.



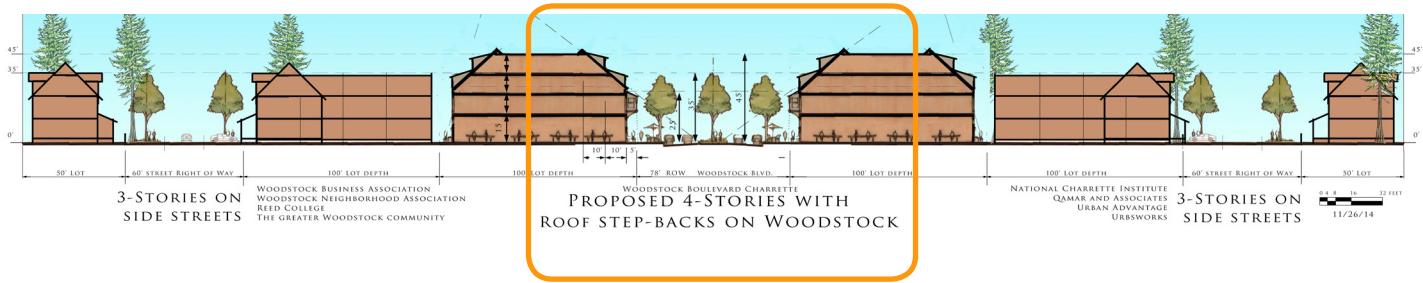
Qamar Architecture & Town Planning Co.

Similar stepback with upper story decks can be seen on Sellwood's lofts and library building constructed in the past decade on SE 13th Avenue by developer Laurence Waxman.



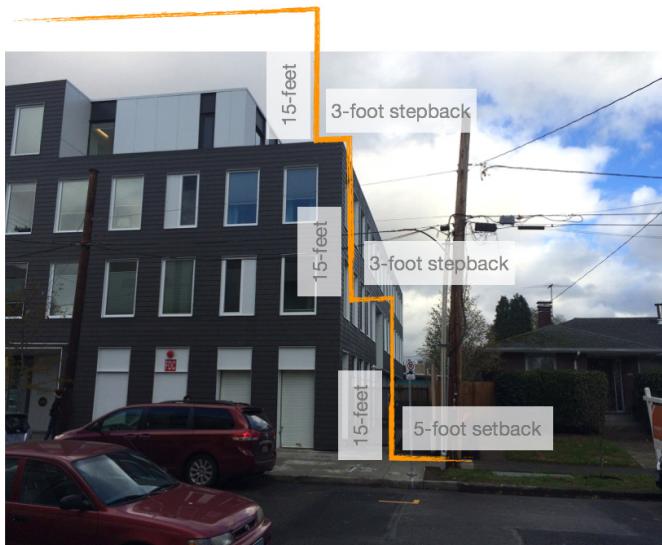
Four-story mixed-use building with third- and fourth-story stepback

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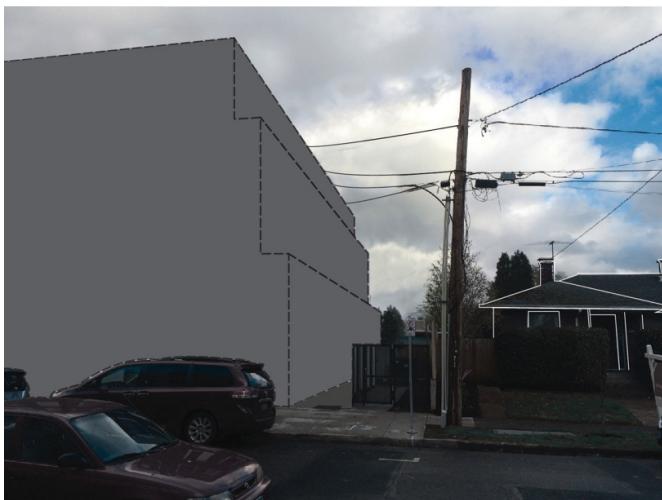


The illustration above shows a third and fourth floor stepback above the second story. The upper story stepbacks could be regulated as a 45-degree angle above the top of the second story. So, if the third and fourth floors were 10-feet tall, then the building facades would also step back 10-feet as exterior roof decks. Alternately, those upper stories could be stepped back into a sloped roof with dormer windows as a more cost effective method compared to waterproofed decks.

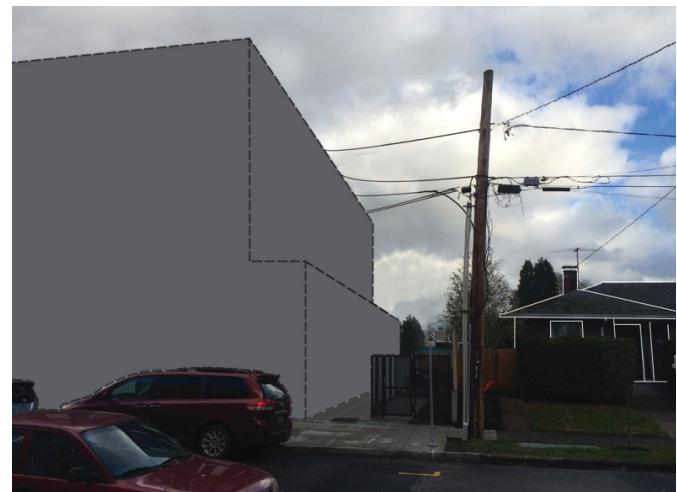
The community also expressed interest in methods for creating a compatible transition between the mixed-use and single-family-residential zone at the mid-block. These drawings show how setbacks and stepbacks can ease the main street-to-residential transition when zone change is on the same block.



Current zoning requirements.



This drawing shows the effect of a deeper setback at the rear.

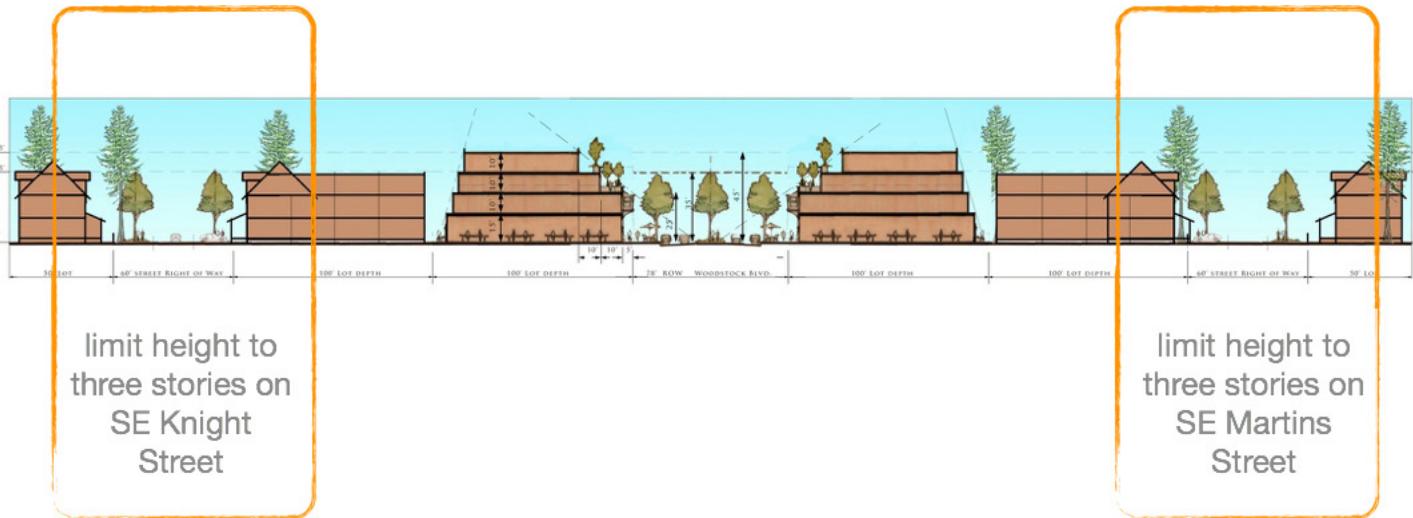


This drawing shows the effect of the deeper setback plus a deeper stepback at the rear.



This drawing shows the cumulative effect of deeper rear and side setbacks plus a deeper stepback.

All images this page: Urbsworks, Inc.



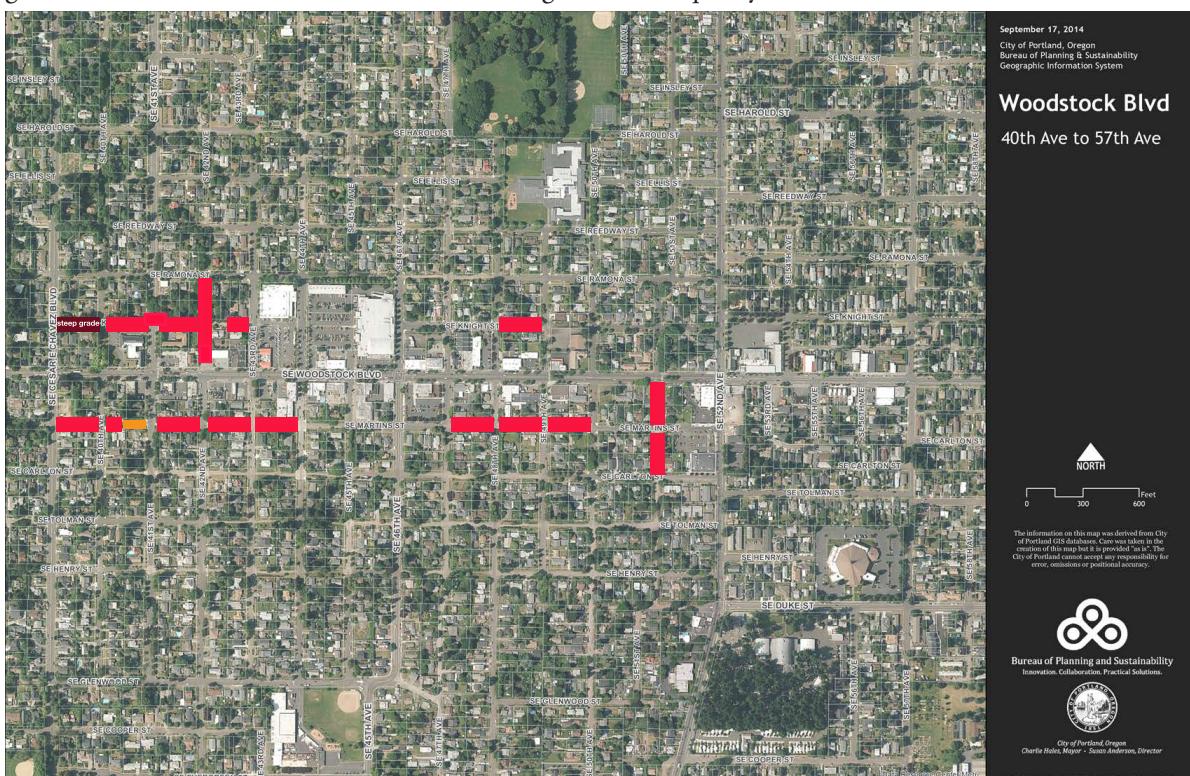
Setbacks, stepbacks and height limits can ease transitions between commercial and residential zones across the street as on SE Knight and SE Martins.

Unimproved Streets

The community listed the unimproved streets as a top issue. During the charrette the design team investigated the options for improving these streets. The team referred to the City's Street by Street Initiative which offers some creative solutions to unimproved streets. Another reference was the study conducted by PSU in collaboration with the Woodstock Neighborhood Association titled "Roadway Not Improved" at www.roadwaynotimproved.com.

A set of optional street designs was presented at a special meeting for local residents held on Saturday morning, October 25, 2014. Outreach for this meeting especially targeted people who live on SE Martins and SE Knight Streets. See page 38 for meeting notes.

The following options reflect the community's vision that these streets maintain the nature of a quiet lane. Each option contains a narrow 16-feet wide paved road. Roads this wide encourage a mix of pedestrian, bike and auto traffic. Motorists must yield to allow others to pass. These lanes may also meander through the block further slowing traffic. The minimal pavement also allows greater storm water infiltration which benefits regional water quality.



Areas of unimproved roads closest to Woodstock in the study area



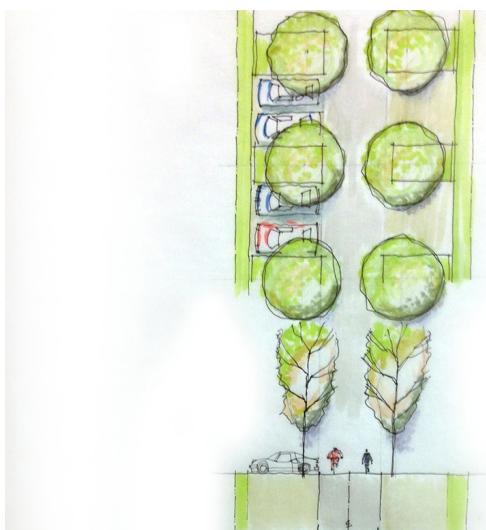
Unimproved street option: 16-foot paved lane and sports court



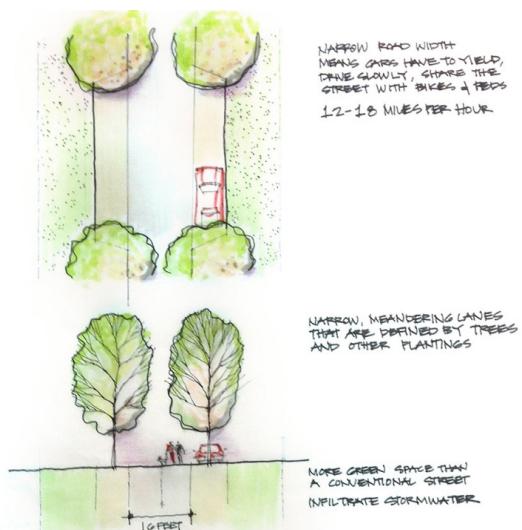
Unimproved street option: 16-foot paved lane and garden areas



Unimproved street option: Community bulletin board along 16-foot paved lane

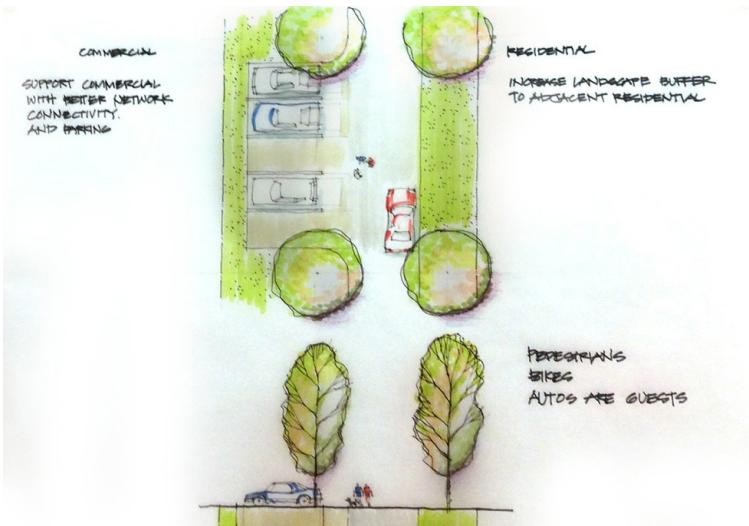


Unimproved street option: 16-foot paved lane with head-in parking and multi-use path

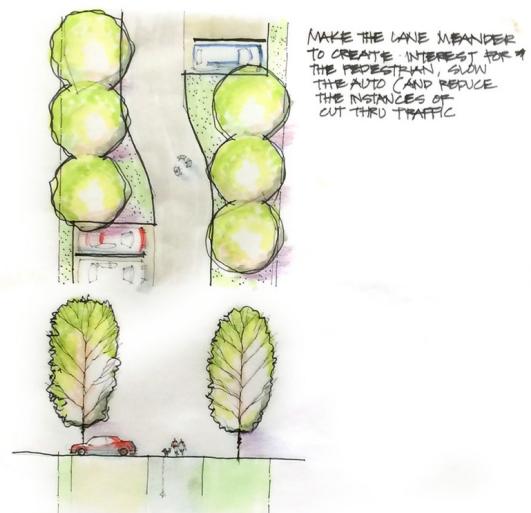


Unimproved street option: 16-foot paved lane with parallel parking and multi-use path

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Unimproved street option: Head-in parking on commercial zoned side and planter area on residential side of the street



Unimproved street option: The meandering lane increases interest for the pedestrian, slow auto traffic and reduces cut-through traffic

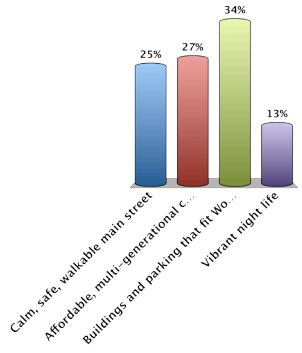
All images this page: Urbsworks, Inc.

Keypad Polling

The public meeting held on Thursday December 4, 2014 started with a presentation of the above material. Next community members discussed the zoning questions and the proposals for controls over building form at their tables. Members of the neighborhood committee and charrette design team helped to facilitate the discussion. Zoning and economic experts were available to answer questions. Anonymous keypad polling was conducted after about 40 minutes of discussion. See map on page 6 for zoning references.

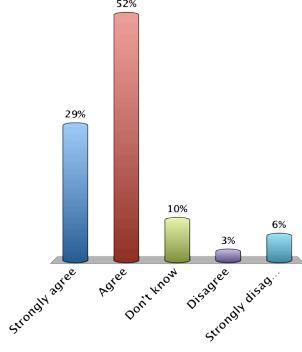
What most important to you?

1. Calm, safe, walkable main street
2. Affordable, multi-generational community
3. Buildings and parking that fit Woodstock
4. Vibrant night life



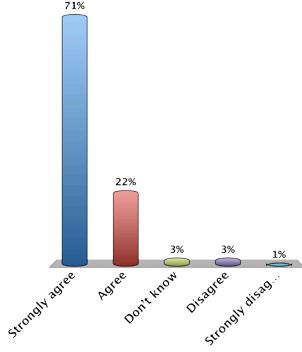
Do you support the proposals by local businesses to expand their commercial zoning?

1. Strongly agree
2. Agree
3. Don't know
4. Disagree
5. Strongly disagree



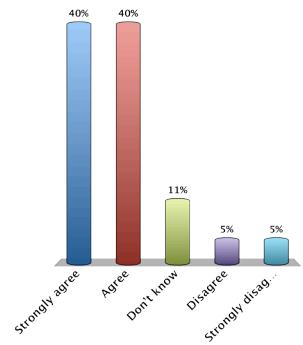
Should buildings be required to stepback at upper floors along Woodstock?

1. Strongly agree
2. Agree
3. Don't know
4. Disagree
5. Strongly disagree



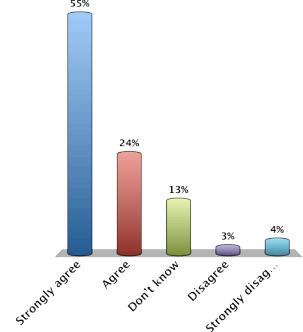
Should local business owners have the ability to expand?

1. Strongly agree
2. Agree
3. Don't know
4. Disagree
5. Strongly disagree



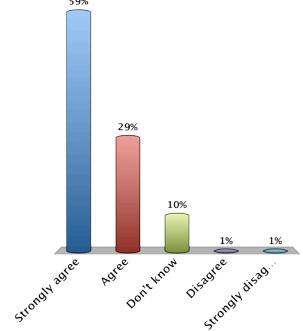
Do you support the proposed zoning change from Multi-Dwelling R1 Zone to Mixed-Use from 50th to mid-block between 51st, 52nd?

1. Strongly agree
2. Agree
3. Don't know
4. Disagree
5. Strongly disagree



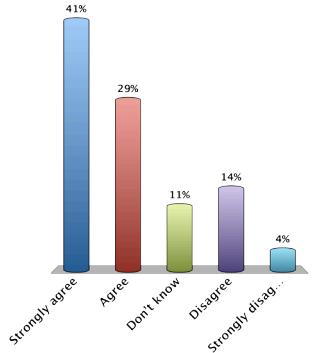
Should additional setbacks and stepbacks be required between commercial and residential at the mid-block?

1. Strongly agree
2. Agree
3. Don't know
4. Disagree
5. Strongly disagree



Should commercial buildings across the street from residential be limited to three stories?

1. Strongly agree
2. Agree
3. Don't know
4. Disagree
5. Strongly disagree



Site-specific Studies

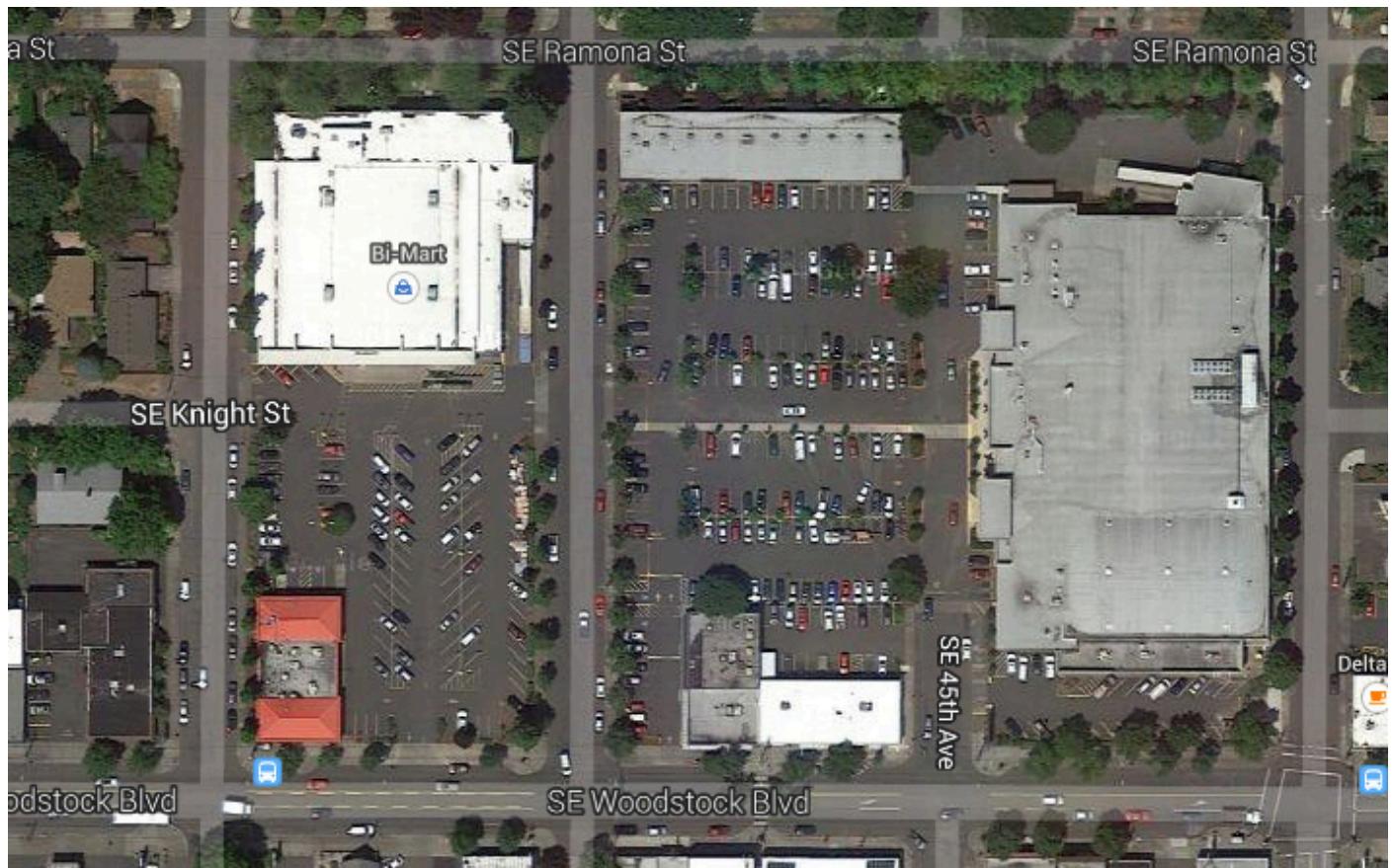
During the charrette the design team created a set of plans to illustrate how three important sites could be developed in line with the community vision for a vibrant, walkable main street. These studies were completed purely as hypothetical illustrations. The designer did consult with the owners of the properties during the design process. However the plans do not represent any actual proposals by the property owners.

The Bi-Mart and Safeway Blocks

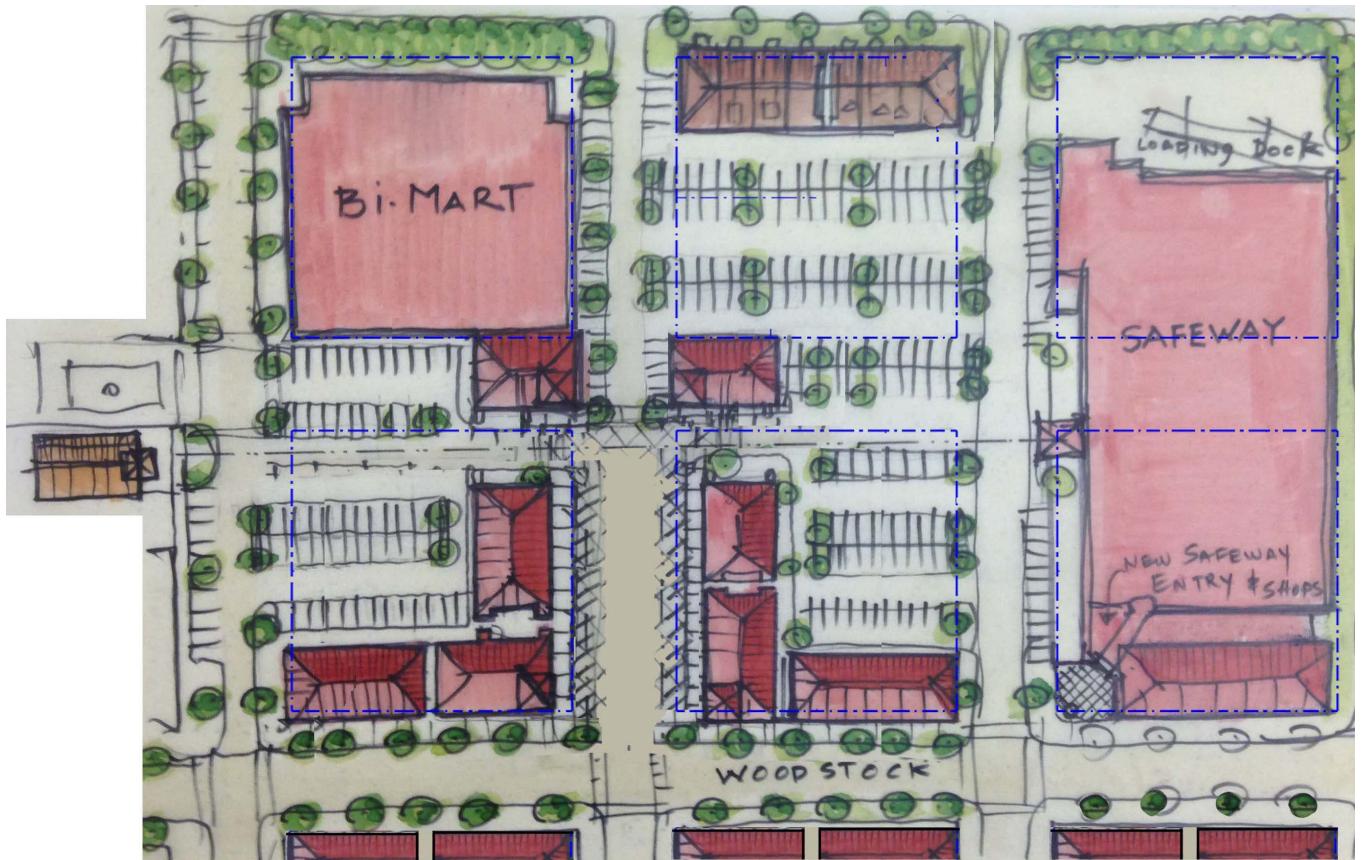
The Bi-Mart and Safeway sites offer a unique opportunity under one ownership to significantly improve the pedestrian character, retail viability, and residential livability of the Woodstock District. These two “big-box” stores are valuable anchors to the retail main street. The addition of New Seasons directly across from Safeway will offer even greater variety of grocery choice for a broader demographic.

From a site planning standpoint, this four-block, mid-century development functions as an auto-oriented shopping center. Redevelopment could include elements that have main street appeal. Recommendations by the charrette team are for future additions and redevelopment of this unique four-block “super-block” should at a minimum:

1. Reduce visual dominance of parking lots from Woodstock as a primary main street, and SE Ramona as a residential street
2. Develop new mixed-use storefront buildings facing continuously along Woodstock
3. Locate surface or structured parking in the middle of the super-block
4. Develop new residential townhomes or apartments on the south side of SE Ramona Street between SE 43rd-46th Avenues
5. If full redevelopment of the entire site is not currently an option, incremental short-term phases could be implemented, such as infilling temporary one-story retail facing Woodstock between SE 43-46th Avenues, and replacing the retail and loading docks that backs SE Ramona between SE 44th-46th with new townhomes or apartments to match the existing residential across SE Ramona.



Bi-Mart and Safeway Site, Existing



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Bi-Mart Safeway Concept Drawing A. Drawing showing the an extension of the retail mainstreet north to Bi-Mart.



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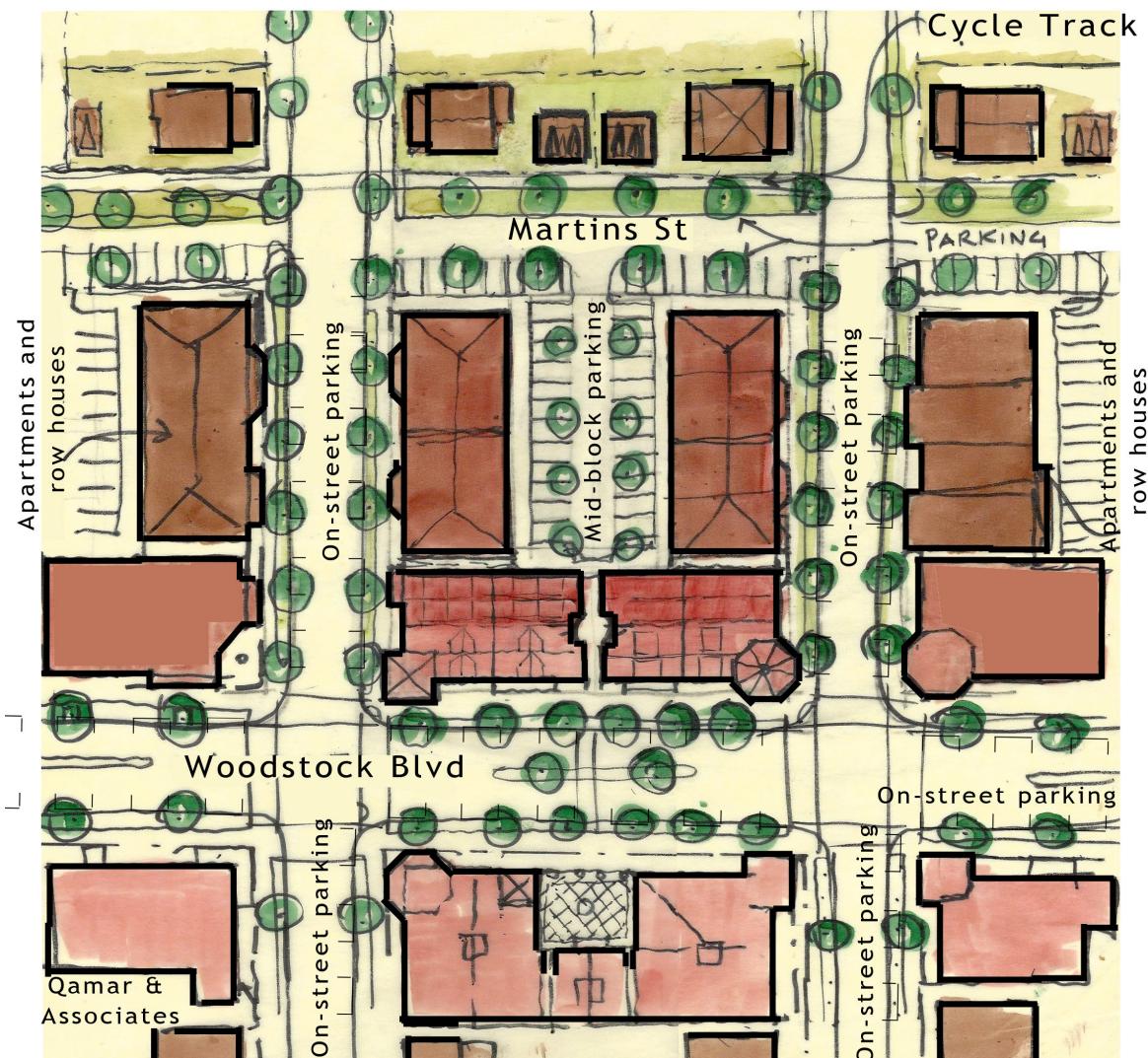
Bi-Mart Safeway Illustrative Concept Drawing B. Drawing showing filling in the storefront commercial retail along the Woodstock main street.

Full-block Redevelopment Analysis

Most of the blocks along Woodstock are standard 200-square-foot Portland blocks. Several blocks could be fully or partially redeveloped. The “U-block” building layout shown in the diagram consists of mixed-use retail with residential/office above, facing Woodstock, as well as two buildings on the back half of the block that could be residential apartments or town houses transitioning into the existing residential on the adjacent blocks. This layout would leave the center of the block for parking in an open or covered mid-block courtyard.

Parallel on-street parking should be maximized on the three sides of the block on Woodstock and the adjacent side streets.

Treating key portions SE Martins and SE Knight streets as alleyways in the heart of the main street would help to both support Woodstock retail and buffer the residential. Additional head-in parking can occur in the street rights-of-way on SE Martins and SE Knight on the sides backing up to Woodstock. The other sides of those two streets are residential, so a plus-or-minus-20-foot green buffer that includes a cycling track would help to transition between the retail backs and residential. See page 31.



Qamar Architecture & Town Planning Co.



All images this page: Carol Maurey Bellows

The above images show how a plaza could be created in front of the Subway, Cloud City Ice Cream, Cricket and WS Tax Service by sidewalk extensions into the parking areas. Similar urban interventions have proved successful in similar contexts, like the Hillsdale Shopping Center.

EXECUTIVE SUMMARY

By Joseph Ready of Urbsworks, Inc.

Context for Planning the Vision Document

Woodstock is one of Portland's oldest neighborhoods. It is also one of the corridors designated for neighborhood mixed-use in the 2015 Portland Comprehensive Plan that will guide existing and new commercial and residential growth and development over the next 25 years. For some time the Woodstock Stakeholders Group, Woodstock Community Business Association, Woodstock Neighborhood Association, and Reed College recognized the value of creating a vision for the Woodstock Boulevard business district and neighborhood. Recognizing that change is constant and with the expectation of proactively engaging in creating a successful future, representatives of these groups contacted the Portland-based National Charrette Institute in early 2014. They sought advice on bringing residents, businesses and commercial property owners together to articulate a clear vision for growth on Woodstock Boulevard. As a result of multi-ple conversations, the Woodstock Main Street Design Charrette was adopted as the strategy most appropriate to deliver the high-quality results that these stakeholders expected.

The Portland Bureau of Planning and Sustainability also saw the visioning exercise and design charrette as an opportunity to engage the community in the current Comprehensive Plan update. Their support of the project and the process is intended to immediately inform the next draft of the Comprehensive Plan. The support of the Bureau for the charrette process was also grounded in their mission of making all neighborhoods more successful, more accessible, more diverse, and more equitable for all residents.

A design charrette is a series of loosely-scripted, design-based engagements with individuals and groups held over multiple consecutive days. Design charrettes empower their participants to inform the discussion and share their experience and expertise with others. For the Woodstock Charrette, a multi-disciplinary design team responded to input by generating specific design proposals to which the community offered additional comments and suggestions. The Woodstock Community Vision charrette included seven topical meetings, two technical reviews, a public open house and three public meetings. In total, the charrette provided more than forty hours of meeting time with diverse community members. This community visioning charrette was held in October 2014 at the All Saints Episcopal Church on Woodstock Boulevard. A final public meeting was held on Thursday, December 4, 2014 as the ultimate charrette wrap-up prior to generating this report. One of the essential elements of the December presentation was a community survey on the issues emerging from the design charrette. See page 29.

In the proposed Portland Comprehensive Plan, the Woodstock core area is proposed as both a Neighborhood Center and a Neighborhood Corridor as illustrated in in the City's Centers and Corridors Diagram. Woodstock, like all neighborhood centers, is a hub of commercial services, retail shops, and activity for its surrounding neighborhood. Neighborhood centers typically include small parks or plazas that support local activity and gathering—something that Woodstock residents felt was an important part of their vision plan. Neighborhood corridors are the main streets that connect neighborhoods with each other and to other parts of the city. When well-designed, they support neighborhood business districts, provide housing opportunities close to local services and amenities, and connect people to each other by transit. As such, neighborhood corridors serve two purposes: they connect people to regional destinations and they also provide a distinct sense of place that supports a local economy. Currently Woodstock Boulevard serves its function as an element in the regional transportation system more effectively than, and at the expense of, its place making role as an important component of the public realm.

Woodstock Street Network and Street Design

Charrette participants are eager to see improvements to Woodstock Boulevard that preserves its village character while also making significant upgrades that support its sense of place. Participants imagine a pedestrian paradise: a vibrant street with broad sidewalks shaded by mature trees with well-designed lighting that brings character to the night while making people of all ages feel safe and welcome. On this future Woodstock Boulevard, pedestrian crossings will be frequent, safe, and convenient. Volumes of automobile traffic will continue to be robust, but speeds will be slowed by a 20 mph zone and drivers will have to yield to other cars accessing on-street parking spaces, to TriMet buses serving transit stops, pedestrians at crosswalks, and cyclists riding

in traffic. The Woodstock Boulevard of the future meets the needs of residents before serving the desires of the system of regional transportation.

Streets like Woodstock Boulevard are critical links in a complete street network. When the network of streets is complete, the street system is also more effective, efficient, and resilient. Unfortunately, the street grid in close proximity to Woodstock Boulevard is severely disrupted by numerous unimproved street segments. Where they occur, unimproved streets limit effective emergency response, encourage cut-through traffic on adjacent, paved streets, and result in periodic flooding. The unimproved streets fail to support the businesses on Woodstock Boulevard because discouraged drivers find it difficult to navigate around a block to their commercial destination. “Fixing” the unimproved streets in Woodstock is not a single, isolated task. The charrette proved that a better solution for these streets is the implementation of a set of context-specific, targeted, individual design solutions that remedy the existing deficiencies without compromising the neighborhood character.

The higher density (R2.5) housing designated by the now 30-year-old current Comprehensive Plan for areas within two blocks of Woodstock fails to be actually zoned and developed at that desired higher density because the required infrastructure—an improved street—is not in place. The charrette team drew up potential solutions that would provide adequate infrastructure to accommodate increased density close to the Boulevard, while at the same time encouraging only limited, slow, and local traffic. The actual roadways of these proposed streets would be quite narrow, and they could be “shared streets,” meaning that the “active transportation” modes of walking and bicycling would be prioritized. Since the roadways of these streets would be narrow by design, remaining space in the designated right-of-way could be used to accommodate diagonal parking where needed for local businesses and destinations, or for providing the linear or pocket parks called for in the charrette process. The customized design of these street improvements could serve yet another purpose—they could serve as an effective buffer between entire blocks of commercial (or mixed-use) development and adjacent blocks of residential development.

Charrette participants were very concerned about managing increased traffic, congestion, and parking that future development such as the New Seasons store will bring to Woodstock Boulevard. Nearby residents are worried about the extent to which parking demand on the main street will spill over into their neighborhood. Streets are resources of the commons: they are built and maintained by the communities they serve. In addition to the mobility they provide, they also serve as the temporary storage for the cars of customers and residents as they complete their activities of daily living. The charrette team demonstrated, and charrette participants agreed that the current urban form of auto-oriented buildings, parking lots, and curb cuts diminished the overall quality of the Woodstock main street. The charrette team looked at the potential for incorporating new parking without adding costly structured parking or large surface parking lots. They determined that Woodstock Boulevard, with well-designed and targeted on-street parking, could support the urban form that allows 150,000 square feet of new storefront commercial parked on street, and 1,000 new housing units with on-site and on-street parking.

Neighborhood Business

The Woodstock Business District prides itself on being an accessible location serving the daily needs of all households in its market area. Woodstock is a paradox because there is not a sufficient number of residents to support a chain grocery store, yet there will soon be two (Safeway and New Seasons). These stores draw customers to Woodstock from outside of its local retail service area. At the same time that Woodstock is drawing more distant customers to its main street for groceries, there are numerous goods and services that residents can only find outside of its market area. The earliest visioning exercise of the Charrette revealed a powerful desire for a greater variety of lively and interesting retail and entertainment choices on the boulevard that eliminate as much of the retail “leakage” as possible.

There are two other factors affecting the market viability for retail on Woodstock: there is currently no vacant retail space, and the fact that most of the current building stock, even if it were vacant, is outdated for modern retailing. This lack of vacancy means that new retail space must be built to serve new retail businesses and the new space will cost more, rent for more, and have to generate higher sales per square foot, than existing space. Finally, it is very important that the village character of the district is maintained so that Woodstock, as a destination, is clearly distinct from other mixed-use districts in Portland. Retaining its historic quality through careful design if buildings and street amenities will be critical in differentiating Woodstock as a desirable location.

The Woodstock main street meets the daily needs of neighborhood residents in an accessible location with a distinctive character that suits the personality of the neighborhood. Many of the daily needs of households can be met on Woodstock Boulevard. From the earliest visioning exercise of the charrette, however, a desire for greater variety of lively and interesting retail and entertainment options was frequently expressed. This expectation for increased variety also included extending the activity on the main street into more hours of the evening.

The current zero vacancy rate for commercial buildings on the boulevard makes it extremely difficult for new and innovative businesses to locate in the neighborhood. New commercial development will meet the immediate demand for additional space and stimulate new residential development.

Design

In addition to more hours and increased commercial choices, there was a strong demand expressed by charrette participants for attention to design: streetscape design; the design of parks, plazas, and pocket parks; and architecture and urban design. Whether new construction or renovation of existing buildings and storefronts, there is a consistent voice for high-quality design that reflects the qualities unique to the Woodstock neighborhood. Woodstock Boulevard has a history of modest, low-scale, utilitarian main street buildings. The buildings built to the sidewalk with active and expansive retail storefronts. Consistent with this era of neighborhood main streets development, these simple storefronts had high ceilings and transom windows that allowed natural light into the retail spaces. These storefronts were designed to provide maximum exposure for goods and services and engage the customers passing by on Woodstock.

In the initial stages of the charrette, many of the nearly 100 participants expressed a desire that future development along Woodstock Boulevard be no taller than one or two stories, “Keeping Woodstock Woodstock” to them means preserving the streetcar village commercial scale of one- and two-story buildings. Many opponents to taller buildings, permitted under the current zone, cited their aversion to the type of development becoming increasingly common in nearby inner SE neighborhoods, like Division Street, where four-story mixed-use buildings built up to the sidewalk loom over both sides of the street.

After four days of looking at Woodstock from a variety of perspectives—from the values and aspirations of those for whom it is the center of their “village,” to the current zoning and the future zoning likely to be assigned through the Comprehensive Plan update, to economic feasibility models for different types of mixed-use development—it became more and more apparent that mixed use development with building heights of up to three to four stories and increased surrounding residential density would be a good thing for the overall health of Woodstock Boulevard and its surrounding community. High-quality design is the key to community acceptance.

As to the need for greater residential density, the Charrette team posits that to support the aggregate of businesses and activities the community desires, there will need to be a greater number of people in the Woodstock Boulevard “walk shed.” In addition, economic analysis by Ed Starkie of Urban Advisors showed that three- to four-story mixed-use buildings were more feasible to develop than one- to two-story buildings.

Next Steps

This report is meant to serve as a resource for the Woodstock community to use as it provides input and testimony to the Comprehensive Plan Update. We expect the Woodstock Community Vision Plan to succeed because it began as a community-based initiative, was supported throughout the Woodstock Main Street Design Charrette by the active participation of residents and businesses, and the follow-up after the charrette has equaled the intensity of the charrette with ongoing input, engagement, and passion.

APPENDIX

Appendix A - Meetings

Neighbors, churches, community advocates meeting 10/24/14, 10:30 AM

What is your vision for Woodstock?

- Concern- 2 Portlands. Want diversity (income, population) increase housing, housing choice and affordability
- Rose CDC would be interested in developing in Woodstock
- Affordable- 30% of income to housing
- Transportation choice is a factor too
- Find, identify tools to preserve, create affordable housing choice
- Community- physical spaces/places that support community interaction, build on what we already have
- Tear downs of affordable units, replacing w/3,000 sf \$500k and up homes
- Adult care industry is currently booming but tail is coming as pensions disappear
- Woodstock supportive/app. For senior care facilities
- Environmental justice issues need much more attention
- Infill is currently destroying affordable housing instead of promoting affordability
- Promote social, cultural and environmental resilience
- Walkable, bikable Woodstock
- Keep Woodstock \$ in Woodstock
- What would Woodstock look like if it was designed around community rather than the car (the car as a tool not as a design determinant)
- Vision zero- streets safe for pedestrians 8 to 80
- Aging in public
- Urban garden zones (scaled to population and density)
- Entertainment- find/identify places for performance space at multiple scales
- Entertainment is an element in community building and culture
- Entertainment extend hours into the evening on Woodstock (Woodstock on Woodstock)
- Places for multiple generations to gather
- Homes w/out parking- cost of parking as an impact on affordability (ties into robust transit)
- Access for the disabled
- Support for the disenfranchised
- Community gardens/healthy food
- Active transportation
- Family oriented Woodstock (nuts and bolts)
- Draw people up the hill from Eastmoreland

General comments on Woodstock building concept drawings

- Don't make too generic- Lake Oswego/Orenco Station
- Step back residential above commercial for sound/noise
- Could imagine seeing some tall buildings in higher density areas along the boulevard
- Narrow (25-30') modules are great. Can we apply design standards to enforce that?
- I really like the idea of 2-stories at sidewalk plus 2-stories stepped back above
- More multi-story mixed use buildings would be great
- Basement parking!
- Needs permanent food cart space
- Mixed use buildings are fine but would like different heights, not all boxy
- No historicist architecture
- Love the density but worry about the cuteness factor. Maybe regulating materials could allow for stylistic variety, setbacks could provide "mini squares" in each block
- Ditto the cuteness factor! Take into consideration that a busy main street will impact homeowners on adjacent street- esp. parking- mutual respect
- Vertical setbacks are key to keeping pedestrian scale good! Prefer the shorter scale solution
- Architecture needs to match Woodstock's native architecture so that the neighborhood retains its sense of place.
- Would love to see more architectural diversity including a mix of modern buildings. Feels a little suburban development
- At least 1 multi-modal transportation station: car parking, bike rental, bus station, train or trolley
- If the south buildings are 4-stories will that shadow the road
- This but Woodstock- keep the quaint dated look
- Nice drawing especially favor middle one but it looks like Paris. Hard to believe Woodstock . Like building articulation but less might be more
- I hope Woodstock can have infill which maintains modest character. 3-4 stories would work well but borrowing architecture from the past seem inauthentic
- 4-5 story mixed use buildings are fine especially w/setbacks at the 4-5 floors
- Balconies and courtyards where renters/condo owners can grow food are important
- Green roofs and green walls and distributed energy are important. Let's get these buildings connected to a district energy system that is powered by renewable or waste energy

Neighbors meeting, 10/25/14, 10:30 am

- Speed bumps
- Buttons at intersections and stop signs
- Parking permits
- Parking district idea. Biggest problem- no enforcement- 1 hr at library
- Dangerous at 49th around library
- People have inserted private "things" in right of way
- How about neighbors who object? Can they block?
- Concern re: parking control discouraging visitors

- Diverters as traffic calming devices
- What are the costs to property owners? Maintenance costs- who?
- Like trees, plants to slow traffic
- Community gardens, basket ball courts, how could corporations bear costs?
- How about some 1-ways to manage retail traffic? But faster? SE Martins 1-way for a few blocks?
- Safeway exit rt. or left only or stop light
- Outside places to sit, eat
- Like ideas: don't see a lot of cars now, dedicated areas for bikes
- Concerned about safety, pedestrian features
- More bio swales
- 51st traffic cut through- light too long
- Noise at night from night spots
- Sidewalk gaps
- Concern re: Harleys at night now on improved streets
- Like them but ped only?
- Add proper lighting like gas lights
- A lot of this expensive
- Painting lanes
- Can't park cars on trees

Business Meeting Notes

Businesses:

- Otto's
- Portland Fish Market
- Red Fox Vintage
- Pace Setter Athletic
- The Joinery
- Grand Central Bakery
- El Gallo Taqueria
- Angie Even, Property Owner
- Heller Chiropractic
- New Seasons Market
- Odanga Salon
- Dieringer Properties, Owner of BiMart and Safeway sites

Priorities	Comments
Traffic calming, 20 mph 39th to 57th	13
Define identity with:	
Pedestrian Lighting	13
Consistent Landscaping	9
Drywells	1
Street Trees	6
Pedestrian Wayfinding	13
Bike Wayfinding	10
Defined Gateways 39th, 57th	10
Increased Bike Racks	13
More nightlife	3
Coordinated Hours for night	6
Improved bicycle ways (SE Martins)	9
Parking management:	
Better use of existing	13
New on side streets	13
New on SE Martins	13
Lighting in medians	13
Hanging Flowerpots	6
Community Policing to reduce crime	13

Appendix B - Charrette Comments

Written Comments by Community Members during the Charrette

General Comments

- Speed bumps on 45th- Glenwood and Woodstock
- Make the unimproved streets into picturesque lanes. Automobiles can hardly navigate now, do they need to in the future? Lanes where people could go on evening walks without navigating puddles would be nice
- Access to the businesses on bike where we can stop and shop at will. Consider a design concept such as cycle tracks on both sides of Woodstock to connect to 52nd and 41st down to Reed College. This may require compromises for a complete street removing parking from one or both sides. We have a lot of parking around Woodstock w/much under utilized space. Might require space wise a little shrinking of sidewalks 12-15 ft down to 9-10. Cycling on SE Martins is great for just riding or destinations not on Woodstock but when you bike is your transportation the best design is where the commerce is located. Cycle tracks would serve the whole populous: kids, elderly, wheel chair, etc. calmer w/separation from the road. Bike lanes is second choice as long as where services are actually located.
- Bike facilities on Woodstock
- Decrease speeds on Woodstock to 15-20

Most exciting ideas	Vision for future character of blvd.	Additional comments
Pedestrian-centric Woodstock (& bikes), perhaps car-free Woodstock park/courtyard space	Community oriented Independent businesses Purveyors of everything you need to live here, including arts & recreation	Thanks!
Traffic calming on Woodstock; limits to cut-through traffic Protected bike lanes	Continues accessibility for low/middle-income residents Convenient transit connectivity to the river Public space with water, benches & greenery	
Greater diversity of businesses Low & moderate-income housing Active public space	A place where pedestrians are welcomed, primary, and numerous, with lots of places to live, work, shop, socialize, or hang out.	
Shared plaza where people of all ages can rest, meet, enjoy outdoors/art	Village feel: self-contained; amenities; day & night Supporter of local business & arts Diverse population—ages/demographics/ethnicity	
Movie theater Shops with local products (boutique/gifts) Outdoor public gathering space Water feature in park	More cohesive building fronts with planters, benches, etc. along the boulevard Small and compact but filled with a great variety of businesses & services. Two-story buildings, mixed-use spaces. Underground parking where possible (or above buildings)	

Most exciting ideas	Vision for future character of blvd.	Additional comments
Creative architectural vision More trees		
Bike access, lanes or cycle tracks More crossings, particular at the Bike Gallery/gas station Movie theater Plaza at Safeway, with dense business, underground parking Plaza on adjacent street with Reed Plaza, with benches for sitting, art, water feature Pocket parks, particularly at 50th Storefronts instead of parking at street level	Multi-modal—bike lanes, cycle tracks, streetcar Far more tree cuts Stage, City Repair benches, kids' play area at 50th, with holiday tree lighting on the two big trees Homes between around 52nd through 46th, mixed use retail (Alberta-like scale mixed use buildings with apartments) Less banks and beauty shops	Parking lots need businesses, and some underground parking Bimart & Safeway and street in between as theatre, plaza, "places to be" More food options Electric car charging station maybe at Shell or on 52nd @ Woodstock
Central plaza with water feature including covered area for winter farmers market, benches, tables, trees, etc. Multi-use 2-3-story buildings with nice architecture More restaurants, less banks and parking lots	Big hopeful of better pedestrian crosswalks and traffic lights Small businesses—local, diverse Parking—underground?!	Attract different cultures somehow.
Public gathering space, fronted by cultural center, movies, pub Chain of green spaces, pocket parks (maybe following stream trails through Insley, Harold from Woodstock Park to Reed)	Smaller businesses Less asphalt Some unifying architectural style Pedestrian district?	"Stakeholders" have too much influence. Money does not have to equal speech.
Condense the business area to 3x8 blocks Enforce/encourage NW vernacular architecture, with 2-3-story buildings, coherent trees cape Repurpose bank parking lots	My vision is pessimistic if the political class is unwilling to confront developers and monied interests.	A much better library could serve as a cultural center, immigrant uplift center, democracy-building center, etc. See University City, MO.
Overarching feel/architecture—unified with trees, lights, flower baskets Movie theater Good restaurants, brew pub, outdoor eating space Central plaza, outdoor gathering place	Businesses (stores) and community areas that will draw people here Community events	
Brew pub Theater Live music venue	More little, independent businesses More little & local satellite businesses like Grand Central (i.e., Powell's Books, Lucky Lab, Lompoc pub)	

Most exciting ideas	Vision for future character of blvd.	Additional comments
Central plaza More cohesive look for boulevard from 39th to 55th	More multi-ethnic/cultural influence to represent diversity in our area.	
Central plaza Gaslight on Woodstock and side streets where there's lots of pedestrian activities Safer, better pedestrian crossings on SE 52nd & Woodstock Woodstock is fully pedestrian—no cars Movie theater	Gaslight-lined streets with full pedestrian access to Woodstock without cars A cohesive “look” to buildings on Woodstock with mixed use, no taller than 35-foot buildings AND required parking for any new residential.	Turn the near-empty church that's on SE 50th & Woodstock into a community center Big, bold, lit crossings in middle of all blocks and including VERY unsafe SE 52nd, which is a freeway!
Making Woodstock more green (street trees, landscaping, pocket parks)	Abundant greenery—street trees, landscaping, pocket parks, fountains Attractive signage regs. Walkability: bike paths, pedestrian friendly Quality architecture	
Thoughtful multi-use, community friendly, pedestrian scale, multi-modal development, i.e. “not Division”	Vibrant, community/family-friendly day and night, walkable place with an “authentic” character	Use green infrastructure, traffic calming, franchise design guidelines and under grounding of utilities to enhance character and livability.
Bicycle/pedestrian improvements Community Movie theater Year-round farmers market Community gardens / food forests	More community	
Smarter designs of the streets for better traffic control More green space, especially for community gardens	More pedestrian/community-friendly area	
Street planning Green space planning Limit autos	Well groomed and walkable Local businesses that provide for our needs Senior/elder friendly	Thanks for putting this together!
Community garden/orchard Designing for walkable neighborhood (less cars)	Our community's needs are met locally in a way that is harmonious with the environment, avoiding pollution and imports. Local economy	Local credit union please.
A carless Woodstock! (Never imagined a pedestrian/bike-only idea. Kooky, but exciting to imagine!)	SAFE unique character Economically diverse Family friendly “Full Service” as opposed to “Boutique”	Nicely hosted and organized event. BIG thanks to sponsors (some of whom had their names in the dislike columns, but it was an honest audience!)

Most exciting ideas	Vision for future character of blvd.	Additional comments
Community space—green and entertainment Redo traffic for bike safety	Vibrant village I'd like it to LOOK better—more trees & plantings	
Mini parks/gathering spaces along Woodstock	Pedestrian friendly main street Bike friendly (dedicated) side streets (SE Ramona? SE Martins?) NO McMansions Beautiful apartments along Woodstock (NOT like Division/Williams...no stark yellow plastic/rust faddish architecture)	
Multi-amenity “downtown” main street Sidewalk cafes More parks A more walkable/bikeable neighborhood	A walkable, bikeable commercial center surrounded by a family friendly neighborhood	We need a viable bikeway through Woodstock! Woodstock Blvd. is not viable for biking, and the adjacent streets from Cesar Chavez to 52nd are knotted/unimproved/too narrow.
Designated bike road on Ellis Mixed-use—businesses on bottom, residential top Town center (outdoor square) Family friendly brew pub Safer crosswalks	Safe, family friendly Walkable	
Town square/meeting space/pocket park	Trees, lots of trees (maples) Walkability Mixed-use buildings Bike lanes and bike parking	A TRUE VILLAGE feel
Green space Bike lane Mixed use building that invites diverse populations Town square	Local Green Inviting Diverse	Enjoyed the process.
	Family friendly, mix of ages (old and young) Small businesses that employ people	
Making Woodstock bike friendly	A place where I can walk and bike with my family day and night, even in the dark and rain.	
Art/cultural center Public plaza More green spaces Maintain character or at least tree canopy of unimproved roads	A vibrant, green, culture and design district Multicultural / socio-economic diversity Still affordable for small business owners and all families	
Restaurant district / community friendly nightlife Vibrant foot traffic Art center	Vibrant foot traffic	

Most exciting ideas	Vision for future character of blvd.	Additional comments
More diverse businesses and restaurants (mixed use)	Vibrant business Pedestrian and bike friendly Nice pocket parks as gathering and stopping places	
Brewery (like Gigantic Brewing) Breakfast place Less driving, more walking & biking—street car and bike lanes Less chain stores and banks Improve side alley streets Movie theater Less parking lots, maybe a parking structure Outdoor patio spaces	That I won't have to leave to get anything, and I won't have to drive a car.	

Appendix C - Strong/Weak Places

See page 18

Strong Places

# of comments	Comment
1	Woodstock Community Center
2	Bike lanes
2	Ace hardware
2	Ace Picolina/Bakery/Fish market
2	Bike Shop
2	Food carts
2	Hardware store
2	New Seasons
4	Cloud City Ice cream
4	Papaccino's
6	Farmer's market
6	Ottos
9	Grand Central Bakery
12	Library
13	Joinery/ Food carts The area between 39th and 45th Village feel Library Accessibility of services at Library BiMart Coffee Cat Fish Market Safeway Two supermarkets Wellness center First Cup Mezza Tani's Toast- Resto Tom Yum Large residential lots Nearby parks Park Woodstock Park'Plentiful parking by BiMart/Safeway accessibility Established Crosswalks Low traffic areas for walking/ biking Median near Ace Hardware (which was an idea from the community)

safe walking
 Store accessiblitiy (in close)
 Walkability
 Gravel road at Reed- slows traffic
 Lewis Elementary
 Woodstock Elementary
 Cozy

Weak Places

# of comments	Comment
1	Fenders Restaurant & bar
1	Unimproved roads
2	Empty church at SE 50th
2	Gental Dental
2	Liquor Store
2	Tanning salon
2	Too many banks
2	Bimart parking lot
2	unpaved side roads
3	Shell station
3	Safeway Parking lot
4	Plaid Pantry
4	Zoomcare
5	East of Library block
7	52nd corner (murder, 711, Vacancy, poor gateway
	Bank parking lots
	Building across from library
	Concern about big, new building potential
	Improve stripmalls by Safeway
	Vacant lot at 50th
	lakc of public buildings-- swimming pools, other amenities, recreation
	Need more pedestrian activities in evening
	Bike route on Woodstock
	lack of bike parking
	More bike lanes
	not a safe way to ride bike from east to west
	convenience store
	East of 48th needs development more
	Empty storefronts west of Lutz

Gap beyond 50th
gentle dental
Lutz
No businesses farther east
Storage bldg at 54th
need more restaurants est of 45th
Empty lot at 49th & Woodstock
Apartments at 51st
Insensitive Infill of housing
Big parking lots
Large expanses of parking lots
Street parking @ library
52nd St. Not walkable
Crosswalk by Papacinos
Pedestrian Danger, lack of safety at 52nd
Street crossing at 42nd and Woodstock
Sidestreet access to Woodstock
Unpaved streets
46th AT by Safeway
Driveway at Safeway off Woodstock
Improve unimproved roads for safety
intersection at 32nd by shoe store (north side of Woodstock)
left turn @ 52nd st.
Unpaved area by community center
Unsafe traffic
Awkward Public transportation
SE Martins

Appendix D - Table Visioning

# of comments	Comment	Category
1	Architecture with nice large windows	architecture & design
1	Diverse architectural styles	architecture & design
1	Eliminate derelict buildings	architecture & design
1	Gaslit walkway 52nd to 41st or 39th	architecture & design
1	New neighborhood signage-- rebranding	architecture & design
1	regulated, quality signage	architecture & design
2	revitalize 49th to 52nd	architecture & design
2	Streetscape of two story buildings with mature trees	architecture & design
2	Turn area between Delta and Lutz into Mixed Use	architecture & design
5	complete retail district and & services	architecture & design
8	Mixed use/ midlevel	architecture & design
	Better use of Bank blocks	architecture & design
	Buildings height limit 35'	architecture & design
	Community Plaza and buildings	architecture & design
	Nods to historic, significant architecture/ places	architecture & design
	Revitalize area near super torta	architecture & design
	Vary architecture, aesthetically pleasing	architecture & design
1	Bigger community center that is open	arts & culture
1	Festive events	arts & culture
2	Open artists' studios	arts & culture
2	Park with covered amphitheater for free concerts	arts & culture
2	yoga/ dance studios	arts & culture
3	Arts center	arts & culture
3	Distracting, beautiful things- art, store windows	arts & culture
3	Pioneer Square type venue	arts & culture
4	Public artwork	arts & culture
5	Musical venue	arts & culture
6	Community Plaza and buildings	arts & culture
9	movie theater	arts & culture
	Auditorium, art community center	arts & culture
	Community performance center	arts & culture
	Cultural Arts Center @ Presbyterian church	arts & culture
	Interactive public art	arts & culture
	Performance space/ venu	arts & culture
1	bike/ pedestrian way on unimproved roads	bicycling
2	Bike friendly	bicycling
2	bike streets	bicycling
2	Dedicated east-west bike blvd (Ellis)	bicycling
3	Bicycle blvd on Ramona and Carlton	bicycling

# of comments	Comment	Category
1	Arts and crafts stores	business
1	Change gas station into restaurants- Italian and dessert place	business
1	fill in gap in retail (49th to 52nd)	business
1	More variety of shops	business
2	Fitness Center	business
2	Practical businesses	business
2	Year round farmer's market	business
3	No franchises	business
3	Small specialty stores- books, antiques, quilt boutique shops of locally handmade goods	business
	E-charging stations	business
	farmer's market	business
	More retail	business
	North Woodstock commercial center (42nd/43rd)	business
	People opportunity to stop, eat shop	business
	Pet supply store	business
	Toy and Book Store	business
1	Family friendly restaurants	dining
2	breakfast café	dining
3	More brew pubs (near library)	dining
5	Community friendly nightlife	dining
5	Restaurant district	dining
	brew pub with good food	dining
	brew pub with good food	dining
	jazz club	dining
	More night time activity- bars, restaurants	dining
	Multicultural influence in food, shops, art	dining
	Vibrant restaurants	dining
1	business courtyard development	Green spaces
1	Street trees	Green spaces
2	Gardening opportunities for renters and condo owners	Green spaces
2	healthy, beautiful street trees	Green spaces
2	Planted median of trees, flowers,	Green spaces
3	European plaza at liquor store-café seating,	Green spaces
3	Play area for kids by community center	Green spaces
3	Rain gardens- native trees/ plantings	Green spaces
	Central outdoor meeting place replacing Plaid Pantry & gas station	Green spaces
6	Green blvd- trees fountains, places to stop	Green spaces
6	Pocket park	Green spaces
7	Turn Keybank into an outdoor community plaza/ center	Green spaces

# of comments	Comment	Category
11	Open green space	Green spaces
	Art parks	Green spaces
	Green and wild spaces throughout neighborhood	Green spaces
	Green infrastructure	Green spaces
	Green places to sit outside	Green spaces
	Maple trees/ hanging flower baskets	Green spaces
	Planters that are maintained	Green spaces
	Sheltered public space	Green spaces
1	No McMansions	Housing
2	more housing options (multi-family)	Housing
3	Affordable housing	Housing
3	Livestock (goats)	Housing
	Apartments on Woodstock have been replaced by mixed use bldgs	Housing
	Commercial/residential buffer	Housing
	Courtyards, balconies, multifamily housing	Housing
	Economic diversity	Housing
	Eldery services	Housing
	Live/ work housing	Housing
	Multi-family on boulevard	Housing
	Multigenerational	Housing
	Residential courtyard by 54th At.	Housing
	Single family adjacent	Housing
3	no parking lots facing the street	parking
3	off street parking structures (LEED certified)	parking
	Sufficient parking	parking
	Underground parking at Safeway	parking
1	More crosswalks/ flashing signs	pedestrian
1	Vibrant foot traffic	pedestrian
1	Walkable commercial center with amenities	pedestrian
2	safer crosswalks	pedestrian
2	sitting benches	pedestrian
5	Accessible pedestrian crossings	pedestrian
5	Peds from Cesar Chavez & 52nd	pedestrian
	Lighting for pedestrians	pedestrian
	Meander through permeable neighborhood	pedestrian
	Public facilities	pedestrian
	Safe Crosswalk between Safeway & New Seasons	pedestrian
1	Better traffic volume	traffic & streets
2	Streetcar	traffic & streets
3	Safe, calm traffic	traffic & streets

# of comments	Comment	Category
4	No unpaved streets	traffic & streets
4	Stop car traffic on Woodstock 2 days a week	traffic & streets
4	Woodstock one-way east/ Ramona one-way west	traffic & streets
	Electric transportaion- individual	traffic & streets
	Neighborhood friendly transportation	traffic & streets
	Regular bus	traffic & streets
	Traffic calming/ speed bumps	traffic & streets
	Outdoor pool	youth & education
	Young people involved in jobs	youth & education
1	Fitness Center	
2	diversity of age sex culture	
	lucky to have a flat area, great for all generations to walk	
	Peaceful, thriving, multigenerational, equity	

Appendix E - Vision Wall Comments

# of comments	Comment
10	Movie theater
10	Stress free, safe Bike lanes on Woodstock
7	Gathering spaces, town square, plaza
6	Limit upward expansion to 2 or 3 stories
6	No Division St. highrises
5	Brew Pub with great food
5	High quality locally owned dining options
5	More safe crosswalks
4	Encourage & attract more “basic” services and businesses (including laundromat)
4	Encourage arts projects, music, art shows, public arts offerings
4	Increase foot and bike friendly traffic
4	More trees/ better canopy/ as canopied as Eastmoreland
3	Bring back the parade
3	Develop east/west of 52nd Ave to integrate with more dense commercial areas/ make more pedestrian friendly
3	Don't fix the unpaved streets; they are traffic calming/ green and unique
3	Encourage diversity of age, income and cultures
3	More green space between buildings
3	Pave unimproved streets/ add sidewalks
3	Pocket parks (on unimproved streets)
2	Art and cultural Center
2	Bigger, year round Farmer's Market
2	Breakfast spot
2	Calm traffic to reduce speeds (especially on Steele and 41st)
2	develop for community connections, low impact, encourage bikes and walking
2	Green Streets with native plants and trees (stormwater infrastructure)
2	Identify with design (expand look of Otto's)
2	More stores to walk to
2	More traffic control, left turn signals and lighted pedestrian crossing
2	Multiuse buildings
2	small and /or local businesses
1	Accessible spaces for an aging or disabled populations
1	Artists' lofts, apartments above businesses
1	Boutique/antique store
1	Business district designed around a courtyard with businesses who can use the public space
1	Clarify/ enforce housing and building codes and regulations
1	Create walking/biking paths on unimproved streets



- 1 Design shops
- 1 Disaster planning & training businesses
- 1 Discourage bike use on Woodstock. Build, encourage parallel bike routes and use diverse signage
- 1 Encourage business owners to allow pets or provide pet tie-ups near shops
- 1 encourage youth employment
- 1 Fewer convenience stores- 2 max
- 1 Find ways to encourage Eastmoreland/ Woodstock interaction
- 1 Fix “flooded” areas where pedestrians are walking
- 1 Gateway to Woodstock- more
- 1 I have a lot of through traffic on Marins and 51st where people are trying to avoid the traffic light on 52nd & Woodstock. People do 40+mph. Very dangerous
- 1 Improve crime control in neighborhood
- 1 Kid/ family friendly businesses
- 1 Limit development to no more than 2 houses per infill
- 1 Montessori school Pre-K to 6th
- 1 More connection with Reed- a place to interact with their cultural programming
- 1 More quirky/ unique businesses with affordable food choices
- 1 Natural, organic, sustainable business
- 1 no more tatoo parlors or beauty salons
- 1 Outdoor space for restaurants
- 1 Parklets
- 1 Performing Arts Center
- 1 Redesign unpaved streets as orchards or walkng path loop through the neighborhood
- 1 sidewalk cafes
- 1 Stop housing demolition
- 1 Storm sewer improvements
- 1 Townhouses must have off street parking
- 1 Toy/ book store
- 1 Transition areas between business and residential areas
- 1 Walkability to businesses: not setback



March, 12, 2015

City of Portland Planning & Sustainability Commission
1900 SW 4th Ave, Suite 2500
Portland, OR 97201

Metro staff has appreciated the opportunity to serve on the City's Transportation Expert Group (TEG), which has provided input to the Bureau of Planning and Sustainability (BPS) and the Bureau of Transportation (PBOT) on the development of the City's Transportation System Plan (TSP).

Metro staff supports the efforts of the City to develop a forward looking TSP that will help the City and Region achieve its goals. Some of the specific areas that Metro supports:

- Policies that support focusing project and program investments in 2040 Regional Centers and Corridors
- The project evaluation process designed to achieve climate, equity, health, safety, and economic opportunity outcomes
- Policies combining transportation and parking demand management with transit, bike, and pedestrian investments (consistent with the 2015-16 "short list" of actions to begin implementing the Region's recently adopted Climate Smart Strategy)
- Emphasis on quicker, lower-cost improvements via Transportation System Management (consistent with recommendations from the Climate Smart Strategy).

Finally, one concern that Metro staff has expressed to City staff and the TEG regards the possibility that the City may be backing away from the regional complete streets policy. The Regional Transportation Plan (RTP) states that all modes need to be accommodated/usable on all streets (except for certain freeways – where a parallel path often provides the bike/ped accommodation). Metro is concerned with the possibility – discussed at the TEG - of shifting away from a Complete Streets concept in Portland policies. Metro is not supportive of a policy that some streets do not need to allow for walking or biking. Metro views this as a step backwards from regional and local objectives encouraging safe and viable options for people not in motor vehicles.

Thanks for the opportunity to show our support for the Portland TSP. We look forward to working with the City in the remaining phases of the TSP update process.

Sincerely,

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Lake McTighe
Senior Transportation Planner
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503-797-1660

Abstract

Portland's strategic location as a transportation hub can be improved considerably by incorporating new technologies and priority managed commercial vehicles lanes within the existing Portland freeway network. **The basic premise of network analysis is the more connections you have on a network the slower the network moves.** When considering the I-5 Corridor between downtown Portland and Vancouver there are too many interchanges too close together that don't adhere to current design standards and are therefore unsafe. Some of these interchanges are mere blocks from existing MAX stations with associated vehicular conflict with pedestrians, cyclists and buses. There are also large numbers of private out of town commuters using I-5 during peak periods along, adding more connections to a congested network.

Doubling of Freight Movement by 2035

The [2010 Portland Regional Freight Strategy](#) projected an overall doubling of freight tonnage moved in the region by 2030. Much of the projected doubling of freight tonnage passing through the Portland metropolitan region doesn't terminate here but instead moves well beyond the region's boundary to the rest of the country. This places a heavier transportation cost on the entire region to service connections to the rest of the country.

Introduction to Managed Lanes

"Managed lanes" are defined as a limited number of lanes set aside within an expressway cross section or lanes comprising a separate expressway facility where multiple operational strategies are utilized and actively adjusted as needed for the purpose of achieving pre-defined performance objectives. The operation and utilization of managed lanes, typically situated within expressway rights-of-way, are controlled in order to optimize travel flow and reduce congestion. To move toward uncongested operations, managing a lane typically involves reducing excessive traffic volumes, reducing conflicts between vehicles, reducing the number of incidents, and better managing those incidents that occur.¹"

I-5 Corridor Between Downtown Portland and Downtown Vancouver

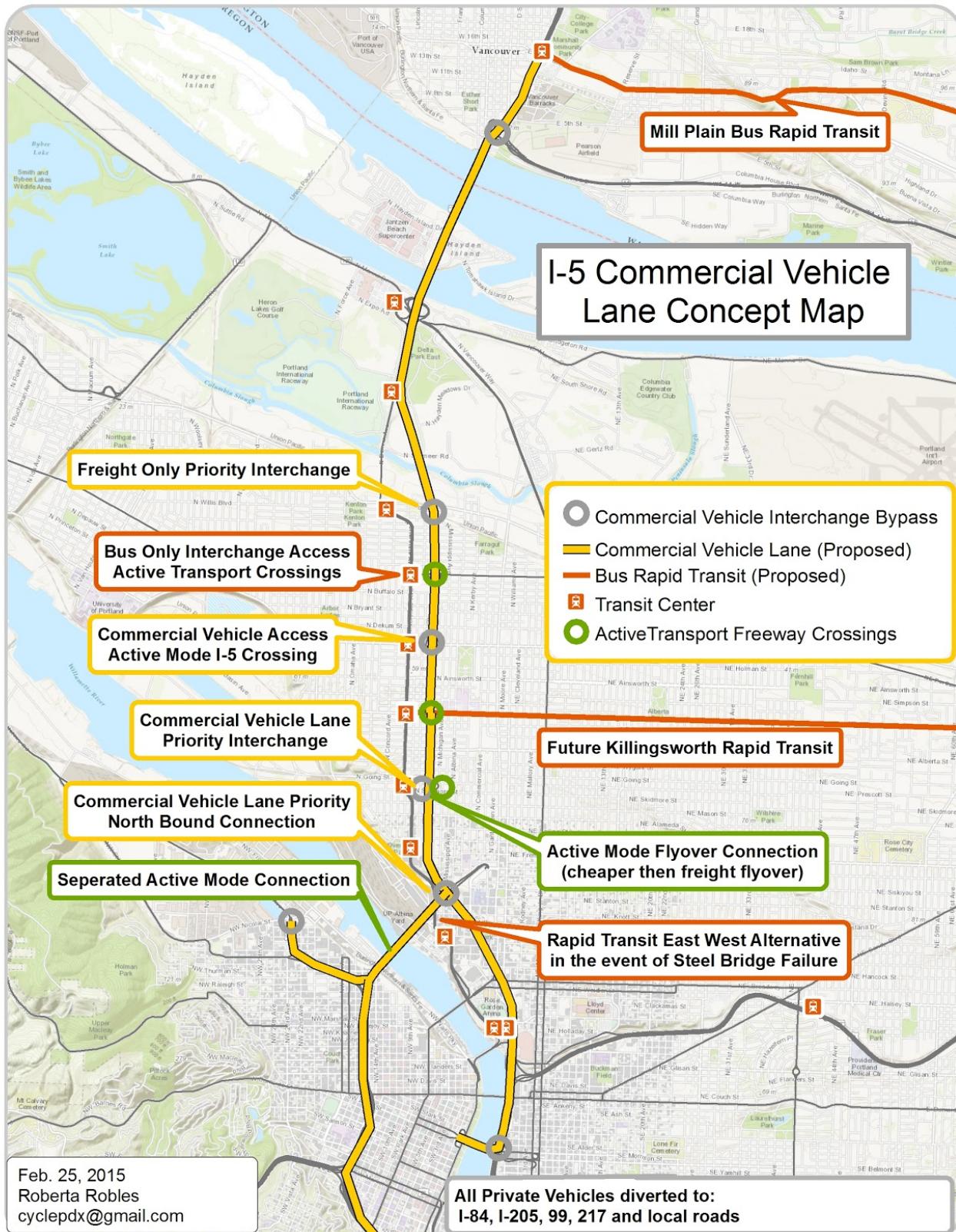
The Columbia River Crossing 2013 project was hamstrung by the focus on expanding major interchanges with little support from Vancouver for an expensive Max line. The CRC Environmental Impact Statement did not include analysis of a commercial vehicle lane option that combined freight and bus priority lane². In 2006 the CRC sub group



Chicago Metropolitan Agency for Planning
August 2008

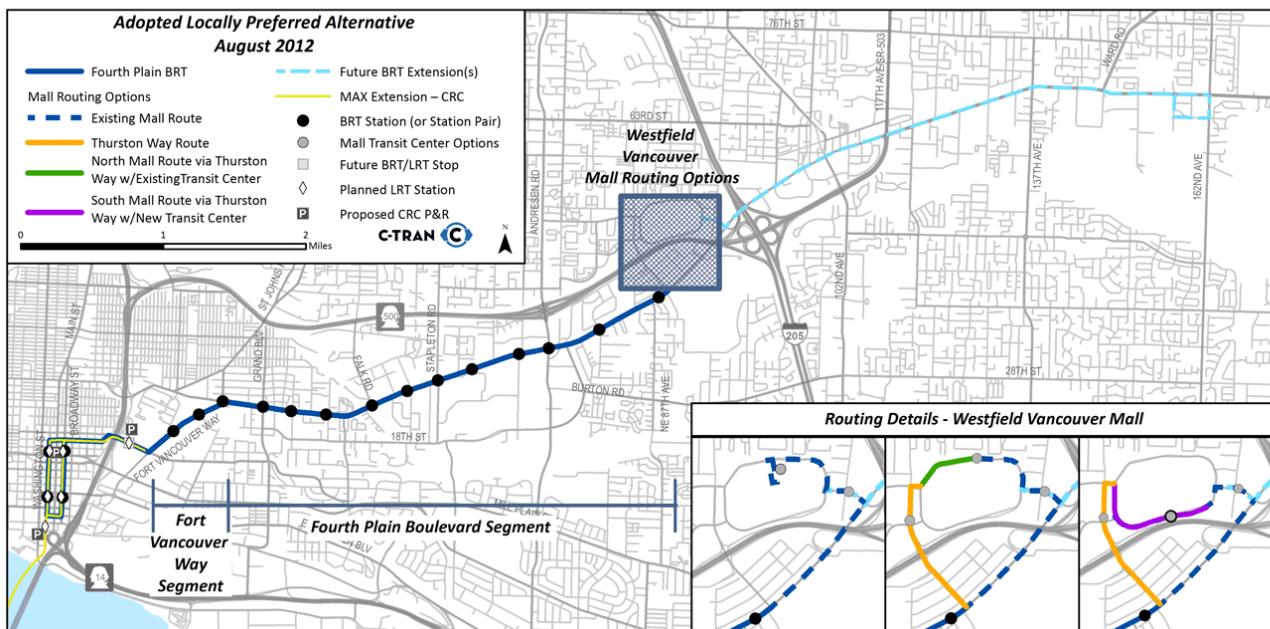
¹ Quote from the Chicago Metropolitan Agency for Planning [Managed Lanes Strategy Study](#).

² Screening of Freight Components Memo, 2006 to the CRC Task Force from the CRC Freight Working Group.



on freight recommended some freight bypass lanes and freight direct access ramps as components of existing projects. Since this time driver technologies and ITS improvements has broadened the range of how freeway networks could be managed given the physical constraints alongside this congested corridor.

Managed commercial vehicle lanes consisting of combined freight and bus traffic is a viable option worthy of further consideration. Most importantly C-TRAN, is moving forward with opening their first bus rapid transit corridor via the Mill Plains Rd Bus Rapid Transit. Bus Rapid Transit (BRT) is the public transportation choice of our neighbors to the north. We need to encourage and support these initiatives.



The next big question for Vancouver's C-TRAN is how to connect Mill Plain BRT with downtown Portland, as these commuters represent a large portion of congestion causing traffic on the I-5 corridor during the peak periods. Removing outdated interchanges and replacing them with fewer and better designed interchanges for dedicated commercial (FREIGHT + BUS) vehicle on-ramps and thru lanes will provide a viable high speed bus and freight option that saves time, reduces I-5 congestion and requires no additional lanes.

This concept plan assumes the existing CRC bridge can be earthquake proofed or a low cost replacement bridge is needed.

FHWA

The Federal Highway Administration has defined commercial vehicle lanes widely, and is seen as giving wide latitude to local jurisdictions to design systems that support moving freight and people as opposed to single occupancy private vehicles. Federal funding policies favor projects that support last mile connections to ports, recognizing the detrimental effects that urban congestion has on national economic trade. Portland is currently finishing a bridge that

excludes private vehicles, the Tilikum Bridge, in favor of active modes and public transit. Similarly, we could build or retrofit the Columbia River bridge with lanes that prioritize freight and buses.

In the future these lanes could be converted into driverless vehicle lanes. According to the Center for Urban Transportation Research paper [Automated and Autonomous Vehicles in Managed Lanes](#) (2013), the technology and demand for managed lanes for autonomous vehicles is not likely to occur until 2040. In the meantime, managed lanes for priority vehicles remains a viable option for moving more freight and people, vs. number of vehicles as the measurement of effectiveness.

Furthermore “ vehicle platooning could yield more significant capacity gains than the elimination of points of traffic constraints”. This illustrates other examples of improved travel times that does not require the expansion of interchanges.



Interchange Area Management Plans

[ODOT has established guidelines](#) for planning the function of interchanges. However none of the interchanges along this corridor have Interchange Area Management Plans that are consistent with changes in the city's Comprehensive Plan.

The CRC Crossing interchange expansions were too expensive and controversial given the extra land requirements. With the I-5 Commercial Vehicle Lane, some interchanges will have to be removed, Each remaining interchange would have to be carefully planned and manage to prioritize freight traffic and other interchanges would be designed to prioritize bus rapid transit. Here are 3 sample interchange concept plans:

1. Swan Island Industrial Area Connection - It's been estimated that in the next 5-10 years the number of jobs will increase from another 1-2,000 in the next five years. There is limited connections into and out of the area by land. Improving freight truck connections via guaranteed green light connection onto the I5- Commercial Vehicle Lane north and

southbound would guaranteed time sensitive critical commercial vehicle travel times. This would eliminate unsafe merging activity with private vehicles. You would be merging with a high technology priority managed lane.

High speed employee transit connections to either the existing max line and or the BRT stop to the east would lead to overall improvements in moving people on and off the island and reducing conflict with small private vehicles. The Swan Island TMA would be critical in developing an employee transit system connection.

2. NW Industrial Area Connection - Similar to the Swan Island connection NW freight related commercial vehicles would have Fremont bridge priority access to both NB and SB I-5 traffic. Since there is no merging with private vehicles and instead prioritize commercial vehicles freight connections to the following connection highways including 1-405 and 26.
3. The Killingsworth I-5, BRT, Growth Center, Portland Community College represents a unique opportunity to achieving tremendous growth in an urban center identified for high growth. Reconsider this entire interchange given the expected growth in urban density. It will be easier to achieve urban density goals with improved active transport connections with service to BRT and Max stations. Moving freight through this interchange would be improved if commuters have better transit options. A completely new urban center will not be easy to achieve if there are excessive number of private vehicles accessing the freeway network.
4. Further research is needed to identify priority freight connections to both Portland and Vancouver Ports, and the Portland International Airport. **It is likely that this type of improvement to ports would be a strong contender for a federal Tiger Grant.**

Clearly more work needs to be done to outline the objective for each interchange and how to achieve regional goals. ODOT should give further consideration to how interchanges are integrated into the local neighborhoods in a manner that supports regional growth objectives, not just vehicle throughput. Fewer interchanges are easier to manage and maintain.

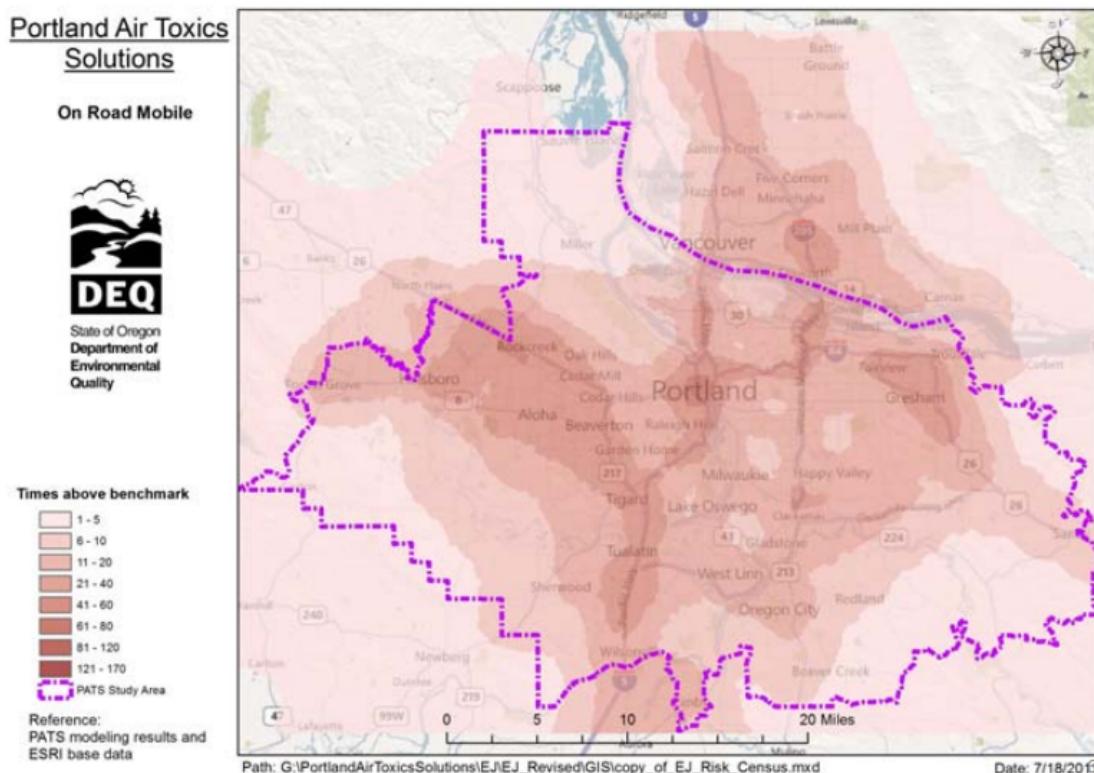
Equity Issues

The I-5 corridor between downtown Portland and Vancouver is the most heavily polluted corridor in the entire State of Oregon. Specific consideration needs to be made to ensure that the corridor does not further concentrate environmental pollutants.

This corridor is also the home to the most diverse neighborhoods in Oregon. These citizens suffer higher rates of asthma and other airborne diseases. The Oregon Department of Environmental Quality has performed meaningful environmental justice analysis. According to [Environmental Justice Consideration](#) (2011), there is no question that these neighborhoods and citizens have been shouldering higher health costs for their proximity to the I-5 corridor. Clearly

there is a need for innovative solutions that prioritizes innovation, efficiency and cleaner technologies that will benefit everybody.

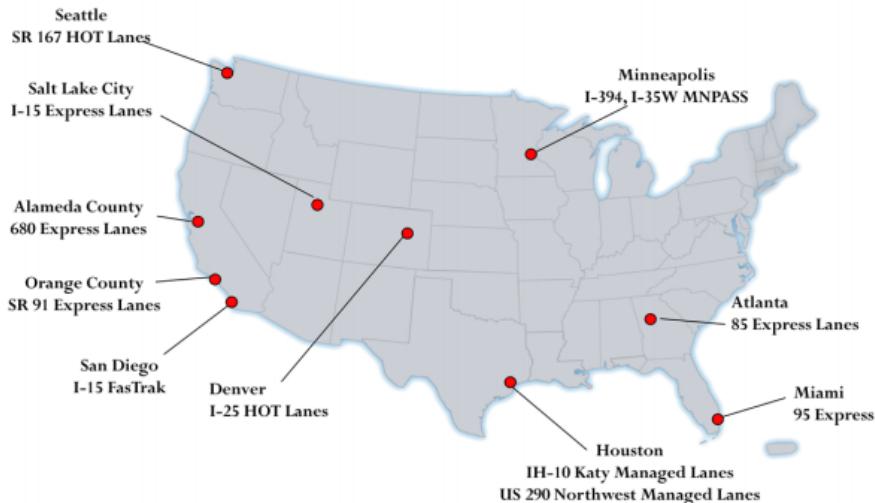
(http://www.deq.state.or.us/aq/toxics/docs/pats/7_25_11presentation.pdf)



Successful Managed Lanes

There are many examples of managed lanes across the USA and Internationally.

Managed Lanes around the US



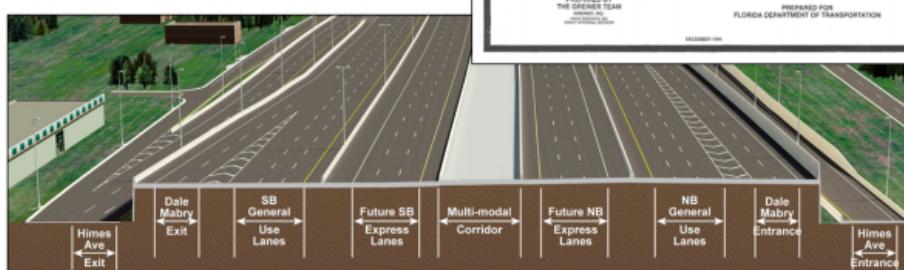
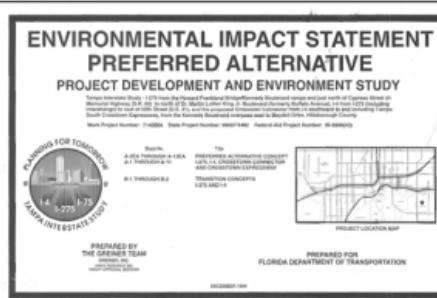
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From a presentation on [Florida Managed Lanes presentation](#) the Statewide Managed Lanes Action Plan outlines the roll out and connection of High Occupancy Toll Lanes most of which are planned for inclusion within the existing right of way.

Tampa Interstate Study



- Recommended: Express Lanes in Median
- General Use Lanes construction in progress



In Australia and New Zealand, where the author has experience, the Auckland Northern Busway is an example of a completely separate bus facility next to a freeway that connects the North Shore suburbs across the harbour to the downtown core. This is a similar geographic water constraint as the Columbia River with similar population transport patterns. In New Zealand the Northern Busway was functioning at full capacity shortly after opening. Double decker busses are now being deployed to increase people capacity. Given the understanding that kiwis would never give up their cars, it was surprising to find they were willing to give up their cars if they were given the option to take up to an hour off their daily commute times on a decent bus..



SH1 Northern Busway, Auckland¹⁸



M2 Motorway, Australia

Conclusion

The I-5 corridor between downtown Portland and Vancouver is congested with unsafe interchanges too close together. Removing some of the bottlenecks in support of a Commercial Vehicle Lane to prioritize the movement of freight and buses is a more efficient and reliable use of the existing road space. A high speed bus corridor would also support and connect to the Mill Plains BRT, and minimize commuter times across the Columbia river.

Recommendation

- The City of Portland add the I-5 Commercial Vehicle Lane Concept Plan to the Transportation System Plan updates.
- The I-5 Commercial Vehicle Lane be consider as a part of the Comprehensive Plan update with specific consideration given to Max Stations in close proximity to I-5 interchanges.
- ODOT consolidate and removing outdated or inefficient interchanges. Priority given to moving freight and buses. Separate and minimizing motor vehicle conflict with active modes.
- Work with C-Tran and Vancouver agencies regarding Vancouver BRT connections to downtown Portland.

Outcomes:

1. Improved Regional Travel Times to key Industrial Areas
 2. Improved Transit Facilities Options
 3. Reduced Congestion
 4. Reduced Environmental Impacts
 5. Improved Air Quality
 6. Increase Economic Development
 7. Neighborhood Traffic Calming
-
-

Roberta Robles Biography

Roberta Robles has experience in freight movement analysis, Intelligent Transportation Systems (ITS), ramp signaling and freeway networks. In New Zealand, Roberta worked as a transport planner at Transit New Zealand (similar to ODOT) and Auckland Regional Council (similar to Portland Metro). Prior to that she worked on the ODOT Bridge Replacement Program. Roberta is currently a stay at home mom living in NE Portland.

CENTRAL NORTHEAST NEIGHBORS, INC.

4415 NE 87th Ave * Portland, OR 97220-4901
503-823-3156

City of Portland

Attn: Planning & Sustainability Commission psc@portlandoregon.gov
1900 SW 4th Ave.
Portland, OR 97201

CC: Susan Anderson, BPS Director Susan.Anderson@PortlandOregon.gov
Joe Zehnder, Long Range Planning Manager Joe.Zehnder@portlandoregon.gov
Erik Engstrom, Comp. Plan Project Manager Eric.Engstrom@portlandoregon.gov
Alison Stoll, Exec. Director Central NE Neighbors, Inc. alisons@cnncoalition.org

Subject: Central Northeast Neighbors, Inc. Support of our member neighborhoods; Beaumont Wilshire, Cully, Hollywood, Rose City Park, Roseway and Sumner efforts to do public outreach and develop individual neighborhood association Recommendations for Comprehensive Plan Update – Proposed Draft

Honorable Chairman Baugh & Commissioners,

The Central Northeast Neighbors, Inc. Board of Directors, at our March 4, 2015 board meeting, voted to support the individual efforts of our member neighborhoods: Beaumont Wilshire, Cully, Hollywood, Rose City Park, Roseway and Sumner in commenting and making recommendations to the Comprehensive Plan Update draft.

Central Northeast Neighbors, Inc. has provided and disseminated information about the opportunities for neighbors to participate in giving comments and recommendations for the Comprehensive Plan. We have provided links via our website and e-news. Our Land Use Transportation committee and board has had updates from BPS staff. Many of our neighborhoods have had individual presentations.

We support our individual neighborhoods in their efforts to bring forward comments and ideas to better improve the plan and to continue to build a more livable Portland for the future.

Sincerely,



Jo Schaefer, President of the Board

Division Design Initiative Update

Division Perceptions Survey

Survey Background and Purpose:

During the spring of 2014, the Division Design Initiative along with a Portland State University student undertook a survey called “Division Perceptions” to get a better understanding on how the residents along the Division Street corridor feel about the rapid changes that have taken place in the last 18 to 24 months, design preferences, and their vision for the future of Division.

Survey Outreach & Dissemination:

The survey was distributed and advertised via social media including Facebook, Twitter, the Division Design Initiative email list, RNRG, the Richmond Neighborhood Association, the Richmond Association newsletter, the Hosford-Abernathy Neighborhood District, the Oregonian and Southeast Uplift. Survey cards were distributed by businesses on Division Street, tables set up at the Hawthorne and Division – Clinton Street Fairs, and during a Movie in the Park event.

Survey Demographics:

- Total Respondents: The survey had 253 responses as of 10/1/14
- Age & Gender: The average age of the respondents was 47. Of those who identified gender there were 117 female and 101 male responses.
- Location of Respondents: 236 respondents identified themselves as living in southeast, 141 living directly within the affected area along with 37 living within 10 blocks of the corridor.
- Business Owners: Forty-eight of the respondents identified that they were small business owners with half of those saying that their business was directly located on the Division Street corridor, 16 of those where home based businesses and the average amount of time they have been in business was approximately 11 years.

Initial Survey Takeaways:

The Division Perceptions survey will remain open through October, however initial analysis of the survey data indicates some commonly expressed themes:

- **Preference for smaller buildings on Division.** For design preferences, 112 respondents noted scale/or building height. Of these respondents, 83% specifically expressed a preference for 2 and 3 story buildings. This number is larger (90%) if including those noting a preference for “smaller” buildings.
- Many respondents noted a **desire for preservation of buildings with special architectural, historical or cultural value** and there were many positive comments of recent retrofits of existing buildings such as D-Street Village and Roman Candle Bakery, and many responses noted positives to increased vitality to the street and addition of new businesses.
- Many respondents noted a **desire for more retail and concerns over increased parking issues, safety, and loss of local businesses.**
- Many comments noted that recent new construction on Division is perceived to be too “box-like” in design and many cited a **desire for more articulated architectural character and materials to match that of the existing neighborhood character.**
- Also commonly expressed was a **desire for more open space, landscaping and public gathering spaces on Division.**
- Respondents also frequently noted **concern for the lack of affordable housing and a desire for more diversity of unit types and family-friendly housing and amenities.**

Richmond Neighborhood Association

c/o Southeast Uplift
3534 SE Main
Portland, OR 97214
Phone: 503/232-0010

<http://richmondpdx.org/>

RNAnewsletter@gmail.com richmondna@yahoo.com



March 12, 2015

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201
psc@portlandoregon.gov

Barry Manning
Senior Planner
Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue #7100, Portland, OR 97201

Re: Comprehensive Plan and Zoning Issues

Dear Planning and Sustainability Commission and Mr. Manning:

At the Richmond Neighborhood Association's (RNA) regular monthly meeting on March 9, 2015, the RNA continued its discussion of zoning issues and the Comprehensive Plan Update process. It voted to take a position on the following issues:

3-Story Height Limit on SE Division St.

The RNA Board voted to request the city to place a three-story height limit on SE Division for those properties that are not already four-stories, but the RNA left open the issue of whether a fourth story should be allowed through amenity bonuses. The RNA will likely address the latter issue at its April meeting when Barry Manning will give a presentation on the Mixed Use Zones Project.

The impetus behind this issue is the significant community backlash against the extensive development that has changed the look and feel of SE Division in just a few short years. There have been eight 4-story apartment buildings built the past 2 years between SE 31st Ave and 39th Ave/Cesar Chavez Blvd and a new 27-unit, 4-story apartment building (without parking) is planned for 3021 SE Division. In addition, a 72-unit building, without parking, was recently completed at SE Division and 48th Ave. and a 120+-unit building, with parking, is planned for SE Division and 50th Ave.

This backlash has been frequently expressed at RNA meetings, including Land Use meetings, and has been voiced through an online survey created by the Division Design Initiative ("DDI").¹

¹ The DDI is a project of the inter-neighborhood Division Design Committee (DDC), initiated to make recommendations for addressing community design concerns and to inform future

The Division Design Committee, in partnership with Portland State University students, developed a “Division Perceptions Survey” (<http://divisionperception.suprmap.org>) to get a better understanding on how the residents along the Division Street corridor feel about the rapid changes that have taken place in the last 18 to 24 months, design preferences, and their vision for the future of Division.” In the survey, 83% of respondents expressed a preference for 2 and 3 story buildings, while 90% overall stated a preference for “smaller” buildings. A summary of the survey results is attached.

The RNA’s motion did not pass unanimously. Three board members opposed the motion, stating a concern that a 3-story limit would prevent people from living closer to the central city and it would require people to commute farther. However, as one board member commented, not everyone who moves to Portland needs to live on SE Division, which has reached its density saturation point. Further, as Commissioner Fritz has noted in Council sessions, Portland’s current zoning capacity is more than adequate to meet the projected population influx over the next 20 years.

The RNA’s vote specifically left open the issue whether the Board will recommend that the city should adopt the amenity bonus framework being considered by the Mixed Use Zones Project, which would allow extra stories above a base height level. The RNA felt it was premature to vote on this issue since the MU Zones Project has not yet finalized the amenity bonus framework or the menu of qualifying community benefits. Next month, Barry Manning, the Project Director of the MU Zones Project, will give a presentation to the RNA on the Mixed Use Zones Project and the amenity bonus framework.

Approval Criteria for Zone Change Requests from CM2 to CM3

The RNA voted unanimously to support having approval criteria for zone change requests to up-zone from CM2 to CM3 zones.

The RNA was unable to settle on the appropriate criteria, as it needed more information on the proposed set of criteria listed in the Draft Zone Application Locational Criteria in the Mixed Use Zoning Project: Draft Revised Zoning Concept Information Sessions, February 25-26, 2015. For instance, the RNA was unclear on the proposed distance for the criteria “Near high-capacity transit stations and on streetcar corridors.” Other ideas for additional locational criteria that were stated at the meeting include: adjacent to 4-lane streets, not being placed next to R2.5 or R5 zones, neighborhood notification, and meeting heightened sustainability criteria.

development patterns and planning along Division. Formed in Spring 2014, the DDC includes representatives from key neighborhood and business organizations in the inner SE Division community (RNA, HAND, Division Clinton Business Association, SE Uplift, South Tabor Neighborhood Association, and Sustainable Southeast). The DDI is currently drafting design guidelines for SE Division from SE 11th Ave. to SE 60th Ave. This project furthers the work of the Division Vision Coalition and the 2006 Division Main Street/Green Street Plan. The design guidelines are expected to be completed by Summer 2015.

Planning and Sustainability Commission

Barry Manning

March 12, 2015

Page 3

The RNA will look to Mr. Manning's presentation in April to elaborate on the proposed approval criteria.

Sincerely,



Allen Field

Chair

Richmond Neighborhood Association

cc: Susan Anderson, Director, Bureau of Planning and Sustainability
Joe Zehnder, Chief Planner, Bureau of Planning and Sustainability
Marty Stockton, Southeast District Liaison, Bureau of Planning and Sustainability
Mayor Charlie Hales
Commissioner Amanda Fritz
Commissioner Nick Fish
Commissioner Steve Novick
Commissioner Dan Saltzman

March 12, 2015

Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97204

Dear Chair Baugh & Commission Members:

During Multnomah Neighborhood Association's recent review of the Transportation System Plan, we noted that a vital North-South connector in Southwest Portland is missing from the plan and/or potentially ill conceived. Although we understand newly proposed projects are not being added to the TSP at this time, we respectfully submit the following comments in hopes of informing the TSP and improving an existing project.

Currently the updated TSP lists project #90006 Inner SW 35th (Pedestrian/Bike Improvements) from Vermont Avenue to Barbur Blvd. Although project #90006 would serve as a North-South connector, we are writing to you today to recommend an alternative route that would utilize SW 30th->SW Hume->SW 31st (for the section between Capitol Hwy and Barbur Blvd).

SW 30th->SW Hume->SW 31st would better serve the public good by:

- Providing active transportation options for a more inclusive population;
- Meeting pedestrian and cyclist safety demands along a route with high vehicular traffic; and
- Connecting high density, workforce, and senior housing to vital services as well as improve access to recreation and business districts.

Inclusive Access to Active Transportation

Project #90006 as conceived along SW 35th includes numerous steep grades that would limit use by diverse populations. One section is so steep that it includes railroad tie stairs along a public easement. This route would exclude our seniors, those with disabilities, as well as caregivers with young children, and even adults who could not bike this route because of the steep incline. The alternative route of SW 30th->Hume->SW 31st provides the flattest route between Multnomah Village and Barbur Blvd. and would encourage active transportation options for more people.

Improved Safety

According to recent traffic counts, project #90006 along SW 35th has very low traffic volumes and, therefore, may not warrant the high cost-benefit ratio of bike and pedestrian improvements. However, in looking at recent traffic counts of the alternative route along SW 30th->SW Hume->SW 31st, the traffic volume is significantly higher between 5,000-10,000 trips daily putting this route in the same category as Capitol Hwy. These high traffic volumes demonstrate the need to improve safety for both pedestrians

and cyclists along this route especially around areas with poor line of sight and a dangerously blind corner at SW 31st and Hume.

In addition, this alternative route would leverage numerous safety improvements at key intersections and provide sidewalk infill of less than 1 mile. At SW 31st and Barbur Blvd., improvements include a traffic light, marked crosswalks, a Tri-Met bus shelter, as well as sidewalks constructed during recent development outlined below. In addition, North-South bicycle and pedestrian improvements along this alternative route would provide a connection to the new Multnomah Blvd bikeway and sidewalks.

Vital Connection to Services

Since the last TSP was published, the Multnomah Neighborhood has seen an increase in population primarily incurred via in-fill development as well as higher density housing complexes such as the Headwaters Apartments. Headwaters and other higher-density housing options are located along the alternative route and are clustered at Multnomah Blvd/SW 30th as well as Barbur Blvd/SW 31st. There currently exists no safe route to access social, recreational or businesses services on foot or by bike for these residents of our community. These areas of high-density, workforce and senior housing and the people who live here deserve a safe North-South connection to transit, businesses, and the vital social services located within Multnomah Village including Neighborhood House's food pantry, the Multnomah Senior Center, the Meals on Wheels dining room, and the Southwest Community Health Center.

In addition, by making bicycle and pedestrian improvements along SW 30th ->SW Hume-> SW 31st, families would be able to access two recreational features at either end of this alternative route including Spring Garden Park recently funded for improvements in 2016 and the enrichment opportunities housed at the Multnomah Arts Center.

In conclusion, as the City of Portland upholds the concept of complete neighborhoods, providing bicycle and pedestrian improvements along SW 30th -> SW Hume-> SW 31st between Capitol Hwy and Barbur Blvd. would put the Multnomah Neighborhood one step closer to achieving that goal. This alternative route would link two business districts, provide vital connections between high-density housing and social services and recreational opportunities, and do so along the least topographically challenging route that would be the most inclusive of our diverse residents.

We greatly appreciate your consideration of these recommendations on how best to leverage existing safety improvements and the limited resources for transportation projects.

Sincerely,



Carol McCarthy
Multnomah Neighborhood Association Chair
4311 SW Freeman St.
Portland, Oregon 97219

cc: Commissioner Steve Novick
 Leah Treat, Director, Portland Bureau of Transportation

Jill Kilpatrick Souede
1517 SW 61st Drive • Portland, OR 97221
503.927.1502 • jillsouede@gmail.com

March 12, 2015

VIA EMAIL

Joan.Frederiksen@portlandoregon.gov and psc@portlandoregon.gov

Re: Proposed rezoning of 6141 SW Canyon Court to an R2000

Dear Ms. Frederiksen:

It has come to my attention that a proposal for rezoning the property located at 6141 SW Canyon court (the “subject property”) from an existing R20 to a multi-family 2000 designation has been received by the City of Portland.

The Subject Proposal.

According to the City of Portland’s Planning and Sustainability, Multi-Dwelling Residential Zones code, a multi-family 2000 designation “allows approximately 21.8 dwelling units per acre. Density may be as high as 32 units per acre if amenity bonus provisions are used.” The subject property contains approximately 1.28 acres. The addition of an estimated 27 units to 61st Drive would be devastating.

SW 61st Drive Cannot Accommodate Increased Pedestrian and Motor Vehicle Traffic.

SW 61st Drive is a small, winding, tree-lined road with little room for the current traffic it somehow accommodates. The road has neither sidewalks nor anything that could be called something close to a shoulder. This means that all pedestrian traffic is directly on the road. In addition, SW 61st Drive provides a “shortcut” access point to Burnside Street heading downtown and Barnes Road heading the opposite direction. **Make no mistake: increased traffic on SW 61st Drive with the addition of the apartments will result in serious if not fatal human injury.** It is already a dangerous road for pedestrians with its tight twists and turns resulting in blind corners.

Conflicts with Current Neighborhood.

The current neighborhood has a rural, community feel. My husband and I moved into the neighborhood because of its natural, forested environment. The addition of a few houses to this area would not ruin this; however, multi-family housing units are not consistent with the intent of the neighborhood. The destruction of this area would be a devastating loss for the City.

Insufficient Public Transportation.

It is easy to see by looking at a TriMet map that this area has none of the proper infrastructure to support the addition of large densities of people. This means that more cars than might usually be associated with such developments will be accompanying any new occupants.

Current Multi-Family Housing.

Canyon Court already offers multi-family housing units. The Commons at Sylvan Highlands has 287 units ranging from studios to 2 bedrooms. Additionally, condos at the edge of Canyon Court offer even more housing options. Multi-family housing abounds on Barnes Road and the surrounding area, with better public transportation. The proposal for the subject property serves no need other than capital gain for the current owners.

An Additional Proposal.

Another apartment development on Canyon Court is pending approval. A Type II Proposal for a 4-building, 266 dwelling units property was filed on February 20, 2014 (Case File Number LU 14-241892 AD). If approved, the strain on Canyon Court and SW 61st Drive will be excessive.

In summary, it is clear that a multi-family zoning designation for the subject property is quite simply a poor fit for this neighborhood.

Very truly yours,

Jill Souede

Planning and Sustainability Commissioners:

I am submitting this testimony on the proposed zoning changes for NW Portland Alphabet district. I am the owner of 526 NW 18th Ave., one of the Trenkmann homes which are National Historic Landmarks. I am opposed to the proposed downzoning in the area, and would prefer to retain the existing RH zoning.

My reasons include 1) Density Planning: Existing Structures 2) Planning for Natural Disaster/Unplanned Demolition 3) Minimal benefit/Larger Cost

1) Density Planning: Existing Structures. Certain density has been allocated to the broader NW Alphabet area to prepare for the future surge in population expected in Portland, and the Historic Preservation Zoning Incentives allow for the transfer of this density should particular homeowners wish to dispose of it—which is a nice flexibility. As the Trenkmann homes are National Historic landmarks, there are protections in place to prevent demolition and preserve the structures. Removing an entire layer of density in one of Portland's most close-in neighborhoods takes away the option to retain the density from all homeowners (rather than individual homeowners having a choice to transfer it), and seems inconsistent with Portland's longer term urban planning goals of infill.

2) Planning for Natural Disaster/Unplanned Demolition. Much of the discussion around development deals with the ramifications to existing structures. However, in the event of an earthquake, major fire or any other circumstance that would demolish the existing structures, it is far more sensible to have the land zoned appropriately. If the Trenkmann homes were to collapse, it would seem illogical, inconsistent with Portland's sustainable development goals, and far from the public's best interest to allow R1 density residential construction in a full city block minutes from the city center and surrounded by RH apartment buildings with FAR allowances. The land would be far better utilized to house a greater number of smaller scale living units.

3) Minimal Benefit/Larger Cost. Since most of the land in question is already used in an RH capacity, and most of the single family structures are either historic landmarks or contributing historic resources, there are very few actual properties that would be impacted on a practical level by downzoning, so any net protection from high density or incompatibility would be minimal. Most of the neighborhood is already high density residential or commercial. This benefit is far outweighed by the costs associated with #1 and #2.

Best,

Matt Brischetto

1503 SE Belmont St.

Your Last Chance to Help Shape the Future of Argay

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The zoning only takes effect when the current farm use on some of these areas ends, and new development is to take place. Unless changed, the area at the southeast corner of 122nd and Shaver is planned for office and light industrial use, with apartments (up to three stories high) to the east and south – right up to the new Beech Park. West from NE 147th to the backyards of the existing homes in Argay is another area planned for offices and light industrial development.

The Argay Neighborhood Association has met with planners and has submitted the official Neighborhood Association hearing testimony. Other residents have submitted their comments. Now make your voice heard!

Below are sample comments that were at the Argay Neighborhood Association meeting held on January 20th. They are suggested comments for anyone who opposes more apartments and new office buildings and light industrial in our neighborhood. They are meant as a starting-point. Write your own or use what is there. The official email address and regular address are provided. The more people who comment, the more the City has to listen. Comments need to be in by March 13, 2015; but the sooner the better. To avoid double counting or "skewing" the results and because these comments are treated just like testimony at a hearing, the City wants to be able to verify that each comment comes from an Argay resident or property owner. For that reason, they need your name and address.

Al Brown (The Land Use Chair for the Argay Neighborhood Association) said at the meeting that he would help anyone who needed more information or had questions. Email: alanlbrown@msn.com or by phone: 971-271-8097.

Take a few minutes now, to protect and change the future of your neighborhood!

Email Address:

TO: psc@portlandoregon.gov (The Comment email address)

SUBJECT LINE: Comprehensive Plan Testimony – Argay Neighborhood

Regular Mail Address

Planning and Sustainability Commission
Comp Plan Comments – Argay Neighborhood
1900 SW 4th Avenue
Portland Oregon 97201-5380

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 R-3 zoned land in the Argay Neighborhood be reclassified to R-5 or R-7 single-family residential, and the proposed Mixed Employment areas (Change Numbers 287, 288, 289 located at the SE corner of NE 122nd and Shaver and 290, located at the SW corner of NE 147th and Sandy Blvd.) also be reclassified to R-5 or R-7 single-family. Also, I support the City's similar change #688 along NE 148th Avenue north of I-84. *Moved into this house – Feb 1, 1964 – raised three children here – wonderful family neighborhood! Quiet – safe – friendly*

I want to keep Argay a family friendly neighborhood.

Name: *Karen Edmonds*

Address: *13212 NE Rose Parkway*

My daughter and her two children live with me in this home – where she grew up and attended public schools! Please reclassify R-3 land to proposed above

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I want to keep Argay a family friendly neighborhood.

Name: *Cody Weaver*

Address: *13212 NE Rose Parkway
Portland, OR 97230-2831*

I live here with my mom, sister and Grandma - it is grand ma's house - I am 20 years old - an adult

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I want to keep Argay a family friendly neighborhood.

Name: *Ashley Werner*

Address: *13212 Ne Rose Pkwy
Portland OR 97230-2831*

*I am a registered voter at this address
I live here with my Mom and
my mother-in-law at my grandma's house
Ord 187832 Vol. 2.3B, page 14470*

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I want to keep Argay a family friendly neighborhood.

Name: JAN NEVER

Address: 13212 NE ROSE PARKWAY PORTLAND, OR 97230 - 2831

Ord. 187832 Vol. 23.B, page 14471

I am a registered voter at this address. I move up in this home and live here now with my two adult children.

(Handwritten note from Argay resident Jan Wallenberger)

Argay is great
but have trouble finding HIRL developments
located at NE 122nd and Shaver
specifically R-5 & R-7. These changes
be a progression of smaller areas
the result of undeveloped land sites
likely used for second homes
completely different from single family houses
long way from town centers
from Argay to town centers
is 30 minutes driving time

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

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I want to keep Argay a family friendly neighborhood.

Name: *Jan Wallenberger*

Address: *13131 NE 50th St. Apt. 4
Portland OR 97230*

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I want to keep Argay a family friendly neighborhood.

Name: Sheila Prein



Address: 12833 NE Myron



March 12, 2014

City of Portland

Attn: Planning and Sustainability Commission

1221 SW 4th St.

Portland, OR 97204

RE: Bureau of Transportation's Recommended List of Major Projects and Citywide Programs

Dear PSC and TSP Members:

Thank you for considering our neighborhood's priorities. Below you will find our ranked priorities from the major project and citywide programs list. Each priority has an attached narrative briefly explaining the importance of the specific project to our neighborhood.

Neighborhood Priorities:

1) 70075 Lower SE Bikeway Network Improvements 5,000,000

In a neighborhood hemmed in by multiple auto-oriented roads (82nd, Woodstock, Foster—not to mention Harold, Duke), the bikeways would give bike-oriented alternatives for individuals seeking multimodal options to get to other parts of the city. It seems easy to imagine the bike-oriented mode as one large bike wheel with spokes leading in various directions with the I-205 path close the east (with easy access via Foster Rd. bike lanes) and the Springwater Corridor trail to the south. Mount Scott Arleta is primed to be a model for the city in connecting portions of the city that, to this point, have prioritized auto-oriented modes of transportation.

2) 70028 Harold St Bikeway 1,414,000 – Move to constrained

Harold St. is viewed and treated as a neighborhood collector street (though it is officially designated a residential street). As a plan that looks to the future (with more limited resources for auto-centric modes of transportation), it would behoove the city to think about moving Harold St. to the constrained list, otherwise, who knows how long before anything would be done to the one street within the neighborhood that runs straight east west between 52nd and 82nd? Between the Mt. Scott Community Center, the abutting park, the many homes that line Harold St., this is a residential street being used as a collector. Many families and children would benefit from the safety and accessibility improvements offered by improved bike provisions. With new ideas in bike-oriented transportation,

such as advisory bike lanes, on the table, and with the creation of the 50s plan, it is important to keep Harold on the city's radar. Updating the current speed bump layout and looking into advisory lane models seem like viable options that would, perhaps, be more cost efficient. Furthermore, with alternative routes for auto-oriented traffic (Woodstock just a few blocks south, Foster within blocks to the north) so nearby, the city could use Harold as a model for the future of a multimodal (auto, bike, bus) neighborhood collector. Bike-oriented traffic would help potentially calm auto-oriented traffic, which is a continued, documented issue on Harold, which would improve the safety of a street that sees documented issues with speeding (a safety and livability issue).

3) 70074 Inner Steele Bikeway 1,077,000

A long, Harold and Steele bikeway would be an almost 3-mile connector for bike-oriented traffic to travel from 82nd to inner southeast, which would then put individuals closer to already established bikeways (such as the 20s bikeways) to get them to work or to business districts. Furthermore, both Harold St. and Steele run along parks and a series of bikeways would offer safe means of travel for families getting between these city parks.

4) 70071 Sixties Neighborhood Greenway 1,500,000

There are relatively few north-south greenways for individuals in this section of the city (before one reaches the I-205 pathway). A sixties greenway would be a convenient and safe connection for riders west of 82nd (in particular), who don't want to cross 82nd to reach the I-205 pathways to go north or south. An individual living as far south as Brentwood-Darlington could connect by bike to a job in the inner portion of the city.

5) 70024 (RTP: 10186) Lents Town Center Improvements, Phase 2 11,510,000

With the upcoming changes to Foster Rd., taking the opportunity to make larger changes to Lents would be welcome and would help the odds of Lents becoming a more appealing location as a center for commerce.

Thank you for your consideration,

Patrick Fuller, MSANA Transportation Chair



East Portland Action Plan

March 12, 2015

Planning and Sustainability Commission
1900 SW Fourth Avenue #7000
Portland, OR 97201

RE: East Portland Displacement Prevention Needed Now-- Housing and Economic Development Subcommittee Comprehensive Plan Recommended Tools

To the Commission,

The East Portland Action Plan (EPAP) Housing and Economic Development Subcommittees are greatly concerned about displacement of low-income people and communities of color in our neighborhoods. Last month 'Governing Magazine' reported that Portland is the most gentrified large city in the United States. The Dr. Lisa Bates authored City of Portland commissioned 'Gentrification and Displacement Study' identified large numbers of the most vulnerable Portlanders as residing in East Portland neighborhoods.

We advocate that the City of Portland and its new Comprehensive Plan take a strong stand against the displacement of these vulnerable populations before it is too late. The full EPAP has agreed that it will be too late to address displacement prevention within 5 – 10 years, many thinking within 5 years. The following recommendations have not yet had the opportunity to be vetted by the full EPAP, but given the Comprehensive Plan input deadline, the EPAP Housing and Economic Development Subcommittees currently, after 6 months of deliberation, recommend the following tools be prioritized for displacement prevention in East Portland (not in prioritized order):

- Rent stabilization
- Just cause eviction combined with code enforcement and tenant education
- Impact analysis on new development to determine whether it will cause displacement
- Acquisition and rehabilitation programs tied to long-term affordability
- 'No Net Loss' of affordable housing ordinance
- Broadening homeownership and cooperative ownership programs
- Inclusionary zoning, both mandatory and voluntary
- Community Benefits Agreements that include strong goals for local hiring and participation of disadvantaged, minority, and women workers and contractors

- Living Wage Provisions
 - Local Hiring
 - Minority Contracting
 - Commercial Stabilization
 - Community Reinvestment Act
 - Transit Oriented Development for commercial properties

There is a Chinese proverb that says, "The best time to plant a tree is twenty years ago. The second best time is now." Please act now so that twenty years from now Portland will be a more vibrant, diverse and equitable place.

Sincerely,

Frieda Christopher Jean DeMaster
Co-Chairs On Behalf of the East Portland Action Plan Housing Subcommittee

Nick Sauvie Lori Boisen
On Behalf of the East Portland Action Plan Economic Development Subcommittee

Cc: Arlene Kimura, EPAP Co-Chair
Jeremy O'Leary, EPAP Co-Chair
Charlie Hales, City of Portland Mayor
Dan Saltzman, City of Portland Commissioner
Nick Fish, City of Portland Commissioner
Amanda Fritz, City of Portland Commissioner
Steve Novick, City of Portland Commissioner
Andrea Valderrama, Office of Commissioner Novick
Susan Anderson, City of Portland Bureau of Planning and Sustainability (BPS)
Christine Scarzello, BPA East Portland District Liaison
Traci Manning, City of Portland Bureau of Housing Director
Matthew Tschabold, PHB Policy Manager
Portland Development Commission
Patrick Quinton, Portland Development Commission (PDC) Executive Director
John Jackley, PDC Director

EAST PORTLAND ACTION PLAN

www.eastportlandactionplan.org

East Portland Neighborhood Office 1017 NE 117th Ave. Portland, OR 97220
503.823.4035 or lore.wintergreen@portlandoregon.gov

PURB Recommendation to the PSC
On Comprehensive Plan Policies

The Citywide Systems Plan and the Transportation Systems Plan

BES is proposing a capital improvement program that over the next 10 years will of necessity result in substantial yearly sewer rate increases throughout the period. A large part of that program involves projects intended to improve the sewer collection systems. These projects are needed to assure system functioning and private property protection in large part due to the impact that storm water from developed properties has on the sewer system. They needed are regardless of whether or not there was any growth or redevelopment in the city. However because a substantial portion of the storm water load originates on the current city streets their redevelopment with green infrastructure will most likely work to reduce the costs associated with this portion of the BES capital improvement program. Not surprisingly, the cost of every new project or street improvement project proposed by PBOT in the TSP will be impacted by costs associated with storm water management.

In the CSO areas of the City, “green infrastructure” most likely will work to reduce the costs associated with the “Maintenance and Reliability” projects described in the Citywide System Plan. That appears to have been the result in the “Tabor to the River” project area, where substantial use of the public right of way was made for such installations. It should be remembered that each of the areas proposed for these BES projects have differing conditions which may result in differing benefits from green infrastructure installations. It should also be understood the this portion of BES’s CIP is intended to be responsive to METRO’s 2040 plan and variations from that plan in the location as well as density of development will probably increase the costs of these program unless other measures are taken to address those costs. Concurrent project development following coordinated storm water planning may to be one such measure.

BES’s capital improvement program in the West Hills MS4 storm sewer areas is struggling to adequately respond to the area’s current developed character let alone its continued growth or redevelopment. Because of substantial variations in the character of the storm water infrastructure requirements imposed over time on the development of properties in the West Hills the area has to be described as lacking complete storm water systems. One portion of the area has recently been evaluated and it was found that more than 20% of its streets and parcels lack approachable access to a storm water conveyance system. This historic lack of an adequate storm water systems and legal constraints on restricting the use of existing properties means that BES’s CIP program in this area - the Inflow and Infiltration program (required by DEQ to prevent the discharge of raw sewage into the environment) is compelled to serve homes that discharge storm water into the sanitary system. Because of costs associated with having the Washington County (Clean Water Services) sewer system accept the large volume of sewage such a combination of flows creates BES chose to build an expensive pump station and a pressure line to return this effluent to the City’s treatment plants. To date this system has be plagued with technical problems illustrating quite well the problems associated with pursuing solely a technological or grey solution to the challenge of storm water management. A nearby needed transportation project was blocked because it had to rely on

onsite “green infrastructure” to manage its storm water and this approach rendered it too costly. Again concurrent transportation project and storm water project development following coordinated storm water planning appears to be appropriate response to the challenges this area faces.

Outer East Portland’s storm water issues relate to the Johnson Creek watershed, an MS4 area, and UIC areas that drain primarily into the Columbia Slough. In this area of the City there is clearly conflict between the desire for the use of land for economic development versus its use for an environmental benefit. It appears possible that many of these disputed lands are often impacted by the storm water systems functioning within the hydrological cycle. The question presented is if the systems used for the management of storm water are, by altering groundwater levels or displacing other uses, impacting certain areas that might be useful for economic development what are the equity implications of providing this environmental benefit to the City at the cost of an areas potential economic development? An honest response to this dilemma appears to require concurrent project development following coordinated storm water and transportation planning.

PURB recommends as part of its update of its comprehensive plan the City needs to clearly state that it has a policy favoring storm water and transportation project **concurrency**. Such a policy requires coordinated planning of city storm water management and transportation improvement projects. The recently released PBOT- BES Coordination Charter appears to be an excellent step in this direction but it needs to be enhanced by clear policy direction that this approach is and will, without explicit changes to the comprehensive plan language, remain the City’s policy.

A review of the Citywide Systems Plan and the Transportation Systems Plan presented as part of the Comprehensive Plan process has to leave any astute observer concerned regarding the costs associated with meeting the capital demands of the major programs envisioned by both the Bureau of Environmental Services and the Bureau of Transportation. Portland’s citizens and ratepayers need as absolute as possible an assurance that wherever transportation and storm water needs can in some manner be addressed concurrently to produce substantial costs savings to the programs they will be, adopting comprehensive plan policies requiring this and coordinated BES and PBOT planning is needed in order to provide such an assurance.



Southwest Hills Residential League

P.O. Box 1033

Portland, OR 97207

www.swhrl.org

swhrl@swni.org

Dear: Portland Bureau of Transportation

Thursday, March 12, 2015

Subject: South West Hills Residential League Public comment on TSP priorities

The SWHRL board has voted to endorse the following TSP projects for funding. This list is in order of priority to the neighborhood.

1. 90024 - Broadway ped
2. 90031 – Dosch
3. 90038 – Humphrey
4. 90054 – Patton

Thank you for excellent service to the residents of this great city and please consider the unique geographical challenge of the SW Residential Hills Community when prioritizing funding for Pedestrian, Bike, Public Transit and Motorists.

Signed:

Sean Baioni
1717 SW Myrtle St.
Portland, OR 97201
SWHRL Transportation Chair

SUNNYSIDE NEIGHBORHOOD ASSOCIATION

RECOMMENDED COMPREHENSIVE PLAN MAP DESIGNATIONS

Land Use Designations

Mixed Use - Urban Center

Multi - Dwelling 2,000

Taxlots

Mixed Use - Neighborhood

Single - Dwelling 2,500

Mixed Use - Dispersed

Recommended Changes to City Proposals



Far Southwest Neighborhood Association

Portland, Oregon

Marcia Leslie
5445 SW Palatine St.
Portland, OR 97219

March 12, 2015

Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: 2035 Comprehensive Plan

In his letter of March 6, SWNI's President Sam Pearson referred to four earlier letters submitted by SWNI, each with considered observations on the Plan, to which he added the latest comments on the Transportation Systems Plan, Land Use and Parks, all of which we fully endorse. This letter will take each chapter and offer some comments, observations and suggestions.

On page GP 1-2 of Chapter 1 it states "The goals and policies in this Plan . . . are all for the purpose of informing and guiding land use decisions." In the next paragraph it says "there may be competing or conflicting policies" (when applying goals and policies to particular situations, such as specific development proposals or area plans).

This contradicts Goal 1.C on page GP 1-4 and Policy 1.3 on page 1-7 which both claim that the Plan is "internally consistent." If this was true, there would be NO competing or conflicting policies. *Any such policies should be resolved in favor of the policy that does the least harm and preserves the character and integrity of the existing area.*

Goal 1.D refers to implementation tools/actions "to protect the public's current and future interests." This will be addressed further in Chapter 2.

Policy 1.15 is totally unacceptable and needs to be deleted from the Plan. By stating that "the goals and policies of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that conflict with a goal or policy in this plan" *you are superseding the public's current and future interests which Goal 1.D claims to protect.*

In Chapter 2 individuals and generic communities are recognized as the "civic infrastructure." Missing from this infrastructure are the Neighborhood Associations which have played an important role in the "civic infrastructure" of the city for many years.

By eliminating Neighborhood Associations as recognized public bodies, *you are denying an important part of that public the right to express their community needs and current and future interests through their representative organizations.*

Goal 2.G needs to include "Neighborhood Associations" after "organizations".

In the Glossary, there are generic references to "Community" and "Neighborhoods," but no reference to "Neighborhood Associations." The definition of "Neighborhoods" needs to be deleted and replaced in the Glossary with "Neighborhood Association: a community with defined boundaries, as recognized by the City of Portland, existing in all areas of the city; a NA may include residential, commercial, mixed use, industrial, educational and environmental areas."

In Policy 4.8, suggest changing the wording from "limit reductions in" to a more proactive "protect privacy and solar access for residents and neighbors . . ."

In Policy 4.13, does "respect existing entitlements" include recognizing the validity of Covenants and Restrictions (CC&Rs) and acknowledging that they CAN supersede building codes and policies when they are more restrictive than those codes and policies?

Policy 4.14 – I could find no reference to "healthy residential design and development" in Chapter 4. Rather than say "(see those policies below)", please cite them by #, i.e. "(resource efficient is 4.47)." Is "healthy residential" 5.40 or something else?

Suggest moving Policy 4.25 wording into Policy 4.46.

The sections on "Resource-efficient design and development", "Designing with nature" and "Hazard-resilient design" are well done and comprehensive, as is "Environment and Watershed Health" in Chapter 7.

I'm sure you have already caught and corrected the numbering errors on pages GP 6-17 and 6-18.

Skipped Chapter 8. Comments on Chapter 9 will be sent in a separate letter.

Thank you for considering these comments.

Sincerely,

Marcia Leslie, Chair
Far Southwest Neighborhood Association

Far Southwest Neighborhood Association

Portland, Oregon

Marcia Leslie
5445 SW Palatine St.
Portland, OR 97219

March 12, 2015

Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Transportation System Plan

There is a vast number of worthwhile projects citywide, and limited resources to repair and/or improve the infrastructure to the extent needed.

In the March 6 letter sent to you by SWNI President Sam Pearson he listed the top 10 projects identified by the Transportation committee and affirmed by the SWNI Board. The Far Southwest Neighborhood Association agrees wholeheartedly with the first choice on the list, and the 8th (although it was incorrectly identified as 90087, it should be 90090) which is a project residents of FSW have been looking forward to for many years. The remaining projects are also acceptable as priority choices.

However, we would like to make the following suggestions:

90007 should be prioritized for "1-10 years" rather than "11-20". This route provides access to both Jackson Middle School and Stephenson Elementary School, along with one church and a mosque.

Funding for 90086 and 103540 (Red Electric Trail, at an estimated cost of \$24.753 million) would be better spent on 90064, 90098 and 90099 (estimated cost of \$16.883 million) with nearly \$8 million left over to spend on other more needed infrastructure projects.

90064 provides long-overdue safety improvements from the West Portland Crossing nearly to the Tigard Fred Meyer, both of which are popular destinations for residents all along the project, and would provide enhanced walkability and connectivity.

90098 and 90099 would provide bridges that would be structurally sound and more likely to survive an earthquake that will bring down the current bridges, along with other older structures in the area.

Last, 90091 should be a priority. Hundreds of cyclists use Terwilliger as their "freeway" to work on the hill and downtown Portland, preferring it to the traffic congestion and dangers of Barbur Blvd. Having continuity along their route of choice would increase the safety of their commute.

In summary, our top 5 TSP projects would be:

90026
90090
90064
90070
101910

Please remove 90086 and 103540 from priority status.

Thank you for considering these comments.

Sincerely,

Marcia Leslie, Chair
Far Southwest Neighborhood Association



Woodstock Community Center, 5905 SE 43rd Avenue, Portland, Oregon 97206

March 12, 2015

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

RE: 2035 Comprehensive Plan Comments

Dear Planning and Sustainability Commissioners:

The Woodstock Neighborhood Association (WNA) has been actively engaged in the city's comprehensive plan revision process for the past two years, especially with respect to recommended and proposed changes that will impact the Woodstock Neighborhood Center, the commercial corridor of SE Woodstock Blvd. between SE Cesar E. Chavez Blvd. and SE 57th Ave.

Last fall, the Woodstock Neighborhood Association and other neighborhood interest groups—business owners represented by the Woodstock Community Business Association, commercial property owners represented by the Woodstock Stakeholders Group, and Reed College representatives—collaborated on a neighborhood-wide visioning event. The Woodstock Charrette, as it was called, held over four intensive days, October 23, 24, 25, and 27, 2014, was facilitated by the National Charrette Institute (NCI), a locally based nonprofit organization. Several city staff with expertise in planning, transportation, and economic development provided technical support. A public recap, or finale, held on November 4, 2014, gave the neighborhood an additional opportunity to weigh in on key questions concerning proposed zoning changes and design elements for the district.

We hereby submit the final Woodstock Charrette Report (WCR), "The Woodstock Boulevard Community Vision," as part of our testimony to the Comp Plan. WNA would like to emphasize the following points, some of which emerged from this public process, in which over a hundred neighbors were engaged.

Maintenance of Woodstock's Small Village Character

It is very important to Woodstock Neighbors that the small village character of the district be maintained so that Woodstock, as a destination, is distinct from other mixed-use districts. Several public sessions of the charrette focused on height and scale of buildings, which neighbors feel is an important element in "keeping Woodstock, Woodstock." Through the charrette process, many neighbors came to accept the idea that three- and perhaps even four-story buildings would contribute

to creating a livelier main street with a better mix of small retail shops and restaurants. However, keypad polling (see WCR, p. 29) reflects strong support for requirements such as setbacks and step backs to help soften the impacts of taller buildings.

Need for Street Improvements

The number of east-west unimproved street segments adjacent to and parallel to SE Woodstock Boulevard is an impediment to realizing the full potential of the Woodstock Boulevard Corridor as a Neighborhood Center. We need to also consider the neighborhood's desire to retain what it values as positive aspects of the unimproved streets, i.e., they work well for traffic calming and for discouraging unnecessary cut-through traffic. Design concepts for street improvements in the Neighborhood Center presented at the Woodstock Charette appeared to have wide support among participants, and the charrette report notes that it is "the community's vision that these streets retain the nature of a quiet lane." The options prioritize use by bicycles and pedestrians but they also suggest a narrow lane for vehicle access and some additional parking (see WCR, pp. 27-28). These options are supported in Portland's 2035 Comprehensive Plan draft:

Policy 9.6 Transportation hierarchy for people movement. Implement a hierarchy of modes for people movement by making transportation decisions according to the following prioritization:

1. Walking
2. Cycling

Woodstock Neighborhood Association members have consistently advocated for an overall plan for street segment improvements. It makes sense to prioritize planning for the unimproved streets closest to the neighborhood center. With customized design, these streets could effectively serve as a buffer between blocks of mixed-use development and adjacent blocks of residential development.

Additional Traffic and Parking Concerns

The Woodstock Charrette process tried to deal with the topic of parking. It came up in posted comments and in discussions about possible design of future commercial development. There was a consensus that the look and feel of large, street-facing parking lots interferes with a more desirable pedestrian-friendly shopping district. At the same time, many residents expressed concern about the potential for overflow parking on residential streets which has become the norm in popular eastside main street neighborhoods such as Hawthorne and Division and Alberta, and advocated for city code that would require more parking to be included in mixed-use developments that will eventually increase both residential and commercial density. We feel the Woodstock Charrette Report does not adequately address these concerns and we recommend the city continue to study and refine overall regulations related not only to parking but transportation and congestion as well. As an east-west commute corridor, Woodstock boulevard often feels "maxed out" traffic-wise, during commute times. It is of utmost importance that an overall

transportation plan work to relieve this congestion, if Woodstock is to continue to develop more density.

Expansion of Commercial (future Mixed Use) Zoning

The NCI team made a case that in order to achieve the character the neighborhood says it wants—a livelier mix of businesses on the main street and increased vitality and night life, while maintaining the Woodstock Corridor as a multigenerational and affordable place to live—there would need to be expansion of both retail space and residential density in and around the Neighborhood Center.

At the final public charrette meeting on December 4, 2014, attendees were asked to consider zoning changes proposed for the Woodstock Neighborhood Center as part of the Draft 2035 Comprehensive Plan. Specific questions regarded expansion of mixed-use zoning, both east-west along SE Woodstock Blvd., and south of SE Woodstock Blvd. (See keypad polling results, WCR, p. 29.)

On the attached zoning map, presented at the Woodstock Charrette, green dots indicate proposed changes to current zoning, which had previously been reviewed and discussed by the Woodstock Neighborhood Association's Land Use Committee. The changes include the following zoning changes from R5 to Mixed Use:

- Two parcels adjacent to and south of Otto's (MapApp proposal #441)
- One parcel adjacent to and south of Woodstock Hardware Garden Center (MapApp proposal #732)
- The southern half of the entire block behind The Joinery (MapApp proposal #55)

Charrette participants overwhelmingly agreed to these proposed changes on the basis that local businesses were likely to need to expand in the next 20 years and the neighborhood would like to make that possible in order to keep them here.

In addition, the neighborhood supports the following two zone changes proposed for the purpose of map "clean up":

- The small strip of property behind Grand Central Bakery and Portland Fish Market (MapApp proposal #54)
- The parcel south of Woodstock Library currently used as the library's parking lot (MapApp proposal #739)

In keypad polling at the December 4, 2014 Woodstock Charrette finale, nearly 80% of participants supported a proposed zone change from R1 to Mixed Use for properties facing SE Woodstock Blvd. (on both sides of the boulevard) between SE 50th Ave. and SE 52nd Ave. (see WCR, p. 29).

Alternative Proposal for Further Expansion of Woodstock's Mixed Use Zone

At Woodstock's February 18, 2015 Land Use Committee (LUC) meeting, attendees took a closer look at the map of proposed zone changes for our Neighborhood Center, and a new idea emerged—to fill in the gap-toothed nature of the southern half of the block between SE Woodstock Blvd. and SE Martins within the current commercial corridor. While they debated what the best boundaries of such expansion might be best — SE 41st to SE 49th or SE 40th to SE 52nd — the committee began to envision the full block along that entire one block strip as solidly and consistently rezoned for Mixed Use.

When the Land Use Committee shared this idea at the subsequent Woodstock Neighborhood Association general meeting on March 4, 2015, a substantial majority of 23 attendees supported expanding mixed-use zoning between SE 40th and SE 52nd in a straw poll. However, this is a relatively recent proposal, and hasn't had time for full study, let alone vetting by the larger neighborhood community. In further study, we may want to consider similar expansion north on certain blocks between SE Woodstock Blvd. and SE Knight. But until the city's final definitions and regulations for the new mixed-use zone designations are finalized, we cannot make a fully informed recommendation on further expanding outright or designated MU zoning north and south of Woodstock Boulevard.

Request for Lower Intensity MU Zone; Especially Adjacent to Residential Zones

In considering the most appropriate mixed-use zone designation for Woodstock's small Neighborhood Center, and especially the expansion of the MU designation as discussed above, we cannot overemphasize the importance of ensuring good transitions to buffer and soften the impacts of increased mixed-use development on residential areas closest to Woodstock's Neighborhood Center. When a zone change from Residential to Mixed Use is proposed for properties adjacent to or across a local street from existing residential zoning, it makes sense to apply the lowest intensity Mixed-Use Zone possible—likely MU1, which according to the latest proposal would allow buildings up to 35 feet in height. We would also request lower profile (MU1) designation for parcels being transitioned from R1 along Woodstock Blvd.

Support for Proposed Residential Zone Change North of Reedway

The Woodstock Neighborhood Association's Land Use Committee proposed and supports down zoning to R5 of all parcels designated R2.5 from SE Reedway to SE Ellis, between SE Cesar E. Chavez and SE 40th, and the half block just east of SE Cesar E. Chavez from SE Ellis to include one parcel north of SE Harold (i.e., MapApp proposal #427). Increased development in that area would simply be inappropriate due to the terrain—an unimproved road that runs through a deep gully—and apparent slope instability.

Also we would request that the one block area from SE Reedway to SE Woodstock, which is currently designated R 2.5, retain the designated status in order to increase

the possibility of preserving some historic homes in that stretch along SE Chavez.

Value and Importance of Neighborhood Planning

Woodstock Neighborhood Association visioning sessions have consistently drawn good numbers of local residents and business people interested in helping determine the shape of future development in the Woodstock Neighborhood Center.

We strongly desire tools that will give our neighborhood as much local control as possible in guiding the future shape of our village center. The people who live and work in Woodstock know our neighborhood best, and we have its best interests at heart, including an interest in seeing local businesses thrive and grow. The community desires more proactive involvement in the decision-making process around the design of both commercial and residential developments in our neighborhood; currently we are only notified when there are discretionary approvals (adjustments, zone changes, etc).

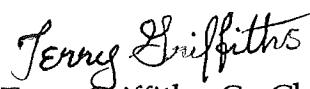
Whether a Centers Overlay Zone, a Neighborhood Plan Update, or some other mechanism, we wish to have the ability to make recommendations and give constructive feedback in regard to development that will inevitably impact Woodstock. We will welcome the opportunity to have input to the city's study of code changes that might slow the current trend of demolitions and oversized homes that threaten not only the character, but also the affordability of our neighborhood.

Lastly, we request that the plan not inadvertently erode or weaken Portland's unique and highly valuable neighborhood association and coalition system by deleting references to or definitions of neighborhood associations from the comprehensive plan. Rather, the draft comprehensive plan should be amended in a way that not only retains, but expands the existing role of the neighborhood associations. Involvement in planning and land use matters of those who have the best knowledge of and the biggest stake in their neighborhood makes sense on many different levels.

We thank you in advance for your time and attention to this matter. We believe the future of Woodstock is bright and are excited about the options and work that lay ahead. Please do not hesitate to contact us if we can provide more detail or be of assistance in your decision making process.



Becky Luening, Chair
Woodstock Neighborhood Association
5209 SE 60th, Portland, OR 97206



Terry Griffiths, Co-Chair
WNA Land Use Committee
4128 SE Reedway, Portland, OR
97202



Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

March 12, 2015

Subject: PSC Comprehensive Plan Testimony (TSP)

Dear Planning Commissioners:

In addition to previous submitted testimony, the Working Waterfront Coalition (WWC) is submitting this letter regarding Portland's Transportation System Plan (TSP) as part of the Comprehensive Plan update. The WWC's previously submitted testimony on January 21, 2015 asked that the Planning and Sustainability Commission's recommended draft of the proposed Comprehensive Plan recognize the importance of harbor businesses to the economy and middle-income job growth; reduce regulatory burden and provide predictability for development and redevelopment; provide an adequate supply of developable harbor industrial land with acceptable site characteristics; and ensure that policy language is balanced to accomplish the above.

In addition, the WWC would like to take the opportunity to reinforce the message regarding the importance of Portland's freight transportation system to Portland's industrial areas, and how critical it is to the success of Portland waterfront properties.

Portland's freight transportation system supports the growth, expansion and productivity of industrial businesses. Without a strong freight system, growth and expansion are compromised and harbor business productivity is impacted. The transportation freight system allows for the efficient movement of goods and services, and access for employees to and from their living wage jobs.

The WWC requests that considerable weight be given to TSP projects that improve freight mobility and access to industrial lands and employment. Further, we encourage the use of city transportation funds to ensure those priority projects are implemented. We appreciate the opportunity to comment.

Sincerely,
Jack Isselmann
Jack Isselmann, President

Established in 2005, the Working Waterfront Coalition, with its extensive knowledge of harbor industry needs and active industry participation, is dedicated to working with its partners to ensure an appropriate balance between environmental concerns and the needs of river-related, river-dependent employers. Portland's Harbor is a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. In addition, WWC members are conscientious stewards of the environment, making significant investments in the harbor consistent with state and federal laws and regulations to reduce the impacts of human activity on the harbor's ecological resources.

March 12, 2015

Portland Planning and Sustainability Commission
1900 SW 4th Ave.
Portland, OR 97201-5380

The Crestwood Neighborhood Association has reviewed the TSP and would like to submit the following comments on the projects that it feels are of value to the Crestwood neighbors.

Outer Taylor's Ferry Road (Barbur Blvd to 60th) - TSP project #90064:

We would like this to be on the "constrained" list. Outer Taylor's Ferry Road is the only way for us to get to West Portland Crossroads and suffers from a lot of motor vehicle traffic from Washington County and the I-5 ramps leading to PCC. It's also needed to support the SW Corridor Plan since all its proposed routes go through West Portland. This project should be "segmented" to prioritize the segment from Capitol Highway to SW 48th, and "re-scoped" to build just a sidewalk on the south side and an uphill bike lane on the north side. We feel that this revised scope would address the critical portion of this project and would also allow the city to address the broken fence near SW 43 and Taylor's Ferry Rd (a safety concern that the city has been ignoring for many years).

Capitol Highway (Multnomah to Taylors Ferry) - TSP Project #90026:

This is a very important project to Crestwood as it connects two major communities: Multnomah and West Portland Crossroads. Without it, pedestrian and Bike transit along Capitol Highway is very difficult and not very safe.

Markham Pedestrian Bridge (from SW 48 over I-5 to Markham School) - TSP Project #90048:

Due to the hilly terrain in Southwest Portland, this bridge provides a way for our neighbors to access the businesses in West Portland Crossroad without having to hike down the gully on Taylor's Ferry Road. This would help our neighborhood become a "20 minute neighborhood".

SW 45th (Cameron to Taylors Ferry) - TSP Project #90008:

Again, due to the hilly terrain in Southwest Portland, SW 45th is difficult for pedestrian and bike travel between SW Vermont and SW Taylor's Ferry Road. This project would allow neighbors to use modes of transportation other than their cars.

Sincerely,

John Prouty, Vice-President
5262 SW Taylor's Ferry Road, Portland, OR 97219
Crestwood Neighborhood Association
CrestwoodNABoard@gmail.com



March 12, 2015

Portland Planning and Sustainability Commission
c/o Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Dear Commissioners:

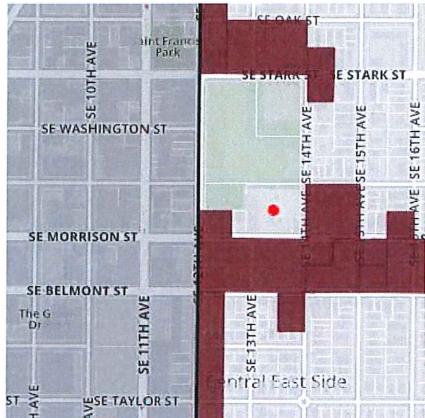
Portland Public Schools (PPS) asks that its property (R150599) near the intersection of SE 14th and SE Morrison be included in new Mixed Use zoning that implements the Comprehensive Plan Update.

Although this site is owned by PPS, it is not anticipated to be needed for educational purposes and has been declared "surplus" by the PPS Board of Education. The site is 57,182 square foot and zoned High-Density Multi-Dwelling Residential (RH) with an allowed 4:1 Floor Area Ratio and a height of 75 feet. At this location, the RH zoning doesn't allow ground floor commercial uses.

The site is located on a block which directly abuts the Central City Plan District, is well-served by mass transit, and well-positioned to support neighborhood preservation efforts by concentrating new development on a “civic” corridor. Additionally, it is surrounded predominately by Commercial Storefront (CS) zoning and existing development in the vicinity is mixed-use.

PPS believes that Commercial Mixed Use 3 (CM3) zoning is appropriate for the site for the following locational reasons:

- on a civic corridor, close to the Central City;
 - served by frequent-service transit;
 - located in an area planned for more intense mixed-use development; and
 - directly adjacent to proposed Mixed Use – Urban Center zoning by the Bureau of Planning and Sustainability (*see graphic below, PPS property designated by red dot*).



CM3 zoning will allow for redevelopment that better meets the intention of the Comprehensive Plan Update and better serves the neighborhood through a broad array of retail, service, and office uses that promote local

employment and housing opportunities and minimizes impacts to the historic residential fabric of Inner Southeast Portland.

PPS has not yet discussed this request with the Buckman Neighborhood Association, but intends to do so in the coming weeks. Thank you for taking the CM3 zoning request for PPS surplus property near SE 14th and SE Morrison under consideration.

Regards,



Sara King, AICP

Program Director – Planning and Asset Management
Portland Public Schools

CC: Joe Zehnder, Chief Planner, Bureau of Planning and Sustainability
Marty Stockton, District Liaison, Bureau of Planning and Sustainability
Tony Maglano, Chief Operation Officer, Portland Public Schools



BUCKMAN COMMUNITY ASSOCIATION

c/o Southeast Uplift 3534 SE Main Portland, OR

(3) 236-2214

March 12, 2015

Planning and Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97214

Dear Chair Baugh and fellow PSC Commissioners,

At the March 12th monthly meeting of the Buckman Community Association, the BCA Board voted write a letter to urge the Commission to leave in place the existing zoning of four contiguous blocks of **SE Morrison and Belmont from 15th to 19th Avenue** and to reject the proposed change. This was our second recent discussion on this proposal. Both meetings have been well attended with many neighbors expressing their concerns and opposition.

Our reasons for opposing the proposal and for requesting this area be dropped from this large scale "upzoning" effort include:

The proposed creation of four solid blocks of mixed use development will result in rows of full blocks of 4-5+ story high dense apartment buildings loaded with high-rent studio apartments.

Many residential homes and units currently exist here and provide affordable housing options that are diverse in layout and more family-friendly. These would be threatened and likely demolished.

The mixed use (CS) zoning is currently being used to build exclusively large, dense, residential structures with no commercial, little to no set-backs, no amenities, and with expensive, small studio apartments.

These blocks are within three blocks of 12th Avenue where block after block of ExD zoning currently exists, and where the large former section of residential Buckman was already demolished decades ago to make room for business and high-density growth.

Residential Buckman has historically endured periods where large chunks of the historic homes have been demolished. This proposal continues that trend to further destroy this neighborhood historic character and resources.

Although the Association was not informed directly of this proposal, when we discovered it, planning staff originally presented this rezoning proposal as a "non-conforming" use issue. Yet In fact within these 4 solid blocks are dozens of housing units properly zoned and conversely the rezoning itself would create dozens of non-conforming structures.

This section of SE Belmont and Morrison is almost exclusively residential and an important and essential bridge between the area around Buckman School and our children's park at Colonel Summers. Creating a four block tower of five story apartment blocks creates a wall and barrier, damages the livability of the residences that line the opposite sides of Belmont and Morrison and effectively divides the neighborhood.

In stark contrast to upzoning this stretch of residential Buckman, many residents have instead spoken for years of "decoupling" the Morrison and Belmont couplet and restoring two way traffic on Morrison to slow it down and enhance its residential feature. The proposed changes would conversely intensify the street immensely.

The existing R1 housing options in this area is *welcomed* in Buckman as opportunities for other than studio rental housing options. Recently two successful R1 developments have been built in Buckman which have created larger housing units suitable for housing families with children, an ongoing and long term goal of the Association. We do not want to lose the R1 along Morrison and Belmont.

Existing robust commercial corridors lie just three blocks west from 12th Avenue to the river and one block east from 20th Avenue to Cesar Chavez. We are not deficient in this category.

There are many more reasons why we believe the zoning should remain the as it is which we welcome to present directly to the Commissioners at any time.

14th and SE Stark:

In addition to the rejection of the proposed zoning changes from SE 15th-19th, the Association also unanimously voted to reject the proposed rezoning of two properties on SE Stark at 14th to CS from R1.

These reasons include:

Again, the R1 underlying zoning is acceptable and welcomed on this street as it is on SE Morrison and Belmont. In this case, it helps to maintain these low relief but popular incubator commercial spaces.

This area has already been completely "over-activated" recently with the sweeping switch without any conditional use process of 65,000 sq. ft. Washington High School from residential to 100% private commercial space. In addition to the numerous offices and business tenants, it now also has an 1100 person venue scheduled to be open 7 nights per week all within a residential neighborhood with a extremely limited parking

The area does not need further "activation".

Concern for the loss of sunlight for neighbors behind the properties which with CS zoning could now be built up 4-5 stories.

Finally, while the Board did not have time to weigh in on the rezoning of a large swath of Buckman between SE 17th and 19th from r-5 to R2.5, we have heard from neighbors quite concerned about this move.

The R5 designation was hard fought in the years of massive demolitions and open turn of the century house burnings allowed in the area for the development of track apartments in the 1960's and 70's. Maintaining options for families, for home ownership in a neighborhood with over 80% rentals is critical to supporting the schools, the parks and stabilizing the community. While much of residential Buckman is already zoned R2.5, R1 or contains apartments built in the CS zones, the interior areas away from the main streets have been kept at R5 to help maintain and protect the housing stock. Yet, by some intense focus and scrutiny, this area is now all blocked out to be upzoned. We ask for a relook at Planning staff's move to rezone this area, for further understanding of the historical and cultural reasons for the needed R5 in the is area, and for it to be left as it is for now.

The Comprehensive Plan is a work to make our city a better place for the future. We at the BCA share that desire to work to preserve what is good and change what should change. In these aforementioned places, and with a great deal of community support and concern, we strongly request these proposals be removed.

Thank you for all the work you do, and for listening to those, who like you, care so much about this city.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Sue Lindsay". It is positioned above a horizontal line that extends across the page, ending in a stylized flourish.

Susan Lindsay
Co-Chair, Buckman Community Association



HBBA 2015-16 Board Members

Officers

Cassie Ridgway,
Interim President
Altar

Miranda Levin, V. Pres.
Memento

Liz Potter, Secretary
New Seasons Market

Greg Moon, Treasurer
Western Seminary

Directors:
Matt Galli
Fred Meyer - Hawthorne

Roger Jones
Aetna Brokerage

Bruce Chaser
Well Adjusted, LLC

Shelly Arnold
Rivermark Community Credit Union

Hilda Stevens
BAZI

Gabrielle Mercedes Bolivar
Mainspring Portland
(formerly FISH)

HBBA Mission

to promote the general business welfare of the businesses and all members of this Association and generally of all businesses bordering SE Hawthorne Boulevard from SE 12th Avenue to SE 60th Avenue and, HBBA promotes, develops and preserves Hawthorne Boulevard through community involvement, as a desirable place to work, shop and live.

Hawthorne Boulevard Business Association
P.O. Box 15271
Portland, OR 97293-1271
(503) 775-7633

March 12, 2015

To: Bureau of Planning & Sustainability

From: Hawthorne Boulevard Business Association (HBBA)

Re: 2035 Comprehensive Plan Proposed Draft – July 2014
Portland Mixed Use Zones Project document – 2/25/2015
Slide #1, page 29

The HBBA Board of Directors voted on March 11, 2015 to respond to the 2035 Comprehensive Plan Proposed Draft specifically regarding **building height** and the lack of proposed step back within the rules for the 80' Right of Way streets (i.e. Powell and Sandy).

This classic Streetcar Era District does not fit the Civic Corridor definition (Policy 3.38) and finds “mid-rise” development of 4 to 6 stories disrespects the neighborhood character of the Boulevard which is already constrained to the point that bicycles are forced to transit the area by way of SE Salmon and SE Lincoln/Harrison. Hawthorne most clearly aligns with Neighborhood Corridor (Policy 3.42).

Recommendation: Define Hawthorne Boulevard as a Neighborhood Corridor.

We propose it would be preferable to place 70' ROW streets in the 60' ROW (ie Belmont, Division) arena. Hawthorne and other 70' streets are generally more traditional Main Streets with narrower sidewalks and a traditional feel to them. We believe it would be disruptive to the ambience, mass and scale of the District to create a designation that allows more 4 story buildings without a step back above the 3rd floor.

Recommendation: Change the ROW footage to < 75' in order to include Hawthorne Boulevard with the 60' ROW designation.

We also encourage requiring a step back after the 3rd floor to better integrate into the residential areas to the north or south in order to not overpower the existing fabric between the commercial and the residential community.

www.hawthornebpd.com

EIN: 93-0886868

Jill Kilpatrick Souede
1517 SW 61st Drive • Portland, OR 97221
503.927.1502 • jillsouede@gmail.com

March 12, 2015

VIA EMAIL

Matt.Wickstrom@portlandoregon.gov and psc@portlandoregon.gov

Re: Proposed Redevelopment of 6400 SW Canyon Court

Dear Mr. Wickstrom:

It has come to my attention that a proposal for redevelopment of the property located at 6400 SW Canyon Court (the “subject property”) has been filed with the City of Portland.

The Subject Proposal.

According to the Type II proposal, the applicant plans to place four apartment buildings comprised of 266 dwelling units and 311 parking spaces on the subject property.

SW 61st Drive, SW Canyon Court, and the Surrounding Neighborhoods Cannot Accommodate Increased Pedestrian and Motor Vehicle Traffic.

SW 61st Drive is a small, winding, tree-lined road with little room for the current traffic it somehow accommodates. The road has neither sidewalks nor anything that could be called something close to a shoulder. This means that all pedestrian traffic is directly on the road. In addition, SW 61st Drive provides a “shortcut” access point to Burnside Street heading downtown and Barnes Road heading the opposite direction. **Make no mistake: increased traffic on SW 61st Drive with the addition of the apartments will result in serious if not fatal human injury.** It is already a dangerous road for pedestrians with its tight twists and turns resulting in blind corners.

The entrance from Skyline Boulevard to SW Canyon Court winds directly in front of East-West Sylvan Middle School. A blind, nearly 90-degree corner with a crosswalk cutting across it is between the Skyline and the proposed property. Cars often drive too fast around that corner, nearly striking middle school students attempting to cross the street. The increase of 311 cars to this road would be ridiculous.

Conflicts with Current Neighborhood.

The current neighborhood has a rural, community feel. My husband and I moved into the neighborhood because of its natural, forested environment. The addition of a few houses to this area would not ruin this; however, multi-family housing units are not consistent with the intent of the neighborhood. The destruction of this area would be a devastating loss for the City.

Insufficient Public Transportation.

It is easy to see by looking at a TriMet map that this area has none of the proper infrastructure to support the addition of large densities of people. This means that more cars than might usually be associated with such developments will be accompanying any new occupants.

Current Multi-Family Housing.

Canyon Court already offers multi-family housing units. The Commons at Sylvan Highlands has 287 units ranging from studios to 2 bedrooms. Additionally, condos at the edge of Canyon Court offer even more housing options. Multi-family housing abounds on Barnes Road and the surrounding area, with better public transportation. The proposal for the subject property serves no need other than capital gain for the current owners.

The proposal for the subject property would nearly double the housing already offered by the Commons at Sylvan Highlands. The strain on this rural area tucked behind Mt. Calvary Cemetery would be severe. In summary, it is clear that the granting of the redevelopment proposal for the subject property would be a huge mistake.

Very truly yours,

Jill Souede

March 12, 2015

Portland Planning and Sustainability Commission
1900 SW 4th Ave.
Portland, OR 97201-5380

In support of official comments from The Crestwood Neighborhood Association, with additional input.

Outer Taylor's Ferry Road (Barbur Blvd to 60th) - TSP project #90064:

We would like this to be on the “constrained” list. Outer Taylor’s Ferry Road is the only way for us to get to West Portland Crossroads and suffers from a lot of motor vehicle traffic from Washington County and the I-5 ramps leading to PCC. It’s also needed to support the SW Corridor Plan since all its proposed routes go through West Portland. This project should "segmented" to prioritize the segment from Capitol Highway to SW 48th, and "re-scoped" to build just a sidewalk on the south side and an uphill bike lane on the north side. We feel that this revised scope would address the critical portion of this project and would also allow the city to address the broken fence on the overpass near SW 43 and Taylor’s Ferry Rd (**which is a bridge safety feature badly compromised by an auto accident, and is the only separation between a dangerous stretch of Taylors Ferry road and a child eating, rodent infested ravine that is one mother of a lawsuit about to happen, and the city with no defense as they admit they own the liability**).

Capitol Highway (Multnomah to Taylors Ferry) - TSP Project #90026:

This is a very important project to Crestwood as it connects two major communities: Multnomah and West Portland Crossroads. Without it, pedestrian and Bike transit along Capitol Highway is very difficult and not very safe.

Markham Pedestrian Bridge (from SW 48 over I-5 to Markham School) - TSP Project #90048:

Due to the hilly terrain in Southwest Portland, this bridge provides a way for our neighbors to access the businesses in West Portland Crossroad without having to hike down the gully on Taylor’s Ferry Road. This would help our neighborhood become a “20 minute neighborhood”.

SW 45th (Cameron to Taylors Ferry) - TSP Project #90008:

Again, due to the hilly terrain in Southwest Portland, SW 45th is difficult for pedestrian and bike travel between SW Vermont and SW Taylor’s Ferry Road. This project would allow neighbors to use modes of transportation other than their cars.

Sincerely,

Tony Hansen, President, Crestwood Neighborhood Association
10450 SW 55th Ave Portland OR 97219

3832 SW Corbett Ave.
Portland, OR 97239

March 12, 2015

RECEIVED
PLANNING BUREAU

2015 MAR 13 A 9:32

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

Dear Sirs & Madams,

I am writing to comment on the Draft 2035 Comprehensive Plan.

- 1: Neighborhood associates are critically important for citizen involvement and should be strengthened.
- 2: The plan should be amended to define neighborhoods by neighborhood association boundaries.
- 3: Seats on the commission should be created for each neighborhood coalition and on all land use committees.

I am baffled by the land use decisions being made in Portland the past few years. It's extremely disturbing watching beautiful and functional old buildings and large old trees being destroyed for the sake of density, which in the process, destroys livability. This isn't sustainability.

Looking at two recent examples. In my early SW Portland neighborhood, two doors down from my house, a 7-story 48-unit apartment building is under construction with only 12 parking places. My neighbors and I were not ever, at any time, informed of this project or construction. Most of the original houses are 2-story Victorians that depend on on-street parking. There is no grocery store, drug store, shops, restaurants, libraries, or other resources within a mile walking distance and most of these resources are even further away. The added density and associated noise alone will decrease the quality of life in this neighborhood, not to mention the aesthetic damage. In a contrasting development, a new, large 1-story building with a large surface parking lot is under construction in Hillsdale town center on SW Capitol Hwy directly across from a grocery store, bakery, restaurant, nearby library, drug store, a vibrant farmers market, and more. The building in the town center would be far better suited for upper story apartments! Who made these decisions and approved them? Where was the citizen and neighborhood participation? The impression both these developments leave is that developers are in charge, that there is no planning nor sustainability.

I urge the Planning and Sustainability Commission to embrace protecting, in a sustainable manner, Portland.

Sincerely,



Sha Gleason

Pauline Duffy

2735 S.E. 28th Avenue
Portland, OR 97202
Phone: 503-233-4652

RECEIVED
PLANNING BUREAU

2015 MAR 13 P 1:24

Planning and Sustainability Commission
1900 SW Fourth Avenue
Portland, OR 97201

March 12th, 2014

Re: Draft 2035 Comprehensive Plan

Dear Commissioners:

I am very concerned about many aspects of the draft 2035 Comprehensive Plan. It is replete with ambiguous language and is missing metrics that could be used to evaluate whether the plan is working and if its goals are being met. As it stands, it appears to greatly dilute the power of Portland's neighbourhood associations. Also, under the current schedule many details won't be finalised until after it is adopted by your office and forwarded to the City Council. This is the antithesis of community involvement.

I ask that at the very minimum the draft plan should be amended to:

- require the city to coordinate land-use planning by providing notice of official hearings to the neighbourhood associations, as in the current plan;
- that neighbourhoods continue to be defined by their association and geographic boundaries, and the existing role of neighbourhood associations not only be retained but expanded;
- that you create a seat for each neighbourhood coalition on the commission and on all major land-use committees.

Meaningful neighbourhood involvement is essential if Portland is to attempt to maintain a livable city. This is a draft plan and I respectfully ask you to consider the very constructive feedback you are being provided by thoughtful, knowledgeable and caring residents.

Yours sincerely,



15449 N.W. Melody Court
Beaverton, Oregon 97006
March 11, 2015

Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

Dear Commission,

I am writing in reference to the property located at 1309 SE Linn Street, Portland, Oregon 97202, which I am the owner.

I understand the Comprehensive Plan Map designation for this property presently is “Store Front Commercial”.

I am requesting that zoning remain the same, as present: “Storefront Commercial”.

Thank you very much for your consideration.

Sincerely,

Dorothea M. Fleskes
(503) 645-4231

March 12, 2015

Dear Planning Commissioners and Staff:

We live at 1414 SE Oak Street which abuts 1403-1415 SE Stark, a nonconforming property which the city wants to up zone to commercial from R1.

Unfortunately a commercial designation doesn't require any retail space and could have the opposite effect of the current building being torn down and a dense apartment building being built with no benefits to the neighborhood. For this reason if the city decides to rezone this property it should be CM-1 with the most restrictive FAR under this designation. It should also require retail space on the first floor.

A design review should be required on all new commercial properties with a neighborhood notification requirement. This would help neighborhoods have some self determination, which we believe is in line with our collective American values. Why should a developer have the sole say in what is built when their motivation is profit and most of them do not even live in the neighborhood. Great cities are built with a common vision and goal.

Parking is another concern that needs to be addressed. The city requirement that buildings within 500 ft of a bus line need only to have parking for 25% of the units is a fallacy. PBOT's own study confirms that 65% of apartment dwellers own cars. They may not drive the car to work but they still need a place to park their car. Allowing dense apartments up against single family residential neighborhoods without proper planning for parking overwhelms the adjacent residential streets.

Washington High School was recently flipped from R1 to commercial without any conditional use review. The adjacent neighborhoods are reeling from the influx of a 850 seat, 200 plus events/year venue. City planning was severely lacking with a PBOT requested parking study canceled by BDS. Because of this more commercial zoning is not needed here.

Finally I believe that a more transparent process is needed to rezone a property. When one planner gets too much power something is amiss. A

open process is the democratic way. Three minutes in front of a planning commission with no idea of who is making the zoning proposals is not transparent enough for us. On top of this citizens at this time have only a draft of what the final zoning laws or designation will be. Things need to be slowed down. Democracy is a messy business but it is the way of our country.

In closing I would also like to say we support Chip Rees, Christine Yun and Shelia Baraga letters regarding zoning in the Buckman.

Thank you for your consideration.

Rick Johnson and Patricia Cain , Homeowners

1414 SE Oak Street

Portland, Oregon 97214

3/12/2015

ATTN: Leslie Lum,

My name is Richard Surgeon, I own the property at 9000 NE Levee Rd. I've owned this property for 35 years. I have been pursuing having my property changed to R-20 for years, just to be shot down every time by red tape because of it's current zoning and environmental overlays.

I support the attached proposal for an R-20 zoning change request of my residential farming property by removing the Industrial Sanctuary designation. This Industrial Sanctuary designation should never have been placed on our properties. There have been many other Residential housing developments in our neighborhood, such as the Blue hearing development that (I believe) shows that this proposal is the most realistic way to utilize our properties in the future. It will also allow balance that truly respects the home owners residential livability and a real biodiversity of a natural habitat.

I hope this helps you to be inclined to support this proposal.

Thank you for considering my wishes

Richard Surgeon

"Land Use Request" for Plan Map Designation Change from Industrial Sanctuary to Residential (R-20) as Part of the Comprehensive Plan Update

Location: East Columbia Neighborhood; abutting or using access to NE Levee Road and unimproved NE 13th Avenue

Property IDs: R171711 (9009 NE Levee Rd); R171707 (9000 NE Levee Rd); R171713 (8855 NE Levee RD); R171708 (8916 NE Levee Rd); R171709 (8850 NE Levee Rd); R171714 (vacant, no address); R171716 (vacant, no address, same ownership as abutting lot R17119 to the north)

Existing Zoning: RFhp (RF: Residential Farm/Forest, h: Aircraft Landing Overlay Zone, p: Environmental Protection Overlay Zone); RFch (c: Environmental Conservation Overlay Zone); RFhpX (x: Portland International Airport Noise Impact Overlay Zone); RFchx; RFhx; and RFh

Existing Plan: IS: Industrial Sanctuary; ISb (b: Buffer)

Considerations:

- I. "Change in Circumstances" since enactment of the Industrial Sanctuary Designation
 - A. In 2011, as part of the Middle Columbia Corridor/Airport Natural Resources Inventory, this area received substantial coverage of the Environmental Overlay Zoning of "p" protection and "c" conservation (see zoning map included). That map shows the "p" and "c" overlay zones covering: approximately one-half of four of the properties; one-third of one property; two-thirds of one property; and all of one property.
 - B. The extensive coverage of the "p" overlay zone is important for future development potential. As characterized in the Zoning Code website "Zone Summaries": "The Environmental Protection zone provides the highest level of protection to the most important resources and functional values. . . . Development will be approved in the environmental protection zone *only in rare and unusual circumstances.*" [Emphasis added]. The environmental zoning appears to have taken the majority of this area out of potential development in the future. As such, any development, in particular industrial development with its large buildings and extensive paving associated with heavy truck traffic, would not be anticipated to be approved or occur in the majority of this area with the Plan designation of Industrial Sanctuary.
 - C. The portion of the lots not covered by environmental zoning is where there are five houses with a total improvement value of over \$655,000. A reasonable expectation is that these homes outside the environmental zoning would be less likely to be developed for industrial uses due to the existing improvement values and the relatively small acreage not in the "p" or "c" zones.

II. R-20 Zoning Request

- A. R-20 zoning would match and be compatible with the zoning to the immediate north.
- B. R-20 residential zoning would protect environmental resource values by not developing those areas and yet add a few additional new home sites concentrated in the area of NE Levee Road outside the "p" and "c" zones. In addition, there could also be the possibility of application by individual property owners for small Planned Development lots located outside the environmental zones. A Planned Development can result in a lot density closer to the development potential of their entire property.
- C. A buffer between industrial and residential uses already exists in the abutting industrial zoned (IG2h) property to the south. Along the industrial property's northern boundary is a 50-foot wide buffer strip zoned IG2bh. The "b" buffer zone was a condition of approval of the industrial development and was enacted to serve as a "buffer" to reduce adverse effects between incompatible land use attributes, such as noise, lights, and views.
- D. It is recognized that there is a "need" to maintain adequate planned areas for future industrial growth. However, continuing to include this area in the inventory of acreage to fulfill future industrial need could be viewed as representing a false acreage number in that inventory. That is because the majority of the acreage is covered by undevelopable environmental zones and, except for one smaller lot, the remaining acreage is already developed with housing, significantly reducing the conversion to industrial land use.

III. Transportation and Access Issues

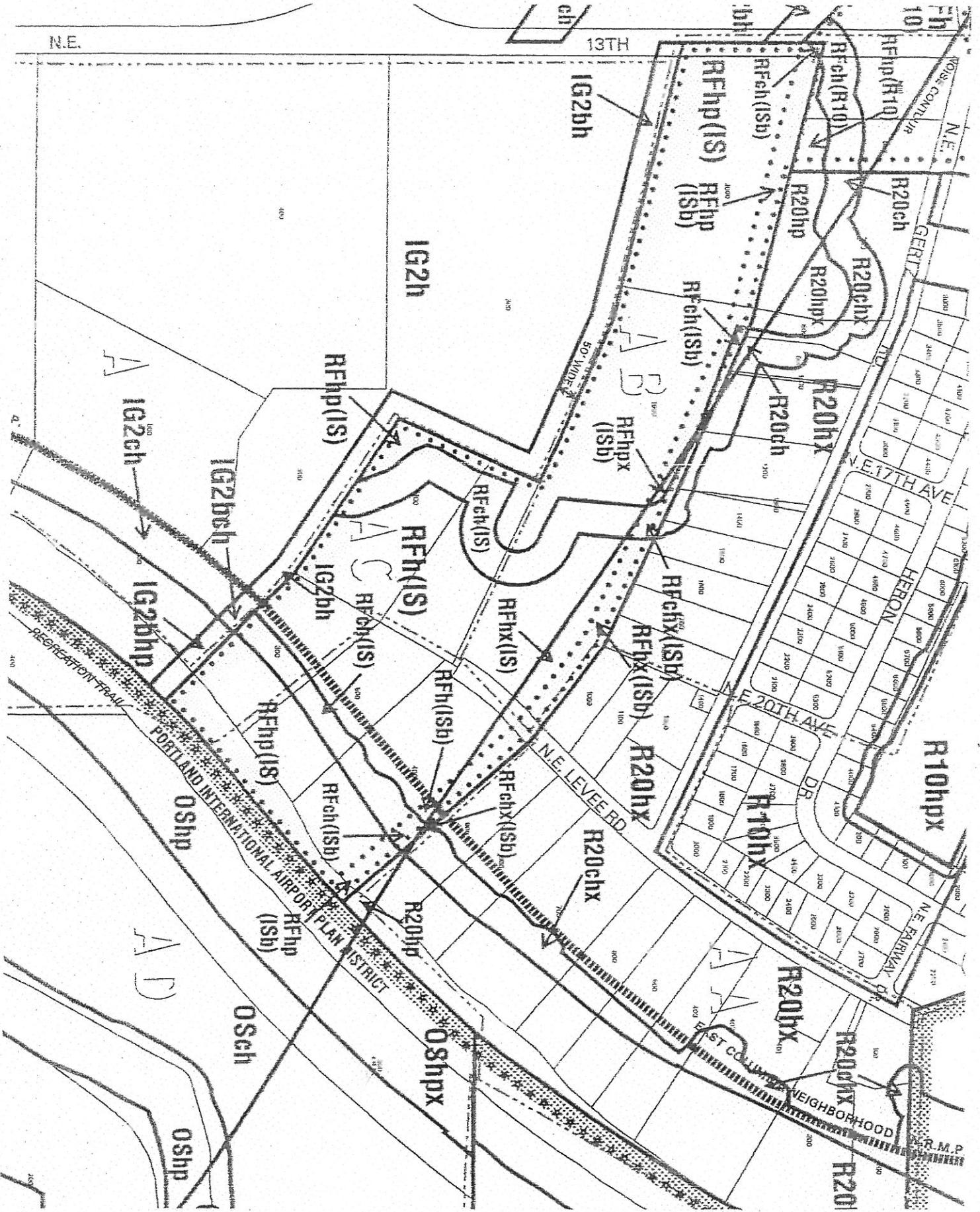
- A. The homes in this area gain access to the public road system only through NE Levee Road to NE Gertz Road, which are both narrow, two-lane, local streets without full improvements. There is no outlet to the east because of a major drainage slough; to the west, NE Gertz Road contains a major truck barrier (tight radius traffic circle) constructed to keep large industrial truck traffic from the nearby residential neighborhoods; and NE 13th Avenue is posted with "no truck" signs at NE Marine Drive. Therefore, there is no legal large truck traffic route to this area from the north.
- B. The industrial property to the south has existing frontage and access necessary for truck traffic on a portion of NE 13th Avenue south of the unimproved part of NE 13th which effectively disconnects the industrial traffic from the residential streets to the north. To the west, the industrial road system connects via NE Fazio Way and NE Gertz Road, to NE Vancouver Way.
- C. In summary, the road system to the north of this area does not allow industrial truck traffic and the property owner to the south does not appear to have the incentive to provide a road system through the property to reach the small developable (not environmentally zoned) part of the subject ownerships.

IV. Environmental Zoning Placed on Industrial Sanctuary Planned Properties Was Contrary to Directives to the City of Portland in the Gunderson, LLC vs. City of Portland LUBA Decision (affirmed by the Oregon Court of Appeals and Oregon Supreme Court)

- A. In January 21, 2011, three months before the "Airport Futures" Comprehensive Plan Update and associated zone changes were adopted in April 2011, the Land Use Board of Appeals (LUBA) ruled that the adopted environmental restrictions (in this case Willamette River Greenway zoning provisions) placed on industrial properties in the "North Reach River Plan" were overturned because such environmental restrictions in effect reduced the amount of industrial lands without taking that reduction into account in accordance with Division 9 Administrative Rules for Statewide Planning Goal 9 Industrial Development. The Gunderson vs. City of Portland LUBA decision stated on page 11, lines 13 through 24 the following:

Because the likely result of applying the new regulations is that the city's supply of land potentially available for new or expanded industrial development would be effectively reduced, perhaps significantly so, it is incumbent on the city to consider the impact of such potential reductions on the city's industrial land supply and determine, based on an adequate factual base, whether any such impacts on the inventory are consistent with the city's Goal 9 obligation to maintain an adequate supply of industrial land. To do so, the city must necessarily (1) undertake to quantify to the extent necessary the number of acres the new regulations will likely remove from potential industrial development, compared to the existing acknowledged regulations, and (2) evaluate the impact of any net reduction in land supply on the city's Goal 9 inventory of industrial lands. The second step will entail making at least some determinations regarding the adequacy of the city's industrial land supply, before and after application of the new regulations.

- B. In recognition of the Gunderson decision, industrial property owners within the "Airport Futures Plan Area" demanded in hearing testimony that the proposed environmental zoning overlay zones be removed from their properties prior to the Comprehensive Plan and Zoning Map amendments being adopted. The "Airport Futures" plan and zoning changes were adopted soon after (April 2011). The request by industrial land owners for the city to remove the environmental overlay zones was followed/complied with for all non-governmental industrial lands **except** the subject NE Levee Road properties. Within the "Airport Futures" area, the NE Levee Road Industrial Sanctuary properties were the only privately owned properties in the industrial lands inventory that had environmental restrictions placed on them. No analysis of the developable industrial acreage lost due to the environmental zoning was ever done, in blatant disregard of the Gundersun vs. City of Portland requirements.
- C. Since the City of Portland chose to not comply with the requirement to determine the amount of acreages lost and the resulting impact on the industrial lands inventory as a result of the extensive environmental overlay zones mapped on the NE Levee Road properties, then we must conclude that the city never intended to actually ensure that the properties were available for later industrial development. The city cannot have it both ways: count the properties in the industrial inventory and also apply environmental zoning to severely restrict their later use as industrial properties.
- D. In conclusion, the Industrial Sanctuary Comprehensive Plan designation for the subject properties should be removed.



Our neighborhood, Humboldt, is suffering from the whole scale demolition of single family homes.

This includes the clear cutting of established trees on these properties by developers who only pay a few hundred dollars into the "Tree Fund", which does not plant replacement trees in our neighborhood, and results in a net loss of trees and habitat for birds. This in a city which prides itself on valuing trees!

In a neighborhood composed of one and two story homes, developers are cramming in three story duplexes, with two-car garages on the alley and two ADUs built over the garages.

Our back yards have helped to knit our community together, and by removing back yards and replacing them with interior courtyards obscured by buildings, the people are losing a valuable resource of communicating and sharing.

Often, the new structure blocks all of the sunlight from existing houses, devaluing the property and making privacy impossible for the people living there.

The design of these "developer" style houses is nothing like the other houses in the area, since they are built to plans from generic corporations, and the developers are often from out of state, having no interest in what happens here after they pocket the cash.

Which brings me to another point, that the price of the new house is usually twice the assessed value of the existing homes here. The demographics are forcing citizens who have lived here, paying taxes and contributing to the city, out of their family homes. They can't afford the higher rents.

When the small, 100 year-old house next to ours was bought last year, and we received a notice from the City of a proposed lot division and demolition followed by construction of a three-story duplex such as described above, many of the neighbors as well as the Humboldt Neighborhood Association wrote objections. Our objections were completely ignored, and the BDS approved the division and the unwanted development.

The City must start listening to the people who live here and keep Portland a place of charming neighborhoods where people of modest means can live. The race to destroy what is good and build rubbish is exemplified by the concrete monster being built next to the John Palmer House at N. Mississippi and Skidmore. Even being on the National Historic Register as a treasured building can't save us from the rapacious developers with no respect for our heritage, or the city.

Thank you for your consideration.

Mary McMurray
4406 N. Commercial Avenue
Portland, OR 97217

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 2:20 PM
To: Kovacs, Madeline
Subject: FW: Ashcreek comments on Transportation System Plan

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

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

From: Brian Hill [mailto:brian.hill5@comcast.net]
Sent: Thursday, March 12, 2015 12:16 PM
To: Planning and Sustainability Commission; Transportation System Plan
Subject: Ashcreek comments on Transportation System Plan

The following motion is the collective opinion of the Ashcreek Neighbor Association which I am in agreement and would like you to consider

That Ashcreek submit comments on the Transportation Systems Plan project list to move three projects on the “unconstrained” list to the “constrained” list. All three of these projects should be phased to prioritize portions of larger projects that access priority destinations such as West Portland/SW Capitol and Barbur (project 90064), SW 64th/Barbur (project 90011) and the commercial centers in Garden Home and Multnomah Village (90033). In addition, Project 90033 should be re-scoped to remove concrete sidewalks and storm water construction from the project plan. ANA requests that the project plan include only those components identified in an agreement with PBOT dated 6/13/2012, and to include a walkable ditches-to-swales type improvement between SW 45th and SW Multnomah Boulevard. Additionally, the section of Garden Home Road between SW Capitol Highway and SW 45th in the Multnomah Neighborhood should be treated as a separate project.

I would also like to emphasize the importance of performing the promised (by Portland Bureau of Transportation) improvements on SW Garden Home Road between SW 45th and where Garden Home Road meets up with Multnomah Boulevard. That plan, developed in cooperation with PBOT, was an alternative to speed bumps along GHR and called for moderate improvements to create a gravel-based walking path along the south side of GHR and various signing and striping improvements to reduce vehicle speeds and increase pedestrian/bicycle safety. This did not include widened turn lanes, sidewalks or expensive storm water treatments. While promised to the neighborhood in

2011, virtually none of the approved improvements has occurred. (As mentioned in the motion above, it is a "walkable ditches-to-swales" improvement not a vastly expensive boulevard-type treatment.)

Also of highest priority for myself is for a traffic light at the dangerous and problematic intersection of SW GHR and Multnomah Boulevard.

Thank you for your consideration.

Brian Hill
5703 SW Knightsbridge Drive
Portland, Oregon

From: Planning and Sustainability Commission
Sent: Thursday, March 12, 2015 4:20 PM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony
Attachments: Comp Plan AV Comments 3.13.15.docx; ATT00001.htm

Follow Up Flag: Follow up
Flag Status: Flagged

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

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

From: Anton Vetterlein [mailto:antonvett@comcast.net]
Sent: Thursday, March 12, 2015 4:05 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

To: Portland Planning and Sustainability Commission
March 13, 2015

RE: Community Involvement in the Proposed Draft Comprehensive Plan

I support the broadening of the definition of “communities” to include groups outside the traditional neighborhood associations, but how those community groups are empowered in the city decision-making process needs to be explicit. Their role is vague and un-defined in the Draft Plan. An undefined role is powerless. This Draft Plan gives lip service to equity but in actuality it disenfranchises all community groups.

Portland became the progressive and well-planned city that it is famous for today in large part because of neighborhood groups that challenged the power of politicians and the private interests that supported them. They helped to create a city that put civic-minded planning ahead of special interests and that attracted progressive planners and technocrats from around the country. But now those planners and technocrats think that citizen's interests are too parochial and are seeking to disenfranchise them with a new Comprehensive Plan. A community group – whether geographically or

ethnically based – is parochial by definition. The Comprehensive Plan needs to maintain the current role of neighborhood associations in city planning and government and equitably extend that role to other community groups.

Anything less is a power-grab by bureaucrats and politicians and a return to the old days of special interests having un-due influence in city government.

Sincerely,

Anton Vetterlein
430 SW Hamilton St.
Portland, Oregon, 97239
antonvett@comcast.net



3534 SE Main Street
Portland, OR 97217
P: 503.232.0010
f: 503.232.5265
www.seuplift.org

March 12, 2015

Dear Portland Planning and Sustainability Commission,

The Southeast Uplift neighborhood coalition appreciates the complex efforts behind Portland's Comprehensive Plan Update 2035 (Comp Plan) and supports the goal to, "ensure Portland is on a path to become a more prosperous, healthy, educated, equitable and resilient city."

In listening to our member neighborhood associations and reviewing input from other neighborhood coalitions, the SE Uplift board has identified several points of concern regarding the Comp Plan draft and process. These comments, which were unanimously adopted by the board at the March 2, 2015 meeting, fall into the following broad categories:

- Process: We request additional time for the public to thoughtfully review and comment on the Comp Plan draft and map
- Community Involvement: We ask that the plan acknowledge the historic role of neighborhood associations and that it includes all formally adopted area, district, and neighborhood plans in an appendix and that they have the same force and effect as the plan itself.
- Neighborhood Character: The plan does not do enough to recognize the distinct qualities of individual neighborhoods. Additional policies around historic resources, view sheds and design are needed.
- Transportation and Infrastructure: We are concerned that the plan does not adequately provide for new infrastructure that is commensurate with new density.

Our specific comments and concerns are detailed below.

Request to Modify Comprehensive Plan Timeline

The process of public involvement must be real - not merely an exercise in order to declare such involvement has been achieved. SE Uplift notes the input offered by Susan Lindsay, Co-Chair of the Buckman Community Association:

Uplifting community advocacy since 1968.

... the public was repeatedly told at the small number of hearings which actually allowed public oral comment on the proposals that written public comment on all these proposed changes would be taken well into March 2015. Yet recently I was personally informed by Planning staff that decisions were proposed to be made on these matters imminently long before the public comment period ends. How can that be?

This is particularly disturbing as we planned to host an open public forum/meeting on these proposed significant land use changes, designed with the March deadline for comment in mind...yet it appears now that your ability to hear and be informed of the large-scale discontent and concern regarding these proposals will be null and void, arriving "after the fact" in the process.

The impact of impending development in SEUL neighborhoods may be the most significant challenge since the proposed Mt. Hood Freeway in the early 1970's.

In many aspects the current situation is much more daunting. It is one thing to challenge a specific project like a freeway. Understanding the nuances and details of comprehensive planning, and the varied impacts on our neighborhoods - individually and collectively - takes time.

The complicated nature of zoning and codes, professional planner jargon, and thick volumes of supporting documents can be detrimental to the process of community involvement. While SE Uplift recognizes that our member neighborhoods will have differing opinions on Comp Plan specifics, **it is paramount the process be of necessary length and breadth for all concerned to study in detail the comp plan and then offer input that will be recognized.**

Citizen Involvement is the first goal as outlined in SB100, the landmark legislation which created much of Oregon's current statewide comprehensive planning requirements.

Given the important relationship between the Comprehensive Plan Goals and Policies and the implementation package, we join with SWNI in supporting the Multnomah Neighborhood Association's request for the following timeline changes as outlined by Carol McCarthy in her Nov. 14, 2014 letter,

Uplifting community advocacy since 1968.

- 1) Remove the PSC vote in [May] 2015.
- 2) Change the July 2015 City Council hearings on the Comprehensive Plan Goals and Policies to [Portland Sustainability Commission] PSC hearings which allows citizens the chance to comment on revisions made by the PSC before the Goals and Policies are incorporated into the Comprehensive Plan.
- 3) The November 2015 City Council hearings would be changed to PSC hearings to allow citizens an opportunity to comment before the Comprehensive Plan and the Implementation Package move forward to City Council.
- 4) Reschedule the City Council hearings on the Comprehensive Plan and Implementation Package to February 2016.

As SWNI President Sam Pearson has noted: "Neighborhood associations need time to comment on the adopted zoning definitions from the Campus Institutional project and the Mixed Use Zone project before they are incorporated into the Comprehensive Plan."

While we appreciate the response by PSC Chair Andre Baugh that "The PSC is the decision-maker as to when we close the record, and when we vote," we anticipate Mr. Baugh will live up to his promise that "the PSC is prepared to increase opportunities for review and testimony if necessary."

Community Involvement: Recognition of Neighborhood Associations and Plans

As an organization with a mission to help engage citizens in shaping their communities, we believe the following recommendations will strengthen community involvement:

1. We agree with the input of the *Northeast Coalition of Neighborhoods* (January 21, 2015) in regards to "Acknowledgment of the Legacy and Contributions of Neighborhoods," and their support of Portland's Public Involvement Advisory Council (PIAC) comments on Chapter 2 of the Comp Plan—in particular "clarifying that neighborhood associations and coalitions are an integral and official part of the City's public involvement program."
2. We support PIAC's comment that: "Our city's early commitment to community involvement in government is recognized internationally, and the neighborhood system has been central to that history" and that we should "restore policy language on adequate funding for the community involvement program" because "the commitment of adequate resources marks the difference between a policy that

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makes a meaningful difference in the City's work and one that looks good on paper." (Nov. 10, 2014).

3. We join PIAC in requesting that an independent body, rather than the Planning and Sustainability Commission, oversee the Community Involvement Program.
4. We concur with a related sentiment expressed by *Southwest Neighborhoods, Inc.* (SWNI) that the Comp Plan "must maintain the current standing of Neighborhood Associations (NA) in planning, land use, and development processes." We find a remarkable citywide concurrence in these sentiments, regardless of the specific differences our neighborhoods may have on details of the proposed Comp Plan. As expressed by the Eastmoreland NA, "Historically neighborhood associations are the designated contacts in land use review, requesting neighborhood planning and protecting Portland citizens from destructive impulses of urban freeway visionaries, the pressures of irresponsible development and careless abuse of environmental and cultural resources."
5. SE Uplift seeks to strengthen the current standing of NAs in this process, particularly in regards to notification requirements and realistic time frames that allow NAs to offer constructive input on proposed demolitions, developments, and other aspects relating to their neighborhoods. To that end, we agree with the *Richmond Neighborhood* (Dec. 16, 2014) that "current notification requirements [for new developments] are too open-ended and often do not allow adequate time or notice to affected community members to have meaningful or timely input."
6. In previous years, many of our neighborhoods have worked with city staff to develop plans that are specific to their neighborhoods. These adopted plans should not be discounted. We join with SWNI in requesting that, "all area, district, neighborhood, and environmental plans be compiled and included as an appendix in the Comprehensive Plan and be considered to have the same force and effect of the plan itself.

Respecting Neighborhood Character

We appreciate the Plan's recognition that "one size does not fit all." As a coalition made up of 20 neighborhoods with distinct histories and cultures, however, we do not feel like the five pattern areas described in the Plan adequately protect what makes our neighborhoods unique and livable. We believe that additional policies need to be developed around the following areas:

1. Historic Resources: We join with the Richmond and Sunnyside neighborhood associations in requesting that the Historic Resources Inventory be updated as soon

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as possible. The inventory has not been updated since the 1980s. There should be policies in place to require more frequent updating.

2. Design: While many of our neighborhoods are slated to receive significant new development over the course of the Plan's timeframe, the vast majority of our coalition area does not have mechanisms like design overlays or community design standards in place to assure that new development is compatible and respectful of existing character. We believe that more design scrutiny and more opportunities for public input in design are critical.
3. View sheds: While there are protections of view sheds west of SE 12th avenue, most of our coalition area has no protections. Being able to see Mt. Hood and the West Hills, as well as places of cultural importance can add to a sense of place in a neighborhood. We ask for policies that protect view sheds on the east side of Portland.

Transportation and Infrastructure

In order for this to be a truly comprehensive plan, we believe that more work needs to be done to align new infrastructure needs with new development and growing populations. Significant investments in a variety of infrastructure will be necessary to accommodate the projected population growth in the next twenty years including new parks, sewer capacity upgrades, transit, etc. As North Portland Neighborhood Services (NPNS) has aptly noted "that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers."

By addressing this challenge we mean not just stating lofty goals in terms of livability. It is imperative that we establish specific commitments with achievable deliverables to ensure additional development does not degrade our quality of life in critical areas, for example:

- Parks - even today the Map App shows a large swath of the SEUL district is park deficient, and that's before our coalition area experiences a marked increase in population and density.
- Environment - many neighborhoods have expressed interest in health overlay zones.
- Roads & Transit - we're close to a billion dollar backlog of street maintenance. It's hard to imagine how meaningful enhancements can be made to our transit options when basic city functions like street maintenance lag seriously.

A few areas where we can specifically point to additional thought to better align resources with aspirations:

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1. Unimproved Roadways: Portland has over 100 miles of unimproved roadways, many of which are in our coalition area. Current policies are insufficient and lead to only incremental improvements at best. Directing growth to a neighborhood like Woodstock without having a subsequent plan for improving the unimproved roadways that lead to the neighborhood center is not a coordinated growth approach.
2. Orphan Highways: 82nd Avenue and SE Powell Avenue are two critical parts of SEUL's transportation network. They also are corridors that are slated for significant new development in the Plan. We are concerned that the state ownership of these roadways is often at cross-purposes with the city's aspirations for adjacent land use. We request that additional policy language be developed that clarifies state and local coordination of state highways.

Conclusion

The Southeast Uplift Coalition of Neighborhood anticipates engaging with issues pertaining to the Portland's proposed Comprehensive Plan 2035 in greater detail in the upcoming months. We look forward to continuing Portland's respected tradition of community involvement throughout this process. We thank you and city staff for your important work and appreciate your consideration of our comments.

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